

LANCASTER LOCAL PLAN

Sustainability Appraisal Addendum

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1 Introduction

This SA Addendum provides an update to the January 2017 Published Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (hereinafter referred to as SA) that accompanies the Lancaster Local Plan being prepared by Lancaster City Council ('the Council').

The Local Plan, which is comprised of a Strategic Policies and Land Allocation Development Plan Document (DPD) and a Development Management DPD, was submitted to the Secretary of State (Planning Inspectorate) on 15 May 2018 for examination. The Inspector, at the time of writing, is in the process of determining if the Plan is sound.

This Addendum has two key purposes:

1. Identify and clarify how the Council and the SA of the Local Plan, which has been an iterative process over several years involving the preparation of numerous reports and assessments, has approached reasonable alternatives with relation to the balance between housing and jobs. This is covered in **Chapter 2**. Overall, it is considered that the approach through the SA to the balance between housing and economic development has been appropriate and consistent with the statutory requirements; and
2. Consider in more detail the potential effects of the Council's proposal to allocate less housing in the Local Plan than the Objectively Assessed Need (OAN). The assessment of the Council's proposed housing target of 522 dwellings per annum (dpa) is provided in the January 2017 Publication version of the SA. This assessment was originally carried out in a Technical Note prepared in January 2016 by Arcadis. An update to this appraisal is provided in **Chapter 3** in light of the new information made available to Arcadis following the modelling exercise and subsequent March 2019 Technical Note prepared by Turley.

2 Housing, employment and the balance between them

2.1 Context

Over the course of the Plan-making process the Council has considered various growth targets. The Council's decision-making process with regards to the questions of 'how many houses should the Local Plan seek to deliver?' and 'how much economic growth should the Local Plan seek to support?' has been informed by a wide variety of evidence bases. Determining an appropriate quantity of development for Lancaster has been informed by technical studies including:

- North Lancashire Green Belt Review (Lancaster CC and ARUP 2016);
- Strategic Housing Land Availability Assessment (Lancaster CC 2015) – now updated form part of the Strategic Housing and Employment Availability Assessment (Lancaster CC 2018);
- Strategic Flood Risk Assessment – Stage 1 (JBA 2018);
- Lancaster District OAN Verification Study (Turley 2018);
- Sustainable Settlements Review (Lancaster CC 2018) and;
- Strategic Housing Market Assessment Part 2 (Arc, February 2018).

Determining the opportunity for economic and jobs growth in the District over the course of the Local Plan has been informed by technical studies including:

- Lancaster District Employment Land Review (ELR) (Turley 2015);
- Lancaster District: Prospects & Recommendations for Achieving Economic Potential (Turley 1st Edition 2015, Updated in 2017); and

These various assessments, alongside other evidence bases, have provided the Council with a comprehensive picture of the District's ability to accommodate residential development and to achieve economic growth. The SA accompanying the Local Plan has also helped to inform the Council's decision making with regards to accommodating new development at various stages by identifying and evaluating the likely sustainability effects of different housing targets:

- In 2014, the report 'SA of Strategic Options' identified and evaluated the likely sustainability effects of the Local Plan delivering 12,000 new homes by 2031;
- The 2016 SA Technical Note identified and evaluated the likely sustainability effects of the Local Plan delivering 13,000 – 14,000 homes; and
- The 2018 Publication SA that accompanied the Submission version of the Local Plan identified and evaluated the likely effects of 12,000 new homes (or 522 dpa).

The quantity of housing delivered through the Plan will influence the growth of Lancaster's population and subsequently the number of new jobs that can be filled by local people. Whilst the quantity of housing proposed for the Local Plan has generally decreased over time, and in the Submission-version was 522dpa, the quantity of new employment land has not declined over time. The Council has therefore sought to determine whether, despite the lowered housing target, the aspirational jobs and economic growth they are pursuing through the Plan could still be realised. The Council therefore commissioned Turley in March 2019 to conduct a modeling exercise and prepare a Technical Note on the implications of the Plans proposal to deliver 522dpa.

The following section will consider the extent to which the Council is obliged to consider reasonable alternatives to the balance between residential and economic development in light of the evidence documents they have gathered and the infrastructure and environmental planning constraints prevalent in the Lancaster District.

2.2 Reasonable alternatives

Box 2.1: SEA Directive Art. 5(1)

Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.

Box 2.2: SEA Regulations Sch. 2

... an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Box 2.3: Reasonable Alternatives & Case Law

The jurisprudence governing the application of reasonable alternatives is founded in *Save Historic Newmarket Ltd v Forest Heath District Council* (2011); *Cogent Land LLP v Rochford District Council* (2012) and *Heard v Broadland District Council* (2012):

- The SEA accompanying the draft plan needs to adequately set out the reasons for an authority preferring the alternative selected (and rejecting other reasonable alternatives) and to critically examine the evidence upon which such a preference was based.
- A description of what alternatives were examined and why has to be available for consideration in the environmental report.
- Alternatives should be subjected to the same level of analysis as the preferred option.

One of the only cases where the courts have found that the duty to consider any reasonable alternatives has been breached over is the Court of Appeal decision in *Ashdown Forest Economic Development LLP v Wealden District Council* [2015], where a local planning authority (LPA) was found to have breached its duty to consider all reasonable alternatives.

As per **Boxes 2.1 – 2.3**, SEA requires the consideration of reasonable alternatives in order to show that evidence has generated the proposed Plan, rather than vice-versa. Determining if an alternative is reasonable is typically an evaluative and qualitative assessment for the Council. Should an option be considered to be clearly so unreasonable that no reasonable person acting reasonably could have made it, then it would not constitute a 'reasonable alternative'.

During the SA/SEA of Local Plans, reasonable alternatives are typically considered for all options where such alternatives exist, such as for growth targets, development management policies or sites allocated for development. For the most part, it is up to the Council to determine whether reasonable alternatives to Plan options exist and what these reasonable alternatives are.

Reasonable alternatives to the housing target:

In some cases, but certainly not all, it is appropriate to consider reasonable alternatives to the total or annual quantity of housing delivered through a Local Plan (as well as reasonable alternatives to the quantity of economic development). As set out above, Lancaster City Council has carefully considered the local housing needs and trends in the District. Over the course of the SA process, the likely environmental effects of various housing scenarios, including 675dpa, 600dpa and 522dpa, have been identified and evaluated in order to inform the Council's decision making. The quantity of housing ultimately proposed in the Plan, 522dpa, falls short of the objectively identified need for the District, which is 675dpa, due to there being significant development constraints in the District. However, the Council is seeking to satisfy local housing needs as much as possible and has essentially allocated all land that could reasonably be considered to be available and suitable for residential development. It is local environmental and infrastructure constraints that mean that many locations in the District would be unsustainable locations for new homes (and sustainability underpins the Council's decision-making) and so the Plan can currently only deliver a quantity of new homes that would fall slightly short of the area's overall need.

It is therefore considered that any alternatives to the approach of 522dpa would be unlikely to qualify as 'reasonable alternatives' for the purpose of SEA/SA. It would evidently be inappropriate to allocate even less housing sites and fall further short of the local need. To attempt to allocate more housing sites at locations that are unavailable, unviable or undeliverable, would also clearly be an unrealistic unreasonable alternative. The proposed approach of delivering 522dpa is therefore considered to be the only reasonable option on offer to the Council in terms of residential development and it would therefore be inappropriate for the SA to assess alternatives to this approach.

The SA has at each stage identified and evaluated the sustainability effects of the housing figure being proposed in the Plan and made recommendations to help avoid or mitigate adverse effects, and to enhance positive effects, where feasible.

Reasonable alternatives to the employment target:

As set out above, the Council has commissioned and undertaken various technical studies to identify the potential for economic growth in the District and the employment land needed to facilitate this. The Council has sought to retain existing allocated employment areas where they are considered to have economic value and, in the view of the Council, will continue to do so over the course of the Plan period. These are represented via Policy EC1 of the Strategic Policies & Land Allocations DPD. These sites form part of the already established supply of employment land in the District and their retention is considered to be fully justified. In light of the economic opportunities presented to the district within the plan period, to take account of the changing demands of local businesses and employers and to ensure there is sufficient flexibility, room for expansion, adaptability for churn and to help ensure that the Plan is futureproofed for a changing economic climate, the Council has chosen to allocate a number of sites for differing, sometimes specific, employment uses. These are represented via Policy EC2 of the Strategic Policies & Land Allocations DPD.

In total, the Plan allocates 40.8ha of new employment land across the District. The Council recognises that the total hectareage of land safeguarded or allocated for existing or new employment uses is in excess of that outlined in the ELR, but this approach is considered to be entirely justified and to provide the flexibility and choice advocated by the NPPF. There are a number of businesses, employers and economic drivers in the District that are geographically tied to the area, including the Port of Heysham and Heysham Nuclear Power Station, which require room to adapt, expand and evolve over the course of the Plan period. Furthermore, the Council is seeking to take advantage of the newly constructed Bay Gateway that has enhanced linkages between the Port of Heysham and the M6. This would significantly enhance the attractiveness of the area for investment and economic growth. Finally, this approach would provide significant opportunities for regenerating significant tracts of brownfield land in the South Heysham area, which are part of the former ICI Petro-Chemical works, and which are unsuitable for residential development.

In line with the Council's reasoning, the SA considers that the proposed approach to employment land (i.e. 40.8ha of new employment land) is entirely reasonable. In line with the Council's reasoning, the SA considers that the approach taken to employment land in the Plan seeks to strike an appropriate balance with housing ambitions whilst being realistic. Alternatives to this would be unlikely to qualify as 'reasonable alternatives' for the purpose of SA/SEA. The SA does therefore not seek to identify or evaluate the environmental effect of allocating more or less employment land.

It would also be clearly unreasonable to change the use of sites from employment purposes to residential purposes. Given the constraints on land available for housing, the Council has assessed each of the established employment sites and determined that they are clearly unreasonable locations for residential development. This is primarily because sites allocated for employment uses in the Local Plan are either in an existing employment use (such as industrial, office or retail use), are adjacent to or surrounded by land in existing employment use or are isolated away from existing settlements and so residential development here would clearly be unreasonable. A justification on a site by site basis as to why the employment site would clearly be an unsustainable location for residential development is provided in **Table 2.1**.

Table 2.1: Justifications for why employment sites would be unsustainable locations for residential development. These justifications were provided to Arcadis by the Council in March 2019.

Site ref.	Location	Size (ha)	Justification for being unsuitable for residential development
EC1.1	Carnforth Business Park	8.4	This site is located on the eastern edge of Carnforth in close proximity to Junction 35 of the M6 which lies adjacent to the site of the east. As stated in the ELR this is a relatively recently developed employment site, and Kellet Road Industrial Estate lies adjacent to the west. Therefore, it is not considered that this would be a suitable site for residential development, and instead is more appropriate for employment uses.
EC1.2	Carnforth Levels	2.9	This site is located on the northern edge of Carnforth, and within easy access of Junction 35 of the M6 and approximately 400m south of the Truckhaven Service Station. When the ELR was undertaken the whole site was in employment use, with the primary usage being B2 or B8. The section of the employment site to the west of Scotland Road is occupied by Travellers Choice Coaches who were granted planning permission in January 2016 to expand their site further north (15/00848/CU). This site is therefore evidently in active employment use and being used to capacity, it is therefore not considered suitable for housing.
EC1.3	Land at Scotland Road, Carnforth	2.3	The size of this employment area has already been decreased through the re-designation of land for retail purposes, which is now occupied by Booths and Aldi. When the ELR was undertaken all of the usable land was occupied. The ELR noted that expansion of this site is only possible to the east, but that this area would be more likely to be developed for housing (see SHELAA). This employment site has therefore already been reduced in size to facilitate other development uses and is currently being used to capacity. Therefore, this site is not considered suitable for housing.
EC1.4	Land at Warton Road	1.5	This site is located to the west of Warton Road between 2 railway lines and to the north of Carnforth Railway Station. At the time of the ELR this employment site occupied another parcel of land to the east of Warton Road, however this was largely vacant. This vacant site has therefore been allocated as a Development Opportunity Site through the submitted Local Plan, proposed for mixture of uses (where appropriate) including employment, commercial, residential and recreational. This employment site has therefore already been reduced in size, with the eastern section being re-allocated as a Development Opportunity Site, and so given its location and that the site is occupied at capacity, this site is not considered suitable for housing.
EC1.5	Kellet Road Industrial Estate, Carnforth	1.5	This site is located to the west of Carnforth Business Park and to the east of Carnforth High School, in close proximity to junction 35 of the M6. At the time of the ELR, the larger units were occupied, with only 0.14ha of the site remaining vacant. The ELR noted that the site was in relatively good condition overall and the buildings were well maintained. Part of the site is also within Flood Zone 2. Given the size of the site, and its location between a large existing employment site and a secondary school, this site is considered to be more appropriate for employment uses rather than residential development.
EC1.6	Port of Heysham Industrial Estate	33.9	This site includes Heysham Port and lies directly to the north of Heysham Power Station. When the ELR was undertaken the site was mostly occupied with only 1.67ha of vacant land. The functioning of Heysham Port is heavily reliant upon this Industrial Estate and given the site's proximity to the Heysham Nuclear Power Station to the south, and the employment links and growth opportunities which have opened up as a result of the Bay Gateway, this site is not considered to be suitable for housing and therefore should remain in employment use.

Site ref.	Location	Size (ha)	Justification for being unsuitable for residential development
EC1.7	Heysham Industrial Estate	23.1	This site lies to the south of Heysham and to the west of Middleton. At the time of the ELR the site was 19.47ha in size, of which 18.5ha was usable, but only 5.62ha was in use. It was recognised that the site was of low environmental quality. The ELR states that the position of this site would make it ideal for the relocation of displaced businesses from Heysham Port, but that there is a need to improve the existing conditions. Alternatively, there is the potential to relocate other intensive industrial uses from elsewhere in the district. Taking this into consideration and recognising the employment opportunities which have been arisen since the opening of the Bay Gateway in 2017 and to maximise this and achieve the overall vision for the Heysham Gateway area, this employment site has been expanded to 23.1ha. Given its relatively isolated location, proximity to a settlement which is not considered to be a Sustainable Settlement and previous uses, this site is not considered suitable for housing development and so should continue to be allocated under a larger area to promote economic growth in Heysham.
EC1.8	Royd Mill, Heysham	2.1	This site is located on the southern edge of Heysham. The ELR identified there was only one vacant plot of 0.26ha. Therefore, the majority of the site was occupied. The site lies adjacent to the A683 which directly joins the new Bay Gateway M6 link road. There have therefore been significant improvements in the local transport infrastructure. The site remains in use as an employment site with limited remaining capacity, combined with the site's location and in order to achieve the vision for the Heysham Gateway, this site is not considered to be suitable for housing.
EC1.9	Major Industrial Estate	13.6	This site is located to the south of Heysham. At the time of the ELR 7.16ha of land was occupied, and 5.95ha remained vacant. These are two separate vacant plots, one of which received planning permission for a freight depot and a new detached office building, vehicle workshop and warehouse (15/00199/FUL). This demonstrates the intention to improve the quality of this employment site. At the end of the second plot planning permission was granted for a 47.5MW gas fired power station (14/01117/FUL). Therefore, given these uses, combined with historic uses, proximity of the Bay Gateway and the relatively isolated location of this site, it is not considered suitable for housing, and so is more appropriate for employment.
EC1.10	Lancaster West Business Park	35.5	This site is located to the south of the A683 which directly joins the Bay Gateway, and adjacent to the northern edge of Middleton. The ELR identified the site as having an overall area of 28.41ha. It was noted that much of the designated employment area was yet to be developed, with 12.54ha standing vacant. The northern section is primarily occupied by Middleton Waste Transfer Station and the south contains B2 and B8 uses. An area to the northwest has recently received planning permission for an industrial unit with associated offices, storage and distribution facilities (18/00154/FUL).
EC1.11	Caton Road Industrial Estate	34.5	This site is divided into two sections. One of which lies to the north of the Lancaster Canal aqueduct, and the other to the south. Both are in close proximity to junction 34 of the M6. In the ELR, within the northern area there was only 0.44ha not in use. However, since then planning permission has been granted for a McDonalds (14/00775) on this area, and so the site is now fully occupied. Most of this site is occupied by B8 uses, mainly haulage firms who are heavily reliant upon easy access to the motorway. Within the southern section of the site, at the time of the ELR, 1.87ha was vacant, most of which were subdivisions of larger buildings in the Lansil Industrial Estate and Lake Enterprise Park. The site is bound by Caton Road to the east and the River Lune to the west. This site has been flooded in recent years and so permission was

Site ref.	Location	Size (ha)	Justification for being unsuitable for residential development
			sought for the installation of a flood defence wall along the length of this entire employment site to protect it from potential future flood events (18/00751/FUL). The conditions for which are currently being discharged. The majority of the area lies within Flood Zone 3, and so given this and the fact that the site is currently almost filled to capacity, this site is not considered suitable for housing.
EC1.12	White Lund Employment Area	100.2	This site is located between Lancaster and Morecambe and is the primary employment site of the district. When the ELR was conducted, 87.91ha was classed as usable land of which 21.45ha was occupied by buildings, of which only 1.96ha of buildings remained vacant. Overall, 21.21ha of land remained vacant. It was noted that these are brownfield plots of a generally low environmental quality and would require clean-up before any redevelopment took place. A number of these plots have received planning consents, highlighting the intention for these to continue to be used for employment purposes. As this site is a significant strategic, long-established employment site, which still continues to attract a range of businesses and now has better transport connections to the M6 via the Bay Gateway, it is not considered suitable for housing.
EC1.14	White Cross Business Park	5.7	This site is located within the centre of Lancaster. It is the only established employment site which has been allocated for office development located within the district's Regional Centre. The ELR found that the western part of the site was almost fully occupied, and that of the 125 offices on the western side, only 10-20 were vacant. Although the site is surrounded by residential properties, it is recognised that this is an important employment site for predominantly B1 uses which should be protected and not developed for housing.
EC1.15	Lancaster Business Park, Caton Road	10.7	This site is located on the northern edge of Lancaster and close to junction 34 of the M6. The ELR states that it is a modern development, in comparison to the others, and mainly contains B1 office uses. As reported in the ELR, there are still large areas of the site which remain undeveloped, approximately 5.41ha of the 9.41 usable area. Therefore, there is capacity for this site to accommodate future businesses. Although the site is not currently utilised to capacity, given its proximity to the M6 and its relatively isolated location from existing residential properties in Lancaster, this site is considered to be more suitable for employment uses as opposed to housing.
EC1.16	Claughton Brickworks, Claughton	7.4	This site is located within the centre of Claughton on the edge of the A683 and currently facilitates the brick works which are still in operation. When the ELR was undertaken the entire site was occupied, and included a mix of B2 and B8 uses, and one A1. As the site is still in active use and is not located within a Sustainable Settlement, this site is not considered suitable for housing and so should remain an employment site.
EC1.17	Halton Mills, Halton	0.9	This site is located on the southern edge of Halton, adjacent to the River Lune. As stated within the ELR it is a relatively new development, which was built as part of the wider residential development in this area. The site is primarily B1 which some light B2 use. At the time of the ELR there were 4 buildings on site, only part of one remained vacant. This site was constructed alongside residential properties and the majority of this site is in use, which demonstrates a need for an employment site in this location. Therefore, it is not considered appropriate for this site to be considered for allocation as a housing site.
EC1.18	Glasson Dock	5.4	The site is located on the northern edge of Glasson Dock, adjacent to the River Lune Estuary and consequently almost all of the site lies within Flood Zone 3. When the ELR was conducted the site was split between two businesses, one of which is the Lancaster Port Commission who occupy the port works on both

Site ref.	Location	Size (ha)	Justification for being unsuitable for residential development
	Industrial Area		sides of the inlet. Therefore, this employment site facilitates the functioning of Glasson dock. For these reasons, combined with Glasson Dock not being identified as a Sustainable Settlement, the site is not considered suitable for housing development.
EC1.19	Hornby Industrial Estate	0.7	This site is located in the centre of Hornby within the AONB. It is entirely occupied by Intaglio Engraving and so there is no remaining capacity. Although this site is located within a Sustainable Settlement, to which employment opportunities is a contributing factor, and as the site is currently being actively used at capacity for employment purposes, it is not considered to be suitable to allocate this land for housing.
EC1.20	Cowan Bridge Industrial Estate	1.3	this site is located on the southern edge of Cowan Bridge. As stated within the ELR, despite being a designated employment site there are no industrial units on site, instead the main use was A1. At this time the site was fully occupied, however the site is currently up for let. The ELR notes that the site could have possible B2 usage with a different occupier in the future. This is the most northerly employment site within the district and so to maintain a good geographical distribution of employment sites and recognising that Cowan Bridge is not a Sustainable Settlement, it is considered that this site is not suitable for housing and so should remain an employment allocation.
EC1.21	Willow Mill, Caton	0.2	this site is located in Caton within the AONB. The ELR states that the site comprises two buildings, one of which was partially occupied and the other was vacant. The site is mainly B1 uses. The 3-storey office is a well maintained grade II listed building. Although this site is not filled to capacity, it provides a rural office location for local businesses to locate to. The site is located within a Sustainable Settlement, and as part of this assessment the availability of employment opportunities is a contributing factor. Therefore, given the limited availability of employment opportunities within rural areas across the district it is considered important to protect this site for employment purposes, as opposed to allocating it for housing.
EC1.22	Galgate Mill	0.6	this site is located on the northern edge of Galgate. The main buildings on site are Listed Grade II and the site is occupied by Galgate Furniture Mill. Although this site is located within a Sustainable Settlement, it is important to recognise that employment opportunities contribute towards this assessment, and because the previous employment site on the opposite (eastern) side of Chapel Lane has been granted permission at appeal for student accommodation (14/00989/CU), it is important to ensure this employment site is protected. Therefore, it is not considered appropriate to allocate this site as potential housing land.

Reasonable alternatives and the balance between housing and jobs:

The SA has established that in the case of the Lancaster District and their Local Plan, reasonable alternatives to the housing and jobs targets are unavailable to the Council. As there are no reasonable alternatives to the housing employment targets, it is not feasible for the SA to consider reasonable alternatives to the balance between both targets because any balance other than that which is proposed in the Plan would be unreasonable.

It should also be noted that it is not a function of SA or SEA to determine if the balance between housing and jobs is appropriate. The SA Framework against which the Plan is appraised in order to identify and evaluate environmental effects is not an appropriate tool for determining if a housing growth figure could facilitate a jobs growth target. Instead, it is assumed in the SA that the balance proposed by the Council is appropriate in light of the evidence bases supporting their decision making as it is not possible for SA to state that the proposed housing growth would or would not facilitate the proposed employment growth.

3 Environmental effects of the proposed balance

3.1 Context

This SA Addendum has so far established that there are not considered to be any reasonable alternatives to the balance between housing provision and jobs growth proposed in the Local Plan.

In March 2019 the Council commissioned consultants at Turley to prepare a Technical Note on the likely implications of the proposed housing target, 522dpa, in terms of population growth and subsequently the jobs growth it would facilitate. This Technical Note provides new detail and insights into the proposed 522dpa scenario that were previously unavailable for the SA. The purpose of this Chapter is to update the appraisal of the 522dpa scenario in light of the new evidence to ensure that the SA's identification and evaluation of environmental effects caused by the Plan is based on the best available information.

3.2 Results of the Technical Note

The technical note prepared by Turley did not assess housing need in Lancaster. Instead, it undertook a modelling exercise to examine the demographic and economic impacts of the Council's proposed level of housing growth. In summary, the modelling indicates that providing 522dpa between 2011 – 2034 could:

- Result in a total of 11,425 homes forming in Lancaster;
- Facilitate a population growth of between 19,449 – 21,3126 people, accommodated within these households;
- Enable the working age population of Lancaster to grow beyond levels previously predicted, although the strongest growth would still continue to be in the District's older population; and
- Support the creation of approximately 8,721 – 9,545 jobs by 2034, which would represent a positive growth in Lancaster's economy although would fall short of the 9,551 – 10,348 jobs previously identified as being likely in the Council's evidence base. The proposed scale of housing provision may constrain job growth or lead to an increase in net in-commuting from outside of the District.

3.3 Appraisal of the 522dpa scenario in light of the Technical Note

The Publication version of the Sustainability Appraisal provided an appraisal of Policy SP6 from the Plan Part 1. This policy sets out the Council's commitment to delivering 522dpa over the lifetime of the Plan. The results of this appraisal remain accurate and valid, although the identified and evaluation of effects can be further supplemented by accounting for the outputs of modelling work completed by Turley. The appraisal of the 522dpa scenario, updated in light of the results of Turley's modelling work, is presented in **Table 3.1**.

Table 3.1: Appraisal of the 522dpa scenario, as per the January 2017 Publication Sustainability Appraisal, updated in light of the 'Implications of the Proposed Housing Requirement Technical Note'.

SA Objectives	Summary of effect	Duration	Direct/ Indirect	Reversibility	Certainty	Commentary
Housing	+	LT	D	R	High	<p>522dpa would fall short of the OAN, which is 675dpa.</p> <p>522dpa could result in a total of 11,425 homes forming.</p> <p>The proposal to achieve fewer dwellings than the identified OAN is justified by environmental and infrastructure constraints in the District. 522dpa is understood to be the maximum extent of achievable and deliverable opportunity on sites which can deliver development that the Council considers to be sustainable.</p> <p>The Plan would help to ensure that approximately 77% of the District's OAN is met through the Plan.</p>
Crime	+/-	LT	I	R	Low	<p>Development sites for housing in Lancaster District are on both greenfield and brownfield land. Developing on greenfield may introduce new opportunities for crime. On the other hand, developing derelict brownfield sites may decrease crime that could occur on these sites.</p>
Education Health	+	LT	I	R	Med.	<p>Housing that can meet a range of needs (e.g. affordable housing) could increase quality of life and therefore benefit physical and mental health. Increased housing supply could also lead to reduced rates of homelessness increasing the quality of life of those affected.</p> <p>A large number of the proposed housing sites are close to existing educational facilities and therefore could potentially increase accessibility to and encourage lifelong learning.</p> <p>The proposed 522dpa scenario would be likely to lead to a lower population growth than higher housing figures, and this may help to reduce any growing pressure on the capacity of the District's health and education services.</p>
Access	+/-	LT	I	R	Low	<p>Delivering housing in the main settlements such as Lancaster and Carnforth will help to ensure access to basic goods, services and amenities in these areas for new residents and this is further strengthened by the number of policies suggesting the introduction of new services and goods in the district. However, housing in the smaller settlements of the District may lead to a more limited access</p>

SA Objectives	Summary of effect	Duration	Direct/ Indirect	Reversibility	Certainty	Commentary
						to goods, services and amenities, as per the Sustainable Settlements Review (2018). From an overall site perspective access to basic services is generally strong due to a large amount of the proposed allocations being in or close to existing urban centres or villages and introducing more goods and services in line with the amount of new development in that particular area would continue this trend.
Local Economy Economic Drivers Workforce Economic Inclusion	+	LT	D	R	High	<p>Short-term employment opportunities will be created through the delivery of the housing, particularly in the construction industry. Housing proposed in the more rural areas of the district will help to increase rural diversification in these areas. Inward investment from developers will also become more likely. A large amount of the proposed housing is in or around key urban areas (e.g. Lancaster) and could potentially help to ensure new resident benefit from excellent access to jobs whilst enhancing the vibrancy of central areas. This effect could be strengthened when considered in conjunction with the suite of economic growth policies proposed by the Council.</p> <p>If a range of housing is provided (e.g. in terms of type, cost or location) then it is likely there will be a diverse workforce to at least go some way to meeting local economic needs. With a large amount of the proposed housing in or around key urban areas (e.g. Lancaster) it would more than likely result in an increase in the local population which could potentially offer a range of skills and training that could meet local economic needs.</p> <p>Housing in the urban centres especially will be likely to improve the accessibility of jobs in those areas particularly those areas that currently suffer from high employment deprivation (e.g. Morecambe).</p> <p>The reduced housing delivery of 522dpa could also result in the potential difficulty to deliver the full economic potential in the District that was formerly identified by the delivery of the higher OAN figure in the 2015 Housing Requirement Report. The overall outcome of this, in terms of the District's economic growth, remains minor positive. Had the full OAN figure been delivered the potential for economic growth would have been higher.</p>
Energy Climate Change	-	LT	I	R	Med.	The proposed increase in housing numbers, and the likely population growth of 19,449 – 21,3126 people, would be likely to lead to a net increase in energy consumption with, although to a lesser extent than had the full OAN been satisfied.

SA Objectives	Summary of effect	Duration	Direct/ Indirect	Reversibility	Certainty	Commentary
Air Quality	-					<p>The potential for developments to reduce energy use and maximise energy efficiency is unknown at this stage of the appraisal, however, it considered that development as a whole across the district would increase overall energy consumption.</p> <p>Large amounts of greenfield land will be lost to accommodate the proposed housing resulting in an increase in impermeable land. This would lead to increased surface and potentially fluvial flood risk (see individual site assessments). The large number of dwellings, and the likely population growth of 19,449 – 21,3126 people, would be likely to increase GHG and pollution emissions to the air through increased use of private cars. This may be exacerbated by a somewhat increased rate of commuting into the District from people outside, caused by the lower population growth in the District than had the full OAN been satisfied. A number of housing allocations in the District are in close proximity to main urban centres and these would encourage the use of sustainable transport. It should also be borne in mind that Travel Plans would be required through the Development Management process.</p> <p>Increases in traffic and congestion could be a major problem for areas such as Lancaster, Carnforth and Galgate where there are currently AQMAs in place.</p>
Water	-	LT	D	R	Med.	<p>A number of the proposed sites are either close to, adjacent to or have water bodies within them. This could lead to pollutants potentially entering local watercourses and possibly result in further adverse effects on biodiversity for example.</p> <p>The likely population growth of 19,449 – 21,3126 people would be expected to result in a net increase in water consumption in Lancaster in relation to current levels, although to a lesser extent than had the full OAN been satisfied.</p>
Biodiversity	-	LT	D	R	Med.	<p>New development would arise in areas of sensitive ecological value to some extent e.g. BHS within the Bailrigg Garden Village site and development adjacent to Morecambe bay SPA/SAC/SSSI/Ramsar. Most of which can be mitigated at the local level (see individual site assessments).</p>

SA Objectives	Summary of effect	Duration	Direct/ Indirect	Reversibility	Certainty	Commentary
						The loss of greenfield land has the potential to result in the loss of habitats across the District and so could potentially lead to an adverse effect on biodiversity, although to a lesser extent than had the full OAN been satisfied.
Landscape Townscape Heritage	-	LT	D	R	Med.	With there being such a large number of heritage assets in the District this could result in a large number of housing sites potentially having negative impacts on these assets, although to a lesser extent than had the full OAN been satisfied. The majority of new development would be expected to be in-keeping with the local character, although the net loss of greenfields would in some locations be expected to have an adverse effect on the local character.
Resource Use Waste	-	LT	I	R	Med.	The delivery of 522dpa, along with the likely population growth of 19,449 – 21,3126 people, would be expected to lead to a net increase in the amount of resources consumed in Lancaster as well as the amount of waste generated in the area, although to a lesser extent than had the full OAN been satisfied.

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