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say

# Developing a Local Plan for Lancaster District

Representations Statement (Regulation 22)  
(1) (c) (v-vi) – Further Mods ADDENDUM [May 24]

Shaping  
a better future

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## 1. Introduction

- 1.1 As part of the independent examination of the Climate Emergency Review of the Lancaster District Local Plan (CELPR), Lancaster City Council held a consultation on Proposed Main Modifications. These changes are proposed to address matters the Inspector considers necessary to ensure that the submitted Local Plan may be found ‘sound’.
- 1.2 The Proposed Main Modifications consultation ran for 6 weeks from 15 June 2023 closing 5pm on 28 July 2023. Following the publication of a new Written Ministerial Statement by central government on 13<sup>th</sup> December 2023, the appointed Inspector for the CELPR requested that a further proposed Main Modifications consultation be undertaken on Main Modifications 14 and 25. This consultation ran for 6 weeks from 22<sup>nd</sup> March closing at 5pm on 3<sup>rd</sup> May 2024.
- 1.3 This statement provides a high-level summary of the main issues raised during the further main modifications consultation. It provides a further modifications addendum to the documents submitted to the Secretary of State in March 2022 an September 2023 as follows:
1. [P\\_07 Regulation 18 Statement of Consultation document](#) [January 2022]
  2. [SD\\_07 Representations Statement \(Regulation 22 \(c\) of the Town and Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\) document](#) [March 2022]
  3. [EX/LCC/26 Representations Statement \(Regulation 22\) \(1\) \(c\) \(v-vi\) – ADDENDUM](#) [Sept 23]
- 1.4 This statement has been prepared in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Its purpose is to show how we have met the legal requirements for consultation.

## 2. The Representation Period

- 2.1 The Proposed Main Modifications consultation ran for 6 weeks from 22<sup>nd</sup> March closing at 5pm on 3<sup>rd</sup> May 2024. The documents can be found on the council consultation platform <https://keepconnected.lancaster.gov.uk/mm-2>.

## 3. How Many Representations were Received at the Further Main Modifications Consultation?

- 3.1 A total of 82 representations were made. Below is breakdown on duly made representations for each policy:

MM Ref	DPD	Policy / Other	No of Reprs	Sound	Not sound	Not stated
MM14	DM	Policy DM30a	80	72	6	2
MM25	DM	Policy DM53	4	1	2	1
Other	DM	Policy DM42	1	0	0	1

## 4. Summary of the Main Issues Raised to the Development Management DPD

- 5.1 Main Modification 14 and Main Modification 25 both relate to the DM DPD. Over 95% of those received were made in relation to proposed main modification 14 which relates to Policy DM30a of the DM DPD. Of these specific responses, 90% were in support of modification MM14 (or of retaining the original wording of policy DM30a) through to adoption stage.
- 5.2 In relation to proposed main modification MM25, which relates to DM DPD Policy DM53, there were far fewer representations made, of which only one respondent chose to leave a comment. The representation received was requesting amendments specifically to figure 13.1 and some of the supporting policy text of DM53.
- 5.5 A single response, unrelated to either of the two main modifications (MM14 and MM25), was also received requesting an amendment to DM DPD Policy DM42.
- 5.6 A summary of all duly made representations received is set out in the ‘Summary of representations in Plan (further modification) order’ document.

## 6. Who we invited to make representations and how we engaged

- 6.1 Formal notification of the further main modification consultation was given on 22<sup>nd</sup> March 2024 and representations were invited for a 6-week period until 5pm on 3<sup>rd</sup> May 2024. The Council’s [Statement of Community Involvement \(SCI\)](#) sets out the council’s approach to engaging in preparing development plan documents and in considering planning applications. The SCI identifies who we engage with. It is important that this is read in conjunction with the [Duty to Co-operate Statement of Compliance](#) which sets out the council’s approach to engaging with neighbouring authorities.
- 6.2 The section below outlines who we invited to make representations and how we engaged for the main modification consultation to ensure that the requirements of the council’s Statement of Community Involvement have been met.

Requirements of Regulation Town and Country Planning (Local Development) Regulations 2012	How the council satisfied the requirement
Which bodies and persons the local planning authority invited to make representations	<p>Planning Policy Consultation Database consultees were notified on the main modification consultation.</p> <p>The database consisted of residents, business, parish councils and organisations who had been consulted on previous policy matters, those that had requested for inclusion and statutory bodies (as listed in the <a href="#">Council’s Statement of Community Involvement</a>). All</p>

Requirements of Regulation Town and Country Planning (Local Development) Regulations 2012	How the council satisfied the requirement
	<p>bodies were notified of the consultation and invited to respond.</p> <p>The council maintains active engagement with neighbouring authorities. All relevant bodies were notified of the main modifications consultation and invited to respond.</p>
<p>How those bodies and persons were invited to make representations and methods used.</p>	<p>All main modification consultation material was stored on our <a href="#">Keep Connected Consultation Platform</a>, embedded onto the council webpages:</p> <ul style="list-style-type: none"> <li>• <a href="#">Local Plan Examination webpage</a></li> <li>• <a href="#">Planning Policy Consultee webpage</a></li> </ul> <p>The Inspector asked we send to those who have participated in the previous consultations for the Climate Emergency Local Plan Review: Regulation 19 consultation, the Main Modifications consultation, and any others on the Council’s consultation database. Emails (via newsletters) were sent to over 2,200 consultees including all those who have signed up to the <a href="#">Planning Policy consultation mailing list</a> in addition to all specific bodies</p> <ul style="list-style-type: none"> <li>• <a href="#">Newsletter 24 April 2024</a></li> <li>• <a href="#">Newsletter 22 March 2024</a></li> </ul> <p>And also added to our website: <a href="#">Planning Policy Consultations &amp; Newsletters - Lancaster City Council</a></p> <p>Copies of the main modification consultation documents were made available at the ‘Principal Offices’</p> <p>The main modification consultation material explained:</p> <ul style="list-style-type: none"> <li>✓ How to get involved in making representations to the main modification consultation and what can and can’t influence;</li> <li>✓ How and when comments can be made on the main modifications,</li> <li>✓ How and when comments will be taken into account, i.e. forwarded to the inspector</li> </ul>

<b>Requirements of Regulation Town and Country Planning (Local Development) Regulations 2012</b>	<b>How the council satisfied the requirement</b>
	<p>Details on how bodies and persons were invited to make representations and methods used are included in the following documents that were made available during the main modification consultation on our <a href="#">Keep Connected Consultation Platform</a> which included the:</p> <ul style="list-style-type: none"><li>• Statement of Representation Procedure</li><li>• Guide to Make a Representation</li></ul>

**Lancaster City Council**

**Further Main Modifications consultation summary of representations in Plan (further modification) order**

<b>MM14 – Policy DM30a</b>				
80 representations – 72 sound / 6 not sound/ 2 not stated				
MM ID Ref	Respondent Name	Organisation	Modification sound/ not sound	Summary of comment
1	Alison Cahn	N/A	Sound	No comments
2	Mrs Jo Butterworth	N/A	Sound	No comments
3	Fariha Blockley	N/A	Sound	No comments
4	Jim Greenan	N/A	Sound	No comments
5	Ms Frances Bowen	N/A	Sound	No comments
6	Ms Mandy Blackwell	Mandy Blackwell Recruitment	Sound	No comments
7	Ms Caroline Cattermole	N/A	Sound	No comments
8	Ms Alison Cahn	N/A	Sound	No comments
9	Mrs Susan Rigby	N/A	Sound	No comments
10	Mrs Elizabeth Mills	N/A	Sound	No comments
11	Mr Peter Bailey	Lancaster resident	Sound	No comments
12	Ms Pam Hearne	N/A	Sound	No comments
13	Thomas Jordan	N/A	Sound	No comments
14	Mr. Jean Marc Mbouma	Mine Tech Services	Sound	No comments

<b>MM14 – Policy DM30a</b>				
80 representations – 72 sound / 6 not sound/ 2 not stated				
MM ID Ref	Respondent Name	Organisation	Modification sound/ not sound	Summary of comment
15	Ms Yuliia Radzivil	MineTechServices	Not Sound	No comments
16	Mr Joseph Atkinson	MTS	Sound	No comments
17	Mr Artem Ponomarenko	Mine Tech Services	Sound	No comments
18	Mrs Denise Medcalf	N/A	Sound	No comments
19	Ms Kate Cargin	N/A	Sound	No comments
20	Mr C Hart	N/A	Sound	No comments
21	Ms Helen Brunskill	Brunskill Design	Sound	No comments
22	Miss Rowan Eden	N/A	Sound	No comments
23	Andi Chapple	N/A	Sound	No comments
24	Mrs Monica Williams	N/A	Sound	No comments
25	Ms Belinda Nixe	N/A	Sound	No comments
26	Ms Barbara Walker	N/A	Sound	No comments
27	Ms Christiane Gravenberg	N/A	Sound	No comments
28	Mrs Beverley Whitaker	N/A	Sound	No comments
29	Andrew Paton	N/A	Sound	No comments
30	Dr Gillian Davies	N/A	Sound	No comments



<b>MM14 – Policy DM30a</b>				
80 representations – 72 sound / 6 not sound/ 2 not stated				
MM ID Ref	Respondent Name	Organisation	Modification sound/ not sound	Summary of comment
31	Dr Emily Heath	N/A	Sound	No comments
32	Mrs Mary Breakell	N/A	Sound	No comments
33	Miss Sara Taylor	N/A	Sound	No comments
34	Mr Tom Barnish	N/A	Sound	No comments
35	Miss Christine Bennett	N/A	Sound	No comments
36	Isaac Beevor	Climate Emergency UK	Sound	No comments
37	Isabelle Baverstock	N/A	Sound	No comments
38	Philip Withnall	N/A	Sound	No comments
39	Miss Melanie Forrest	N/A	Sound	No comments
40	Mr Christopher Coates	Halton-With-Aughton Parish Council	Sound	No comments
41	Mr Josef Davies-Coates	N/A	Sound	No comments
42	Mrs. Judy Ainger	Mr & Mrs	Sound	No comments
43	Dr Sue Roberts	Bioabundance Community Interest Company	Sound	No comments
44	Ariel Cahn	N/A	Sound	No comments

<b>MM14 – Policy DM30a</b>				
80 representations – 72 sound / 6 not sound/ 2 not stated				
MM ID Ref	Respondent Name	Organisation	Modification sound/ not sound	Summary of comment
45	Cllr. Martin Cahn	South Cambridgeshire District Council	Sound	No comments
46	Mr Charles Ainger	N/A	Sound	No comments
47	Jon Sear	N/A	Sound	No comments
48	Lisa Redrup	Personal	Sound	No comments
49	Tom Lelyveld	N/A	Sound	No comments
50	Ms Rachael Hamilton	N/A	Sound	No comments
51	Miss Natasha Styles	The Planning Bureau on behalf of McCarthy Stone	Not Sound	It is the respondent's view that the building fabric standards set by a local authority should not go beyond those set by government building standards (or planned building standards in the case of the Future Homes Standard). It is their view that this is supported the written ministerial statement of 13th December 2023, and that the modification MM14 will add needless complexity and undermine economies of scale for developers. They therefore suggest bringing policy DM30a in line with national standards.
52	Ms Ann Denise Lanes	N/A	Sound	No comments
53	Lindsay Alder	National Highways	Sound	No objection to amendments
54	Mrs E Davison	N/A	Sound	The respondent supports the reinstatement of the original wording of policy DM30a, and is of the view that this would help to address both the climate emergency and fuel poverty.
55	Aylward Town Planning Ltd on behalf of	Derwent Development Management Ltd	Not Sound	It is made clear that all comments are limited to the non-residential aspects of policy DM30a only.

<b>MM14 – Policy DM30a</b>				
80 representations – 72 sound / 6 not sound/ 2 not stated				
MM ID Ref	Respondent Name	Organisation	Modification sound/ not sound	Summary of comment
	Derwent Development Management Ltd			Several amendments to both the policy text and supporting text are proposed in detail.
56	Peter Dutton	Gladman Developments	Not sound	Gladman are of the view that policy DM30a should be brought in line with national building standards and that the previous revision of the policy (as proposed in the summer consultation of 2023) should be retained. They further state that the 13th December WMS backs up this view, and that the policy modifications proposed could result in combined/duplicated standards.
57	Joanne Harding	Home Builders Federation	Not Sound	The respondent considers modification MM14 to be unsound, unjustified and not consistent with national policy, and have expressed that policy DM30a should be removed entirely so that the matter of building standards can be left to national building regulations. The respondent cites the recent 13th December 2023 WMS as a reason not to go above national building regulations. The respondent does not view the modified policy DM30a to be viable, and does not consider that housing supply has been adequately considered. The respondent has made comments on the validity of the viability assessment. The respondent has also suggested that changes are made to the policy such that the fabric standards therein are applied from the date of application, not construction.
59	Paul Nellist	Asteer Planning on behalf of Taylor Wimpey	Not Sound	The respondent is of the view that the policy DM30a should not require fabric standards above those specified by national government in building regulations. The respondent also expresses concerns over the viability of the policy DM30a, and states that the requirement to provide details of phasing within the Energy and Carbon Statement should be removed. Several specific comments have also been included on how viability could be effected and a number of technical issues have also been highlighted in both the policy text and supporting text with accompanying suggested amendments.
60	Pauline Shearer	Sport England	Not stated	The respondent has no comment on the proposed modifications

<b>MM14 – Policy DM30a</b>				
80 representations – 72 sound / 6 not sound/ 2 not stated				
MM ID Ref	Respondent Name	Organisation	Modification sound/ not sound	Summary of comment
62	Sara Taylor	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
63	Isaac Beevor	Climate Emergency UK	Sound	The respondent is in full support of MM14 and note that this will benefit residents, future home owners and the planet itself.
64	Philip Withnall	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
65	Tom Lelyveld	N/A	Sound	The respondent is in support of the original policy DM30a and states that higher building standards will not make sites undeliverable on the grounds of viability. The respondent also states that the policy DM30a will be an important step towards addressing fuel poverty and the climate emergency.
66	Dr Kathy Pitt	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
67	Lois Hurst	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
68	Lisa Redrup	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
69	Dr Stuart Parkinson	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
70	Charles Ainger	N/A	Sound	The respondent is in support of the original policy DM30a and states that the policy is both justified and pragmatic, adding that homes built to lower standards than those required by DM30a will have to be retrofitted if we are to keep to our net zero 2050 target.
71	Cllr Martin Cahn	South Cambridgeshire District Council	Sound	The respondent is in full support of MM14 and remarks that the policy seems consistent with the UK's international obligations.
72	Arthur Shaw	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty

<b>MM14 – Policy DM30a</b>				
80 representations – 72 sound / 6 not sound/ 2 not stated				
MM ID Ref	Respondent Name	Organisation	Modification sound/ not sound	Summary of comment
73	Ceri Mumford	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
74	Monica Williams	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
75	Josef Davies-Coates	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
76	Judy Ainger	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
77	Alan Thawley	N/A	Sound	The respondent is in support of the reinstatement of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty. They also state that all local authorities should have the power to set their own fabric standards, and that the reinstatement of the policy would send an important message.
78	Ann Denise Lanes	N/A	Sound	The respondent supports the reinstatement of the original policy DM30a and states that this would 'future proof' new housing, contribute to eliminating fuel poverty, and would help to tackle the climate emergency. The respondent also mentions the health benefits to be gained through the elimination of mould in new properties.
79	Paul Antony Fox	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
80	Belinda Nixie	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
81	Gillian Davies	N/A	Sound	The respondent is in support of the original policy DM30a and states that it is an important step towards addressing both the climate emergency and fuel poverty
82	Andrew Paton	N/A	Not Stated	The respondent states that insisting on high insulation is vital for maximising energy efficiency and hence addressing both fuel poverty and the climate emergency

<b>MM25 – Policy DM53</b>				
4 representations – 1 sound / 2 not sound / 1 not stated				
MM ID Ref	Respondent Name	Organisation	Modification sound/ not sound	Summary of comment
15	Ms Yuliia Radzivil	MineTechServices	Not sound	No comments
53	Lindsay Alder	National Highways	Sound	No objection to amendments
58	Ms Helen Clarkson on behalf of Mr Paul Morris	CBRE Limited on behalf of Lancaster University	Not Sound	The respondent is of the view that modification MM25 fails to address the issues that the respondent has raised previously at multiple stages of consultation. It is highlighted by the respondent that MM25 revokes other main modifications which have already been consulted on (examples have been given). The respondent also highlights the illegibility of the proposed figure 13.1, reiterates that their own wind turbine and parts of their estate do not fall within the areas denoted as ‘suitable for wind’, and highlights several concerns they have with the figure. The respondent also stipulates that there are inconsistencies with the wording of the policy text of DM53. Finally, the respondent provides a list of recommended changes to the wording of policy DM53 and Figure 13.1
60	Pauline Shearer	Sport England	Not stated	The respondent has no comment on the proposed modifications

<b>Comments not relating to either MM14 or MM25</b>				
1 representation – 0 sound / 0 not sound / 1 not stated				
MM ID Ref	Respondent Name	Organisation	Modification sound/ not sound	Summary of comment
61	Doug Moir	Lancashire County	Not Stated	The respondent highlights that references to the ‘Lancashire Archaeology Advisory Service’ within policy DM42 may now be out of date, as this group no longer exists.

		Council Historic Environment Team		
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