Q1.	Part A: Personal DetailsName (including title)	Ms Alison Cahn	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, PNew Residential Development, DM30a	enting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	nich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high energy standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

The original wording should not be struck out.

B

Q1.	Part A: Personal DetailsName (including title)	Ms Rachael Hamilton	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commer Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Para 3 of DM30a, New paragraphs 7-13 supporting text	nting on from the Schedule of Propose plicies & Land Allocation DPD (SPLA) on age 28, Paragraph 7.18	ed Main Modifications (e.g.
,	Description of the proposed Main Modification (e.g. The modifications seek to stop Lancaster City Council which will be most effective in ensuring new developmentargets to achieve net zero. The modifications seek to mand measures that would ensure developers could not goonstructing them till later.	from requiring developers to meet star ments minimise energy use in compliar emove requirements for higher standard	nce with the City Council's s than building regulations,
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	Yes	
;	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	e unsound, please identify which test	of soundness your
	Positively prepared?	No	
,	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
Q11	In light of the proposed Main Modifications please s your objection and make the Local Plan legally comidentified. It will be helpful if you could provide you	ppliant or sound, having regard to the	matter(s) you have

Q1.	Part A: Personal DetailsName (including title)	Ms Frances Bowen	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the Management DPD (DM) / Strategic Policy SPA_MOD_02, Chapter 7, Policy SP3, Part New Residential Development, DM30a	nting on from the Schedule plicies & Land Allocation DF	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Numbe	er)
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

Q1.	Part A: Personal DetailsName (including title)	John Rembowski
Q2.	Organisation (where appropriate)	University of Edinburgh, University of Warwick
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3.	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

Modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These clearly supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dorth East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy, which it must be added, is already lagging behind on its Net Zero commitments, as laid out by the UK's Climate Change Committee. The Inspector for Lancaster also ignores recent warnings (March 2023) from the UN's International Panel on Climate Change that we need to ACT NOW to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. Billions of people worldwide - particularly those in the 'developing' world who have contributed the least to climate change - are already facing the effects of an increasingly extreme and unpredictable changing climate. Actions such as MM14, which will directly contribute to the suffering of those most vulnerable to the impacts of climate breakdown both domestically and abroad, cannot be justified on any legal or moral grounds. In conclusion, MM14 is not justified and is inconsistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency and the suffering already facing those most vulnerable both at home and abroad. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place, and will ensure that the UK continue to lag behind on its Net Zero commitments. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

Resp

Q1.	Part A: Personal DetailsName (including title)	Catharine Patha	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proporties the relevant reference number that you are condevelopment Management DPD (DM) / Strateg Example: SPLA_MOD_02, Chapter 7, Policy SP. New Residential Development, DM30a	mmenting on from the Schedule of gic Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modificat	ion is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify wl	nich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

Q1.	Part A: Personal DetailsName (including title)	Mrs Helen Knott	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved proposed the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification t representation relates to?	to be unsound, please identify which tes	t of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

?

Q1.	Part A: Personal DetailsName (including title)	Sarah price	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The decision of the inspector is entirely out of sync with our national policy in the UK, and the fact that we have a climate emergency. How can some councils be allowed to do this and not others? The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Ms Sara Grimes	
Q2.	Organisation (where appropriate)	Bath & Dest Community Energy	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	•	mmenting on from the Schedule of Proposed Migic Policies & Land Allocation DPD (SPLA) or the	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification	n (e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	tion is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	on to be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
Q11	.In light of the proposed Main Modifications plo your objection and make the Local Plan legall	ease set out what modification(s) you consider y compliant or sound, having regard to the mat	-

identified. It will be helpful if you could provide your suggested revised wording of any policy or text.

The Bath & amp; North East Somerset EiP Inspector ruled that it was sound to exceed the 2015 WMS for the reasons set out below. This followed confirmation from DHLUC and also a representation and speaker at the hearing from Client Earth setting out the legal basis for the energy efficiency policy that exceeded the WMS. https://beta.bathnes.gov.uk/sites/default/files/EXAM%2010%20Note%20on%20Local%20Energy%20Efficiency%20Targets %20FINAL.pdf The Planning Inspectorate leaves itself open to serious legal challenge if it proceeds with this Major Modification which is not in line with national policy and unsound.

Q13. Part B: Your Representation (2)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18

not answered

Q1.	Part A: Personal DetailsName (including title)	Kevin Frea	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategies Example: SPLA_MOD_02, Chapter 7, Policy SPS New Residential Development, DM30a	nmenting on from the Schedule of Proc c Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Christopher Coates	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are composed Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Propose c Policies & Land Allocation DPD (SPLA) of	d Main Modifications (e.g.
Q8.	Description of the proposed Main Modification ((e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

As a former member of the Planning Ctte on Lancaster City Council and a construction industry project manager with 35 years experience in the industry it is my view that modification MM14 should be abandoned completely and the original proposed Policy DM30a with a requirement for net zero homes should be retained. Councils in other parts of the country (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have submitted plans with much higher energy standards than building regulations and planning policies that aim for net zero in residential buildings. Planning Inspectors in these cases have agreed that local authorities can set such policies ahead of national Government policy Lancaster City Council's original policy was positively prepared, justified, effective, and consistent with National Policy, in the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. There have been recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. Having been involved in a number of low energy construction projects locally in the past decade I firmly believe that the original proposed Policy DM30a is easily achievable on the ground and that the construction industry has been gearing up for such changes in recent years in anticipation of such changes. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. I therefore believe that MM14 should be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

QI.	Part A: Personal DetailsName (including title)	Mary Seane-Challerjee	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propo the relevant reference number that you are con Development Management DPD (DM) / Strategi Example: SPLA_MOD_02, Chapter 7, Policy SP New residential Development DM30 a	nmenting on from the Schedule of Proposed ic Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modificati	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

I am astounded by this modification. Building is a major source of carbon emissions. Improving new building regulations is one of the simpler things we can do. Better insulated homes/buildings are also much more comfortable for those who live in them or use them. I am one of the fortunate people who lives in a zero emissions home. The only people who will benefit in the short term from this modification would be the builders who lobby against well-built houses. In my view the modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council. 12 - Do you want to make a representation? Click No, unless you want to respond to another Modification. Further information for those interested Here is the written ministerial statement WMS 2015, which the Inspector has used to justify her ruling: Written statements - Written questions, answers and statements - UK Parliament Cornwall has recently adopted policies similar to Lancaster for higher energy efficiency in new build housing. The letter from the Inspector to Cornwall clearly lays out the issue with the WMS 2015 throughout. But is summarised in Paragraph 167: The WMS of 25 March 2015 has clearly been overtaken by events. Nothing in it reflects Part L of the Building Regulations, the Future Homes Standard, or the Government's legally binding commitment to bring all greenhouse gas emissions to net zero by 2050. In assessing the Council's approach to sustainable energy and construction, the WMS of 25 March 2015 is of limited relevance. The Framework makes clear in paragraph 152 that the planning system should support the transition to a low carbon future in a changing climate. Whilst paragraph 154 b) of the Framework requires that any local requirements for the sustainability of buildings should reflect the Government's national technical standards, for the reasons set out, the WMS of 25 March 2015 has been superseded by subsequent events. While it remains extant, any inconsistency with its provisions does not mean that the approach the Council has taken lacks justification. In that sense, there is nothing in the Council's approach that raises issues of soundness. The Inspector also argues: While I acknowledge that there are still those who express scepticism, the scientific community and governments worldwide fully accept the dangers posed by climate change, and the need for urgent action to address it. In that context, it seems to me that it would be perverse to criticise the Council for attempting to do too much, too soon. As a result, I am content that the DPD has been positively prepared and is justified. There is no undue variance from national policy. Read the Inspector to Cornwall's final report here. The Lancaster Inspector's letters and the response of the Council can be found here under 'Examination News and Updates': Local Plan Examination - Lancaster City Council [/et_pb_text] [/et_pb_column] [/et_pb_row] [/et_pb_section]



Q1.	Part A: Personal DetailsName (including title)	Elizabeth Mills	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate? Please the relevant reference number that you are commenting on from the Schedule of Proposed Main Modification Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a			n Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be dropped. The original proposed Policy DM30a with a requirement for net zero homes should be returned instead as this is essential to protect people from the impacts of climate change and also from cost of living issues. The original policy was positively prepared, justified, effective, and consistent with National Policy, i.e. Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. This is a serious dereliction of duty to to safety of local people and at odds with the Climate Change Act. MM14 is not justified is not consistent with current national policy as it seems to be justified by an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency. We are already too late in acting. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future, or even as soon as they are built, to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Ms Marion Rose	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategi Example: SPLA_MOD_02, Chapter 7, Policy SPS New residential development DM30a	nmenting on from the Schedule of Proposed c Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)		
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of	f soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy efficiency standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council



Q1.	Part A: Personal DetailsName (including title)	Miss Lucy Rees	
Q2.	Organisation (where appropriate)	South Gloucestershire Council	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Catriona Stamp
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are con	osed Main Modification does your representation relate?Please state mmenting on from the Schedule of Proposed Main Modifications (e.g. gic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): P3, Page 28, Paragraph 7.18
	Description of the proposed Main Modification MM14, page 71, paragraph 3	n (e.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modificat	tion is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modificatio representation relates to?	n to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A: Personal DetailsName (including title)	Dr Ellie Kuitunen	
Q2. Organisation (where appropriate)		
Q3. Address		
Q4. Postcode		
Q5. Telephone		
Q6. Email address		
the relevant reference number that you are comm	ed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18	
Q8. Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)	
MM14, page 71, paragraph 3		
Q9. Do you consider this proposed Main Modification	n is:	
Legally compliant	No	
Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
Positively prepared?	No	
Justified?	No	
Effective?	No	
Consistent with national policy?	No	

MM14 is not justified and not consistent with current national policy to reach net zero by 2038. It ignores the urgency demanded by the climate emergency. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



QI.	Part A: Personal DetailsName (including title)	Mr Benjamin Alexander Somers
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Paul Roberts	
Q2.	Organisation (where appropriate)	UWE Bristol	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Proposed Mai c Policies & Land Allocation DPD (SPLA) or the	n Modifications (e.g.
	Description of the proposed Main Modification ((e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
,	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The complete abandonment of modification MM14 is necessary from both a legal and moral standpoint. It is imperative that we retain the original proposed Policy DM30a, which mandates net zero homes. This original policy was thoroughly prepared, justified, effective, and aligned with national policies, particularly the Climate Change Act (Amendment 2019) that commits the UK to achieving net zero emissions by 2050 and the 2021 enhancements in the Building Regulations. These prevailing regulations supersede the outdated Written Ministerial Statement WMS15, which the Inspector refers to as the basis for modification MM14. It is noteworthy that other Inspectors, such as those in Cornwall, Bath & Dry North East Somerset, and Central Lincolnshire, have ruled in favor of empowering local authorities to establish significantly higher energy standards for residential buildings, surpassing national government policies by striving for net zero emissions ahead of schedule. Regrettably, the Inspector for Lancaster disregards recent warnings issued by the Intergovernmental Panel on Climate Change (IPCC) in March 2023. These warnings emphasize the urgency of immediate action to reduce carbon emissions if we are to fulfill our commitments under the ratified Paris Agreement. In conclusion, MM14 lacks justification and fails to align with the current national policy due to its reliance on an outdated WMS that has been superseded by more recent legislation. Moreover, it does not demonstrate proactive preparation as it overlooks the pressing demands of the climate emergency, as evidenced by the recent record-breaking heatwaves including an exceptional marine heatwave off our shores. This modification also proves ineffective on a national scale by introducing inconsistency into the Planning Inspectorate's approach towards energy efficiency policies for new homes, thereby causing confusion among local planning authorities. Additionally, from a local perspective, MM14's implementation would necessitate costly retrofitting of new homes in Lancaster District to achieve net zero emissions, a more expensive endeavor than initially constructing buildings to high energy efficiency standards. Consequently, it is imperative that MM14 is entirely abandoned, and the original wording proposed by Lancaster City Council is reinstated to ensure a legally and morally sound approach to net zero across our economy.



Q1.	Part A: Personal DetailsName (including title)	Cllr Sarah Warren	
Q2.	Organisation (where appropriate)	Bath & Dorth East Somerset Cou	ıncil
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved proposed the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, DM30a	nenting on from the Schedule of Proposition Policies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification t representation relates to?	o be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. It also neglects the Committee on Climate Change's recent Progress Report, which concludes that the Government is not taking urgent enough action on climate change to comply with its own Climate Change Act. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



QI.	Part A: Personal DetailsName (including title)	MS Parii Hearrie
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): rage 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy efficiency standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Sarah Mason	
Q2.	Organisation (where appropriate)	Morecambe Bay Partnership	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Power Residential Development, DM30a	nting on from the Schedule of Proposed Mai olicies & Land Allocation DPD (SPLA) or the	n Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
,	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of so	undness your
	Positively prepared?	No	
,	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

C2. Organisation (where appropriate) C3. Address C4. Postcode C5. Telephone C6. Email address C7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate?Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a C8. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 C9. Do you consider this proposed Main Modification is: Legally compliant No Sound No C10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?	Q1.	Part A: Personal DetailsName (including title)	Mrs Diana Martin	
Q4. Postcode Q5. Telephone Q6. Email address Q7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate?Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a Q8. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modification is: Legally compliant No Sound No Q10. If you consider the proposed Main Modification to be unsound, please Identify which test of soundness your representation relates to?	Q2.	Organisation (where appropriate)		
Q5. Telephone Q6. Email address Q7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate?Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a Q8. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modification is: Legally compliant No Sound No Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?	Q3.	Address		
O3. Part B: Your Representation (1)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a O8. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 O9. Do you consider this proposed Main Modification is: Legally compliant No Sound No O10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?	Q4.	Postcode		
 Q7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a Q8. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modification is: Legally compliant No Sound No Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to? 	Q5.	Telephone		
the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a Q8. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modification is: Legally compliant No Sound No Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?	Q6.	Email address		
MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modification is: Legally compliant No Sound No Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
Q9. Do you consider this proposed Main Modification is: Legally compliant No Sound No Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?	Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
Legally compliant No Sound No Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		MM14, page 71, paragraph 3		
Sound No Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?	Q9.	Do you consider this proposed Main Modification	is:	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		Legally compliant	No	
representation relates to?		Sound	No	
	Q10		be unsound, please identify which to	est of soundness your
Positively prepared?		Positively prepared?	No	
Justified? No		Justified?	No	
Effective? No		Effective?	No	
Consistent with national policy? No		Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Jack Hubert Mayhew	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	O. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



QI.	Part A: Personal Details Name (Including title)	Samanina Gray
Q2.	Organisation (where appropriate)	Wyre Council
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
00	Description of the proposed Main Medification /o	Dana CO. Dava ayan h Murahay)
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page ou, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

I am the Climate Change and Environmental Projects Officer at Wyre Council, and I live within Lancaster so this is very pertinent to my position. Our council is watching to see whether we can adapt our Local Plan in a similar light, and actually make a meaningful reduction on our borough's carbon footprint in arguably the most influencive way - via Planning. Already this decision has halted serious work in this area for our council and countless others, who have been watching with interest so see if we can finally make the positive changes we really need to as Local Authorities. It seems one backward and disastrous decision could simply ruin this all, with far-reaching consequences. We feel that the modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A: Personal DetailsName (including title)	Alastair Singleton
Q2. Organisation (where appropriate)	
Q3. Address	
Q4. Postcode	
Q5. Telephone	
Q6. Email address	
the relevant reference number that you are co	osed Main Modification does your representation relate?Please state mmenting on from the Schedule of Proposed Main Modifications (e.g. gic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): P3, Page 28, Paragraph 7.18
Q8. Description of the proposed Main Modification	n (e.g. Page 60, Paragraph Number)
p 71 - MM14 para 3	
Q9. Do you consider this proposed Main Modificat	tion is:
Legally compliant	No
Sound	No
Q10.If you consider the proposed Main Modification representation relates to?	on to be unsound, please identify which test of soundness your
Positively prepared?	No
Justified?	No
Effective?	No
Consistent with national policy?	No

Lancaster City Council originally proposed for net zero housing should be retained, as it was positively prepared, justified, effective and consistent with national policy - viz the Climate Change Act (Amendment 2019), which binds the Government to a 2050 net zero target, together with the 2021 uplift in the Building Regulations. Both supersede at law the Written Ministerial Statement WMS15, which the Inspector relies on to justify Modification MM14. The original proposal should hold, unmitigated. Here in Bath & Death amp; North East Somerset our Inspector agreed that the Council can set higher and more responsible energy standards than current building regulations to encourage net zero housing ahead of current Government policy. The Inspector for Lancaster ignores recent warnings by both the IPPC and the Government's own Climate Change Committee that we need to act immediately if there is to be any chance of meeting the commitments to the Paris Agreement which the Government has ratified. The Inspector's MM14 is inconsistent with current national policy, relying on an outdated WMS which has been overtaken by later legislation. It is not positively prepared, is inconsistent and is ineffective on both the national and local planes. It should be dropped in favour of Lancaster City Council's original proposal.



Q1. Part A: Personal DetailsName (including title)	Mr Joseph Earl
Q2. Organisation (where appropriate)	Morecambe Bay Partnership
Q3. Address	
Q4. Postcode	
Q5. Telephone	
Q6. Email address	
the relevant reference number that you are comm	d Main Modification does your representation relate?Please state nenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8. Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)
Q9. Do you consider this proposed Main Modification	is:
Legally compliant	No
Sound	No
Q10. If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness your
Positively prepared?	No
Justified?	No
Effective?	No
Consistent with national policy?	No

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



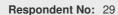
Q1.	Part A: Personal DetailsName (including title)	Mr Vincent MacDonald	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP1, Policy SP2, PDM30a	nting on from the Schedule of Proposolicies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which te	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

As a resident of Lancaster City I applaud the proposal to set targets that go beyond Part L. The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. It was positively prepared as it provided clear objective assessments for developments. Considering the recent IPCC reports is it clearly justified. It is effective as it presents a routemap for developers to reduce their emissions. There are many best practice examples from across the UK which present ways for developers to meet these requirements. The most stringent requirements can be met now, for example through Passivhaus design principals. It has consistently been demonstrated that Passivhaus, when embedded early in the design process, has minimal impact on overall cost of development. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dilding regulations and aim for net zero residential buildings ahead of national Government policy. I note that this policy is aimed at Operational Energy and would support measures that reduce emissions further through regulation of Embodied Energy with Whole Life Carbon calculations.



Q1. Part A: Personal DetailsName (including title)	Ann Denise Lanes
Q2. Organisation (where appropriate)	Green Elephant Cooperative
Q3. Address	
Q4. Postcode	
Q5. Telephone	
Q6. Email address	
the relevant reference number that you are cor	
·	·
Q8. Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)
Q9. Do you consider this proposed Main Modificati	ion is:
Legally compliant	No
Sound	No
Q10. If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which test of soundness your
Positively prepared?	No
Justified?	No
Effective?	No
Consistent with national policy?	No

In order to resolve my objections, the proposed Main Modifications MM14 would have to be abandoned. I ask that the original proposed policy DM30a is accepted, as this would make the Local Plan legally compliant and sound. The original proposed policy DM30a takes into account the seriousness of the climate emergency facing us, it is consistent with the Climate Change Act (amendment 2019) which commits the UK to achieve net zero by 2050, and is also consistent with the tightening up of Building Regulations (2021). The Inspector seems to be relying on Written Ministerial Statement WMS 15 for justification of their Main Modification 14 but this is superceded by the Climate Change Act and is therefore not justified. Also there are several precedents where local authorities have set higher energy efficiency building standards than current Building Regulations, with the agreement of other Inspectors. So, together with its incompatibility with the Climate Change Act, MM14 is inconsistent with National Policy and Practice. In addition, there are examples of local authorities building very high quality housing developments, achieving innovative changes in energy-efficient building design and bringing down costs, effectively eliminating the Passivhaus cost premium e.g. Exeter City Council since 2010. Local authorities must be allowed to aspire to high building standards. To do otherwise is a completely false economy. Houses built to current Building Regulations will need retrofitting in 10 years' time. Highly energy efficient homes not only drastically reduce fuel poverty but also virtually eliminate mould and damp issues. In contrast homes built as recently as 10 or 20 years ago now have serious damp and mould issues - currently a national problem requiring changes to the Law (which will become Awaab's Law this summer). Current Building Regulations are simply not high enough. If Lancaster City Council requires new residential developments to be built to a much higher standard than current Building Regulations, much unnecessary expenditure will be avoided in the near future. The DM30a approach is the essence of soundness. MM14 in contrast is neither positively prepared nor effective as it ignores recent national and international policy commitments and would not enable Lancaster City Council to meet its carbon emission reduction targets nor avoid considerable future expenditure on its housing stock. Therefore I propose that MM14 is dropped entirely and DM30a is reinstated.





Q1.	Part A: Personal DetailsName (including title)	Ms A Redfearn	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development DM30a	enting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	n test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
Q11	. In light of the proposed Main Modifications please		

I suggest that the modification MM14 should be completely abandoned, with the original proposed policy DM30a with a requirement for zero net homes, be retained. Other local authorities, Cornwall & DANES ruled that councils can set energy standards that exceed national recommendations. The Lancaster Inspector has ignored written IPCC warnings about the urgency to act to limit climate change impact. The original policy was positive and effective, it met the climate change act requirements. The MM14 uses outdated standards and is woefully inadequate to meet current energy efficiency needs. Stick o the original proposal and avoid additional work in future.



Q1.	Part A: Personal DetailsName (including title)	Ms Caroline Davis	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a		
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your	
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



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Q1.	Part A: Personal DetailsName (including title)	Ms Kerrilee Barrett	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of P Policies & Land Allocation DPD (S	roposed Main Modifications (e.g.
	New nesidential Development, Divisoa		
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3 MM14, page 71, paragrap		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whi	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Jennifer Lowe	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development DM30a	enting on from the Schedule of Proposition on Front (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
Q11	In light of the proposed Main Modifications please your objection and make the Local Plan legally co-identified. It will be helpful if you could provide yo	mpliant or sound, having regard to the	e matter(s) you have
	The modification MM14 should be abandoned complete consistent with national policy,	ely. The original policy was positively pre	pared, justified, effective and
Q12	2. Would you like to make another representation?	No	



Q1.	Part A: Personal DetailsName (including title)	Mr Graham Lowe	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New residential development DM30A	nenting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

Model Answer: The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Lindsey Graydon	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended by the commended by the series of the relevant Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter SPLA_MOD_02, Chapter 7, Policy SP3, Parameter SPLA_MOD_03, Chapter 7, Policy SP3, Parameter SPLA_MOD_04, Chapter 7, Policy SP3, Parameter SPLA_MOD_05, Chapter 7, Policy SP3, Parameter SPA, Parameter S	nting on from the Schedule of Proposed I Dlicies & Land Allocation DPD (SPLA) or t	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14,page 71,paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Chris Hart	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a.	nting on from the Schedule o	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. Answer: MM14, page 71, paragraph 3	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify w	hich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be dropped. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Anna Hunter	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	no idea - but I believe we should be building only so rooms - which would allow for future flexibility for who could become a toilet en-suite later. With good inspira flexibilty on a daily basis so space is utilised more. A flexible walls parents could have children sleep with operation. Kitchens can have a dining area disappen necessary	eelchairs, carers, walking aids, family chation we can have moveable soundproof. large bedroom at night - yet a large day the them, carers can tend elderly relative	anges. A large cupboard now f walls - which would allow for yroom when you need it. With yes, or convalescing after an
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	As I am disabled and struggle with cognition I can bedrooms & Dunges currently being built locally are oppressive and depressive. Housing should be a footprint suitable for future, or regular changes. Famil move walls to suit the time of day. Locally another d render off several houses. Repacked with insulation a higher building regs to support sustainable housing the just someone needs to take the stand and say the well-	are just not appropriate for anyone others large as possible - therefor my movables who have part -time care for children eveloper has clearly built his homes based and done again. These are less than 5 years barely needs heating - a passive house	er than a single person. They ple wall idea would make any n or relatives would be able to dly as they've stripped all the ears old. Build well now - with
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	Yes	
	Sound	Yes	

Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

Positively prepared?

Yes

Justified?

Yes

Effective?

Yes

Consistent with national policy?

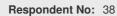
Yes

Q11. In light of the proposed Main Modifications please set out what modification(s) you consider necessary to resolve your objection and make the Local Plan legally compliant or sound, having regard to the matter(s) you have identified. It will be helpful if you could provide your suggested revised wording of any policy or text.

As I say I have no idea how local residents can say they don't want more naff builders building more naff houses that are desperately unsuitable for modern life. Pokey rooms & pokey as draughty as the terraced housing we're struggling to heat Someone somewhere needs to say - this is where we start making those changes. From today - lets look at how families with children, dependant elderly relatives, or disabled can live more suitably in one house for the whole of their lives. People shouldn't have to keep moving as their circumstances change. housing for wheelchair adapability is pretty simple. Make a larger footrint. Over several floors, Leave large cupboard for now on each floor & pokey if/when an internal lift is needed - it can be installed. We've bought an old terraced house with this in mind - I currently use a powerchair outdoors - but one day may find stairs difficult. Those moving walls I've mentioned would enable a 16ft x 20ft space that would be sociable. Enable carers to lift and move me easily. Or that extended family to visit if we become grandparents. Or indeed to next family who move in may have children from previous relationships - and bedrooms can be made larger at night, and the dayroom larger in the day. We need to learn to live with different living spaces on different floors. For safety - parents should be able to sleep on floors below their children. this was they hear them wake up if they're not on the same floor & amp; you can hear them disappear downstairs when they shouldn't be up!



Q1.	Part A: Personal DetailsName (including title)	Ms C Hopkins	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	nting on from the Schedule of Proceedings on Sch	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
Q11	In light of the proposed Main Modifications please your objection and make the Local Plan legally coridentified. It will be helpful if you could provide yo	mpliant or sound, having regard	to the matter(s) you have
	The original proposed DM30a with a requirement for ne consistent with the Climate Change Act (Amendment responsibility and commitment to National Policy.	•	
012	Would you like to make another representation?	No	





Q1.	Part A: Personal DetailsName (including title)	Mrs Mary Breakell	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dilding Regulations and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The recent climate emergency warnings are already being born out by extreme weather globally. The UK government ratified the Paris Agreement and so net zero housing regulations are ever more crucial. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place.





Q1.	Part A: Personal DetailsName (including title)	Philip Withnall	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	nting on from the Schedule o	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to l representation relates to?	be unsound, please identify w	hich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Respondent No: 40

Q1.	Part A: Personal DetailsName (including title)	Dr Claire Nance
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): lage 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification i	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Emily Heath
Q2.	Organisation (where appropriate)	Sustainable Lancaster in Climate Emergency (SLICE)
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commended by the commended of t	Main Modification does your representation relate? Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g	p. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Respondent No: 42

Q1.	Part A: Personal DetailsName (including title)	Frieda Wignall
Q2.	Organisation (where appropriate)	Ashden Climate Solutions
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comm	ed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	ı is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness your
	Positively prepared?	No
,	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Tamara Satchell	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.e.)	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
,	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Joseph Hobbs	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	nich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Dorothy Ball	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic FExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Developments DM30a	enting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.s	g. Page 60, Paragraph Number)	
	MM14 p71 paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
;	Sound	No	
Q10	.If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	f soundness your
	Positively prepared?	No	
,	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
		No set out what modification(s) you conside	-

MM14 should be abandoned completely and instead retain the policy for low carbon homes DM30a. This would then be consistant with the Climate Change Act which supercedes the ministerial statement WMS15, the climate change act having a target for net-zero by 2050 - only 27 years away. The IPCC's latest severe warning makes clear we must act now - not sometime in the future, if we are to even reach the targets we agreed to at the COP in Paris. Other COuncils - Cornwall, Bath, Central Lincolnshire are acting to build to higher carbon standards than central government dictate.

identified. It will be helpful if you could provide your suggested revised wording of any policy or text.

Respondent No: 46

Q1.	Part A: Personal DetailsName (including title)	Mr Fraser Smalley	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	b be unsound, please identify wh	nich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details Name (including title)	Gemma wren	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, I	enting on from the Schedule of Policies & Land Allocation DPD (Proposed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	ich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Mr. Daren Chandisingh	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, I New Residential Development, DM30a	enting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify w	hich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas reductions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Respondent No: 49

Q1.	Part A: Personal DetailsName (including title)	Mrs Sophie Keen	
Q2.	Organisation (where appropriate)	Morecambe BAy PArtnership	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comm	ed Main Modification does your representation relate?Ple nenting on from the Schedule of Proposed Main Modifica Policies & Land Allocation DPD (SPLA) or the Policies N Page 28, Paragraph 7.18	ations (e.g.
	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness y	our/
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Isabelle Baverstock		
Q2.	Organisation (where appropriate)			
Q3.	Address			
Q4.	Postcode			
Q5.	Telephone			
Q6.	Email address			
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Proposition of Proposition of SPLA	sed Main Modifications (e.g.	
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)		
Q9.	Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No		
	Sound	No		
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No		
	Justified?	No		
	Effective?	No		
	Consistent with national policy?	No		



Q1.	Part A: Personal DetailsName (including title)	Miss Judith Colley	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the proposed between the proposed the relevant reference number that you are commended between the proposed the relevant reference number that you are commended by the proposed by the proposed that you are commended by the proposed by	nting on from the Schedule of Propo olicies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Mark Tanner	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Propolicies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Mrs Sarah Blackler	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are commen	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18	
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	





Q1.	Part A: Personal DetailsName (including title)	Dr paul tynan	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P new residential development DM30a	enting on from the Schedule of Propo olicies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
	MM14 page 71 para 3		
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas reductions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council. 12 - Do you want to make a representation? Click No, unless you want to respond to another Modification. Further information for those interested Here is the written ministerial statement WMS 2015, which the Inspector has used to justify her ruling: Written statements - Written questions, answers and statements - UK Parliament Cornwall has recently adopted policies similar to Lancaster for higher energy efficiency in new build housing. The letter from the Inspector to Cornwall clearly lays out the issue with the WMS 2015 throughout. But is summarised in Paragraph 167: The WMS of 25 March 2015 has clearly been overtaken by events. Nothing in it reflects Part L of the Building Regulations, the Future Homes Standard, or the Government's legally binding commitment to bring all greenhouse gas emissions to net zero by 2050. In assessing the Council's approach to sustainable energy and construction, the WMS of 25 March 2015 is of limited relevance. The Framework makes clear in paragraph 152 that the planning system should support the transition to a low carbon future in a changing climate. Whilst paragraph 154 b) of the Framework requires that any local requirements for the sustainability of buildings should reflect the Government's national technical standards, for the reasons set out, the WMS of 25 March 2015 has been superseded by subsequent events. While it remains extant, any inconsistency with its provisions does not mean that the approach the Council has taken lacks justification. In that sense, there is nothing in the Council's approach that raises issues of soundness. The Inspector also argues: While I acknowledge that there are still those who express scepticism, the scientific community and governments worldwide fully accept the dangers posed by climate change, and the need for urgent action to address it. In that context, it seems to me that it would be perverse to criticise the Council for attempting to do too much, too soon. As a result, I am content that the DPD has been positively prepared and is justified. There is no undue variance from national policy. Read the Inspector to Cornwall's final report here. The Lancaster Inspector's letters and the response of the Council can be found here under 'Examination News and Updates': Local Plan Examination - Lancaster City Council Signed: Kevin if you need help completing the survey. Post Views: 0 Frea Click Here to email



QI.	Part A: Personal DetailsName (including title)	wir Peter Cheason	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved by the Policy Spanning Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New residential development DM30a	nenting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)	
	MM14, page71 paragraph 3		
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification t representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Policy Framework lays out that the planning system should "shape places in a way that that contribute to radical.reductions in greenhouse gas " (para 152) and take "a proactive approach to mitigating and to adapting to climate change " (para 153) . The modificatio MM14 will not lead to "radical reductions in greenhouse emissions" and should be abandoned completely. The original proposed policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified., effective and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, The National Planning policy Framework, and the 2021 uplift in the building regulations. These supersede the written ministerial WMS15, which which the Inspector cites as the basis for the modification MM14.OTHER Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local Authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of National Government policy. The inconsistency shown by the planning Inspectorate in their decision for Lancaster ignores recent warnings (March 2023) from the IPPC that failure to act now will jeopardise our commitment under the Paris agreement, which the UK Government has ratified. MM14 is not justified and inconsistent with current National Policy as it relies on an outdated WMS which has been overtaken by other legislation. It is not positively prepared and totally ignores the urgency required by the Climate emergency. It is not Nationally effective and is inconsistent in its approach from the Inspectorate in terms of policies relating to energy efficiency in new homes and creates confusion for local planning authorities. It is ineffective locally as new homes will have to be retro fitted in future to achieve net zero at greater cost. MM14 should be dropped entirely and the wording returned to that originally proposed by Lancaster City Council.





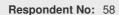
Q1.	Part A: Personal DetailsName (including title)	Mrs C L Didsbury	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew residential development, DM30a	enting on from the Schedule of Policies & Land Allocation DPD (Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	ich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Respondent No: 57

Q1.	Part A: Personal DetailsName (including title)	Anna Goddard	
Q2.	Organisation (where appropriate)	Carnegie Publishing Limited	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commented Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPA, Pastample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPA, Pastample: SPA	nting on from the Schedule of Propose plicies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

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Q1.	Part A: Personal DetailsName (including title)	Daniel Stone
Q2.	Organisation (where appropriate)	Centre for Sustainable Energy
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): lage 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No
Q11	.In light of the proposed Main Modifications please	set out what modification(s) you consider necessary to resolve

We write to register our objection to MM14 and register our support for policy DM30a as originally worded. The modification MM14 should be completely abandoned. The original proposed Policy DM30a with a requirement for net zero homes should be retained, and in fact strengthened to require new buildings to be net zero from adoption. The policy is justified and necessary The IPPC's latest synthesis report (March 2023) summarises the accepted climate science and current situation around the globe. Its key findings of fact can be summarised as follows (my emphasis): "Human activities... have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850–1900 in 2011–2020. Widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred. Human-caused

climate change is already affecting many weather and climate extremes in every region across the globe. This has led to widespread adverse impacts and related losses and damages to nature and people. Continued greenhouse gas emissions will lead to increasing global warming, with the best estimate of reaching 1.5°C in the near term in considered scenarios and modelled pathways. Every increment of global warming will intensify multiple and concurrent hazards (high confidence). Some future changes are unavoidable and/or irreversible but can be limited by deep, rapid and sustained global greenhouse gas emissions reduction. The likelihood of abrupt and/or irreversible changes increases with higher global warming levels. All global modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot, and those that limit warming to 2°C (>67%), involve rapid and deep and, in most cases, immediate greenhouse gas emissions reductions in all sectors this decade. Climate change is a threat to human well-being and planetary health (very high confidence). There is a rapidly closing window of opportunity to secure a liveable and sustainable future for all (very high confidence). The choices and actions implemented in this decade will have impacts now and for thousands of years (high confidence)." The UK is a signatory to the 2015 Paris Climate Accord where signatories committed to substantially reduce global greenhouse gas emissions to limit the global temperature increase in this century to 2 degrees Celsius while pursuing efforts to limit the increase even further to 1.5 degrees. The conclusions from this unimpeachable science, and the steps necessary to keep global warming within 1.5 and 2 degrees Celsius are material considerations in the Lancaster case and are directly relevant to the council's efforts to achieve emissions reductions over and above national efforts. Looking at the national context, the Climate Change Act 2008 is the basis for the UK's approach to tackling and responding to climate change, requiring that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are adapted to. The Act also establishes the framework to deliver on those requirements. The Act commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. Legally binding carbon budgets act as stepping-stones towards this target. Although the Climate Change Act commits the UK to reducing emissions to net zero by 2050, the Committee on Climate Change (CCC) in their 2023 report to parliament warns that current policies and plans are insufficient to meet the 6th carbon budget: "The rate of emissions reduction will need to significantly increase for the UK to meet its 2030 NDC and the Sixth Carbon Budget. If the UK is to achieve its NDC, the rate of emissions reduction outside the electricity supply sector must almost quadruple, from 1.2% annual reductions to 4.7%." The 2023 report specifically commented on the role of planning "the planning system must have an overarching requirement that all planning decisions must be taken giving full regard to the imperative of Net Zero". It furthermore made specific mention of "inconsistent inspectorate decisions on whether local authorities can set standards (e.g. on energy efficiency in buildings) that go beyond those set in national building regulations". The 2023 progress report also specifically looked at progress cutting emissions within the building sector: "Policy progress in the buildings sector is not on track, with 77% of the required emissions reduction by the Sixth Carbon Budget period judged to be either at significant risk or with insufficient plans (Figure 5.8, Table 5.2).... "To reach Net Zero, the Government urgently needs to coordinate a shift in how the UK's 28 million homes and two million non-residential buildings use energy. Our assessment of the Government's policy progress for buildings remains largely unchanged from last year. Progress remains broadly insufficient to ensure that the buildings sector reaches zero emissions by 2050." The Balanced Pathway to Net Zero, which represents a scenario that places the UK in the best and most realistic position to achieve net zero by 2050, states that all new builds will need to be net zero by 2025 at the latest (page 40 - my emphasis). Given the lack of progress cutting emissions either globally or nationally, the lack of binding zero carbon policies from the UK government, and the overall slow progress at cutting emissions from buildings, the evidence suggests that local authorities must fill the gap through Local Plan policies. We would therefore support the reinstatement, and in fact strengthening of Lancaster's original draft policy to require new buildings to be net zero from adoption. One cannot fail to see the impacts of global warming already in the system, simultaneously ravaging different parts of the world from just 1.1 °C of warming, with predictions that we will pass 1.5 °C in the near future. Every fraction of a degree of additional warming that is averted by carbon reduction will lessen the increased severity of climate impacts yet to come, the economic, social, and environmental harms and human mortality that will result from them. It is essential that local government is supported and encouraged in securing carbon reductions in addition to the efforts of national government. Consistent with national policy The original intention of the Written Ministerial Statement - Planning Update dated 25 March 2015 (HCWS488) was to remove the ability of local planning authorities to set local energy efficiency standards beyond building regulations, to support the introduction of a national zero carbon homes regime, originally planned for 2016. With binding zero carbon standards introduced nationally, locally policies would not be necessary. However, the Westminster government abandoned the national zero-carbon homes regime, and the amendments to the Energy Act were never enacted. Having first been superseded by the abandonment of the national zero carbon homes regime in 2015, the Written Ministerial Statement was superseded a second time by the recent update to Part L of the building regulations and

government plans to introduce the Future Homes Standard. The government has repeatedly confirmed that local authorities retain the legal right to require developments to meet higher standards than the current building regulations under the Planning and Energy Act 2008. In July 2018 in the Government's response to the technical consultation on updates to national planning policy and guidance (answer to Q33) stated (my emphasis): "A number of local authority respondents stated the view that the text in the revised Framework restricted their ability to require energy efficiency standards above Building Regulations. To clarify, the Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations. The Government remains committed to delivering the clean growth mission to halve the energy usage of new buildings by 2030". Again in 2021 the government confirmed in its response to The Future Homes Standard consultation: 'The new planning reforms will clarify the longer-term role of local planning authorities in determining local energy efficiency standards. To provide some certainty in the immediate term, the Government will not amend the Planning and Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes.' I understand that DLUHC have confirmed the same messages again in response to enquiries from Lancaster Council. In the Inspectors letter of 22nd December (EX INS 22) the Inspector appears to have interpreted the government's 2021 response to mean that until the longer-term role of local planning authorities is confirmed by government, Local Planning authorities will not retain powers to set local energy efficiency standards for new homes. It is clear from the government's responses in 2021 and 2018 that this was not the government's intention. To quote their earlier 2018 clarification verbatim, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations. Exploring the meaning of the government's 2018 statement further, the WMS advised that local plan policies should not be used to set requirements above the equivalent of Level 4 of the Code for Sustainable Homes. This is equivalent to about a 19% reduction in emissions beyond the 2013 building regulations. The Interim Future Homes Standard, brought into force in 2022 result in carbon savings of 31% over the 2013 building regulations, so already exceeding the limit set out in the WMS. If local government is not restricted in its ability to require energy efficiency standards above Building Regulations, the only logical interpretation is that it is able to set standards requiring greater emission reductions than the currently adopted (2022) building regulations, i.e. requiring more than a 31% reduction in carbon emissions over the previous 2013 iteration of the building regulations. This has the result that the WMS is set aside. The WMS reflected the policy intentions of the government of the day, led at the time by David Cameron. We have since had four different prime ministers and further reform of building regulations, to which the WMS related. The 2015 written ministerial statement references the Code for Sustainable Homes, which was withdrawn in 2015 and no longer has any meaning. It also pre-dates highly significant revisions to the Climate Change Act brought in by Theresa May's government in 2019, committing the UK in law to bringing net emissions down to zero by 2050. The 2015 Written Ministerial Statement should be seen as an artifact from a previous proposed regulatory regime which never came into force and should be given limited weight as a material consideration. The Inspectors examining both the Cornwall Climate Emergency DPD and the Bath and North-East Somerset (B& NES) Local Plan partial update came to precisely this conclusion. In view of the clear repeated government statements which would support this view and the judgements of other planning inspectors, the position taken by the Inspector to effectively block policy DM30a appears unreasonable and irrational. The attached Open legal advice from Estelle Dehon KC at Cornerstone Barristers furthermore establishes that LPA's have statutory authority to set energy efficiency targets which exceed the baseline in national Building Regulations. Nothing in law or national policy prevents them from doing so or limits the amount by which they may exceed the baseline, provided that the relevant policies are reasonable, properly prepared, and do not conflict with any other national planning policies. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by unimpeachable climate science. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place, and means that occupants of new homes in the district will need to spend more on their heating bills than people in similar homes in Cornwall or Bath. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council, or further strengthened to ensure that new homes are net zero in operation from the adoption of the plan. We would like to register to speak at the examination in public.





Q1.	Part A: Personal DetailsName (including title)	Mrs Beatrice Zoe Freund	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development DM30a	nenting on from the Schedule of Pr Policies & Land Allocation DPD (S	roposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e. MM14,page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Sandra Elsworth
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state nenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e MM14,page71, paragraph 3	.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	nis:
	Legally compliant	No
	Sound	No
Q10	o. If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No



Q1.	Part A: Personal DetailsName (including title)	Miss Isabelle Guyler	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategies Example: SPLA_MOD_02, Chapter 7, Policy SPSNew Residential Development, DM30a	nmenting on from the Schedule of Proic Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The NPPF, being the most significant driver and consideration for planning policy, clearly states that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas reductions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The significant modifications suggested to DM30a are not in line with current national policy or legislation. DM30a as submitted was consistent with current national policy and direction and therefore is what must be adopted. The 2015 Written Ministerial Statement no longer bears significance, is outdated, and effectively irrelevant as confirmed by DLUHC (the policymakers) themselves. It has been overtaken by events with multiple other local authorities having now been able to adopt similar policies where their inspectors have accepted that the 2015 WMS is no longer valid. Additionally, in my professional capacity as a cross-sector climate specialist, it is negligent to allow homes to continue to be built that are not fit for purpose and will instead directly cause health issues for occupants, incur greater costs at a later stage for occupants, and further contribute to the damaging impacts of climate change.



Q1.	Part A: Personal DetailsName (including title)	Mr David Morton	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propo the relevant reference number that you are con Development Management DPD (DM) / Strategi Example: SPLA_MOD_02, Chapter 7, Policy SP New Residential Development, DM30a	nmenting on from the Schedule of Propic Policies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modificati	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Respondent No: 63

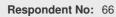
Q12	2. Would you like to make another representation?	No
	not answered	
Q11	your objection and make the Local Plan legally co	e set out what modification(s) you consider necessary to resolve ompliant or sound, having regard to the matter(s) you have our suggested revised wording of any policy or text.
	Consistent with national policy?	No
	Effective?	No
	Justified?	No
	Positively prepared?	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Sound	No
	Legally compliant	No
Q9.	Do you consider this proposed Main Modification	is:
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)
	New Residential Development, DM30a	
Q7.	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state tenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Email address	d Main Madification data your representation valeta ODIcasa state
	•	
Q5.	Telephone	
Q4.	Postcode	
Q3.	Address	
Q2.	Organisation (where appropriate)	
Q1.	Part A: Personal DetailsName (including title)	Miss Lia Elliott



QI.	Part A: Personal DetailsName (including title)	Herry Goodwin
Q2.	Organisation (where appropriate)	Sustainable Carlisle
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	ed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)
	MM14, page71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	ı is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No



Q1.	Part A: Personal DetailsName (including title)	Alan Simpson
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	s:
	Legally compliant	No
	Sound	No
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Effective? Consistent with national policy?	No No





Q1.	Part A: Personal DetailsName (including title)	Michael Johnson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	nting on from the Schedule of Proposolicies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to l	be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

MM14 should be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council. The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place.



Respondent No: 67

Q1.	Part A: Personal DetailsName (including title)	Thea Hutchings	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended by the relevant Management DPD (DM) / Strategic Policy SP3, Pale SPLA_MOD_02, Chapter 7, Policy SP3, Pale New Residential Development, DM30a	nting on from the Schedule of Propos olicies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council. As the owner of a Barratt new build in Garstang (necessity rather than desire), please stop allowing these houses to be built with no thought for the planet or future generations.



Q1.	Part A: Personal DetailsName (including title)	Mr Graham Thomas	
Q2.	Organisation (where appropriate)	Essex Planning Officers Association	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Policy SP1, Palman Modification 14 (MM14), Development Management Design and Construction)	nting on from the Schedule of Propo Dicies & Land Allocation DPD (SPLA age 28, Paragraph 7.18	osed Main Modifications (e.g. A) or the Policies Map (PM):
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	Main Modification 14 (MM14), Part 2 – DM, Policy DM30a, page 71, Paragraph 3 (Sustainable Design and Construction)		Design and Construction)
Q9.	. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

This representation is made on behalf of the Essex Planning Officers Association (EPOA) which represents the 15 local authority Chief Planning officers in Essex. We respectfully request that Modification 14 (MM14) is removed and that the original proposed Policy DM30a, with a requirement for net zero homes, is retained. All 15 authorities in Essex are committed to mitigating and adapting to a changing climate. We are ambitious, innovative and want to take effective, coordinated climate action in Essex. To help with this the independent Essex Climate Action Commission (ECAC) have advised the Essex partners on a programme for ambitious climate change action. The commission published its report 'Net-

Zero: Making Essex Carbon Neutral' in July 2021, and this set challenging recommendations and targets to give focus to addressing Climate Change within Essex. One of the strands of the Commission's work was the Built Environment. EPOA has worked closely with the Climate Commissioners and assisted with the commissioning of technical evidence which identified six key areas of work we need to address, working with both the local authorities and construction sector, to successfully implement the ECAC target of all new homes to be Net zero carbon by 2025. One of the 6 key areas related to having a consistent policy position on Net Zero, which could be incorporated into new Local Plans and/or Reviews. It is with regard to the need for a 'consistent policy position' that we make this representation. In Essex, collaborative working on planning policies between all the Local Planning Authorities is strong and has led to a robust, evidence-based approach (published), and the development of a consistent net zero policy that aligns with national and local climate targets. The Essex Design Guide is being used to bring together the evidence available to support the development of 'net zero' planning policy in Essex local plans. Work to date includes: • Legal advice - Energy Policy and Building Regulations (Cornerstone Barristers, April 2023). • Net Zero Carbon Viability Study for Essex (Three Dragons consultancy, August 2022) • Net Zero Policy Development Study (Introba, Etude, Currie & Development Stu policy for net zero carbon (in operation) development in Essex will ensure that all homes are ultra-low energy buildings that are fossil fuel free, generate renewable energy to match predicted annual energy demand and achieve net zero carbon in operation from the outset (including both regulated and unregulated energy uses). Our evidence studies show that this approach is technically feasible, financially viable and legally justified (https://www.essexdesignguide.co.uk/climatechange/net-zero-evidence/). In terms of the legal justification, we would draw your attention to the 'open legal advice' provided by Estelle Dehon KC of Cornerstone Barristers which is published here: Essex Open Legal Advice - Energy Policy and Building Regulations | Essex Design Guide (https://www.essexdesignguide.co.uk/climate-change/net-zeroevidence/essex-open-legal-advice-energy-policy-and-building-regulations/). The advice clearly sets out the legal justification for LPAs to be able to set energy performance standards beyond the national baseline (Part L Building Regulations) in their local plans, and beyond the 19% improvement over Building Regulations standards referred to in the 2015 Written Ministerial Statement (WMS). In particular, Paragraph 2.3 of the legal advice concludes that as 'the Department of Levelling Up, Housing and Communities (DLUHC) has confirmed that the 2015 WMS is otiose in light of the 2021 updates to the Building Regulations and that there are no plans to bring the 2015 amendment to the Planning and Energy Act 2008 into force, or otherwise to amend the Act' then '...the 2015 WMS should not be accorded any weight'. Paragraphs 19 and 20 specifically cover climate change and planning policy, including highlighting that the NPPF 2021 paragraph 153 provides that plans should 'take a proactive approach to mitigating and adapting to climate change', and that footnote 53 makes clear this must be 'in line with the objectives and provisions of the Climate Change Act 2008'. In the consultation on the Levelling up and Regeneration Bill reforms to national planning policy (22 December 2022), DLUHC indicated there is no intention to amend these provisions of the NPPF and the direction of travel is that planning 'can make an important contribution to ... the vitally important task of mitigating and adapting to climate change'. Furthermore, the consultation also recognises the importance of work by LPAs who are frontrunners by innovating and leading the way in addressing climate change through planning. Paragraph 40 summarises the legal position on setting energy efficiency targets beyond national minimum standards and confirms that 'the statutory power exists in primary legislation and LPAs can exercise that power with confidence'. In relation to the 2015 WMS, paragraph 45 explains that the WMS 'indicated that local plan policies could not be used to set requirements above the equivalent of Level 4 of the Code for Sustainable Homes, which was 19% above the national baseline of the Building Regulations Part L 2013.' However, the WMS has now been 'overtaken by the updated national baseline from June 2022 (Part L Building Regulations 2021) which now exceeds Code Level 4.' Paragraph 48 of the legal advice goes on to highlight the findings of Cornwall's Inspector and states that the conclusion from that Inspector was: 'The WMS of 25 March 2015 has clearly been overtaken by events. Nothing in it reflects Part L of the Building Regulations, the Future Homes Standard, or the Government's legally binding commitment to bring all greenhouse gas emissions to net zero by 2050. In assessing the Council's approach to sustainable energy and construction, the WMS of 25 March 2015 is of limited relevance'. The legal advice concludes in paragraph 49: 'Accordingly, despite the 2015 WMS remaining extant and despite the failure to update the Planning Practice Guidance, it is clear that the Government does not consider that they constrain LPAs and the PEA 2008 empowers LPAs to set energy efficient standards at the local level which go beyond national Building Regulations standards if they wish. This is the correct approach in law. In my view, the right approach is that adopted in the Report on the examination of the Cornwall Council Climate Emergency development plan document: the 2015 WMS should not be accorded any weight.' It is clear from the Essex legal advice that the WMS is out of date and has been overtaken by events. Therefore, as the Inspector uses the WMS as the basis for modification 14 (MM14), then it is our view - supported by the robust and sound evidence provided in the Essex legal advice - that MM14 should be abandoned,

and that the original wording of Policy DM30a should be retained. This would also be consistent with the approach taken by other Inspectors (Cornwall, Bath & Dilton East Somerset and Central Lincolnshire) who have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. A consistent approach from the Planning Inspectorate is greatly needed to enable LPAs to confidently include policies to robustly mitigate and adapt to climate change in their local plans, which is consistent with national legally binding climate targets. In conclusion, it is our view that the original policy DM30a was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act 2008 (as amended 2019) which commits the UK to achieve net zero by 2050 and the 2021 uplift in the Building Regulations. It is our view that MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by updated Building Regulations and other legislation as set out in the Essex legal advice. It is not positively prepared as it ignores the urgency demanded by the climate emergency (as highlighted in the latest warnings contained in the IPPC report of March 2023). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster will have to be retrofitted in the future to achieve net zero. MM14 should therefore be dropped entirely, and the wording of Policy DM30a should return to that originally proposed by Lancaster City Council.



Respondent No:

Q1.	Part A: Personal DetailsName (including title)	Neil Punnett
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Q9. Do you consider this proposed Main Modification is:	
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The NPPF states in para 152 that the planning system "should shape places in ways that contribute to radical reductions in greenhouse gas emissions." and in para 153 that the planning system should also "take a proactive approach to mitigating and adapting to climate change." The modification MM14 will not do this and should be abandoned completely in the face of the climate emergency that we face. The original DM30a requirement for net zero homes should be retained. The Written Ministerial Statement WMS15 is outdated and superseded by the Climate Change Act (Amendment 2019), the NPPF and the 2021 uplift in the Building Regulations. Precedents have been set by Inspectors in other areas (Cornwall, Central Lincolnshire, Bath & Dry North East Somerset) who have ruled that local authorities can set much higher energy standards than building regs and aim for net zero residential buildings.

Q12. Would you like to make another representation?

No



QI.	Part A: Personal DetailsName (including title)	Dr Tim Fenn	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedul Policies & Land Allocation [e of Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Num	ber)
	MM14, page 71, paragraph 3		
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identif	fy which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including	g title) MR Ian Dalgleish
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you	h proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): plicy SP3, Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modi	fication (e.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Me	odification is:
	Legally compliant	No
	Legally compliant Sound	No No
	Sound	
Q10	Sound O.If you consider the proposed Main Mod	No
Q10	Sound O.If you consider the proposed Main Mod representation relates to?	No lification to be unsound, please identify which test of soundness your
Q10	Sound O. If you consider the proposed Main Mod representation relates to? Positively prepared?	No ification to be unsound, please identify which test of soundness your No



Q1.	Part A: Personal DetailsName (including title)	Dr G Davies	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commovelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule Policies & Land Allocation DP	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Numbe	er)
	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Mrs Catherine Castle	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

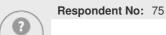
The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



R

Q1.	Part A: Personal DetailsName (including title)	Hugh Castle
Q2.	Organisation (where appropriate)	Lancaster Royal Grammar School
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	o. If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Dominic Wigmore-Shepherd	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Propolicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which t	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Cllr Katie Graham	
Q2.	Organisation (where appropriate)	East Suffolk Council	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test o	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The NPPF lays out that the planning system should 'shape places in ways that contribute to radical reductions in greenhouse gas emissions' (Paragraph 152) and 'take a proactive approach to mitigating and adapting climate change' (Paragraph 153). The modification MM14 will, contrary to these stipulations, NOT lead to 'radical reductions in greenhouse gas emissions' and should therefore be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective and consistent with National Policy -- that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Policy Planning Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors, (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is a) not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. b) not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). c) not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and created confusion for local planning authorities. d) not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr John-Paul Stonard	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	J. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A: Personal DetailsName (including title)	Ms Rhiannon-Jane Raftery
Q2. Organisation (where appropriate)	Creating Climate Conscious Communities
Q3. Address	
Q4. Postcode	
Q5. Telephone	
Q6. Email address	
the relevant reference number that you are con	osed Main Modification does your representation relate?Please state mmenting on from the Schedule of Proposed Main Modifications (e.g. gic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): P3, Page 28, Paragraph 7.18
Q8. Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)
Q9. Do you consider this proposed Main Modificat	ion is:
Legally compliant	No
Sound	No
Q10. If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which test of soundness your
Positively prepared?	No
Justified?	No
Effective?	No
Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs. Judy Ainger	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, P	enting on from the Schedule olicies & Land Allocation DP	of Proposed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Numbe	er)
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy efficiency standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Respondent No: 80

Q1.	Part A: Personal DetailsName (including title)	Jack Broom	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Propos colicies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Panning Policy as it stands, lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions (Paragraph 152) and take a proactive approach t mitigating and adapting to climate change" (Paragraph 153). The modification MM14will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed policyDM30a with a requirement for net zero homes should be retained. The original policy was very positively, prepared, justified, effective and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath and North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national government policy, The inconsistency from the planning inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act NOW to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. To conclude, I think like very many others, that MM14 is not justified and consistent with current national policy and will lead to many so called new homes having to be retto fitted in the near future to comply with the standards needed in a zero c arbon economy. Te nearer we get to Passiv House quality standards the better for the future in reducing energy usage and will lead to a zero carbon economy which is clear is now overdue if recent world climate change is anything to go by . WE need to act now to build the best quality zero carbo homes for the future.



Q1.	Part A: Personal DetailsName (including title)	Dennis Mau	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are composed by the Policy Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (MM14, page 71, paragraph 3	e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Charles Ainger	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic Fixample: SPLA_MOD_02, Chapter 7, Policy SP3, Fixample: Development, DM30a	enting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Chris Newman	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a	nting on from the Schedule of Proposed Main Noticies & Land Allocation DPD (SPLA) or the Pol	lodifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3 and new paragraph 12		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test of sounc	lness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

We need to be proactive in prevention of the significant health impacts of climate change which include the direct effects of extreme heat, flooding and drought; the mental health effects of eco-distress and PTSD; an increased likelihood of pandemics; the spread of mosquito-borne diseases; the stark physical effects of crop failure and famine; and the indirect effects of people fleeing their failing lands - escalating social tensions, protectionism and war. So serious are these impacts that a group of over 200 medical journals gave a joint statement in 2021: The science is unequivocal: a global increase of 1.5° C above the pre-industrial average and the continued loss of biodiversity risk catastrophic harm to health that will be impossible to reverse'. The modification I consider necessary to resolve my objection are that DM30a, MM14 should be dropped, and the wording return to that originally proposed. We know that the National Planning Policy Framework infers we need 'radical reductions in greenhouse gas emissions' (para 152). The main modification highlighted seeks to row back the iterative step by step approach to reducing emissions proposed by the council, and just reduce emissions on a one-off basis by 31%. Contractors need to understand that the pathway to net zero will be a constantly evolving one. They need to be informed now that emissions reduction expectations will increase with time. This is kinder to them and allows them to plan for the long term, because of course even if this MM14 is accepted, the path to net zero won't just stop there. We all know it will continue, and there will be greater pressure as more and more evidence of the harms of climate change grows. It is better to get on the path to net zero now than to dilly dally, and undoubtedly risk even more expensive retrofitting in future. We know from the experience with other inspectors that the majority have ruled that local authorities can set higher targets that national government. The CCC have also stated that between 2014 and 2022, buildings emissions have been broadly flat, having fallen in the previous decades. (Last year's emission reduction is likely to be due to mild weather as well as other behavioural effects). This shows clearly that national government policy has been woefully lagging behind its legal commitment to Net zero. A legal commitment that local councils are party to. MM14 should be dropped, and the wording return to that originally proposed.



Q1.	Part A: Personal DetailsName (including title)	Chelsey Needham	
Q2.	Organisation (where appropriate)	InnerSense	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Model Policy SP3, Po	nting on from the Schedule of Proposed Noticies & Land Allocation DPD (SPLA) or the	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	29. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Respondent No: 85

Q1.	Part A: Personal DetailsName (including title)	Lucy Cheetham
Q2.	Organisation (where appropriate)	South Lakes Housing
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Simon Hollings	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which te	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Sound

Q1.	Part A: Personal DetailsName (including title)	Saskia Andrews	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	27. Part B: Your Representation (1)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dame) and the Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dame) and the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the worl		
	not answered		
Q9.	Do you consider this proposed Main Modification		
	Legally compliant	No	

No

10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
Positively prepared?	No	
Justified?	No	
Effective?	No	
Consistent with national policy?	No	
your objection and make the Local Plan legally con identified. It will be helpful if you could provide you	set out what modification(s) you consider necessary to resolve appliant or sound, having regard to the matter(s) you have ur suggested revised wording of any policy or text.	
not answered		
Q12. Would you like to make another representation?	No	





Q1.	Part A: Personal DetailsName (including title)	Cllr Richard Wright	
Q2.	Organisation (where appropriate)	Central Lincolnshire Joint Strategic Plar	nning Committee
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, Part 2 DM, MM14, Policy DM30a	enting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA) of	d Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	Pages 8-14 of the main mods document		
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	Yes	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
Q11	In light of the proposed Main Modifications please	e set out what modification(s) you consi	der necessary to resolve

The 'national policy' test of soundness is whether the policies in the plan are consistent with 'national policy', which, as is made clear in the Framework, can be broader than just the Framework itself but other statements of national planning policy. By 'other statements', it reasonable to assume that any Act, Regulation, national policy or ministerial statement could be relevant in order to test a policy against it. Indeed, it would be unlawful not to comply with an Act or Regulation, never mind be 'consistent' with them. The Framework requires Local Plans to "support the transition to a low carbon future in a changing climate" in Paragraph 152, stating that they "should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing

resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure." Paragraph 154 then goes onto confirm that "New development should be planned for in ways that:...b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards." Paragraph 155 then stipulates that plans should "c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers." Further guidance is then added in section 6 of the Planning Practice Guidance - see para refs 6-001-20140306, 6-002-2014-0306, 6-003-20140612, and 6-009-20150327. Moving onto relevant legislation, Section 182 of the Planning Act 2008 inserted section 19 (1A) in the Planning and Compulsory Purchase Act 2004. This stipulates that: "Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change." Section 1 of the Planning and Energy Act 2008 makes provision for local planning authorities to impose reasonable requirements for complying with energy efficiency standards that exceed the requirements of the building regulations. "A local planning authority in England may in their development plan documents, a corporate joint committee may in their strategic development plan, and a local planning authority in Wales may in their local development plan, include policies imposing reasonable requirements for—(a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; (b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; (c) development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. (2) In subsection (1)(c)— "energy efficiency standards" means standards for the purpose of furthering energy efficiency that are— (a) set out or referred to in regulations made by the appropriate national authority under or by virtue of any other enactment (including an enactment passed after the day on which this Act is passed), or (b) set out or endorsed in national policies or guidance issued by the appropriate national authority; "energy requirements", in relation to building regulations, means requirements of building regulations in respect of energy performance or conservation of fuel and power. Beyond this the Climate Change Act 2008 sets the national net zero goal by 2050 in law. Further to these elements of law, additional Government policy has been published in the Net Zero Strategy: Building Back Greener which clearly set out the intentions of Government to empower local leaders to take action and deliver their own net zero initiatives (see paragraphs 24 and 25 on page 50 and paragraph 10 on page 263. It also goes further in paragraph 31 to not only reaffirm the government's existing position but that its own Framework is in need of an update where it says: "National planning policies already recognise the importance of sustainable development and make clear that reducing carbon emissions should be considered in planning and decision making. The National Model Design Code provides tools and guidance for local planning authorities to help ensure developments respond to the impacts of climate change, are energy efficient, embed circular economy principles, and reduce carbon emissions. The government is considering how the planning system can further support our commitment to reaching net zero. We will make sure that the reformed planning system supports our efforts to combat climate change and help bring greenhouse gas emissions to net zero by 2050. For example, as part of our programme of planning reform we intend to review the National Planning Policy Framework to make sure it contributes to climate change mitigation and adaptation as fully as possible." Much has been made of the Written Ministerial Statement of March 2015, where the then Secretary of State for Communities and Local Government issued a statement which covered a number of topics including Housing standards: streamlining the system and plan making. These two parts of the statement sought to prevent local plans from setting "any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development". Importantly it then goes onto state that "For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015." It is important to note at this stage that the relevant amendment to the Energy Act was not subsequently commenced and the related zero carbon homes standard and update to Building Regulations referred to in the WMS was also subsequently abandoned. The Written Ministerial Statement then stated that: 'Until the amendment is commenced, we would expect local planning authorities to take this statement of the Government's intention into account in applying existing policies and not set conditions with requirements above a Code level 4 equivalent.' Aside from the fact that this 'expectation' is clearly tentative and non-mandatory in nature, it also expressly only applies to development management and the setting of conditions under then-existing policies. It is also now clearly redundant given that it is predicated on the since-withdrawn zero carbon homes framework. PPG (Paragraph: 012 Reference ID: 6-012-20190315) drew on the Written Ministerial Statement in its July 2019 update. The TCPA eloquently referred to this in a statement it issued in July 2022, and the Central Lincolnshire Joint Strategic Planning Committee endorses this view. The TCPA stated [Note: footnotes of this statement are placed in square brackets and italicised for ease of accessibility]: "This [WMS] was then cited in the 2019 update to the National Planning Practice Guidance as creating a restriction on the extent to which local authorities can impose standards above building regulations generally, i.e. including in setting new plan policies. However, as just set out, that is clearly not what the WMS said. And in any event, the courts have confirmed that [PPG] is not policy [R (Solo Retail) v Torridge DC [2019] EWHC 489 (Admin) [33]-[34]], and is therefore not part of the soundness test of consistency with national planning policy under paragraph 35 of the NPPF [Written Ministerial Statements and the PPG are material considerations in plan preparation and planning decisions, but the level of weight placed on them will reflect (among other things) the extent to which they are up-to-date.]. And given the most recent statements by government (set out below), the abandonment of the zero carbon homes standard, the introduction of new Building Regulations at a level higher than Code 4, and that the practice guidance misstates the content of the WMS, this paragraph of the [PPG] can also reasonably be given no or very limited weight by local authorities in preparing plan policy. In terms of the NPPF, para 154(b) tells us that 'Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.' Optional national technical standards at levels above Building Regulations were introduced following the 2015 WMS. These included national technical standards relating to water efficiency for example. However, as stated in the 2015 WMS, this framework of national technical standards would not cover energy efficiency, with local authorities retaining the power to set local energy efficiency standards for new homes. The same analysis applies to section 1(5) of the Energy Act, [https://www.legislation.gov.uk/ukpga/2008/21/section/1] which states that local plan policies on renewable and low carbon energy generation and the energy efficiency of buildings should not be 'inconsistent with relevant national policies' (defined as national policies relating to energy from renewable sources, low carbon energy or furthering energy efficiency).[And in terms of the percentage of renewable energy required from on-site generation, there is no possible argument that national policy limits local authorities' power to impose standards, subject to the usual soundness tests] Section 43 of the Deregulation Act 2015 introduced powers to disapply the power to set energy efficiency standards in England in relation to housing development, but this provision has never been commenced. And in last year's response to Homes Standard consultation [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956094/Government_res ponse_to_Future_Homes_Standard_consultation.pdf] the Government underlined the contribution local authorities can make to cutting carbon and confirmed that it would not move to commence section 43 pending anticipated reforms to the planning system: '2.40 We recognise that there is a need to provide local authorities with a renewed understanding of the role that Government expects local plans to play in creating a greener built environment; and to provide developers with the confidence that they need to invest in the skills and supply chains needed to deliver new homes from 2021 onwards. To provide some certainty in the immediate term, the Government will not amend the Planning and Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes. 2.41 ... Further, as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal.' Indeed, the Government's response recognises the potential need for local standards to be set to achieve the national net zero goal, stating only that this need will be 'less likely' as national standards become more stringent. So, the full powers of the Energy Act on renewable and low carbon energy generation and the energy efficiency of buildings remain available to local authorities. To be clear, the fact that the WMS is not a sound basis for decision making cuts both ways. That is to say, it is unsafe to rely on it to set a standard requiring a 20% uplift above the latest revision to Part L. That also would be arbitrary. Any up-lift figure must be justified by local evidence and the wider legal and policy requirements set out by the Government. Put simply, you have the power if you can make a sound case." Bringing all of the above 'national policy' commentary together, the key points against which any policy (or lack of policy) in a development plan should be tested against can be set out clearly in six summary points: 1. Targeting 'radical reductions' in carbon emissions is both lawful and specifically supported by the Framework. 2. Plans need to take a 'proactive approach' to mitigating and adapting to climate change 'in line' with the objectives and provisions of the Climate Change Act 2008 (the Climate Act). This means that plans must be in line with the required 80% carbon reduction by 2035 and net zero by 2050. 3. Carbon reduction requirements in local plans therefore have twin statutory anchors in both planning law and in relation to the Climate Act whose carbon budgets are adopted as secondary legislation. 4. Local authorities also have special powers to make requirements in relation to renewable and low carbon energy and building performance set out in the Planning and Energy Act 2008 (the Energy Act). 5. There is no national policy which restricts on site renewable energy generation and no

restrictions on the energy efficiency standards above building regulations for commercial buildings. 6. The 2015 WMS is out of date and relying on it in practice guidance to stop local authorities setting ambitious standards would be illogical and unreasonable. The principle of Local Planning Authorities including energy efficiency policies that go above and beyond Building Regulations has been tested in a number of recent Local Plan Examinations. Cornwall and Bath and North East Somerset had their plans found sound by Government appointed Inspectors and were adopted earlier this year. Beyond this the Central Lincolnshire Local Plan was found sound by Inspectors in the report issued in March 2023 - since the Inspector's latest correspondence with Lancaster City Council. The matter of the principle of including energy efficiency policies that go beyond Building Regulations is considered under Issue 6 (pages 36-39) of the Inspectors' Report into the Central Lincolnshire Local Plan. The Inspectors conclusions in paragraphs 176 and 177 most succinctly summarise their findings on this matter: "176. However, notwithstanding the different views presented on the interpretation of the WMS and the PPG, critically, in June 2022 changes to the Building Regulations were introduced that require a 31% reduction from Part L 2013. This is a material change in circumstances and means that all new residential development already has to exceed the previous Code for Sustainable Homes Level 4 equivalent (a 19% reduction over Part L 2013). The changes brought into effect in 2022 are intended to be an interim measure before the introduction of the Future Homes Standard, which will see all new homes 'zero carbon ready' from 2025 onwards. 177. In summary therefore, we conclude that the approach of Policy S7, which seeks to go above and beyond the requirements of the Building Regulations, is not inconsistent with national planning policy for the purposes of the Planning and Energy Act 2008. When read as a whole, it is also consistent with the Framework which states that the planning system should support the transition to a low carbon future in a changing climate and help shape places in ways that contribute to radical changes in greenhouse gas emissions. Whilst we find conflict with national planning practice guidance, both the PPG and the 2015 WMS have clearly been overtaken by existing and proposed changes to the Building Regulations brought into force in 2022. MMs are therefore not necessary to require the Plan to adhere to Code for Sustainable Homes Level 4 equivalent standards, which are now exceeded by the Building Regulations." Paragraph 174 of the Inspectors' Report also helpfully summarises their position on the WMS: "174. Until the amendment is commenced, the WMS expects local planning authorities to take the statement into account in applying existing policies and not set conditions with requirements above a Code for Sustainable Homes Level 4 equivalent. We share the Committee's interpretation of this to mean during the consideration of planning applications (where existing policies apply), with the imposition of conditions used as the mechanism by which a local planning authority would enforce compliance with Code Level 4 standards." Much of the above is confirmed in open legal advice obtained and published by Essex County Council available at https://www.essexdesignguide.co.uk/climate-change/net-zero-evidence/essex-open-legaladvice-energy-policy-and-building-regulations/. Returning to the Main Modifications relating to Policy DM30a, the modifications proposed render the policy unsound. As has been concluded from the above, the policy as amended would be inconsistent with national policy and guidance, and it would also not be effective in delivering material benefits to addressing climate change as is required under law. The policy as submitted was based on robust evidence demonstrating the necessity for, and the deliverability of, the policy meaning that it was justified and effective, and consistent with national policy. Furthermore, wider evidence, which is relied on and produced by government, clearly justifies the need to act now if we are to have any hope of achieving the legal requirement to achieve net zero by 2050. As such, the removal of much of the policy and its 'watered-down' replacement is not justified. This is a globally important matter that needs to be addressed wherever possible at all levels. As such, the justification is abundant for a positively worded policy such as the policy as submitted. In order to ensure that Policy DM30a meets the tests of soundness it should be reinstated without the changes proposed in the schedule of Main Modifications.



Q1. Part A: Personal DetailsName (including title)

Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, I New Residential Development, DM30a	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which te	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

Mrs Ann Brookes

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Part A: Personal DetailsName (including title)	Ms Leyla Kent	
Organisation (where appropriate)		
Address		
Postcode		
Telephone		
Email address		
the relevant reference number that you are commended by the commendation of the commen	enting on from the Schedule of Propos olicies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
MM14, page 71, paragraph 3		
Do you consider this proposed Main Modification is	is:	
Legally compliant	No	
Sound	No	
If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	st of soundness your
Positively prepared?	No	
Justified?	No	
Effective?	No	
Consistent with national policy?	No	
	the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Find the Modern Policy SP3, Fi	Organisation (where appropriate) Address Postcode Telephone Email address Part B: Your Representation (1)To which proposed Main Modification does your represe the relevant reference number that you are commenting on from the Schedule of Proposed Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is: Legally compliant No Sound No If you consider the proposed Main Modification to be unsound, please identify which test representation relates to? Positively prepared? No Justified? No Effective? No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Mr Nick Armitage	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which te	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Mr Nigel Cochran	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposition of Proposition DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Mr Michael Nightingale	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended be became the proposed became the proposed the relevant reference number that you are commended by the proposed by the proposed the proposed that you are commended by the proposed by the proposed by the proposed that you are commended by the proposed by the proposed that you are commended by the proposed that you are commended by the proposed by the proposed that you are commended by the proposed that you are commended by the proposed by the proposed that you are commended by the proposed by the proposed that you are commended by the proposed by	nting on from the Schedule of Propo Dlicies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	· · · · · · · · · · · · · · · · · · ·		
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Ms Clare Price	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comm Development Management DPD (DM) / Strategic I Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Login: Anonymous

Q1. Part A: Personal DetailsName (including title)

Email: n/a

Q2.	Organisation (where appropriate)	James Wilson Associates	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule o	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number	·)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify v	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

James Wilson

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

	Respondent No:	96
(3)		

Q1.	Part A: Personal DetailsName (including title)	Ivan Kilborn	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which t	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Judith Cook	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	nting on from the Schedule of Properties & Land Allocation DPD (S	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Bridget Cook	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commovelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	





Q1.	Part A: Personal DetailsName (including title)	Ms Linda McCann	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proportion the relevant reference number that you are condevelopment Management DPD (DM) / Strategen Example: SPLA_MOD_02, Chapter 7, Policy SP. New Residential Development, DM30a	mmenting on from the Schedule of Proposed I	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification	n (e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modificat	tion is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr James Singleton	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Proposolicies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Barbara Middlemast-Neal	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Proposed Molicies & Land Allocation DPD (SPLA) or the	lain Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Barbara Walker	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18		
	New Residential Development, DM30a		
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			t of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



QI.	Part A: Personal DetailsName (including title)	MISS Lynn Scholleid	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Pexample: SPLA_MOD_02, Chapter 7, Policy SP3, P	enting on from the Schedule of lolicies & Land Allocation DPD (Proposed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	J. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	ich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Mr Ian Rickard
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9. Do you consider this proposed Main Modification is:		is:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Morena Ashton	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule Policies & Land Allocation DI	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Numb	er)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Mrs Fauzia Hart	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commovelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Kate Ashington	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	



Q1.	Part A: Personal DetailsName (including title)	Mr Michael Benis	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are cor	osed Main Modification does your representation mmenting on from the Schedule of Proposed Main gic Policies & Land Allocation DPD (SPLA) or the P3, Page 28, Paragraph 7.18	n Modifications (e.g.
	Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modificati	ion is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which test of sou	undness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Heather MacGregor	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, PNew Residential Development, DM30a	enting on from the Schedule of Pro colicies & Land Allocation DPD (SF	pposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	n test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



QI.	Part A: Personal Details Name (including title)	michaellockett
Q2.	Organisation (where appropriate)	Ipmcare Limited
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g.	g. Page 60. Paragraph Number)
	MM14, page 71, paragraph 3	g ug, - ug,
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



QI.	Part A: Personal DetailsName (including title)	MX Amanda Bray
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Joanna Haughton
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
O8.	Description of the proposed Main Modification (e.g.	a. Page 60. Paragraph Number)
	MM14, page 71, paragraph 3	3
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. I	Part A: Personal DetailsName (including title)	Ruth Lambert	
Q2. (Organisation (where appropriate)	EarthQuakers	
Q3. <i>I</i>	Address		
Q4. I	Postcode		
Q5. 1	Telephone		
Q6. I	Email address		
t	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved opening the series of the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	nenting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
N	ew Residential Development, DM30a		
Q8. I	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)
М	IM14, page 71, paragraph 3		
Q9. I	Do you consider this proposed Main Modification	is:	
Le	egally compliant	No	
S	ound	No	
	f you consider the proposed Main Modification to representation relates to?	o be unsound, please identify w	hich test of soundness your
Р	ositively prepared?	No	
Ju	ustified?	No	
E	ffective?	No	
С	onsistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Amanda Kasafir	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy SP4, Policy SP3, Poli	nting on from the Schedule of Prop Dlicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to I representation relates to?	oe unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Jean Blanquet	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Beth Middleton
Q2.	Organisation (where appropriate)	Westmorland and Furness Council
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state tenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	· ·	David CO David March 19
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragrapn Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Elizabeth Scott-Clarke
Q2.	Organisation (where appropriate)	South Lakeland District Council
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



QI.	Part A: Personal Details Name (including title)	ws Renate Aspaen	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Helen Middleton	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended by the relevant Management DPD (DM) / Strategic Policy SP3, Palample: SPLA_MOD_02, Chapter 7, Policy SP3, Palample Residential Development, DM30a	nting on from the Schedule of Propolicies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Chris Greatorex	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	enting on from the Schedule of Propose olicies & Land Allocation DPD (SPLA) o	ed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Yvonne Dixon	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule Policies & Land Allocation DP	of Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Numbe	er)
	MM14, page 71, paragraph 3		
Q9.	9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Helen Lindsay	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	nting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10.If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Annette Powell MRTPI	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commer Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Panew Residential Development, DM30a	nting on from the Schedule of Propose plicies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Peter Wood	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Louise Taylor
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	Q7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate?Ple the relevant reference number that you are commenting on from the Schedule of Proposed Main Modific Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies I Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18	
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9. Do you consider this proposed Main Modification is:		s:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Mark Cordery
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are con	sed Main Modification does your representation relate?Please state inmenting on from the Schedule of Proposed Main Modifications (e.g. ic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 3, Page 28, Paragraph 7.18
	New nesidential Development, Divisora	
	Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	on is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Elaine Wilkinson
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are con	sed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. ic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 3, Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	on is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs P J Green	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P	enting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test o	f soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Michael Whitaker	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved by the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Propo Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
00	Description of the proposed Main Modification (e	o a Paga 60 Paragraph Number)	
	MM14, page 71, paragraph 3	s.g. Page oo, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Trish Barlow	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commovelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA) of	d Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Jackie Surtees	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Propolicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Martin McMahon	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test o	f soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr. R C P Wells	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are composed between the proposed by the relevant Representation (1)To which proposed the relevant reference number that you are composed by the relevant Representation (1)To which proposed the representation (1)To which represents the representation (1)To w	menting on from the Schedule of Policies & Land Allocation DPI	f Proposed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g. Page 60, Paragraph Numbe	•)
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify v	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



ω1.	Part A: Personal DetailsName (including title)	Jill feenan	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
	O. If you consider the proposed Main Modification to representation relates to?		nich test of soundness your
	O. If you consider the proposed Main Modification t		nich test of soundness your
Q10	O. If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify wh	nich test of soundness your
Q10	O. If you consider the proposed Main Modification to representation relates to? Positively prepared?	o be unsound, please identify wh	nich test of soundness your
Q10	O. If you consider the proposed Main Modification to representation relates to? Positively prepared?	o be unsound, please identify wh	nich test of soundness your

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Jayne Strange	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	nenting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify w	hich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Thomas G Heyes	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Potential (DPD (DPD (DPD (DPD (DPD (DPD (DPD (DP	nting on from the Schedule of Proposed Molicies & Land Allocation DPD (SPLA) or the	ain Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of s	oundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Cath Higgins	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test o	f soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Julian Brooks	
Q2.	Organisation (where appropriate)	Good Homes Alliance	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SF	posed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	n test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr. David Leack	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Shirley Broughton Ms.	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a	nting on from the Schedule of Propose Dlicies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Frank Alsop	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of lookicies & Land Allocation DPD (Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	ı. Page 60. Paragraph Number)	
	MM14, page 71, paragraph 3	,	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	ich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Cilla Millner	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness you representation relates to?			test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mark Fermor
Q2.	Organisation (where appropriate)	Shropshire Cycle Hub
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	o. If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A: Personal DetailsName (including title)	Mrs Helen Anderson	
Q2. Organisation (where appropriate)		
Q3. Address		
Q4. Postcode		
Q5. Telephone		
Q6. Email address		
Q7. Part B: Your Representation (1)To which proportion the relevant reference number that you are condevelopment Management DPD (DM) / Strategent Example: SPLA_MOD_02, Chapter 7, Policy SP. New Residential Development, DM30a	mmenting on from the Schedule of Proposic Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
Q8. Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modificat	ion is:	
Legally compliant	No	
Sound	No	
Q10. If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which te	st of soundness your
Positively prepared?	No	
Justified?	No	
Effective?	No	
Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr CAH Jubb	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedu Policies & Land Allocation	le of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Nun	nber)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identi	fy which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Anne Griffiths	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Propose olicies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details Name (including title)	Jamerussen
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Brendon Morgan	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Sara Helme	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Pew Residential Development, DM30a	enting on from the Schedule of olicies & Land Allocation DP	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Numbe	r)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Christine Bardsley
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Sarah Punshon	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Po Example: SPLA_MOD_02, Chapter 7, Policy SP3, Policy S	nting on from the Schedule of Proposed Ma olicies & Land Allocation DPD (SPLA) or the	ain Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of s	oundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Maria Gray	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	nting on from the Schedule of Properties & Land Allocation DPD (S	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Paul Frost	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	nenting on from the Schedule of Policies & Land Allocation DP	of Proposed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Numbe	r)
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify v	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Roger Stocker	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule o	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number	·)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify w	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Mary Poths	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, PNew Residential Development, DM30a	enting on from the Schedule of P olicies & Land Allocation DPD (S	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whi	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Rosemary MacKinnon	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, P	enting on from the Schedule of Propo olicies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Jan O'Neill		
Q2.	Organisation (where appropriate)			
Q3.	Address			
Q4.	Postcode			
Q5.	Telephone			
Q6.	Email address			
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of olicies & Land Allocation DPD	f Proposed Main Modifications (e.g.	
	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is:			
	Legally compliant	No		
	Sound	No		
Q10	Q10.If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No		
	Justified?	No		
	Effective?	No		
	Consistent with national policy?	No		

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Janet Slingsby	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mary Holden
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state nenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.	.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Q9. Do you consider this proposed Main Modification is:	
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Richard Speight	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state nenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18	
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:		is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ian Berry	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comme	d Main Modification does your representation relate?Please state tenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18	
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ian Berry	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Pew Residential Development, DM30a	enting on from the Schedule of olicies & Land Allocation DPD	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify w	rhich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr James Garrington
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are commo	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	mr chris houston	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic Pexample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	ich test of soundness your
		be unsound, please identify wh	nich test of soundness your
	representation relates to?		ich test of soundness your
	representation relates to? Positively prepared?	No	ich test of soundness your
	representation relates to? Positively prepared?	No	ich test of soundness your

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Anthony Grayling	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_03, Chapter 7, Policy SP3, Chapter 7, Policy SP3, Chapter 7, Policy SP3, Chapter 7, Policy SP3	nting on from the Schedule of Proposed Noticies & Land Allocation DPD (SPLA) or t	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Katie Higginson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Potential (DPD) (nting on from the Schedule of Propolicies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Russell Jones	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended by the relevant Management DPD (DM) / Strategic Policy SP3, Page 1997.	nting on from the Schedule of Proposed plicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g.	Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s :	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test o	f soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Thomas Hawkins
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	A Markwick	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	enting on from the Schedule of Prolicies & Land Allocation DPD (S	oposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr David Kemp
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A: Personal DetailsName (including title)	Kate Bissell
Q2. Organisation (where appropriate)	
Q3. Address	
Q4. Postcode	
Q5. Telephone	
Q6. Email address	
the relevant reference number that you are com	need Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. & Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 3, Page 28, Paragraph 7.18
Q8. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)
MM14, page 71, paragraph 3	
Q9. Do you consider this proposed Main Modification	on is:
Legally compliant	No
Sound	No
Q10.If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of soundness your
Positively prepared?	No
Justified?	No
Effective?	No
Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Sandy Sharples
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Oliver Gill	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comm	d Main Modification does your representation relate?Petenting on from the Schedule of Proposed Main Modifi Policies & Land Allocation DPD (SPLA) or the Policies Page 28, Paragraph 7.18	cations (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness	your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Frank Friedmann	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a	nting on from the Schedule of Policies & Land Allocation DPD (S	roposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Cllr Stephen Molyneux	
Q2.	Organisation (where appropriate)	East Suffolk Council	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18	
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:		s:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The 2015 WMS has been cited by the inspectorate as reason for modifying Lancaster's Sustainable Design and Construction policy (https://drive.google.com/file/d/130fgwYNAXNDRCCMf9yoh9B8bsMkAxt4C/view?usp=sharing). This statement is now legally deemed 'otiose' (see below legal document prepared for Essex County Council). https://www.essexdesignguide.co.uk/media/2647/essex-open-legal-advice-energy-policy-and-building-regulations.pdf Indeed, this rejection, made on these grounds, is totally out of step with decisions made by other inspectors when considering similar updates for other councils (Bath & amp; NE Somerset, Cornwall, Central Lincs, Eastleigh, Borough Council and Glasgow City Council). Each of these councils have put in place energy efficient measures, above and beyond those set out by Part L or the now abandoned Code Level 4. Lancaster's Sustainable Design and Construction policy (DM30a) is positively in step with the NPPF's assertion that planning should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The policy maps out a three stage plan to get to net zero housing by 2028 which is an exemplary target that all local authorities should be aiming for. Indeed, given the current urgency for the UK to meet net zero targets, this MM14 modification is woefully misinformed. Were this modification to be kept, it sets a dangerous precedent of inconsistency and acts as a huge obstacle for other local authorities wanting to spend the time and money in taking this route. I strongly recommend that this modification be withdrawn and that the DM30a policy be kept and implemented into their local plan.



Q1.	Part A: Personal DetailsName (including title)	Anne Harris	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Pew Residential Development, DM30a	enting on from the Schedule of Folicies & Land Allocation DPD (Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Carl Richardson
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10.If you consider the proposed Main Modification to representation relates to?		be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Maria Angeles	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended by the Policy SP3, Particles of the Policy SP4, Policy SP3, Particles of the Policy SP3,	nting on from the Schedule of Propo Dlicies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Geof Atwell	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Q7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate?Please set the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (I Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18		
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Martin Cahn
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state nenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	n is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

I am a councillor on South Cambridgeshire District Council and Chair of their Planning Committee, a gualified planner and a retired member of the RTPI. While this specific policy in Lancaster has not been before my Council and so I am presenting this in a personal capacity, our council is being presented with similar problems in preparing our Local Plan Review and I personally will be pressing the Council to incorporate similarly strong requirements in our development plan policies when it comes before us. Therefore, the rejection of a proposal to implement a clear timetable for achieving net zero could have direct effects on our review. Any development which does not achieve net zero is storing up additional problems in meeting the agreed target of net zero by 2050 since it creates a continuing and increasing backlog of development to which we will need to give our attention when improving the performance of the existing housing stock, which is the greatest technical challenge. This is a particular problem in my district, one of the fastest growing in the country (and in which from recent statements by the Minister it seems the Government has a desire for growth to be radically increased above current predictions). MM14 creates a precedent which ignores this challenge and will also create problems in other rapidly growing areas. The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned. The original proposed Policy DM30a with a requirement for net zero homes should be retained with a clear deadline for achieving higher energy performance requirements and a deadline for achieving net zero. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency of the climate crisis. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped, and the wording should return to that originally proposed by Lancaster City Council including clear deadlines for achieving higher efficiency and net zero performance of new residential development. To reiterate, any amendment that restricts the Plan to the minimum required by Building Regulations will have major effects on the ability of other councils to include such a policy in their plan. In the case of South Cambridgeshire with a major requirement for new residential development, the council would be left to request such performance through the goodwill of developers, an approach which has major limitations and would create an uneven playing field for developers proposing new development. I personally feel that a clear trajectory to including net zero as a goal in new residential development, with deadlines for achievement, is an essential feature in all new local plans and is consistent with our international commitment, as expressed in the Climate Change Act (Amendment 2019), to achieve net zero by 2050.



Q1.	Part A: Personal DetailsName (including title)	cllr malcolm victory	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	nting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or age 28, Paragraph 7.18	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	If there is a question whether the zero carbon targets at and the government's policies	re unjustified then the Inspectorate is out of	touch with the real world
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	Yes	
	Sound	Yes	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	Yes	
	Justified?	Yes	
	Effective?	Yes	
	Consistent with national policy?	Yes	
	In light of the proposed Main Modifications please your objection and make the Local Plan legally conidentified. It will be helpful if you could provide yo Why should it not be compliant?	npliant or sound, having regard to the ma	atter(s) you have
Q12	2. Would you like to make another representation?	No	



Q1.	Part A: Personal DetailsName (including title)	Harper Robertson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic FExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Eleanor Davidson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	t of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Jennifer Agricola	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commodevelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	.g. Page 60, Paragraph Number)	
	MM14, Page 71, Paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The Planning Inspectorate's decision to replace DM30a (which has a requirement for Net Zero homes by 2050) with MM14 is perverse. MM14 has not been 'positively prepared' and cannot be 'justified' - it does not "contribute to radical reductions in greenhouse gas emissions" or "take a proactive approach to mitigating and adapting to climate change" (Paras 152 and 153). It will not be 'effective' as it will not lead to "radical reductions in greenhouse gas emissions" as it relies on an outdated Written Ministerial Statement (WMS15), and it is not 'consistent with National Policy'. WMS15 has been superseded by (a) the Climate Change Act (Amendment 2019) committing the UK to get to net zero emissions by 2050; (b) The 2021 National Policy Planning Framework updated to incorporate a commitment to ensure that all decisions deliver on the 2050 net zero target, and (c) the June 2022 updated Building Regulations designed to reduce the UK's carbon emissions to net zero by 2050. Unlike DM30a, MM14 does not comply with these updated policies delivering on the 2050 net zero target. MM14 should be abandoned completely. Unlike WMS15 and the Planning Inspectorate's subsequent MM14, DM30a was 'positively prepared', 'justified', 'effective', and is 'consistent with National Policy'. Other Inspectorates such as in Cornwall, Bath, North East Somerset and Central Lincolnshire have ruled that local authorities are fully justified in setting much higher energy standards than the national building regulations in aiming for net zero residential buildings ahead of national Government policy, as they are taking into account the urgency of the climate emergency. They are effectively and positively preparing for the future, consistent with government regulations. On the other hand, Lancaster's Planning Inspectorate and its dinosaur decision completely ignores the IPPC March 2023 warnings of catastrophic climate change due to our inability and lack of action in reducing our carbon emissions in order to meet our commitments under the Paris Agreement which the UK Government has ratified. This inconsistent approach from the Lancaster Planning Inspectorate is thus not effective nationally in terms of policies for energy efficiency in new homes, and creates confusion for local planning authorities, with retrofitting at a later date to achieve net zero far more expensive, and often difficult to accomplish, than building to a higher standard in the first place, so not effective locally. Lancaster City Council should be commended for their commitment to net zero emissions by 2050, with the retrograde changes required by the Planning Inspectorate (MM14) dropped entirely, and the wording returned to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	MR Rafael Martínez	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of l Policies & Land Allocation DPD (Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify wh	ich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)		
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a	nting on from the Schedule of Pro plicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Oliver Quantrill	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or t	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Elizabeth Seakins	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development DM30a	enting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Alice Brown	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7. Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Percentage of the		enting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Richard Wilson	
Q2.	Organisation (where appropriate)	Tatham Parish Council	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed M Policies & Land Allocation DPD (SPLA) or th	ain Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of s	oundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Matthew Duckett	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Charles Ainger
Q2.	Organisation (where appropriate)	Lune Valley Community Land Trust
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commen	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	New Hesideridal Development, Dividua	
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

Required changes. The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy efficiency standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignored recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. Background House-building contributes massively to the country's carbon footprint. The UK government has set the industry carbon-reduction targets of 78% by 2035, with a net zero target by 2050. Unfortunately, according to a recent UN report, the gap between climate performance in the building sector and 2050 decarbonisation targets is widening *(UN, 2022). To reduce overall emissions, the sector must improve building energy performance and decrease building materials' carbon footprint. Instead of local authorities finding this daunting, this should be seen as a great opportunity to deliver sustainable homes through innovation, green jobs and healthier, cheaper-to-run homes. Lancaster City Council's DM30a policy sets that challenge of higher building standards, to meet national carbon reduction targets. To do otherwise is a completely false economy: houses built to current Building Regulations will need retrofitting in 10 years's time. Highly energy efficient homes not only drastically reduce carbon emissions but also reduce fuel poverty and eliminate mould and damp issues. Homes built as recently as 10 or 20 years ago now have serious damp and mould issues - currently a national problem requiring changes to the Law (which will become Awaab's Law this summer). There is no clash between building sufficient homes to address the current housing crisis, and at the same time mitigating the climate emergency. What is required are high quality homes that are both compliant with current national climate change legislation and that also contribute to the ongoing development of innovative building techniques which will help the country reach its net zero targets. If local authorities in other parts of the country have achieved this without additional expenditure (Exeter CC, over 10 years) but rather through driving innovation in design and construction techniques, then Lancaster City Council should be allowed to set the same challenge to the sector. Summary MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council. *https://www.unep.org/news-and-stories/press-release/co2-emissions-buildings-and-construction-hitnew-high-leaving-sector



Q1.	Part A: Personal DetailsName (including title)	Mr Philip Terence Newby	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P	enting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	01 Schedule Main Modification Pages 29 onward, Very details	Poor Graphics to pale and size unable to	note any real changes or
Q8.	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
	Unable to make any view due to poor presentation.		
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
011			
Q1(O.If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
Q1(be unsound, please identify which test	of soundness your
Q1(representation relates to?		of soundness your
Q1(representation relates to? Positively prepared?	No	of soundness your
	representation relates to? Positively prepared? Justified?	No No	of soundness your
	representation relates to? Positively prepared? Justified? Effective?	No No No No set out what modification(s) you consident or sound, having regard to the modification to the	ler necessary to resolve natter(s) you have
	representation relates to? Positively prepared? Justified? Effective? Consistent with national policy? 1.In light of the proposed Main Modifications please your objection and make the Local Plan legally continuous proposed.	No No No No set out what modification(s) you consident or sound, having regard to the modification to the	ler necessary to resolve natter(s) you have



Q1.	Part A: Personal DetailsName (including title)	Ms SOPHIA CENEDA	
Q2.	Organisation (where appropriate)	CARBOGNO CENEDA ARCHITECTS	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development DM30a	enting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA) of	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	Yes	
	Justified?	Yes	
	Effective?	Yes	
	Consistent with national policy?	Yes	

I heard through friends with dismay of the MM14 and do not view it as 'justified', 'effective' or 'consistent with national policy'. Whilst the National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Par. 152) and "take a proactive approach to mitigating and adapting to climate change" (Par. 153), as stated modification MM14 goes wholly against this policy objectives. GHGs emissions reductions are critically urgent and should be immediate in the current climate crisis. In line with this the original proposed Policy DM30a requiring net zero homes should be retained. Contrary to MM4, it was 'positively prepared', 'justified', 'effective', and 'consistent with National Policy' i.e. the Climate Change Act (Amendment 2019) which dictates the UK to be net zero by 2050, the National Planning Policy Framework as already mentioned and the 2021 uplift in the Building Regulations. These policies and regulations clearly supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Not only does MM14 demonstrate an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes (see more on this below) but also it is not effective locally: if adopted, it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, at great costs to the local people (retrofit is always extremely costly) which will then deprived of much needed funds and who deserved buildings to be completed with high comfort and energy standards from the onset. Unlike the Inspector in the case of Lancaster Council, other Inspectors (Cornwall, Bath & Dorth East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. Lastly the Planning Inspectorate's decision for Lancaster also ignores recent warnings by both the government's advisers on climate change (CCC) and the IPCC (in it's March 2023 report) that we need to act now to reduce our carbon emissions if we are to meet the UK commitments under the Paris Agreement. Modification MM14 will not lead to "radical reductions in greenhouse gas emissions", is a shocking proposal in the current context and for all living through the existential threat posed by the current climate crisis (how much temperatures should rise to for this to be obvious? 55 degrees C.? 60?). And it will contribute to biodiversity collapse. MM4 should be abandoned completely and the originally proposed wording by Lancaster City Council should return.



Q1.	Part A: Personal DetailsName (including title)	Councillor Judy Filmore	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
		enting on from the Schedule of Proposed Main Mod Policies & Land Allocation DPD (SPLA) or the Policie	ifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14 page 71 para 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundne	ss your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Sue Tyldesley	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comm	d Main Modification does your representation relate?Pleas nenting on from the Schedule of Proposed Main Modification Policies & Land Allocation DPD (SPLA) or the Policies Map Page 28, Paragraph 7.18	ns (e.g.
	Description of the proposed Main Modification (e. MM14, page 71	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness you	r
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The NPPF says that the planning system should 'shape places in ways that contribute to radical reductions in greenhouse gas emissions' para 152 and 'take a proactive approach to mitigating and adapting to climate change' para 153. Lancaster City Council's proposed Policy DM 30a seeks to do just this and therefore meets the above tests. It is a sound response to the NPPF guidance and similar to policies in adopted Local Plans elsewhere. It complies with the Climate change Act (Amendt 2019) for net zero by 2050and Objection to this policy by the Inspector seems to be based on out of date planning advice in a written ministerial statement dating from 2015 which has been totally superseded - by the above Act, by building regulations, by decisions on other Local Plans and most importantly by disastrous warming of the planet which is particularly apparent this summer. It is so obvious that houses built now should be designed to appropriate standards to meet the climate crisis and not require retrofitting almost as soon as they are built! Reliance on 2015 advice is not sound in 2023 in the face of more evidence of global warming and changes in legislation. I feel strongly that all responsible authorities must do all they can to respond effectively to the climate crisis and take a rounded comprehensive view of the planning guidance not rely on one out of date piece of advice. Other Inspectors in Cornwall, Bath & Dry, North East Somerset and Central Lincolnshire have allowed Local Authorities to take a responsible approach and apply higher standards. Why is the opinion for Lancaster so different and inconsistent - and clearly therefore, I consider, unsound. It is not justified by the facts and legislation on climate, not consistent with other decisions, not positively prepared(being based on an outdated partial position not a comprehensive context) and will not be effective in dealing with the climate crisis. Lancaster City's original Policy DM30a on the other hand meets the tests of soundness and should be reinstated. Please do listen . It is so shortsighted to build new houses which will need retrofitting (at higher cost) in the future. I strongly oppose MM14



Q1.	Part A: Personal DetailsName (including title)	Mark Aylward	
Q2.	Organisation (where appropriate)	AYLWARD TOWN PLANNING LTD on behalf of Development Management Ltd	of Derwent
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Poetample: SPLA_MOD_02, Chapter 7, Policy SP3, Paper 1, Policy SP3, Paper 2, Policy CC3, Paragraph 3	nting on from the Schedule of Proposed Mair olicies & Land Allocation DPD (SPLA) or the F	Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	Yes	
	Sound	Yes	
Q10	o. If you consider the proposed Main Modification to l representation relates to?	be unsound, please identify which test of sou	indness your
	Positively prepared?	Yes	
	Justified?	Yes	
	Effective?	Yes	
	Consistent with national policy?	Yes	
	.In light of the proposed Main Modifications please your objection and make the Local Plan legally conidentified. It will be helpful if you could provide you not applicable.	npliant or sound, having regard to the matter	(s) you have
Q12	2. Would you like to make another representation?	Yes	

the relevant reference number that you are commenting on from the Schedule of Proposed Main Modification Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18		
DM, Policy CC1, Paragraph 4	Policy CC1, Paragraph 4	
Q14. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) Paragraph 4		
Legally compliant	Yes	
Sound	Yes	
Q16. If you consider the proposed Main Moore representation relates to?	lification to be unsound, please identify which test of soundness your	
Positively prepared?	Yes	
Justified?	Yes	
	Yes	
Effective?	1.00	
Consistent with national policy?	Yes	
Consistent with national policy? Q17.In light of the proposed Main Modificat your objection and make the Local Pla		
Consistent with national policy? Q17.In light of the proposed Main Modificat your objection and make the Local Pla identified. It will be helpful if you could	Yes ions please set out what modification(s) you consider necessary to resolve In legally compliant or sound, having regard to the matter(s) you have If provide your suggested revised wording of any policy or text.	
Consistent with national policy? Q17. In light of the proposed Main Modificat your objection and make the Local Pla identified. It will be helpful if you could None applicable. Q18. Would you like to make another representation (3) To which the relevant reference number that you	Yes ions please set out what modification(s) you consider necessary to resolve in legally compliant or sound, having regard to the matter(s) you have if provide your suggested revised wording of any policy or text. entation? Yes th proposed Main Modification does your representation relate? Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM):	
Consistent with national policy? Q17. In light of the proposed Main Modificat your objection and make the Local Pla identified. It will be helpful if you could None applicable. Q18. Would you like to make another representation (3) To which the relevant reference number that you Development Management DPD (DM) /	Yes ions please set out what modification(s) you consider necessary to resolve in legally compliant or sound, having regard to the matter(s) you have if provide your suggested revised wording of any policy or text. entation? Yes th proposed Main Modification does your representation relate? Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM):	
Consistent with national policy? Q17. In light of the proposed Main Modificat your objection and make the Local Pla identified. It will be helpful if you could None applicable. Q18. Would you like to make another representation (3) To which the relevant reference number that you Development Management DPD (DM) / Example: SPLA_MOD_02, Chapter 7, P.	ions please set out what modification(s) you consider necessary to resolve in legally compliant or sound, having regard to the matter(s) you have it provide your suggested revised wording of any policy or text. entation? Yes th proposed Main Modification does your representation relate? Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): olicy SP3, Page 28, Paragraph 7.18	
Consistent with national policy? Q17. In light of the proposed Main Modificat your objection and make the Local Pla identified. It will be helpful if you could None applicable. Q18. Would you like to make another representation (3) To which the relevant reference number that you Development Management DPD (DM) / Example: SPLA_MOD_02, Chapter 7, PDM_MOD_04, Policy SG7, Criterion VII	ions please set out what modification(s) you consider necessary to resolve in legally compliant or sound, having regard to the matter(s) you have it provide your suggested revised wording of any policy or text. entation? Yes th proposed Main Modification does your representation relate? Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): olicy SP3, Page 28, Paragraph 7.18	
Consistent with national policy? Q17. In light of the proposed Main Modificat your objection and make the Local Pla identified. It will be helpful if you could None applicable. Q18. Would you like to make another representation (3) To which the relevant reference number that you Development Management DPD (DM) / Example: SPLA_MOD_02, Chapter 7, PDM_MOD_04, Policy SG7, Criterion VII Q20. Description of the proposed Main Mod	ions please set out what modification(s) you consider necessary to resolve in legally compliant or sound, having regard to the matter(s) you have diprovide your suggested revised wording of any policy or text. entation? Yes th proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): olicy SP3, Page 28, Paragraph 7.18 ffication (e.g. Page 60, Paragraph Number)	
Consistent with national policy? Q17. In light of the proposed Main Modificat your objection and make the Local Pla identified. It will be helpful if you could None applicable. Q18. Would you like to make another representation (3) To which the relevant reference number that you Development Management DPD (DM) / Example: SPLA_MOD_02, Chapter 7, PDM_MOD_04, Policy SG7, Criterion VII Q20. Description of the proposed Main Mod Policy SG7, Criterion VII	ions please set out what modification(s) you consider necessary to resolve in legally compliant or sound, having regard to the matter(s) you have diprovide your suggested revised wording of any policy or text. entation? Yes th proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): olicy SP3, Page 28, Paragraph 7.18 ffication (e.g. Page 60, Paragraph Number)	

Q13. Part B: Your Representation (2)To which proposed Main Modification does your representation relate? Please state

Q22.If you consider the proposed Main Modific representation relates to?	ation to be unsound, please identify which test of soundness your
Positively prepared?	Yes
Justified?	Yes
Effective?	Yes
Consistent with national policy?	Yes
your objection and make the Local Plan le	s please set out what modification(s) you consider necessary to resolve gally compliant or sound, having regard to the matter(s) you have ovide your suggested revised wording of any policy or text.
Q24. Would you like to make another representa	ation? Yes
the relevant reference number that you are	roposed Main Modification does your representation relate?Please state commenting on from the Schedule of Proposed Main Modifications (e.g. ategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): y SP3, Page 28, Paragraph 7.18
Q26. Description of the proposed Main Modification Policy SG9, Criterion VI	ition (e.g. Page 60, Paragraph Number)
Q27. Do you consider this proposed Main Modif	fication is:
Legally compliant	Yes
Sound	Yes
Q28.If you consider the proposed Main Modific representation relates to?	ation to be unsound, please identify which test of soundness your
Positively prepared?	Yes
Justified?	Yes
Effective?	Yes
Consistent with national policy?	Yes
your objection and make the Local Plan le	s please set out what modification(s) you consider necessary to resolve gally compliant or sound, having regard to the matter(s) you have ovide your suggested revised wording of any policy or text.
Q30. Would you like to make another representa	ation? Yes

DM_MOD_06, Policy SG11, Criterion VI	
Q32. Description of the proposed Main Modification	on (e.g. Page 60, Paragraph Number)
Policy SG11, Criterion VI	
Q33. Do you consider this proposed Main Modific	eation is:
Legally compliant	Yes
Sound	Yes
Q34. If you consider the proposed Main Modificat representation relates to?	ion to be unsound, please identify which test of soundness your
Positively prepared?	Yes
Justified?	Yes
Effective?	Yes
Consistent with national policy?	Yes
identified. It will be helpful if you could prov None applicable.	ride your suggested revised wording of any policy or text.
Q36. Would you like to make another representati	ion? Yes
the relevant reference number that you are c	posed Main Modification does your representation relate?Please state commenting on from the Schedule of Proposed Main Modifications (e.g. egic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): SP3, Page 28, Paragraph 7.18
DM_MOD_014, Policy DM30a, Paragraph 9	
Q38. Description of the proposed Main Modification	on (e.g. Page 60, Paragraph Number)
Policy DM30a, Paragraph 9	
Q39. Do you consider this proposed Main Modific	eation is:
Legally compliant	Yes
Sound	Yes

Q31. Part B: Your Representation (5)To which proposed Main Modification does your representation relate? Please state

Q40. If you consider the proposed Main Modi representation relates to?	ification to be unsound, please identify which test of soundness your
Positively prepared?	Yes
Justified?	Yes
Effective?	Yes
Consistent with national policy?	Yes
your objection and make the Local Plan	legally compliant or sound, having regard to the matter(s) you have provide your suggested revised wording of any policy or text.
Q42. Would you like to make another represe	entation? Yes
the relevant reference number that you	
Q44. Description of the proposed Main Modif	ication (e.g. Page 60, Paragraph Number)
Policy DM30a, Paragraph 12	
Q45. Do you consider this proposed Main Mo	odification is:
Legally compliant	Yes
Sound	No
	ification to be unsound, please identify which test of soundness your
representation relates to?	
representation relates to? Positively prepared?	No
-	No No
Positively prepared?	
Positively prepared? Justified?	No
Positively prepared? Justified? Effective?	No No
Positively prepared? Justified? Effective?	No No

Paragraph 12 does include text that recognises that the adherence to these policy objectives should be encouraged but a rigid compliance requirement is unnecessary and unjustified. However, it might be argued to conflict with the main modifications in terms of major non-residential development insofar that it does not refer to whether it is applicable to existing buildings where there is no change to the energy status. We object to this change as currently phrased. It would regrettably oblige schemes for changes of use or other minor works to existing buildings to provide supporting documentation that has otherwise been agreed to be unnecessary. We would recommend the following revisions and confirm that upon this being agreed that we would withdraw our objection accordingly: "The submission of an Energy and Carbon Statement will be required to demonstrate how a development seeks to address the aims of this policy for all new residential development and qualifying major non-residential development (including residential institutions- Class C2 and C2A and the non-residential part of mixed use developments)."

Q48. Would v	ou like to	make another	representation?	Yes
--------------	------------	--------------	-----------------	-----

Q49. Part B: Your Representation (8)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18

DM_MOD_014, Policy DM30a, Paragraph 8a

Q50. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)

Policy DM30a, Paragraph 8a

Q51. Do you consider this proposed Main Modification is:

Legally compliant Yes
Sound Yes

Q52. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

Positively prepared?

Justified?

Effective?

Consistent with national policy?

Yes

Q53. In light of the proposed Main Modifications please set out what modification(s) you consider necessary to resolve your objection and make the Local Plan legally compliant or sound, having regard to the matter(s) you have identified. It will be helpful if you could provide your suggested revised wording of any policy or text.

None applicable.



Q1.	Part A: Personal DetailsName (including title)	Patrice Van Cleemput	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Proposed Main M Policies & Land Allocation DPD (SPLA) or the Pol	lodifications (e.g.
	Description of the proposed Main Modification (e.e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of sound	lness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Kathy Pitt	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved be proposed to the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Resedential Development DM30a	nenting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which t	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

My obection to the main modification 14 is as follows: The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). However, modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and therefore should be abandoned. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded, and much of Southern Europe is experiencing exceptional heat and forest fires). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Clíodhna Mulhern
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g.	g. Page 60, Paragraph Number)
	MM14, Pg71, para 3	
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Jonathan Rowe
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. colicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. As someone who has lived in various areas of the UK in the last twenty years including Bristol, Edinburgh and Ealing, and who cares deeply about a rapid progress to net zero, it is very concerning to me that a positive approach to carbon reduction in Lancaster housing is at risk of being heavily watered down in a way that could have damaging local effects and knock on effects nationwide. As a parent of a three year old child, I believe we need to do everything we can across all sectors to rapidly move to a low carbon future and it worries me that taking a backwards step in housing in Lancaster could set a national precedent for a slowdown of positive progress towards a net zero future for the UK. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry, North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Rachel Stevens-Hall	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	nting on from the Schedule of Proposed Dlicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	MM14, page 71, paragraph 3		
Q9.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is	s:	
Q9.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is Legally compliant	s: No No	of soundness your
Q9.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is Legally compliant Sound If you consider the proposed Main Modification to the second second to the second seco	s: No No	of soundness your
Q9.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is Legally compliant Sound If you consider the proposed Main Modification to representation relates to?	s: No No De unsound, please identify which test o	of soundness your
Q9.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is Legally compliant Sound If you consider the proposed Main Modification to representation relates to? Positively prepared?	s: No No De unsound, please identify which test of the test of	of soundness your
Q9.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is Legally compliant Sound If you consider the proposed Main Modification to be representation relates to? Positively prepared? Justified?	s: No No No De unsound, please identify which test of the control of the cont	of soundness your

The National Planning Policy Framework (NPPF) states that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The Planning Inspector's modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a, with a requirement for net zero homes, should be retained. The proposed Policy DM30a was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Planning Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and should aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, modification MM14 is inconsistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared, as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. By amending Lancaster's zero carbon policy to such an extent, the Planning Inspectorate risks setting a precedent that will impede the UK's chances achieving net zero by 2050. Not delivering on these climate commitments will mean that more money will be spent on retrofitting homes in the future. For the sake of our children, we must take decisive steps to decarbonise our homes and the Planning Inspectorate should be wholeheartedly supporting councils to do this without delay. Modification MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Jessica Neil	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposition of Proposition DPD (SPLA)	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which te	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

As a parent, I would be really pleased to see my local council putting forward a policy like this. We all need to be doing the best we can to ensure that our children's future is as safe as it can possibly be given all the carbon emitted so far, and Lancaster's original plan was doing that. The modifications will not enable that to happen and they set a dangerous precedent that could restrict other councils and therefore severely impact our ability to meet net zero in time. The National Planning Policy Framework clearly states that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The original proposed Policy DM30a with a requirement for net zero homes should be retained because the modification MM14 will not lead to "radical reductions in greenhouse gas emissions". The modification should be abandoned completely. Adequately insulating homes is critical to decarbonising the housing sector. Everyone deserves a warm home and by amending Lancaster's zero carbon policy to such an extent, the government risks watering down our commitments to achieve net zero by 2050. Not delivering on promises will mean that more money will be spent on retrofitting homes in the future. I can see that the modifications really seem to take out the detail which would make this policy effective, in particular the staged increases in the carbon reductions required by each date, eventually getting to net zero. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry, North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Beth Watson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Propo olicies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	J. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

I complete this during a time period when it could not be more obvious how much we need to be planning for the future for all of us - wild fires across the world, hottest days on record, and records being broken consecutively. The science is SO clear that we must be planning for the future. Housing is an issue of huge importance of course, which is why I am delighted to see that Cornwall, Bath & Def NE Somerset, Central Lincolnshire, Lancaster City are all using their expertise and knowledge of what their communities need (as is intended by a governance model that includes Local Authorities - a model the current government clearly feel leaves them with not as much control over an increasingly politically aware electorate as they want!) to balance the need for housing with the urgent need for serious action to control carbon emissions, to plan for a future that is based on renewable energy, and a future in which we may all feel less secure in many ways. The WMS15 has been superseded and it makes no sense at all that the inspector should base the modifications on this?! We NEED proposals such as Lancaster's. And we need to allow Local Authorities to do their jobs!! The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry, North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Sarah Dobson
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. I'm taking the time to respond to this survey, even though I don't live in Lancaster. I have a 7 year old daughter and I want this government and all UK local authorities to abide to Net Zero commitments they enshrined in law and agreed in the Paris Agreement to keep warming to a maximum of 1.5C in order to give her and all children a chance for a future in liveable/ healthy conditions. I do not want to see important policies such as this being watered down as they are in this proposal for short sighted, short term 'gains'. Retaining the original wording would not only reduce emissions at a critical time but also help keep people warm during the winter. I would hate to see this application used as a precedent to justify evasion of laws in the rest of the country that have been put in place to safeguard everyone's future. The UK climate change committee indicates that current programmes will not deliver net zero by 2050, whilst scientists are urging action at greater pace as soon as possible. In South East Cambs in 2022 we experienced the hottest, driest summer on record, something that will inevitably repeat and worsen in future years since we have not peaked global emissions. What I see from this proposal does not reflect the grave seriousness of this situation. Heatwaves are raging across Europe and the world this summer. This is proof that the impacts of climate change, which have the potential to be so deadly that Cambridge University have recently stated that the potential for human extinction within the next 50 years is underexplored. To me it is heartbreaking that our children's future seems to be disregarded by governments and corporate interests such as developers who appear incapable of rising to the challenges we are facing. These are complex challenges and questions. They are ones that this government should be addressing with the utmost urgency in all areas of our infrastructure. Without serious and urgently implemented changes I find it hard to envisage a future for myself, my family and my daughter that doesn't involve a great deal of suffering. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Part A: Personal DetailsName (including title)	Mrs. Sarah Llewellyn	
Organisation (where appropriate)		
Address		
Postcode		
Telephone		
Email address		
the relevant reference number that you are common Development Management DPD (DM) / Strategic P	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Do you consider this proposed Main Modification	is:	
Legally compliant	No	
Sound	No	
If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
Positively prepared?	No	
Justified?	No	
Effective?	No	
Consistent with national policy?	No	
	Organisation (where appropriate) Address Postcode Telephone Email address Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic Plexample: SPLA_MOD_02, Chapter 7, Policy SP3, Flow Residential Development, DM30a Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3 Do you consider this proposed Main Modification Legally compliant Sound Off you consider the proposed Main Modification to representation relates to? Positively prepared? Justified? Effective?	Organisation (where appropriate) Address Postcode Telephone Email address Part B: Your Representation (1)To which proposed Main Modification does your reprethe relevant reference number that you are commenting on from the Schedule of Proposed proposed Main Modification DPD (SPL Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is: Legally compliant No Sound No Alf you consider the proposed Main Modification to be unsound, please identify which representation relates to? Positively prepared? No Justified? No Effective? No

I am writing as a parent of a toddler, whose future I fear for every day. Decarbonizing our homes is an effective and important measure to help us achieve a better future. We are already seeing the effects of climate change in the UK and across Europe, and the recent headlines should inspire every person to spring into action to do what we can to stop this crisis in its tracks. For the sake of our children, we must take decisive steps to decarbonise our homes and the government should be supporting councils to do this, not splitting hairs and creating delays. The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dorth East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Sarah Amandes
Q2.	Organisation (where appropriate)	Democrats Abroad UK
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comm	ed Main Modification does your representation relate?Please state nenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	n is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

As a parent of British children, I am particularly concerned that local authorities retain their right to move decisively to reduce reduce emissions, even when national policy isn't progressing as quickly. I have seen so many new building developments in my area, and without detailed legal requirements, the developers will always choose the older, more polluting option. Proper insulation, heat pumps, and other low-carbon measures can hugely reduce our nation's carbon emissions - which the IPCC has declared we urgently need to do. We are already seeing the deadly disasters brought on by climate change, and authorities need to be empowered to treat net zero as the emergency it is. The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be entirely discarded. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. If developers are allowed to install energy-inefficient, outdated homes, it places undue burden on the residents to then retrofit these homes, leaving families in a position of financial hardship on top of high energy costs. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. Even today, there is severe flooding across Lancashire, which climatologists have named as a result of a warming climate. The more authorities can do to lower emissions now, the more we can avert the destruction of homes and other property brought by extreme weather. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A	a: Personal DetailsName (including title)	Ms Jennifer Rouse	
Q2. Organ	nisation (where appropriate)		
Q3. Addre	ess		
Q4. Postc	ode		
Q5. Telepi	none		
Q6. Email	address		
the re Devel Exam	8: Your Representation (1)To which proposed levant reference number that you are common opment Management DPD (DM) / Strategic Puble: SPLA_MOD_02, Chapter 7, Policy SP3, Public Development, DM30a	enting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
	iption of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
Q9. Do yo	u consider this proposed Main Modification	is:	
Legally	compliant	No	
Sound		No	
-	consider the proposed Main Modification to sentation relates to?	be unsound, please identify w	hich test of soundness your
Positive	ely prepared?	No	
Justifie	d?	No	
Effectiv	e?	No	
Consist	ent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. It's clear that the proposed policy has considerable environmental and social benefits: warmer homes and lower bills for the people of Lancaster, opportunities to promote the renewable energy transition and cut carbon, and a chance to avoid expensive retrofits by adopting strategic thinking now. Cornwall, Bath & Dry North East Somerset and Central Lincolnshire have already set targets for low carbon new builds, so it isn't against national policy. The inspector is referring to the 25 March 2015 Written Ministerial Statement (WMS 2015) which has already been superseded according to Lancaster City Council and many other independent planning inspectors - by the government's legal commitment to net zero by 2050 in the 2019 amendment to the Climate Change Act, by changes to Part L of the building regulations for England in 2021, and frankly, by the incredible moral urgency of acting to decarbonise in every way possible. The IPCC and a global consensus of scientists have warned for years that the only way to avert planetary climate catastrophe is to act now in the swiftest way possible - and this is our last change to achieve the Paris Agreement climate commitments. The government itself has committed to legally binding action - so why is the inspector splitting hairs and cooking up perverse delays to a commonsensical policy that would benefit the people of Lancaster, further our urgent transition to net zero and result in considerable cost savings due to the avoidance of retrofitting homes later? The days of kicking the can down the road cannot continue. As I write this, heat records are being broken one after the other all over the northern hemisphere. Greece is undertaking its largest evacuation ever owing to fires across the country. Rivers of ice are flowing in Italy. Unliveably high temperatures are being recorded in cities from Iran to Arizona. And in Lancashire itself, floods have closed roads in Preston and Weeton owing to torrential rain. Councils around the country, including my own, are looking on as this decision is made. As a parent I would do anything to protect my child from these terrors - I cannot understand why this policy is being rejected when to do so runs counter to good sense, established precedent and moral duty. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. I am asking the Inspector to join with Lancaster City Council and other inspectors in Cornwall, Bath & Dry North East Somerset and Central Lincolnshire in showing the visionary leadership we need, and drop MM14 in its entirety. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council. Let's get to where we need to be, set an example for others and safeguard all our children's futures through doing all that we can to transition to a net zero future as soon as possible.



Q1.	Part A: Personal DetailsName (including title)	Mrs Sophie Williams
Q2.	Organisation (where appropriate)	Parents for Future
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are con	osed Main Modification does your representation relate?Please state mmenting on from the Schedule of Proposed Main Modifications (e.g. gic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): P3, Page 28, Paragraph 7.18
	Description of the proposed Main Modification MM14, page 71, paragraph 3	ı (e.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modificat	ion is:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

I am a mother of 2 young children and an NHS professional. Climate change is now a health emergency and according to the World Health Organisation air pollution due to fossil fuels contributes to 300,000 premature deaths in the UK every year. I have lived in the UK my entire life and I consider myself a nature lover. I volunteer for a climate advocacy group called Parents for Future and with them support our transition to a greener, safer world for the next generations. If you allow these modifications, you will be on the wrong side of history. The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. If MM14 is dropped and the wording returned to that of Lancashire City Council, you will be on the right side of history and other councils across the UK will follow suit. Please consider the lives of our future generations when making this important decision.

Q12. Would you like to make another representation?

No



Q1.	Part A: Personal DetailsName (including title)	Mrs Sam Holmes
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are co	osed Main Modification does your representation relate?Please state immenting on from the Schedule of Proposed Main Modifications (e.g. gic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): P3, Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification	n (e.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modificat	tion is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modificatio representation relates to?	on to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

According to the National Planning Policy Framework, the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. As a concerned parent, I am deeply troubled for the future of the planet for our children and for following generations, and the legacy we are leaving. It is crucial for the UK to rise to the demands of the climate crisis. The UK government has declared a climate emergency and all sectors need to respond accordingly by setting high standards. We have a responsibility as a relatively wealthy country G8 to minimise our carbon impact. As a previous resident of Lincolnshire, I am deeply proud that my home county has taken a role in climate leadership in its housing policy, and I can see material benefits to the people of Lancaster to be able to take positive climate action through their choice of housing. For many UK residents, we feel powerless in the face of climate emergency, and this would be a strong positive step for Lancaster residents, and for other parts of the UK to learn from and share best practise. An estimated 84% of children and young adults experience climate anxiety, and this proposed policy would help the young people of Lancaster to feel like their concerns are being heard and action is being taken to give them a liveable future. Zero carbon housing is becoming a growth industry worldwide, with China taking a strong lead currently. There are strong economic arguments for this policy, in promoting and investing in low and zero carbon technologies; by developing the local housing sector's expertise in these areas, they can attain the knowledge and skills to support other midlands counties and wider, and to maintain pace with the rest of the industry worldwide. The construction industry formed 6% of the UK GDP in 2019, and it is important to ensure that this remains a strong internal market, with potential to develop further growth, and to attract new young employees with a positive message around net zero carbon. In 2019, the Climate Change Committee advised that homes in the UK are not fit for the challenges of climate change, and asked the government to act immediately, both in respect of reducing emissions, and by providing homes that allow local people to adapt to the impact of climate change which is predicted in the near future, including rising temperatures and water shortages. This remains still true, and Lancaster City Council are seeking to meet these challenges with their proposed policy. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & amp; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Jennifer Hannon	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a	nting on from the Schedule of Propos plicies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which tes	t of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. We are doing ourselves and our children an unforgivable disservice, to put it mildly, if we do not deploy every tool at our disposal to become carbon neutral. Domestic heating contributes a significant proportion of the UK's greenhouse gas emissions at 14%. Lancaster City Council have set out a clear path to reducing these emissions, and the requirement for developers to meet higher energy standards is proportionate to the scale of the climate crisis. To modify the policy as the inspector is to ignore the latest IPCC report (March 2023) which tells us that we must act immediately to reduce carbon emissions if we have any chance of staying within the Paris Agreement limit of 1.5 degrees. It is to ignore that we are on the path towards a very dangerous future for our children and that we must act in a way that is commensurate to the risk we face. We are already witnessing extreme weather events that are causing catastrophic damage across the globe and threatening crops - all at our current level of warming. Further to this, it may be cheaper now for developers to build less energy efficient houses but there will be a higher cost further down the line when houses need to be retrofitted. It is imprudent environmentally, socially and financially to kick the net zero can down the road until it becomes unavoidable. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. In conclusion, MM14 is not justified and not consistent with current national policy as it realised in an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency. The world has experienced the hottest day on record for successive weeks now. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is mor expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Rosa Gindele	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, PNew Residential Development, DM30a	enting on from the Schedule of Prolicies & Land Allocation DPD (S	oposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

I suggest that MM14 should be abandoned entirely to be compliant with the National Planning Policy Framework which lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dorth East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



QI.	Part A: Personal Details Name (Including title)	Phili Edmondson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
08	Description of the proposed Main Modification (e.g.	n Page 60 Paragraph Number)	
	MM14, Page 71, paragraph 3	gradient and a second a second and a second	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Thomas Higgs	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Po Example: SPLA_MOD_02, Chapter 7, Policy SP3, Policy S	nting on from the Schedule of olicies & Land Allocation DPD	Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to lead to representation relates to?	be unsound, please identify wh	nich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Alice Rushworth	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Folicies & Land Allocation DPD (Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	J. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	ich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. As a parent, I am acutely aware that we are facing a climate emergency and my children are set to suffer unless we make drastic, widespread change quickly. Any policies that delay or dilute action on the climate crisis are not acceptable and contribute towards putting lives at risk. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Constance Wood	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Propolicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)	
	MM14, Page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which t	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Chayley Collis	
Q2.	Organisation (where appropriate)	UK Passivhaus Trust	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: Development, DM30a	nting on from the Schedule of Proposed Main Dicies & Land Allocation DPD (SPLA) or the	n Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test of sou	undness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Passivhaus Trust and Good Homes Alliance has recently compiled an overview of exemplar Local Plans and policies (https://www.passivhaustrust.org.uk/news/detail/?nld=1209), which demonstrate that the decision regarding Lancaster City Council and modification MM14 is inconsistent. There are increasing calls for WMS15 to be formally revoked. A report for the Climate Change Commission, released in July 2023, looks at barriers and opportunities for delivering net zero and climate resilience through the local planning system and includes a number of recommendations, including that the 2015 Written Ministerial Statement on Plan Making should be revoked immediately: https://www.theccc.org.uk/publication/spatialplanning-for-climate-resilience-and-net-zero-cse-tcpa/ The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mark McPhee	
Q2.	Organisation (where appropriate)	MJM Architecure	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategi Example: SPLA_MOD_02, Chapter 7, Policy SPS	nmenting on from the Schedule of Prop c Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Philip Ward	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved proposed that the relevant reference number that you are commoved by the relevant Residential Development DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, Page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	GRAHAM COLLINGRIDGE
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Tim Attwood	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commer Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Panew Residential Development, DM30a	nting on from the Schedule of Proposed licies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	::	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	e unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The NPPF lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be rejected. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded and wild fires are now endemic in the mediteranean). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will place a higher burden on the carbon savings needed from retrofit to achieve net zero and will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is far more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Jasper Meade	
Q2.	Organisation (where appropriate)	PYC Group	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, I New Residential Development, DM30a	enting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

Why should Passivhaus standards for the local development plan be accepted by the Planning inspectorate? The planning inspectorate is part of the Department for levelling up, housing and communities, and are there to ensure that the legal requirements and national policy are met. As part of the strategic plan for 2021 - 25 they stated that they would contribute to UN Sustainable goals, and help to ensure that decisions and recommendations were made promptly and with consistency. In the speech from The rt Honourable Michael Grove MP (24 July 2023) two of the 10 principles listed for the department are as follows: 5 - Greener homes, greener landscapes and green belt protection. 7 -Ensuring that every home is safe, decent and warm. This was expanded on later in the speech "So for new build homes we will roll out new design codes, and later this year we will consult on a universal Future Homes Standard – to deliver comfortable homes built to be zero-carbon: warm in the winter and cool in the summer." - these are the key deliverables enabled though Passivhaus design principles. Planning for the Future White Paper - states that the planning process should make decisions faster, Ensure that the planning system supports our efforts to combat climate change and maximises environmental benefits. 1.18, and give permanence to the Building Better, Building Beautiful Commission. It also proposes that new homes should aim for 75 -80% less CO2 emissions by 2025 and also that these homes should be built so as to reduce any future retrofit needs. In this same paper Leicester - East Midlands was criticised for prioritising housing applications at the cost of commercial developments, this despite being "the Golden Triangle" for logistics and the 10th largest city in England. The councils that have adopted Passive House Planning Package (PHPP), one key element was that using this standard speeded up planning decisions and ensured that space heating and energy usage were kept to a minimum and was suitable for all projects versus SAP which was only suitable for some projects. In summary, the Planning Inspectorate strap line is "fair, impartial and open". By enabling Passivhaus design as a standard for all types of projects as part of Leicestershire Council development Plan, this would enable faster decisions both for housing and other projects, ensure the CO2 emissions for this area are reduced, and help with the requirements for decarbonization of the energy infrastructure. By refusing to allow this for Leicestershire the Planning Inspectorate are failing to deliver on their own strapline of Fair, impartial and open, and not allowing the council to deliver on national policy as dictated by the Minister in charge of Levelling up, housing and communities.



Q1. Part A: Personal DetailsName (including title	e) Ms Juliet Keenan
Q2. Organisation (where appropriate)	
Q3. Address	
Q4. Postcode	
Q5. Telephone	
Q6. Email address	
the relevant reference number that you are o	posed Main Modification does your representation relate?Please state commenting on from the Schedule of Proposed Main Modifications (e.g. regic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): SP3, Page 28, Paragraph 7.18
Q8. Description of the proposed Main Modification	on (e.g. Page 60, Paragraph Number)
MM14, Page 71, Paragraph3	
Q9. Do you consider this proposed Main Modific	eation is:
Legally compliant	No
Sound	No
Q10. If you consider the proposed Main Modificat representation relates to?	ion to be unsound, please identify which test of soundness your
Positively prepared?	No
Justified?	No
Effective?	No
Consistent with national policy?	No

Why should Passivhaus standards for the local development plan be accepted by the Planning inspectorate? The planning inspectorate is part of the Department for levelling up, housing and communities, and are there to ensure that the legal requirements and national policy are met. As part of the strategic plan for 2021 - 25 they stated that they would contribute to UN Sustainable goals, and help to ensure that decisions and recommendations were made promptly and with consistency. In the speech from The rt Honourable Michael Grove MP (24 July 2023) two of the 10 principles listed for the department are as follows: 5 - Greener homes, greener landscapes and green belt protection. 7 -Ensuring that every home is safe, decent and warm. This was expanded on later in the speech "So for new build homes we will roll out new design codes, and later this year we will consult on a universal Future Homes Standard – to deliver comfortable homes built to be zero-carbon: warm in the winter and cool in the summer." - these are the key deliverables enabled though Passivhaus design principles. Planning for the Future White Paper - states that the planning process should make decisions faster, Ensure that the planning system supports our efforts to combat climate change and maximises environmental benefits. 1.18, and give permanence to the Building Better, Building Beautiful Commission. It also proposes that new homes should aim for 75 -80% less CO2 emissions by 2025 and also that these homes should be built so as to reduce any future retrofit needs. The councils that have adopted Passive House Planning Package (PHPP), one key element was that using this standard speeded up planning decisions and ensured that space heating and energy usage were kept to a minimum and was suitable for all projects versus SAP which was only suitable for some projects. In summary, the Planning Inspectorate strap line is "fair, impartial and open". By enabling Passivhaus design as a standard for all types of projects as part of Lancaster Council development Plan, this would enable faster decisions both for housing and other projects, ensure the CO2 emissions for this area are reduced, and help with the requirements for decarbonization of the energy infrastructure. By refusing to allow this for Lancaster the Planning Inspectorate are failing to deliver on their own strapline of Fair, impartial and open, and not allowing the council to deliver on national policy as dictated by the Minister in charge of Levelling up, housing and communities



Q1.	Part A: Personal DetailsName (including title)	J Keenan	
Q2.	Organisation (where appropriate)	pyc group limited	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule Policies & Land Allocation DI	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Numb	er)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

Why should Passivhaus standards for the local development plan be accepted by the Planning inspectorate? The planning inspectorate is part of the Department for levelling up, housing and communities, and are there to ensure that the legal requirements and national policy are met. As part of the strategic plan for 2021 - 25 they stated that they would contribute to UN Sustainable goals, and help to ensure that decisions and recommendations were made promptly and with consistency. In the speech from The rt Honourable Michael Grove MP (24 July 2023) two of the 10 principles listed for the department are as follows: 5 - Greener homes, greener landscapes and green belt protection. 7 -Ensuring that every home is safe, decent and warm. This was expanded on later in the speech "So for new build homes we will roll out new design codes, and later this year we will consult on a universal Future Homes Standard – to deliver comfortable homes built to be zero-carbon: warm in the winter and cool in the summer." - these are the key deliverables enabled though Passivhaus design principles. Planning for the Future White Paper - states that the planning process should make decisions faster, Ensure that the planning system supports our efforts to combat climate change and maximises environmental benefits. 1.18, and give permanence to the Building Better, Building Beautiful Commission. It also proposes that new homes should aim for 75 -80% less CO2 emissions by 2025 and also that these homes should be built so as to reduce any future retrofit needs. The councils that have adopted Passive House Planning Package (PHPP), one key element was that using this standard speeded up planning decisions and ensured that space heating and energy usage were kept to a minimum and was suitable for all projects versus SAP which was only suitable for some projects. In summary, the Planning Inspectorate strap line is "fair, impartial and open". By enabling Passivhaus design as a standard for all types of projects as part of Lancaster Council development Plan, this would enable faster decisions both for housing and other projects, ensure the CO2 emissions for this area are reduced, and help with the requirements for decarbonization of the energy infrastructure. By refusing to allow this for Lancaster the Planning Inspectorate are failing to deliver on their own strapline of Fair, impartial and open, and not allowing the council to deliver on national policy as dictated by the Minister in charge of Levelling up, housing and communities



Q1.	Part A: Personal DetailsName (including title)	Mr Gabriel Hyde	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Policy SP1, Palample: SPLA_MOD_02, Chapter 7, Policy SP3, Palample Residential Development, DM30a	nting on from the Schedule of Prop Dlicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	oe unsound, please identify which t	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

According to the NPPF, the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was effective and consistent with the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed.



Q1.	Part A: Personal DetailsName (including title)	Mrs Melanie Lindsley	
Q2.	Organisation (where appropriate)	The Coal Authority	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP1, Policy SP2, Policy SP3, POLICY S	nting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or	I Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	Yes	
	Sound	Yes	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test o	of soundness your
	Positively prepared?	Yes	
	Justified?	Yes	
	Effective?	Yes	
	Consistent with national policy?	Yes	
Q11	In light of the proposed Main Modifications please your objection and make the Local Plan legally coridentified. It will be helpful if you could provide yo	npliant or sound, having regard to the m	natter(s) you have
	The Planning team at the Coal Authority have no of Modifications proposed.	objections ot specific comments to make	e in respect of the Main
Q12	2. Would you like to make another representation?	No	



Q1.	Part A: Personal DetailsName (including title)	Giulia Nicolini
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Martin Sleath
Q2.	Organisation (where appropriate)	Unison Cumbria County Branch
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comm	and Main Modification does your representation relate? Please state menting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	n is:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Rich Hibbert	
Q2.	Organisation (where appropriate)	PYC Group	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule Policies & Land Allocation D	e of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, Page 71, paragraph 3	g. Page 60, Paragraph Numl	per)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	y which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

Why should Passivhaus standards for the local development plan be accepted by the Planning inspectorate? The planning inspectorate is part of the Department for levelling up, housing and communities, and are there to ensure that the legal requirements and national policy are met. As part of the strategic plan for 2021 - 25 they stated that they would contribute to UN Sustainable goals, and help to ensure that decisions and recommendations were made promptly and with consistency. In the speech from the rt Honourable Michael Goove MP (24 July 2023) two of the 10 principles listed for the department are as follows: 5 - Greener homes, greener landscapes and green belt protection. 7 -Ensuring that every home is safe, decent and warm. This was expanded on later in the speech "So for new build homes we will roll out new design codes, and later this year we will consult on a universal Future Homes Standard - to deliver comfortable homes built to be zero-carbon: warm in the winter and cool in the summer." - these are the key deliverables enabled though Passivhaus design principles. Planning for the Future White Paper - states that the planning process should make decisions faster, Ensure that the planning system supports our efforts to combat climate change and maximises environmental benefits. 1.18, and give permanence to the Building Better, Building Beautiful Commission. It also proposes that new homes should aim for 75 -80% less CO2 emissions by 2025 and also that these homes should be built so as to reduce any future retrofit needs. The councils that have adopted Passive House Planning Package (PHPP), one key element was that using this standard speeded up planning decisions and ensured that space heating and energy usage were kept to a minimum and was suitable for all projects versus SAP which was only suitable for some projects. In summary, the Planning Inspectorate strap line is "fair, impartial and open". By enabling Passivhaus design as a standard for all types of projects as part of Lancaster Council development Plan, this would enable faster decisions both for housing and other projects, ensure the CO2 emissions for this area are reduced, and help with the requirements for decarbonization of the energy infrastructure. By refusing to allow this for Lancaster the Planning Inspectorate are failing to deliver on their own strapline of Fair, impartial and open, and not allowing the council to deliver on national policy as dictated by the Minister in charge of Levelling up, housing and communities.



Q1.	Part A: Personal DetailsName (including title)	Mr Donald Power
Q2.	Organisation (where appropriate)	Ealing Friends of the Earth
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate?Pleathe relevant reference number that you are commenting on from the Schedule of Proposed Main Modification Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies M Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18		enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM):
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

We are now in the midst of the climate emergency (recognised by both Parliament and most town councils, as well as the UN and all major scientific bodies) and it will only get worse without radical action and leadership. The UK's climate commitments are meaningless unless we apply them to the built environment. The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dorth East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Bert Czernia C.Bulid E MCABE	
Q2.	Organisation (where appropriate)	Midlothian Council	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Cllr Alex Doyle
Q2.	Organisation (where appropriate)	South Gloucestershire Council
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
	MM14 page 71 paragraph 3	
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Northeast Somerset, and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the International Panel on Climate Change that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated Written Ministerial Statement that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council. The restoration of Lancaster City's proposed net zero homes policy has particular importance to South Gloucestershire Council as well as many other local authorities around the country in the process of developing similar policies in response to the legislative requirements around emissions reductions enshrined in the UKs Climate Change Act as well as locally made Climate Emergency declaration commitments. The precedent set by a failure to restore this plan would make it extremely difficult for South Gloucestershire to hit its climate and environmental commitments.



Q1.	Part A: Personal DetailsName (including title)	Sally Ann Shelley Maddocks	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commer Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Panot answered	nting on from the Schedule of Pr plicies & Land Allocation DPD (S	oposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g.	Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	Yes	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
Q11. In light of the proposed Main Modifications please set out what modification(s) you consider necessary to resolve your objection and make the Local Plan legally compliant or sound, having regard to the matter(s) you have identified. It will be helpful if you could provide your suggested revised wording of any policy or text.			o the matter(s) you have any policy or text.
	Bring in line with other councils. Using a ruling from emergency. Shows lack of understanding of the diff centralisation of planning policy without reference to lo Disregards local priorities for adherence to out of date po	erence between local areas . Slocal priorities and the priorities of	nows an alarming dedication to



Q1.	Part A: Personal DetailsName (including title)	Tom Gwilliam	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	n test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Isaac Beevor	
Q2.	Organisation (where appropriate)	Climate Emergency UK	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Pro c Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (MM14, page 71, paragraph 3	e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. Cornwall (https://www.cornwall.gov.uk/planning-and-building-control/planning-policy/adoptedplans/climate-emergency-development-plan-document/), Bath North East Somerset &: (https://newsroom.bathnes.gov.uk/news/council-adopts-ground-breaking-planning-framework), Lincolnshire Central (https://www.lincoln.gov.uk/news/article/263/central-lincolnshire-local-plan-has-been-adopted). Three councils have already adopted what the Planning Inspectorate in Lancaster has thrown out. More councils are coming forward with these proposals in the draft stage. Wirral (https://www.wirralglobe.co.uk/news/20134713.local-plan-five-key-things-draft-plan-willtransform-wirral/), GMCA (https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-(https://www.leeds.gov.uk/planning/planning-policy/local-plan-update/introduction-and-summary), everyone/), Leeds Sheffield (https://www.sheffield.gov.uk/planning-development/emerging-sheffield-plan-draft). All of these policies to set higher energy efficiency, and stronger local building regulations, are justified and legal. This has been shown by the legal advice provided by Essex County Council, which states "National baseline targets for energy efficiency standards are set by Building Regulations. The Planning and Energy Act 2008 gives local planning authorities the power to set targets which exceed these standards. More recent planning decisions have created confusion about the extent of this power. To combat this confusion, we commissioned legal advice from Estelle Dehon KC at Cornerstone Barristers. Her open advice document shows the legal justification for higher energy performance targets. It can be used by local planning authorities in open forums. This includes public inquiries and local plan examinations." (https://www.essex.gov.uk/planning-land-andrecycling/planning-and-development/planning-advice-and-guidance/climate-and) with the link to the document here (https://www.essexdesignguide.co.uk/climate-change/net-zero-evidence/essex-open-legal-advice-energy-policy-andbuilding-regulations/) The above confusion referenced by Essex has been caused by completely inconsistent decisions by the Planning Inspectorate in this case and the Planning Inspectorate as a whole. Local authorities do have the power to go beyond building regulations as many are planning on doing. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the wildfires and record heatwaves). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. We expect the original proposed Policy DM30a with a requirement for net zero homes to be retained.



Q1.	Part A: Personal DetailsName (including title)	Pete Abei
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dave Plumb	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule olicies & Land Allocation Di	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Numb	er)
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Diane Lamb	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Proposed Mair Policies & Land Allocation DPD (SPLA) or the F	Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of sou	indness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Henning Wriedt	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are composed by the Policy Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	menting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modificatio	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	to be unsound, please identify which test o	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Sefton Archer	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Pew Residential Development, DM30a	enting on from the Schedule of olicies & Land Allocation DP	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Numbe	r)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mandy Bannon	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Page 1997.	nting on from the Schedule of Proposed Main plicies & Land Allocation DPD (SPLA) or the P	Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test of sour	ndness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr J Fisher	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Proposition of Propo	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



QI.	Part A: Personal Details Name (including title)	Councillor James Sommerville
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state tenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	old If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Alex Burn
Q2.	Organisation (where appropriate)	4Site Engineering & Donstruction Ltd
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are com-	ed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): , Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	n is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Colette Humphrey
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commer	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. blicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Eric Woods	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. volicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18	
	New Hesidential Development, Divided		
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)			
Q2.	Organisation (where appropriate)			
Q3.	Address			
Q4.	Postcode			
Q5.	Telephone			
Q6.	Email address			
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Proposed Ma olicies & Land Allocation DPD (SPLA) or the	in Modifications (e.g.	
Q8.	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)		
	MM14, page 71, paragraph 3			
Q9.	Do you consider this proposed Main Modification is:			
	Legally compliant	No		
	Sound	No		
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?				
	Positively prepared?	No		
	Justified?	No		
	Effective?	No		
	Consistent with national policy?	No		

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details Name (including title)	міз пасеў пап		
Q2.	Organisation (where appropriate)	RIBA LFA Architect		
Q3.	Address			
Q4.	Postcode			
Q5.	Telephone			
Q6.	Email address			
	Part B: Your Representation (1)To which propose the relevant reference number that you are completed by Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	nmenting on from the Schedule of Proposed c Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.	
	Description of the proposed Main Modification of MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)		
Q9.	Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No		
	Sound	No		
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?				
	Positively prepared?	No		
	Justified?	No		
	Effective?	No		
	Consistent with national policy?	No		

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Ceri Turner	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are commer Development Management DPD (DM) / Strategic Po Example: SPLA_MOD_02, Chapter 7, Policy SP3, Pa	nting on from the Schedule of Propo plicies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details name (including title)	Susan Dyer	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Page 1981	enting on from the Schedu rolicies & Land Allocation	le of Proposed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.ç	g. Page 60, Paragraph Num	nber)
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Nigel Moss		
Q2.	Organisation (where appropriate)			
Q3.	Address			
Q4.	Postcode			
Q5.	Telephone			
Q6.	Email address			
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule olicies & Land Allocation DP	of Proposed Main Modifications (e.g.	
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Numbe	er)	
Q9.	Do you consider this proposed Main Modification i	is:		
	Legally compliant	No		
	Sound	No		
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No		
	Justified?	No		
	Effective?	No		
	Consistent with national policy?	No		

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Kate Treharne	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved proposed the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of l Policies & Land Allocation DPD (Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification t representation relates to?	o be unsound, please identify wh	ich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Suhir Abuhajar	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_03, Chapter 7, Policy SP3, Pastample: SPLA_MOD_04, Chapter 7, Policy SP3, Pastample: SPLA_MOD_05, Chapter 7, Policy SP3, Pastample: SPLA_MOD_06, Chapter 7, Policy SP3, Pastample: SPLA_MOD_06, Chapter 7, Policy SP3, Pastample: SPLA_MOD_07, Chapter 7, Policy SP3, Pastample: SPLA_MOD_07, Chapter 7, Policy SP3, Pastample: SPLA_MOD_08, Chapter 7, Policy SP3, Pastample: SPA, Pastample: SPLA_MOD_08, Chapter 7, Policy SP3, Pastample: SPA, Pastampl	nting on from the Schedule of Problems & Land Allocation DPD (S	oposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	oe unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Peter Ward	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	nting on from the Schedule of Propolicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Miranda Prag	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify w	hich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Andrew McCamley	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SF	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Eric Fewster	
Q2.	Organisation (where appropriate)	ColdProof	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commoved Development Management DPD (DM) / Strategic I Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Propolicies & Land Allocation DPD (SPI	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details Name (including title)	Childe Cox (Assistant Climate Change Onicer)
Q2.	Organisation (where appropriate)	(Assistant Climate Change Officer) Wyre Council
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are com-	need Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. & Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 8, Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	on is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Kenneth Hollis	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Jon Kerr
Q2.	Organisation (where appropriate)	Zero Carbon Harrogate
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commen	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. blicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Molly Hogg
Q2.	Organisation (where appropriate)	Cumbria Action for Sustainability
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commer	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Elinor Rooks	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the proposed between the proposed the relevant reference number that you are commended between the proposed that you are commended by the proposed by the proposed that you are commended by the proposed	nting on from the Schedule of Pro plicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Francis Iszatt	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are composed by the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (o	e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modificatio	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
	.In light of the proposed Main Modifications pleas your objection and make the Local Plan legally of identified. It will be helpful if you could provide not answered	compliant or sound, having regard to	the matter(s) you have
Q12	2. Would you like to make another representation?	No	



Q1.	Part A: Personal DetailsName (including title)	Mr Alasdair Muir
Q2.	Organisation (where appropriate)	A Muir Surveying
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Kath Halfpenny	
Q2.	Organisation (where appropriate)	Wreay Eco Group	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Linda Secker
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state renting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Donna Munro CEng MIMechE	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Proposolicies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Kathryn Baker	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategi Example: SPLA_MOD_02, Chapter 7, Policy SPS New Residential Development, DM30a	nmenting on from the Schedule of c Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
	Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify wh	nich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Victoria Thomas	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Potential (DPD (DPD (DM) / Strategic Potential (DPD (DPD (DPD (DPD (DPD (DPD (DPD (DP	nting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details Name (including title)	DI Alia Costa
Q2.	Organisation (where appropriate)	Lancaster University
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. volicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Sue Walley
Q2.	Organisation (where appropriate)	SENS. Sustainable Staveley
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	· · · · · · · · · · · · · · · · · · ·	
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dominic Kramer	
Q2.	Organisation (where appropriate)	MWK Architects Ltd	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Proposition	sed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which te	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Andrew Goodman	
Q2.	Organisation (where appropriate)	Good Architecture; Association of Environment Conscious Building Passivhaus Trust; ARB and RIBA) ;
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state nenting on from the Schedule of Proposed Main Modifications (e.g Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18	g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness your	
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Michael McFarlane	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, PNew Residential Development, DM30a	enting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	New Residential Development, Divisoa		
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test o	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Diane Hubbard
Q2.	Organisation (where appropriate)	Green Footsteps Ltd
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr William Dawson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Propolicies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Annie Hinge	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Potential (DPD) (nting on from the Schedule of Proposolicies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	t of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



QI.	Part A: Personal DetailsName (including title)	Dr Ellnor Rooks	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	enting on from the Schedule of Pr olicies & Land Allocation DPD (S	oposed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	J. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whic	th test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Robert Pottinger	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_03, Chapter 7, Policy SP3, Pastample: SPLA_MOD_04, Chapter 7, Policy SP3, Pastample: SPLA_MOD_05, Chapter 7, Policy SP3, Pastample: SPLA_MOD_	nting on from the Schedule of Propose Dlicies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	MRS P POTTINGER
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A: Personal DetailsNar	ne (including title)	Dr Rhona O'Brien
Q2. Organisation (where approp	oriate)	Friends of the Earth
Q3. Address		
Q4. Postcode		
Q5. Telephone		
Q6. Email address		
the relevant reference numl	ber that you are common DPD (DM) / Strategic F Chapter 7, Policy SP3, F	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8. Description of the proposed	d Main Modification (e.	g. Page 60, Paragraph Number)
MM14, page 71, paragraph 3		
Q9. Do you consider this propo	sed Main Modification	is:
Legally compliant		No
Sound		No
Q10. If you consider the propose representation relates to?	d Main Modification to	be unsound, please identify which test of soundness your
Positively prepared?		No
Justified?		No
Effective?		No
Consistent with national policy	?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Sandra Bell	
Q2.	Organisation (where appropriate)	Friends of the Earth	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are come Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Prop c Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	Description of the proposed Main Modification (MM14, page 71, paragraph 3	e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which t	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

In light of the proposed Main Modifications please set out what modification(s) you consider necessary to resolve your objection and make the Local Plan legally compliant or sound, having regard to the matter(s) you have identified. It will be helpful if you could provide your suggested revised wording of any policy or text. The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and instead the original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. Since the Inspector's modification for Lancaster the Committee on Cilmate Change has published a report on the planning system in which it calls for consistent alignment of planning policy with mitigation and adaptation actions in the Climate Change Act and specifically recommends revoking the 2015 Written Ministerial Statement on plan-making and replacing it with a statement confirming that planning authorities are able to set more ambitious local standards on energy efficiency. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the impacts of climate change which are already being experenced in the UK. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Lisa Scott	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule Policies & Land Allocation D	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Numb	per)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr D J Bilton	
Q2.	Organisation (where appropriate)	Bilton Design Ltd	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are composed by the Policy Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule c Policies & Land Allocation D	e of Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g. Page 60, Paragraph Numb	per)
	MM14, page 71, paragraph 3		
Q9.	9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			y which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Joachim Neff	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P	enting on from the Sc olicies & Land Alloca	hedule of Proposed Main Modifications (e.g. ation DPD (SPLA) or the Policies Map (PM):
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph	Number)
	MM14, page 71, paragraph 3		
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness y representation relates to?			dentify which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Fariha Blockley
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commen	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g.	Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	9. Do you consider this proposed Main Modification is:	
	Legally compliant	No
	Sound	No
Q10	o. If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Briony Scott		
Q2.	Organisation (where appropriate)			
Q3.	Address			
Q4.	Postcode			
Q5.	Telephone			
Q6.	Email address			
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.	
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)		
Q9. Do you consider this proposed Main Modification		is:		
	Legally compliant	No		
	Sound	No		
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?				
	Positively prepared?	No		
	Justified?	No		
	Effective?	No		
	Consistent with national policy?	No		

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Marian McCraith	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic Personnel SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Pro Policies & Land Allocation DPD (SF	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Prof David Evans	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Panew Residential Development, DM30a	nting on from the Schedule of Proposed plicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to l representation relates to?	be unsound, please identify which test o	f soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Hugh Pottinger	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	enting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr. William South
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. colicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Yvonne Atkins	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are commovelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	nenting on from the Schedule of Proposed l Policies & Land Allocation DPD (SPLA) or t	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms. Kirsty McGhie
Q2.	Organisation (where appropriate)	JMP Architects Ltd
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Cordelia Newsome	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Proposed Nolicies & Land Allocation DPD (SPLA) or the	lain Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of s	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	County Councillor Gina Dowding
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to large representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

NPPF paragraphs 152 and 153 respectively say that the planning system' should contribute to radical reduction in greenhouse gas emissions', and take a 'proactive approach to mitigating and adapting to climate change'. The original proposed policy in the Local Plan Review -DM30a -was positively prepared, justified, effective and consistent with the NPPF and the Climate Change Act and should be retained. The modification MM14 will not lead to radical reductions in greenhouse gas emissions. It is not positively prepared: it ignores stark and recent (March 2023) warnings from the IPCC that carbon emissions must start to reduce now in order to meet international carbon reduction commitments. (Such targets are adopted to avoid widespread human misery and chaos on an overheated planet.) It is neither justified nor consistent with current national policy as it refers to the Written Ministerial Statement of 2015 that is now outdated. The MM14 is in fact inconsistent with the Planning Inspectorate where other Inspectors have ruled that LPA's can set much higher energy standards than building regulations and aim for net zero residential building ahead of national Government policy. It is not effective nationally as it creates an inconsistent approach from the Planning Inspectorate: it is confusing and does reputational damage to the planning system. It is not effective locally as it will mean that new homes will soon have to be retrofitted to achieve net zero. MM14 should be dropped and the wording returned to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Matthew Snedker
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	ed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	n is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification t representation relates to?	o be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Jean Marc Mbouma
Q2.	Organisation (where appropriate)	Mine Tech Services LTD
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are com-	ed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. c Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 3, Page 28, Paragraph 7.18
	Description of the proposed Main Modification (community) MM14, page 71, paragraph 3	e.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	on is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Nicholas Grant	
Q2.	Organisation (where appropriate)	UK Passivhaus Trust	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between Development Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a	nting on from the Schedule of Proposition of Proposition of PD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which te	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Helen Bartosinski
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	ed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	ı is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr. Michael Rogers
Q2.	Organisation (where appropriate)	LAMILUX UK
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms. Claire Potter	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	27. Part B: Your Representation (1)To which proposed Main Modification does your representation relate? Please st the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (Plexample: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18		
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10.If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Sue Denerley	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Find the Residential Development, DM30a	enting on from the Schedule olicies & Land Allocation D	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Numb	er)
Q9.	. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Wiebke Rietz	
Q2.	Organisation (where appropriate)	Alchemilla Architects Ltd	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title	p) Dr Robert Cohen
Q2.	Organisation (where appropriate)	Verco
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are c	posed Main Modification does your representation relate?Please state commenting on from the Schedule of Proposed Main Modifications (e.g. egic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): SP3, Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification	on (e.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9. Do you consider this proposed Main Modification is:		ation is:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness you representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Annie Neat
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9. Do you consider this proposed Main Modification is:		is:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness you representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Beccy Smart	
Q2.	Organisation (where appropriate)	Save Nature photography	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved proposed the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule Policies & Land Allocation D	e of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Num	ber)
Q9.	29. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Kim Wisdom (Senior Conservation)	vation Officer for north Lancashire)
Q2.	Organisation (where appropriate)	The Wildlife Trust for Lancashire	, Manchester and north Merseyside
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development - DM30a	enting on from the Schedule of P Policies & Land Allocation DPD (S	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. 2022 was the hottest UK year on record, with 40C recorded in the UK for the first time, marking a moment of climate history. 2023 seems set to surpass those temperatures, with climate breakdown clearly visible around the world in the form of forest fires, heatwaves, storms, sea level rise, floods, melting sea ice and glaciers. We are in a global climate and nature emergency (https://www.wildlifetrusts.org/aboutus/combatting-climate-and-nature-emergency). The Met Office annual 'State of the UK Climate' report (published TODAY https://www.metoffice.gov.uk/about-us/press-office/news/weather-and-climate/2023/record-breaking-2022indicative-of-future-uk-climate) states that the 2022 weather is a potential warning of what we should expect in the future and "an example that extreme heat events are becoming more frequent, intense and prolonged because of human-induced climate change - something we are seeing being played out across Europe as the report is being published". As Sir David Attenborough said in his opening speech at COP26 (Climate Change) in Glasgow last year, "What we do now, and in the next few years, will profoundly affect the next few thousand years". It is imperative that we all fulfil our responsibilities under COP 15 (Biodiversity) and COP 26 (Climate Change), as well as national (25-year Environment Plan https://www.gov.uk/government/publications/25-year-environment-plan) and local policy climate change commitments (Local Plan Strategic Policy CC1 - Responding to Climate Change and Creating Environmental Stability). Lancaster district has already experienced severe flooding (Storm Desmond, December 2015). Modification number CCPM 1 adds 'High Risk Urban Catchments' to the Policies Map, recognising the increasing threat from flooding linked to climate change. Hest Bank is one of the Our Future Coast sites (https://engageenvironmentagency.uk.engagementhq.com/wyr024-buffer-strips), where nature-based solutions will be designed in partnership with the local community, in order to better protect their homes, businesses and infrastructure from flooding, coastal change and create climate resilience. It is a retrograde step to remove the policy requirement for net zero homes just at the point when we need to be more ambitious & amp; accelerate efforts to mitigate and adapt to climate change if we are to avoid the very worst of the IPCC predictions (https://www.ipcc.ch/report/ar6/wg2/resources/press/press-release/). In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	David Fidoe	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of P Policies & Land Allocation DPD (S	roposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whi	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Hugh Roberts	
Q2.	Organisation (where appropriate)	Lancaster Civic Vision	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Terrie Metcalfe	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commoved Development Management DPD (DM) / Strategic I Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Pr Policies & Land Allocation DPD (S	oposed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr George Martin
Q2.	Organisation (where appropriate)	Buillding Performance Network
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are commo	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Natalia	
Q2.	Organisation (where appropriate)	BI Engineer, Mine Tech Services	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which t	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Samuel Darby	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test o	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Desna Mackenzie	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic I Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed N Policies & Land Allocation DPD (SPLA) or the	lain Modifications (e.g.
	Description of the proposed Main Modification (e.	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of s	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	The Revd Mark Nash-Williams MA, BD	
Q2.	Organisation (where appropriate)	Bishop of Newcastle's Adviser on the Environment	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address	SS	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18	
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your	
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Thomas Scott	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Proposition of Propo	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dee Searle, Vice Chair	
Q2.	Organisation (where appropriate)	Kentish Town Neighbourhood	Forum
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Potample: SPLA_MOD_02, Chapter 7, Policy SP3, Potample: SPA, Potam	nting on from the Schedule of olicies & Land Allocation DPD	Proposed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wl	nich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Calum Millbank	
Q2.	Organisation (where appropriate)	Community energy south	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
	New nesidential Development, Divisoa		
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which te	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Lilian Wouters
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are commer	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Q9. Do you consider this proposed Main Modification is:	
	Legally compliant	No
	Sound	No
Q10). If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Michelle Sullivan	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic File Example: SPLA_MOD_02, Chapter 7, Policy SP3, In New Residential Development, DM30a	enting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		st of soundness your	
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	
	In light of the proposed Main Modifications please your objection and make the Local Plan legally co-identified. It will be helpful if you could provide you MM14, page 71, paragraph 3	empliant or sound, having regard to the	e matter(s) you have
Q12	. Would you like to make another representation?	No	



Q1.	Part A: Personal DetailsName (including title)	Melanie Forrest
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commen	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. blicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)
Q9.	29. Do you consider this proposed Main Modification is:	
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A: Personal DetailsName (including title)	Gilbert Daphne
Q2. Organisation (where appropriate)	
Q3. Address	
Q4. Postcode	
Q5. Telephone	
Q6. Email address	
the relevant reference number that you are com	sed Main Modification does your representation relate?Please state inmenting on from the Schedule of Proposed Main Modifications (e.g. ic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 3, Page 28, Paragraph 7.18
Q8. Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)
Q9. Do you consider this proposed Main Modification	on is:
Legally compliant	No
Sound	No
Q10.If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of soundness your
Positively prepared?	No
Justified?	No
Effective?	No
Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Vicky Morgan	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Q7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate?Please set the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (I Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a		
	•		
Q8.	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10	O. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which te	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Rachel Heron	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposition Policies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10	210. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Rachel Heron	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Panew Residential Development, DM30a	nting on from the Schedule of Proposed Ma	ain Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which test of s	oundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Stephen Feber	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Po Example: SPLA_MOD_02, Chapter 7, Policy SP3, Policy S	nting on from the Schedule of Pro Dlicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to l representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Cllr Christine Wild	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SPA, Policy S	enting on from the Schedule of Proposed Main Mod olicies & Land Allocation DPD (SPLA) or the Policie	ifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundne	ss your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Victoria Evans	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr David Bethune	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed to the relevant reference number that you are commer Development Management DPD (DM) / Strategic Policy SPLA_MOD_02, Chapter 7, Policy SP3, Pallow Residential Development, DM30a	nting on from the Schedule o	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s :	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify w	hich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Councillor Natalie McVey	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule Policies & Land Allocation D	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Numb	per)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Mandy King	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Propose c Policies & Land Allocation DPD (SPLA) c	d Main Modifications (e.g.
	Description of the proposed Main Modification (MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr. Ian Brown	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Proposition on From the Schedule of Proposition of	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Julie Milton
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state tenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.	.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Judith Stevenson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	enting on from the Schedule of olicies & Land Allocation DPI	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Numbe	r)
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify v	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mykyta	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic FExample: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Proposed location DPD (SPLA) or t	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Jane Atkinson
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state tenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.	.g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9. Do you consider this proposed Main Modification is:		is:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Michael Zawadzki	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		est of soundness your	
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Ruth Evans	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	enting on from the Schedule of Propose olicies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)	
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Anne Green	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	•	v. Davia CO. Davia vivas h Niverhan)	
	Description of the proposed Main Modification (e.e.)	g. Page ou, Paragraph Number)	
Q9. Do you consider this proposed Main Modification		is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			est of soundness your
	Positively prepared?	No	
,	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Lady Virginia Beardshaw	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	enting on from the Schedule of Prolicies & Land Allocation DPD (S	roposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	ı. Page 60. Paragraph Number)	
	MM14, page 71, paragraph 3	, 13.11, 113.1	
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10.If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Tristan Strange	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategies Example: SPLA_MOD_02, Chapter 7, Policy SPS New Residential Development, DM30a	nmenting on from the Schedule of Pro c Policies & Land Allocation DPD (SPI	posed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	mr. Viacheslav Brui	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, I New Residential Development, DM30a	enting on from the Schedule of Proposed M Policies & Land Allocation DPD (SPLA) or the	lain Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of s	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Agniezka Cahn	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the Management DPD (DM) / Strategic Policy SP1, Palample: SPLA_MOD_02, Chapter 7, Policy SP3, Palameter Residential Development, DM30a	nting on from the Schedul	le of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Num	ber)
Q9.	Do you consider this proposed Main Modification is	3:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identi	fy which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q2. Organisation (where appropriate)		
Q3. Address		
Q4. Postcode		
Q5. Telephone		
Q6. Email address		
the relevant reference number that you are	proposed Main Modification does your representation relate?Please see commenting on from the Schedule of Proposed Main Modifications rategic Policies & Land Allocation DPD (SPLA) or the Policies Map (F	s (e.g.
Example: SPLA_MOD_02, Chapter 7, Police New Residential Development, DM30a		
Example: SPLA_MOD_02, Chapter 7, Police	cy SP3, Page 28, Paragraph 7.18	
Example: SPLA_MOD_02, Chapter 7, Police New Residential Development, DM30a	cy SP3, Page 28, Paragraph 7.18	
Example: SPLA_MOD_02, Chapter 7, Police New Residential Development, DM30a Q8. Description of the proposed Main Modification	ey SP3, Page 28, Paragraph 7.18 ation (e.g. Page 60, Paragraph Number)	
Example: SPLA_MOD_02, Chapter 7, Police New Residential Development, DM30a Q8. Description of the proposed Main Modification MM14, page 71, paragraph 3	ey SP3, Page 28, Paragraph 7.18 ation (e.g. Page 60, Paragraph Number)	
Example: SPLA_MOD_02, Chapter 7, Police New Residential Development, DM30a Q8. Description of the proposed Main Modification MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modification	ey SP3, Page 28, Paragraph 7.18 ation (e.g. Page 60, Paragraph Number) fication is:	
Example: SPLA_MOD_02, Chapter 7, Police New Residential Development, DM30a Q8. Description of the proposed Main Modificat MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modificat Legally compliant Sound	ey SP3, Page 28, Paragraph 7.18 ation (e.g. Page 60, Paragraph Number) fication is:	
Example: SPLA_MOD_02, Chapter 7, Police New Residential Development, DM30a Q8. Description of the proposed Main Modificat MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modificat Legally compliant Sound Q10. If you consider the proposed Main Modificat Q10. If you consider the proposed Main Modification of the proposed Main	ey SP3, Page 28, Paragraph 7.18 ation (e.g. Page 60, Paragraph Number) fication is: No No	
Example: SPLA_MOD_02, Chapter 7, Police New Residential Development, DM30a Q8. Description of the proposed Main Modificat MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modificat Legally compliant Sound Q10.If you consider the proposed Main Modificat representation relates to?	etion (e.g. Page 60, Paragraph Number) fication is: No No No	
Example: SPLA_MOD_02, Chapter 7, Police New Residential Development, DM30a Q8. Description of the proposed Main Modification MM14, page 71, paragraph 3 Q9. Do you consider this proposed Main Modification Legally compliant Sound Q10.If you consider the proposed Main Modification representation relates to? Positively prepared?	etion (e.g. Page 60, Paragraph Number) fication is: No No No No No No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Freddie Bowry	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Jonathan Cuniowski	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule Policies & Land Allocation D	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Numb	er)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	DI FIONA FRANK
Q2.	Organisation (where appropriate)	Forgebank Films
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state tenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Part A: Personal DetailsName (including title)	Eluned Owen	
Organisation (where appropriate)		
Address		
Postcode		
Telephone		
Email address		
the relevant reference number that you are commended by the commended of t	enting on from the Schedule of Prolicies & Land Allocation DPD (S	roposed Main Modifications (e.g.
	g. Page 60, Paragraph Number)	
Do you consider this proposed Main Modification i	is:	
Legally compliant	No	
Sound	No	
If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	ch test of soundness your
Positively prepared?	No	
Justified?	No	
Effective?	No	
Consistent with national policy?	No	
	Organisation (where appropriate) Address Postcode Telephone Email address Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, PNew Residential Development, DM30a Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is Legally compliant Sound Olif you consider the proposed Main Modification to	Organisation (where appropriate) Address Postcode Telephone Email address Part B: Your Representation (1)To which proposed Main Modification does your representation to the relevant reference number that you are commenting on from the Schedule of P. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (S. Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is: Legally compliant No Sound No Alf you consider the proposed Main Modification to be unsound, please identify white representation relates to? Positively prepared? No Justified? No Seffective? No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Marian Sulek	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	nmenting on from the Schedule of Propo c Policies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	Description of the proposed Main Modification (MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Dawn Keyse	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	nenting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Adele Ivy-Harris	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Proposition of Propo	oposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Elizabeth Neat	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of P Policies & Land Allocation DPD (S	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Rosemary Betterton	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of P olicies & Land Allocation DPD (S	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whi	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)		
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Proposed Main Policies & Land Allocation DPD (SPLA) or the F	Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of sou	ndness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The modification MM14 should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050 and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy efficiency standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The Inspector for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details Name (including title)	Di Ellilla Cardwell
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9. Do you consider this proposed Main Modification is:		s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Judith Van Dam	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed I the relevant reference number that you are commer Development Management DPD (DM) / Strategic Po Example: SPLA_MOD_02, Chapter 7, Policy SP3, Pa New Residential Development, DM30a	nting on from the Schedule of Policies & Land Allocation DPD (S	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)	
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to b representation relates to?	e unsound, please identify which	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	James Dunbar	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness you representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Sarah Dunbard	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Propolicies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Jon Sear	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Personal Example: SPLA_MOD_02, Chapter 7, Policy SP3, Personal Development, DM30a	enting on from the Schedule of P olicies & Land Allocation DPD (S	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
Q9.	9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whi	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Holly Roberts	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	nting on from the Schedule of Proposed Main Mod olicies & Land Allocation DPD (SPLA) or the Policie	ifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:		s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundne	ss your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Joel Lutman	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule Policies & Land Allocation DP	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Numbe	er)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Professor Robert Fildes
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commer	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

One critical component of the planning system is that it should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The revised proposals will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The need is for new homes that do not contribute to the developing climate disaster. The original policy was positively prepared, justified, effective, and consistent with National environmental Policy, The Inspector proposes modification of these that will lead to increased environmental damage. It is hard to understand how anyone with any knowledge of the situation that is developing could propose such modifications. It is a fact that other local authorities have set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The revision to the original proposal ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Hannah Lane	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP3, Policy Residential Development, DM30a	nting on from the Schedule of Propolicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	New Hesideritial Development, Divisoa		
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

I don't understand in light of the cost of living crisis and the climate crisis, why the inspectors has chosen to rejected Lancaster City Council proposal for developers to build new homes to a higher energy standard. Their original proposal will surely benefit local people and communities, and future generations. The Modification MM14 is outdated, as it is based on the Written Ministerial Statement WMS15 which has been superseded by the the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. Additionally, it will surely cost the local communities more in the long terms, as it will mean that new homes in the Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. It also seems out of touch and inconsistent considering that other Inspectors (Cornwall, Bath & Dilding regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

No



Q1.	Part A: Personal DetailsName (including title)	Sara Bundy	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P	enting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

he National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr John Lowery
Q2.	Organisation (where appropriate)	Askam Civil Engineering Ltd
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are common	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14 page 71 paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Rebecca Moore	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic Fexample: SPLA_MOD_02, Chapter 7, Policy SP3, I	enting on from the Schedule of Proposed I Policies & Land Allocation DPD (SPLA) or t	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

As a mother, and as Director of a national campaigning charity where one of our campaigns is ensuring that we are building the right kind of housing (meaning housing that is energy efficient and affordable for most), I am appalled to hear of the decision by a planning Inspector to reject Lancaster City Council's plan to require developers to build new homes with higher energy saving standards than national building regulations, moving swiftly to zero carbon homes. I'm outraged on two fronts: Firstly, decarbonising housing is a major component of the UK's race to net zero. I look into my daughter's eyes and am fearful about the kind of future she has in a country that does not prioritise any and all efforts to get to net zero. There is clear national policy committing the UK to go net zero by 2050. Lancaster City Council are attempting to ambitiously join this race to benefit all of us and this ambition is being restrained, only slowing down our collective net zero progress. Secondly, higher energy saving standards create warmer homes at lower costs, making the new proposed housing an ethical and correct choice by Lancaster City Council as people will have a lower cost of living burden. This decision goes against the National Planning Policy Framework which sets out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). Clearly, the modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. Obviously, MM14 should be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Bryony Davy	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P not answered	enting on from the Schedule of Proof	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	Yes	
	Sound	Yes	
Q10	. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	ch test of soundness your
	Positively prepared?	Yes	
	Justified?	Yes	
	Effective?	Yes	
	Consistent with national policy?	Yes	
	In light of the proposed Main Modifications please your objection and make the Local Plan legally colidentified. It will be helpful if you could provide you	mpliant or sound, having regard	to the matter(s) you have
Q12	Would you like to make another representation?	No	



Q1.	Part A: Personal DetailsName (including title)	Michael Ford-Cowie	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Per New Residential Development, DM30a	enting on from the Schedule o olicies & Land Allocation DPD	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify w	hich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPPC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Kerstin Finkw	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comm Development Management DPD (DM) / Strategic I Example: SPLA_MOD_02, Chapter 7, Policy SP3, I New Residential Development, DM30a	enting on from the Schedule of Policies & Land Allocation DPD	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify w	rhich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. As we are facing a considerable increase in extreme weather events in the years to come, building strong and resilient communities must be at the heart of everything we do as a nation and therefore, we must think ahead and, among other things, pro-actively future proof our built environments. The most effective way to do this is via progressive policies in the planning system like the one proposed by Lancaster City Council. Improving energy efficiency in all sectors of life is key as we are facing the phasing out of fossil fuel use and the need to make electrical power cover all our future energy needs. As a parent, I want to be sure that my child can still enjoy a prosperous life in a country that has adapted in a timely manner to the environmental challenges that global warming brings. MM14 stands in the way of this and should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Kate Studley	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the proposed the relevant reference number that you are commended between the proposed by the relevant reference number that you are commended by the	nting on from the Schedule of Proposed Noticies & Land Allocation DPD (SPLA) or t	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Juliet Chen	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	enting on from the Schedule of Pro olicies & Land Allocation DPD (SF	pposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	n test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Gareth Richards	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Pew Residential Development, DM30a	enting on from the Schedule of Proposed M olicies & Land Allocation DPD (SPLA) or th	ain Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of s	oundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Elaine Currie	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Prop Policies & Land Allocation DPD (SPI	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Mari Rumsey
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	ed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): , Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modificatio	n is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Judith Somerwill	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Policy SP3, Policy SP4, Policy SP3, Policy S	nting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Malcolm Martin	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	enting on from the Schedule of Propo olicies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:		is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	K Jill McKeown	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, PNew Residential Development, DM30a	enting on from the Schedule of Propolicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsour representation relates to?		be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr John Harrington
Q2.	Organisation (where appropriate)	William Ford C of E Junior School
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	J. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9. Do you consider this proposed Main Modification is:		is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Carla Monvid	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Proposolicies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to representation relates to?		be unsound, please identify which tes	et of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Giles Barrett	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Poetample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	nting on from the Schedule of Proposolicies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Jean Cousens	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Jessica Livock	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a	nting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or	I Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test o	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Monica Sampson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: Development, DM30a	nting on from the Schedule of Proposed M Dlicies & Land Allocation DPD (SPLA) or th	ain Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	oe unsound, please identify which test of s	oundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dominic McCabe
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Sarah Coop
Q2.	Organisation (where appropriate)	LOT25 Property Ltd
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Mr John Clegg	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Pr Policies & Land Allocation DPD (S	oposed Main Modifications (e.g.
	*		
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	th test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Marcus J Simmons	
Q2.	Organisation (where appropriate)	Transition Chipping Norton	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved proposed the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	menting on from the Schedule of Proposed M Policies & Land Allocation DPD (SPLA) or th	ain Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10	old If you consider the proposed Main Modification to representation relates to?	to be unsound, please identify which test of s	oundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Carrie Wheeler	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the Management DPD (DM) / Strategic Policy SPA_MOD_02, Chapter 7, Policy SP3, Pallow Residential Development, DM30a	nting on from the Schedule of Prop olicies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	· · · · · · · · · · · · · · · · · · ·		
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Jane May Morrison
Q2.	Organisation (where appropriate)	Energy Saving Trust/ Home Energy Scotland
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Caroline Mason	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed Main Policies & Land Allocation DPD (SPLA) or the F	Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of sou	ndness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr david walker	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	յ. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Helen Forester	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proportion the relevant reference number that you are condevelopment Management DPD (DM) / Strateg Example: SPLA_MOD_02, Chapter 7, Policy SPNew Residential Development, DM30a	mmenting on from the Schedule of Proposed ic Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)	
Q8.	Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)	
Q8.			
Q8.	MM14, page 71, paragraph 3		
Q8.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modificat	ion is:	
Q8.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modificat Legally compliant	ion is: No No	f soundness your
Q8.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modificat Legally compliant Sound If you consider the proposed Main Modification	ion is: No No	f soundness your
Q8.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modificat Legally compliant Sound If you consider the proposed Main Modification representation relates to?	ion is: No No No n to be unsound, please identify which test o	f soundness your
Q8.	MM14, page 71, paragraph 3 Do you consider this proposed Main Modificat Legally compliant Sound If you consider the proposed Main Modification representation relates to? Positively prepared?	ion is: No No No n to be unsound, please identify which test o	f soundness your

As a parent of two young children, I find the Inspector's continued rejection of LCC's carbon zero housing policy to be a hugely concerning given the situation we now find ourselves in. With wildfires sweeping the globe, ice sheets melting at an alarming rate, biodiversity at an all-time low in this country, just as three examples of climate collapse, the UK must be seen to be 'doing their bit.' The government continues to backtrack on commitments made to achieve carbon net zero by 2050 - a timeline that, in my eyes, is increasingly short-sighted with scientists reporting the global warming is happening at a faster rate than was previously suggested. As the Inspector will know well, commitments to reach this deadline are now enshrined in UK law as the Climate Change Act of 2019 but this will not happen if council's are not allowed to make decisive moves to achieve it. We must be brave in our work to create a liveable future for our children. Planners and developers must be held to account and the original wording of MM14 would mean that there are clear targets laid out to do this. Removing these targets would mean that there is too much 'wiggle room' and space for interpretation. Targets set by councils must be specific in order to create clear standards in town planning and Lancaster are leading the way in their policy. As a resident of Brighton and Hove, Lancaster's policy would strengthen our council's commitments to the climate emergency as there will be a clear example to follow. The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & amp; North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Ben Morris	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Policy SP1, Palample: SPLA_MOD_02, Chapter 7, Policy SP3, Palample Residential Development, DM30a	nting on from the Schedule of Dicies & Land Allocation DPD	Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify wh	nich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Rob Burke
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification i	s:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mark Hollinrake
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Emily Frayling
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Ian Stokes	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedo Policies & Land Allocation	ule of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Nu	mber)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please iden	tify which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Gemma Taylor
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
08	Description of the proposed Main Modification (e.g	n Page 60 Paragraph Number)
	MM14, page 71, paragraph 3	g. 1 age oo, 1 aragraph Hamber)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Tony Pearce
Q2.	Organisation (where appropriate)	Stafford Borough Council
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commer	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	::
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	e unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Rosie Pearson	
Q2.	Organisation (where appropriate)	West Oxfordshire District Council	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are cor	osed Main Modification does your representation relate?Please state mmenting on from the Schedule of Proposed Main Modifications (e. gic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): P3, Page 28, Paragraph 7.18	g.
Q8.	Description of the proposed Main Modification	n (e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modificati	tion is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which test of soundness your	
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Hannah Ross-Tatam	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Propolicies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Charlotte Campion	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Hugo Ross-Tatam
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. colicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification i	is:
	Legally compliant	No
	Sound	No
Q10	o. If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr John Hopes	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, I	enting on from the Schedule of look	Proposed Main Modifications (e.g.
	New Residential Development, DM30a		
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	ich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Megan Lounds	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	nting on from the Schedule of Folicies & Land Allocation DPD (Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wh	ich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ben Taylor	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	t of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Zana Dean	
Q2.	Organisation (where appropriate)	Tread Studio architects	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Proposolicies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	J. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	t of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Laura France	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A	: Personal DetailsName (including title)	Ms Karen Mitchell
Q2. Organ i	isation (where appropriate)	Cumbria Action for Sustainability
Q3. Addres	ss	
Q4. Postco	ode	
Q5. Teleph	one	
Q6. Email	address	
the rele Develo Examp	evant reference number that you are comm	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8. Descri	ption of the proposed Main Modification (e.	g. Page 60, Paragraph Number)
MM14, p	page 71, paragraph 3	
Q9. Do yo ı	u consider this proposed Main Modification	is:
Legally	compliant	No
Sound		No
-	consider the proposed Main Modification to entation relates to?	be unsound, please identify which test of soundness your
Positive	ly prepared?	No
Justified	?	No
Effective	9?	No
Consiste	ent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Gill Turner	
Q2.	Organisation (where appropriate)	Northumbria Healthcare	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are concerned by Development Management DPD (DM) / Strates Example: SPLA_MOD_02, Chapter 7, Policy Solvent Residential Development, DM30a	ommenting on from the Schedule of Proposition of Proposition PPD (SPLA)	sed Main Modifications (e.g.
	Town tooldoniaa Bovolopinoni, Binoca		
	Description of the proposed Main Modification MM14, page 71, paragraph 3	n (e.g. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:		tion is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Cllr Julie Wood
Q2.	Organisation (where appropriate)	Malvern Hills District Council
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Sophie Foote	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Picc Policies & Land Allocation DPD (S	roposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification ((e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Rosemary Hervey	
Q2.	Organisation (where appropriate)	Architecture Department design fellow Cambridge University	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18	
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:		s:	
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Jonathan Russell	
Q2.	Organisation (where appropriate)	Buzz Action Foundation CIO	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Councillor Fran Victory	
Q2.	Organisation (where appropriate)	Malvern Hills Green Party	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are com	sed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. c Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 8, Page 28, Paragraph 7.18	
Q8.	Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modificatio	on is:	
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Chris Baxter
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Robert Jones	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Proposed N Policies & Land Allocation DPD (SPLA) or the	lain Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of s	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Sarah Bridges	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test o	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Rob Ward	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are commovelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	nenting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
1	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number	
ľ	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	n is:	
L	_egally compliant	No	
5	Sound	No	
Q10.	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify w	hich test of soundness your
F	Positively prepared?	No	
	Justified?	No	
E	Effective?	No	
(Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Helena Dixon	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
	Do you consider this proposed Main Modification		
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Camilla Govan	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	.If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Sandra Coleman Mrs	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the Management DPD (DM) / Strategic Policy SPA_MOD_02, Chapter 7, Policy SP3, Panew Residential Development, DM30a	nting on from the Schedule of Propo Dlicies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
	www.page / 1, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	S:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which te	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Simon Johnson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: Development, DM30a	nting on from the Schedule of Pro Dlicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details name (including title)	Anne Gausden	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic FExample: SPLA_MOD_02, Chapter 7, Policy SP3, INEW Residential Development, DM30a	enting on from the Schedule of Policies & Land Allocation DPD	Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify wl	nich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Amy Berrisford
Q2.	Organisation (where appropriate)	Manchester Friends of the Earth
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Simon Johnson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Proposed location DPD (SPLA) or t	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Katharine Parsons	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parample: SPLA_MOD_03, Chapter 7, Policy SP3, Parample: SPLA_MOD_04, Chapter 7, Policy SP3, Parample: SPLA_MOD_05, Chapter 7, Policy SP3, Parample: SPLA_MOD_06, Chapter 7, Policy SP3, Pa	nting on from the Schedule of Propos Dlicies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to I representation relates to?	oe unsound, please identify which tes	t of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Zoe Shackleton		
Q2.	Organisation (where appropriate)			
Q3.	Address			
Q4.	Postcode			
Q5.	Telephone			
Q6.	Email address			
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic FExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.	
	Description of the proposed Main Modification (e.g.	g. Page 60, Paragraph Number)		
Q9.	Q9. Do you consider this proposed Main Modification is:			
L	egally compliant	No		
5	Gound	No		
	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your	
F	Positively prepared?	No		
J	Justified?	No		
E	Effective?	No		
C	Consistent with national policy?	No		

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Lisa Ward	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New Residential Development, DM30a	enting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	j. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Julia Shay
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. blicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Darren Ward	
Q2.	Organisation (where appropriate)	Red Raven Design Ltd	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
	Description of the proposed Main Modification ((e.g. Page 60, Paragraph Number)	
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Becky Turner-Jones	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Po Example: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP3, Policy Residential Development, DM30a	nting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	210. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Louise Crow	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Propos Policies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.ç	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Emma Hughes	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA)	d Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.ç	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A: Personal DetailsName (including title)

Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comment Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Panagement DPS (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Panagement (DM) (DM) (DM) (DM) (DM) (DM) (DM) (DM)	nting on from the Schedule of Pro plicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

Ms Sarah Kirk-Browne

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Jane Cheal	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule o	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify w	hich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Chris Adams	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commer Development Management DPD (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Panagement DPS (DM) / Strategic Poexample: SPLA_MOD_02, Chapter 7, Policy SP3, Panagement DPS (DM) /	nting on from the Schedule of Propolicies & Land Allocation DPD (SPLA	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	oe unsound, please identify which to	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mariana Novosivschei	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Proposed Molicies & Land Allocation DPD (SPLA) or the	lain Modifications (e.g.
	Description of the proposed Main Modification (e.g.	y Dogo 60 Dorograph Number)	
	MM14, page 71, paragraph 3	s. rage oo, raragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of s	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Pam Wortley	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Po Example: SPLA_MOD_02, Chapter 7, Policy SP3, Policy S	nting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Emily Pieri	
Q2.	Organisation (where appropriate)	NHS	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	enting on from the Schedule o	f Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number	·)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify w	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Emma Thomas	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule Policies & Land Allocation D	e of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. New Residential Development, DM30a	g. Page 60, Paragraph Numl	per)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	y which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	TIM NICHOLSON	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	nting on from the Schedule of Proposed Mair olicies & Land Allocation DPD (SPLA) or the F	n Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of sou	ndness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Councillor Natalie McVey
Q2.	Organisation (where appropriate)	Malvern Hills District Council
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Harry Paticas
Q2.	Organisation (where appropriate)	Retrofit Action For Tomorrow CIC
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): lage 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification i	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr C Kennedy	
Q2.	Organisation (where appropriate)	NHS	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic Fixample: SPLA_MOD_02, Chapter 7, Policy SP3, Fixample: Development, DM30a	enting on from the Schedule Policies & Land Allocation DF	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Numbo	er)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Ella Best	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Poetample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	nting on from the Schedule of plicies & Land Allocation DP	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Numbe	r)
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	o. If you consider the proposed Main Modification to l representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



ation relate?Please state d Main Modifications (e.g. r the Policies Map (PM):
of soundness your
t t

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1. Part A: Personal DetailsName (including title)	Charlotte Bennett
Q2. Organisation (where appropriate)	
Q3. Address	
Q4. Postcode	
Q5. Telephone	
Q6. Email address	
the relevant reference number that you are con	sed Main Modification does your representation relate?Please state nmenting on from the Schedule of Proposed Main Modifications (e.g. ic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 3, Page 28, Paragraph 7.18
Q8. Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)
MM14, page 71, paragraph 3	
29. Do you consider this proposed Main Modification is:	
Legally compliant	No
Sound	No
Q10. If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which test of soundness your
Positively prepared?	No
Justified?	No
Effective?	No
Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr John Macefield	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Propos colicies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which tes	t of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Mirian Calvo	
Q2.	Organisation (where appropriate)	Lancaster University	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	n test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details Name (including title)	DI EWAII JOHES
Q2.	Organisation (where appropriate)	SW Green Party Regional Council Representative
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are com	sed Main Modification does your representation relate?Please state imenting on from the Schedule of Proposed Main Modifications (e.g. c Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 3, Page 28, Paragraph 7.18
	Description of the proposed Main Modification ((e.g. Page 60, Paragraph Number)
Q9. Do you consider this proposed Main Modification is:		on is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Helen Heathfield	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between the Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a	nting on from the Schedule of Prolicies & Land Allocation DPD (S	roposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Andrew Kay
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are con	osed Main Modification does your representation relate?Please state mmenting on from the Schedule of Proposed Main Modifications (e.g. iic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): P3, Page 28, Paragraph 7.18
	Description of the proposed Main Modification MM14, page 71, paragraph 3	(e.g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modificati	ion is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification representation relates to?	n to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details name (including title)	wir Darren fales	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic Pexample: SPLA_MOD_02, Chapter 7, Policy SP3, Few Residential Development, DM30a	enting on from the Schedule of Policies & Land Allocation DP	of Proposed Main Modifications (e.g.
08	Description of the proposed Main Modification (e.g	n Page 60 Paragraph Numbe	ir)
	MM14, page 71, paragraph 3	g. r age oo, r aragraph Nambe	.,
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Hobert McGinnes	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, P	enting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	J. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



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Q1.	Part A: Personal DetailsName (including title)	Ken Johnston	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Proposed Molicies & Land Allocation DPD (SPLA) or the	ain Modifications (e.g.
	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of s	oundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Matthew Pembery	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic Fixample: SPLA_MOD_02, Chapter 7, Policy SP3, INew Residential Development, DM30a	enting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test o	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miriam Calvo Vilanova	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended between Development Management DPD (DM) / Strategic Policy SP3, Parample: SPLA_MOD_02, Chapter 7, Policy SP3, Parameter Residential Development, DM30a	nting on from the Schedule of Prop olicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mirian Rodriguez
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	ed Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
08	Description of the proposed Main Modification (e	g Page 60 Paragraph Number)
	MM14, page 71, paragraph 3	.g. r ago oo, r aragraph radiisory
Q9.	Do you consider this proposed Main Modification	ı is:
	Legally compliant	No
	Sound	No
Q10). If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Deborah Adler	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Properties & Land Allocation DPD (S	roposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify whic	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Emma Rodriguez	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Page 1997, Po	nting on from the Schedule of Prop Dlicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to I representation relates to?	oe unsound, please identify which t	est of soundness your
	Positively prepared?	No	
,	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Rich Lehmann
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification i	s:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms. Carmen Fabregat
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. colicies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9. Do you consider this proposed Main Modification is:		is:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Sonia Jackson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commovelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Policies & Land Allocation DPI	of Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Numbe	r)
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify v	which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Maryna Movchan	
Q2.	Organisation (where appropriate)	MTS UK	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F	enting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or t	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Councillor Natalie McVey	
Q2.	Organisation (where appropriate)	Malvern Hills District Council	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18	
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9. Do you consider this proposed Main Modification is:		s:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms. Yuliia Radzivil	
Q2.	Organisation (where appropriate)	Mine Tech Services UK	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Please state ications (e.g. s Map (PM):
s your
s your
s your
s your

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Shane McQuillan	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7. Part B: Your Representation (1)To which proposed Main Modification does your representation the relevant reference number that you are commenting on from the Schedule of Proposed M Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18			Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	Q10.If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Cleo Anderson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Page 1981	enting on from the Schedule of Propolicies & Land Allocation DPD (SPI	oosed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.





Q1.	Part A: Personal DetailsName (including title)	Thomas Jordan	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are composed Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	nmenting on from the Schedule of Proc c Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification ((e.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Timothy Gilbert
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comm	d Main Modification does your representation relate?Please state tenting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Ms Kea	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	enting on from the Schedule of Propo Policies & Land Allocation DPD (SPLA	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which te	est of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Julie Mcmurray	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commodevelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule Policies & Land Allocation D	e of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Numl	oer)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identif	y which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Susan Steward
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are com	need Main Modification does your representation relate?Please state menting on from the Schedule of Proposed Main Modifications (e.g. c Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): 3, Page 28, Paragraph 7.18
	Description of the proposed Main Modification (of MM14, page 71, paragraph 3	e.g. Page 60, Paragraph Number)
	Do you consider this proposed Main Modificatio	nn is:
	Legally compliant	No
	Sound	No
Q10). If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Christina Moran	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comment Development Management DPD (DM) / Strategic Policy SPA_MOD_02, Chapter 7, Policy SP3, Panagement DPS (DM) / Strategic Policy SP3, Panagement DPS (DM) / Strategic Policy SP3, Panagement DM)	nting on from the Schedule of Proposed Mai olicies & Land Allocation DPD (SPLA) or the	n Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g.	Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of so	undness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Keanan Waters	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are compevelopment Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3 New Residential Development, DM30a	menting on from the Schedule of Picc Policies & Land Allocation DPD (S	roposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification ((e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which	ch test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Patrick Coad	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Personal Example: SPLA_MOD_02, Chapter 7, Policy SP3, Personal Development, DM30a	enting on from the Schedule of Proposed olicies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	Description of the proposed Main Modification (e.g	ı. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of	soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Barry Marchan
Q2.	Organisation (where appropriate)	Lamilux UK
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	I Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	·	y David CO. David graph Marshau)
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page ou, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Nataliia Halona
Q2.	Organisation (where appropriate)	Mine Tech Services (UK) Ltd
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal Details name (including title)	wir ian Turner	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic Potential (1) SPLA_MOD_02, Chapter 7, Policy SP3, Chapter 7, C	nting on from the Schedule of Pro plicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e.g	. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification i	s:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Matt Bridgestock
Q2.	Organisation (where appropriate)	John Gilbert Architects
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
Q7.	7. Part B: Your Representation (1)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18	
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Alice Davies	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Q9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Paul Williamson
Q2.	Organisation (where appropriate)	TimberTight Ltd
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. olicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
Ω8	Description of the proposed Main Modification (e.g	Page 60. Paragraph Number)
	лм14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification is	s:
L	egally compliant	No
5	Sound	No
	If you consider the proposed Main Modification to I representation relates to?	be unsound, please identify which test of soundness your
F	Positively prepared?	No
J	lustified?	No
E	Effective?	No
C	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Part A: Personal DetailsName (including title)	Mr Charles Frayling	
Organisation (where appropriate)		
Address		
Postcode		
Telephone		
Email address		
the relevant reference number that you are commented bevelopment Management DPD (DM) / Strategic Policy SP3, Page 1997 (DM) / Strategic	nting on from the Schedule of Propose plicies & Land Allocation DPD (SPLA) o	ed Main Modifications (e.g.
	Page 60, Paragraph Number)	
Do you consider this proposed Main Modification is	3:	
Legally compliant	No	
Sound	No	
If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test	of soundness your
Positively prepared?	No	
Justified?	No	
Effective?	No	
Consistent with national policy?	No	
	Organisation (where appropriate) Address Postcode Telephone Email address Part B: Your Representation (1)To which proposed the relevant reference number that you are commended the relevant Management DPD (DM) / Strategic Postample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: SPLA_MOD_02, Chapter 7, Policy SP3, Pastample: Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is Legally compliant Sound Output Consider the proposed Main Modification to the proposed	Organisation (where appropriate) Address Postcode Telephone Email address Part B: Your Representation (1)To which proposed Main Modification does your represent the relevant reference number that you are commenting on from the Schedule of Propose Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) of Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18 New Residential Development, DM30a Description of the proposed Main Modification (e.g. Page 60, Paragraph Number) MM14, page 71, paragraph 3 Do you consider this proposed Main Modification is: Legally compliant No Sound No If you consider the proposed Main Modification to be unsound, please identify which test representation relates to? Positively prepared? No Justified? No Seffective? No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Andrew Guyler	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule of Prop Policies & Land Allocation DPD (SPL	oosed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Ali Abbas
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commo	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)
	Page 71, paragraph 3 (MM14)	
Q9. Do you consider this proposed Main Modification is:		is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

Paragraphs 152 & Def the NPPF states that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" and "take a proactive approach to mitigating and adapting to climate change". Modification MM14 should therefore be rejected as it will not lead to "radical reductions in greenhouse gas emissions". Instead, the original proposed Policy DM30a with a requirement for net zero homes should be retained, as this was positively prepared, justified and effective. It was also consistent with national policy, including the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14, and indeed other Inspectors have ruled that local authorities (such as Cornwall, Bath & North East Somerset and Central Lincolnshire) can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. I therefore believe that modification MM14 should be withdrawn, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Ian Pritchett
Q2.	Organisation (where appropriate)	Greencore Homes Ltd.
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are commented bevelopment Management DPD (DM) / Strategic Policy SP3, Page 1997 (DM) / Strategic	Main Modification does your representation relate?Please state nting on from the Schedule of Proposed Main Modifications (e.g. plicies & Land Allocation DPD (SPLA) or the Policies Map (PM): age 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.g.	. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification is	s:
	Legally compliant	No
	Sound	No
Q10	o. If you consider the proposed Main Modification to be representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Deborah Ray	
Q2.	Organisation (where appropriate)	Lowestoft Town Councillor (completing	in personal capacity)
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New residential development DM30a	enting on from the Schedule of Propose Policies & Land Allocation DPD (SPLA)	ed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to reach net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Cllr Dr Erica Lewis, County Councillor for Lancaster South East, Former Leader Lancaster City Council		r Lancaster South East,
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	d Main Modifications (e.g.
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10). If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test of	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

In this local plan period, the City Council committed to building much-needed homes and to laying the foundation for new housing developments near one of our largest employers. We were, however, let down, again and again, by a national planning system that didn't support us in trying to have the right homes built, to the right standards, at the right prices, with the right support, in the right places. That failure of the national planning system has seen significant & Description (among the right support, in the right places. That failure of the national planning system has seen significant & Description (among the right support, in the right places). resident and councillor opposition to developments. Particularly where developers have chosen sites not identified in the local plan for housing, in areas with known flood risks and a lack of social infrastructure. The National Planning Policy Framework (NPPF) has, again and again, positioned Inspectors to overturn planning committee decisions and resident objections in favour of developer profit. Agreeing to initiate the climate emergency review of the local plan was one of my first acts as Leader of Lancaster City Council. The NPPF lays out that the planning system should 'support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience...." (para 152) and "policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts....". We need a local plan that responds to the climate emergency, but in responding to the climate emergency, we also need to be able to require developments to deliver affordable, accessible and beautiful homes supported with the necessary public and social infrastructure. We should be building new neighbourhoods and communities. Not dormitories. Main modification (MM) 14 will not lead to "radical education in greenhouse gas emissions" and should be abandoned completely. the original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, as per the Climate Change Act (Amendment 2019), which commits the UK to reach net zero by 2050 and the National Planning Policy Framework. These supersede the Written Ministerial Statement (WMS) 15, which the Inspector cites as the basis for MM14. Other Inspectors considering proposals from Cornwall, Bath, North East Somerset, and Central Lincolnshire have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The approach taken in Lancaster's case also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it creates an inconsistent approach in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

Q12. Would you like to make another representation? Yes

Q13. Part B: Your Representation (2)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18

DM33: Development and Flood Risk

Q14. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)

MM18, p85, Criterion IV

Legally compliant	No
Sound	No
Q16. If you consider the proposed Main Modit	fication to be unsound, please identify which test of soundness your
representation relates to?	
Positively prepared?	No
Justified?	No
Effective?	No
Consistent with national policy?	No
your objection and make the Local Plan	ons please set out what modification(s) you consider necessary to resolve legally compliant or sound, having regard to the matter(s) you have provide your suggested revised wording of any policy or text.
resilience of communities". Changes propos and technical work, in a planning system tha	notes that "politics should support appropriate measures to ensure the future ed to Critierion IV for example undertaking flood risk modelling is high complex t expects applicants to pay for much of the process, it is reasonable to place the risk assessment on the applicant. So that the process of review lies with council
	y. As such the original words of criterion IV of policy DM33 should be reinstated.
planning teams and the Lead Flood Authority	
planning teams and the Lead Flood Authority Q18. Would you like to make another representation (3)To which the relevant reference number that you a	ntation? Yes proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM):
planning teams and the Lead Flood Authority Q18. Would you like to make another represent Q19. Part B: Your Representation (3)To which the relevant reference number that you a Development Management DPD (DM) / S	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18
planning teams and the Lead Flood Authority Q18. Would you like to make another representation (3)To which the relevant reference number that you a Development Management DPD (DM) / S Example: SPLA_MOD_02, Chapter 7, Pol	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18 ainable drainage
planning teams and the Lead Flood Authority Q18. Would you like to make another represent Q19. Part B: Your Representation (3)To which the relevant reference number that you a Development Management DPD (DM) / S Example: SPLA_MOD_02, Chapter 7, Pol Policy DM34: Surface water run-off and sust	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18 ainable drainage
planning teams and the Lead Flood Authority Q18. Would you like to make another represent Q19. Part B: Your Representation (3)To which the relevant reference number that you a Development Management DPD (DM) / S Example: SPLA_MOD_02, Chapter 7, Pol Policy DM34: Surface water run-off and sust Q20. Description of the proposed Main Modifi MM19, p91, para 6	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18 ainable drainage cation (e.g. Page 60, Paragraph Number)
planning teams and the Lead Flood Authority Q18. Would you like to make another representation (3)To which the relevant reference number that you a Development Management DPD (DM) / SExample: SPLA_MOD_02, Chapter 7, Pol Policy DM34: Surface water run-off and sust Q20. Description of the proposed Main Modification MM19, p91, para 6	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18 ainable drainage cation (e.g. Page 60, Paragraph Number)
planning teams and the Lead Flood Authority Q18. Would you like to make another representation (3) To which the relevant reference number that you a Development Management DPD (DM) / SExample: SPLA_MOD_02, Chapter 7, Pol Policy DM34: Surface water run-off and sust Q20. Description of the proposed Main Modific MM19, p91, para 6	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18 ainable drainage cation (e.g. Page 60, Paragraph Number)
planning teams and the Lead Flood Authority Q18. Would you like to make another representation (3) To which the relevant reference number that you a Development Management DPD (DM) / SExample: SPLA_MOD_02, Chapter 7, Pol Policy DM34: Surface water run-off and sust Q20. Description of the proposed Main Modified MM19, p91, para 6 Q21. Do you consider this proposed Main Modified Legally compliant Sound	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18 ainable drainage cation (e.g. Page 60, Paragraph Number) diffication is:
planning teams and the Lead Flood Authority Q18. Would you like to make another representation (3) To which the relevant reference number that you a Development Management DPD (DM) / SExample: SPLA_MOD_02, Chapter 7, Pol Policy DM34: Surface water run-off and sust Q20. Description of the proposed Main Modific MM19, p91, para 6 Q21. Do you consider this proposed Main Modific Sound	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18 ainable drainage cation (e.g. Page 60, Paragraph Number) dification is: No No
planning teams and the Lead Flood Authority Q18. Would you like to make another representation (3) To which the relevant reference number that you a Development Management DPD (DM) / SExample: SPLA_MOD_02, Chapter 7, Pol Policy DM34: Surface water run-off and sust Q20. Description of the proposed Main Modific MM19, p91, para 6 Q21. Do you consider this proposed Main Modific Sound Q22. If you consider the proposed Main Modific representation relates to?	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18 ainable drainage cation (e.g. Page 60, Paragraph Number) dification is: No No
planning teams and the Lead Flood Authority Q18. Would you like to make another representation (3) To which the relevant reference number that you a Development Management DPD (DM) / SExample: SPLA_MOD_02, Chapter 7, Pol Policy DM34: Surface water run-off and sust Q20. Description of the proposed Main Modific MM19, p91, para 6 Q21. Do you consider this proposed Main Modification Company of the proposed Main Modification of the proposed Main M	proposed Main Modification does your representation relate?Please state are commenting on from the Schedule of Proposed Main Modifications (e.g. Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): licy SP3, Page 28, Paragraph 7.18 ainable drainage cation (e.g. Page 60, Paragraph Number) diffication is: No No No

Q15. Do you consider this proposed Main Modification is:

Para 153 of the NPPF says, "plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk.....Policies should support appropriate measures to ensure the future resilience of communities...". Throughout this document, Lancaster City Council's planning team have acknowledged that 'no more, no faster' is not an appropriate standard for water management within our district. We have too many flood problems, and there is too little prospect of funding for flood risk reduction works not to use every new development as a flood risk reduction opportunity. Thus we ask for the planning inspectorate's support in line with the NPPF to 'hold and slow' the flow wherever we can. The recent sewerage spills give us another reason to 'hold and slow'. With most of the district's surface water going into combined sewers, slowing the flow would also help to meet the NPPF's requirements under section 15 "Conserving and enhancing the natural environment", the Lune flows into Morecambe Bay, and Morecambe Bay is a Site of Special Scientific Interest. Given we know that the climate emergency will only bring us more rain, while 'no more, no faster' may meet the requirements of the NPPF in other parts of the country, it is clear it does not meet the requirements in Lancaster and the thus the original wording operationalising 'no more, no faster' should be retained.

Q24. Would	you like	to make	another	representation?	Yes
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Q25. Part B: Your Representation (4)To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. Development Management DPD (DM) / Strategic Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18

DM33: Development and Flood Risk

Q26. Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)

MM18, p85 Criterion IX

Q27. Do you consider this proposed Main Modification is:

Legally compliant No Sound No

Q28. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

Positively prepared?

No

Justified?

No

Effective?

No

Consistent with national policy?

No

Para 153 of the NPPF says, "policies should support appropriate measures to ensure the future resilience of communities...". The recent sewerage spills give us another reason to 'hold and slow'. With most of the district's surface water going into combined sewers, slowing the flow would also help to meet the NPPF's requirements under section 15 "Conserving and enhancing the natural environment", the Lune flows into Morecambe Bay, and Morecambe Bay is a Site of Special Scientific Interest. Given we know that the climate emergency will only bring us more rain, while 'no more, no faster' may meet the requirements of the NPPF in other parts of the country, it is clear it does not meet the requirements in Lancaster and the thus the original wording operationalising 'no more, no faster' should be retained.



Q1.	Part A: Personal DetailsName (including title)	Ms Helen Forester	
Q2.	Organisation (where appropriate)	Parents for Future UK	
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
Q7.	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3,	nenting on from the Schedule of Proposed Policies & Land Allocation DPD (SPLA) or	Main Modifications (e.g.
	New Residential Development, DM30a		
Q8.	Description of the proposed Main Modification (e	.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modification	n is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which test o	f soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

We at Parents for Future UK are asking the Planning Inspector to drop Main Modification 14 to Lancaster City Council's Zero Carbon Homes Policy and to return the wording to that originally proposed by Lancaster City Council. It is now imperative that we take clear and decisive action towards securing a liveable future for our children. For Parents for Future as a movement, this means not shying away from allowing councils to create policies which take climate collapse seriously. The Climate Change law (2019) enshrined in law the UK's commitment to achieving net zero by 2050; Lancaster City Council's plans will lead the way in this, and allow them to be an example in setting standards and targets for housing plans in their constituencies. This will mean that all city planners and developers will be required to do what is best for our children, not their pockets. The Inspector's continued rejection of LCC's policy and suggestion of MM14 is short-sighted and unethical, particularly given the recent wildfires and record heat waves sweeping our planet. We must be brave in our work to create a liveable future for our children and planners and developers must be held to account in doing this. The original wording of MM14 would mean that there are clear targets laid out to do this. Removing these targets and specifics would mean that there is too much 'wiggle room' and space for interpretation. New housing developments could create exciting new standards in developments, and the specifics as detailed in DM30a could lead to creative solutions, harness innovation and pave the way to sustainable living for everyone in the UK, irrespective of their socio-economic background.



Q1.	Part A: Personal DetailsName (including title)	Ms Rosemary Hindley	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, PNew Residential Development, DM30a	enting on from the Schedule of Proposed Main olicies & Land Allocation DPD (SPLA) or the I	n Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of sou	indness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Jeremy James	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended bevelopment Management DPD (DM) / Strategic Policy SPLA_MOD_02, Chapter 7, Policy SP3, Particle Residential Development, DM30a	nting on from the Schedule of Prop olicies & Land Allocation DPD (SPL	osed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is	s:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). Modification MM14 does neither and should be abandoned completely; the original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & Dry North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally. We are still working to develop the best approach to net zero buildings, and even those with that aim will fail. Unless we have ambitious targets, and learn form the failures, we will nor progress fast enough. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr Stuart Middleton
Q2.	Organisation (where appropriate)	Peterborough in Transition
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	d Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	Description of the proposed Main Modification (e. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Miss Danette O'Hara	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are commended be below the management DPD (DM) / Strategic Policy SPA, MOD_02, Chapter 7, Policy SP3, Pallow Residential Development, DM30a	nting on from the Schedule of Proposed Dicies & Land Allocation DPD (SPLA) o	d Main Modifications (e.g.
08	Description of the proposed Main Modification (e.g.	Page 60 Paragraph Number)	
	MM14, page 71, paragraph 3	Tage 60, Falagraph Hamber,	
Q9.	Do you consider this proposed Main Modification is	3:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be representation relates to?	pe unsound, please identify which test	of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Sharon Lane	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are commoved proposed the relevant Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New Residential Development, DM30a	nenting on from the Schedule of Pro Policies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification	ı is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to representation relates to?	o be unsound, please identify which	test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr George Oliver	
Q2.	Organisation (where appropriate)	-	
Q3.	Address		
Q4.	Postcode	-	
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which propose the relevant reference number that you are con Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP New Residential Development, DM30a	nmenting on from the Schedule of Proposic Policies & Land Allocation DPD (SPLA)	sed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification	(e.g. Page 60, Paragraph Number)	
	MM14, page 71, paragraph 3		
Q9.	Do you consider this proposed Main Modificati	on is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification representation relates to?	to be unsound, please identify which te	st of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Owen jackson	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are comme Development Management DPD (DM) / Strategic P Example: SPLA_MOD_02, Chapter 7, Policy SP3, P New residential development dm30a	enting on from the Schedule of P olicies & Land Allocation DPD (S	roposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. Mm14, page 71, paragraph 3	յ. Page 60, Paragraph Number)	
Q9.	9. Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of s representation relates to?		ch test of soundness your	
	Positively prepared?	No	
	Justified?	No	
	Effective?	Yes	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Dr Rachel Marshall	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F New Residential Development, DM30a	enting on from the Schedule of Policies & Land Allocation DP	of Proposed Main Modifications (e.g.
	Description of the proposed Main Modification (e.e.	g. Page 60, Paragraph Numbe	r)
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10	If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		which test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Oyindasola Uwaifo
Q2.	Organisation (where appropriate)	Etude Consultancy Limited
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are comme	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
Q8.	Description of the proposed Main Modification (e.g	g. Page 60. Paragraph Number)
	MM14, page 71, paragraph 3	, 13-17, 113 (
Q9.	9. Do you consider this proposed Main Modification is:	
	Legally compliant	No
	Sound	No
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

Etude - energy and sustainability consultants and experts in providing robust evidence bases for other local authorities believe the modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. Over past decade, there has been a realisation that the planning system has a key role to play to mitigate climate change. The Planning and Compulsory Purchase Act 2004 requires the local plan to ensure that development and use of land contribute to mitigation of climate change. The Climate Change Act 2008 sets a clear direction for the UK. It obliges the government to set policy that will enable the UK to meet its carbon budgets. The Planning and Energy Act 2008 empowers local plans to set "reasonable requirements" for new buildings to comply with "energy efficiency standards that exceed ... building regulations" and "supply a proportion of their energy from nearby renewable or low carbon sources". The Deregulation Act 2015 was intended to dis-apply s.1(c) of the Planning and Energy Act to dwellings removing the ability of LPAs to impose local requirements above building regulations on energy efficiency standards. However, this has not been brought into force. On 25th March 2015, a Written Ministerial Statement (WMS) sought to limit the freedom of LPAs to set their own standards until the introduction of zero carbon homes policy late in 2016. Until then LPAs were expected not to set conditions with requirements above CfSH level 4 (i.e. 19% improvement over Part L). However, there has been no adoption of a zero carbon homes policy at a national level. Further to a special report completed by the Climate Change Committee, the Climate Change Act was updated in 2019: the overall greenhouse gas reduction was changed from an 80% reduction to a 100% reduction by 2050, i.e. Net Zero. At the same time, a very large number of local authorities, including many London boroughs declared a climate and ecological emergency. An updated NPPF (National Planning Policy Framework) (2021) now expects the planning system to contribute to a "radical reduction in greenhouse gas emissions" (Para 148) and requires LPAs to take a proactive approach (Para 149). Further, the Government has confirmed that the Planning and Energy Act 2008 will not be amended. The result of all this is that Councils are able to set local energy efficiency standards without falling foul of Government policy. This has been confirmed by recent Planning Inspector reports (e.g. Dec 2022 for B&NES Council and Jan 2023 for Cornwall Council) which indicate that the WMS of 25 March 2015 is of limited relevance and that it has been superseded by subsequent events. It should also be noted that in their response to the Future Homes Standard consultation in 2021, the Government stated the following: "All levels of Government have a role to play in meeting the net zero target and local councils have been excellent advocates of the importance of taking action to tackle climate change. Local authorities have a unique combination of powers, assets, access to funding, local knowledge, relationships with key stakeholders and democratic accountability." The above confirms the ability of Lancaster City Council to set their own standards for new buildings as long as it can be demonstrated that they are technically feasible and that these policies consider the issue of viability and its impact on the delivery of new housing and other buildings. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Diana McIntyre	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, Policy SP	enting on from the Schedule of Pro olicies & Land Allocation DPD (SP	posed Main Modifications (e.g.
	Description of the proposed Main Modification (e.g. MM14, page 71, paragraph 3	g. Page 60, Paragraph Number)	
Q9.	Do you consider this proposed Main Modification is:		
	Legally compliant	No	
	Sound	No	
Q10	Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?		
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mr William Lane
Q2.	Organisation (where appropriate)	
Q3.	Address	
Q4.	Postcode	
Q5.	Telephone	
Q6.	Email address	
	the relevant reference number that you are common Development Management DPD (DM) / Strategic F Example: SPLA_MOD_02, Chapter 7, Policy SP3, F	Main Modification does your representation relate?Please state enting on from the Schedule of Proposed Main Modifications (e.g. Policies & Land Allocation DPD (SPLA) or the Policies Map (PM): Page 28, Paragraph 7.18
	New Residential Development, DM30a	
Q8.	Description of the proposed Main Modification (e.	g. Page 60, Paragraph Number)
	MM14, page 71, paragraph 3	
Q9.	Do you consider this proposed Main Modification	is:
	Legally compliant	No
	Sound	No
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of soundness your
	Positively prepared?	No
	Justified?	No
	Effective?	No
	Consistent with national policy?	No

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Heather Lamble	
Q2.	Organisation (where appropriate)		
Q3.	Address		
Q4.	Postcode		
Q5.	Telephone		
Q6.	Email address		
	Part B: Your Representation (1)To which proposed the relevant reference number that you are common Development Management DPD (DM) / Strategic PExample: SPLA_MOD_02, Chapter 7, Policy SP3, FNew Residential Development, DM30a	enting on from the Schedule or olicies & Land Allocation DPD	Proposed Main Modifications (e.g.
Q8.	Description of the proposed Main Modification (e.g	g. Page 60, Paragraph Number)
	MM14, page 71, para 3		
Q9.	Do you consider this proposed Main Modification	is:	
	Legally compliant	No	
	Sound	No	
Q10. If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?			rhich test of soundness your
	Positively prepared?	No	
	Justified?	No	
	Effective?	No	
	Consistent with national policy?	No	

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.



Q1.	Part A: Personal DetailsName (including title)	Mrs Sarah Jackson		
Q2.	Organisation (where appropriate)			
Q3.	Address			
Q4.	Postcode			
Q5.	Telephone			
Q6.	Email address			
	Part B: Your Representation (1)To which propose the relevant reference number that you are comm Development Management DPD (DM) / Strategic Example: SPLA_MOD_02, Chapter 7, Policy SP3, New residential development DM30a	nenting on from the Schedule of Proposed Main Policies & Land Allocation DPD (SPLA) or the P	Modifications (e.g.	
	Description of the proposed Main Modification (e MM14, page 71, paragraph 3	.g. Page 60, Paragraph Number)		
Q9.	Q9. Do you consider this proposed Main Modification is:			
	Legally compliant	No		
	Sound	No		
Q10	If you consider the proposed Main Modification to representation relates to?	be unsound, please identify which test of sour	ndness your	
	Positively prepared?	No		
	Justified?	No		
	Effective?	No		
	Consistent with national policy?	No		

Q11. In light of the proposed Main Modifications please set out what modification(s) you consider necessary to resolve your objection and make the Local Plan legally compliant or sound, having regard to the matter(s) you have identified. It will be helpful if you could provide your suggested revised wording of any policy or text.

The National Planning Policy Framework lays out that the planning system should "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (Paragraph 152) and "take a proactive approach to mitigating and adapting to climate change" (Paragraph 153). The modification MM14 will not lead to "radical reductions in greenhouse gas emissions" and should be abandoned completely. The original proposed Policy DM30a with a requirement for net zero homes should be retained. The original policy was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act (Amendment 2019) which commits the UK to go net zero by 2050, the National Planning Policy Framework, and the 2021 uplift in the Building Regulations. These supersede the Written Ministerial Statement WMS15, which the Inspector cites as the basis for the modification MM14. Other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. The inconsistency from the Planning Inspectorate in their decision for Lancaster also ignores recent warnings (March 2023) from the IPCC that we need to act now to reduce our carbon emissions if we are to have any chance of meeting our commitments under the Paris Agreement, which the UK Government has ratified. In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by the climate emergency (note the world has just experienced the hottest day ever recorded). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place. MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council.

Q12. Would you like to make another representation?



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We help people change the way they think and act on energy

12th July 2023

Re: Representation in respect of Lancaster Local Plan – Policy DM30a - New Residential Development

We write to register our objection to MM14 and register our support for policy DM30a as originally worded. The modification MM14 should be completely abandoned. The original proposed Policy DM30a with a requirement for net zero homes should be retained, and in fact strengthened to require new buildings to be net zero from adoption.

The policy is justified and necessary

The IPPC's latest synthesis report (March 2023) summarises the accepted climate science and current situation around the globe. Its key findings of fact can be summarised as follows (my emphasis):

"Human activities... have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850–1900 in 2011–2020. Widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred. Human-caused climate change is already affecting many weather and climate extremes in every region across the globe. This has led to widespread adverse impacts and related losses and damages to nature and people.

Continued greenhouse gas emissions will lead to increasing global warming, with the best estimate of reaching 1.5°C in the near term in considered scenarios and modelled pathways. Every increment of global warming will intensify multiple and concurrent hazards (high confidence).

Some future changes are unavoidable and/or irreversible but can be limited by deep, rapid and sustained global greenhouse gas emissions reduction. The likelihood of abrupt and/or irreversible changes increases with higher global warming levels.

All global modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot, and those that limit warming to 2°C (>67%), involve rapid and deep and, in most cases, immediate greenhouse gas emissions reductions in all sectors this decade.

Climate change is a threat to human well-being and planetary health (very high confidence). There is a rapidly closing window of opportunity to secure a liveable and sustainable future for all (very high confidence). The choices and actions implemented in this decade will have impacts now and for thousands of years (high confidence)."

The UK is a signatory to the 2015 Paris Climate Accord¹ where signatories committed to substantially reduce global greenhouse gas emissions to limit the global temperature increase in this century to 2 degrees Celsius while pursuing efforts to limit the increase even further to 1.5 degrees. The conclusions from this unimpeachable science, and the steps necessary to keep global warming within 1.5 and 2 degrees Celsius are material considerations in the Lancaster case and are directly relevant to the council's efforts to achieve emissions reductions over and above national efforts.

Looking at the national context, the Climate Change Act 2008 is the basis for the UK's approach to tackling and responding to climate change, requiring that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are adapted to. The Act also establishes the framework to deliver on those requirements. The Act commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. Legally binding carbon budgets act as stepping-stones towards this target.

Although the Climate Change Act commits the UK to reducing emissions to net zero by 2050, the Committee on Climate Change (CCC) in their 2023 report to parliament² warns that current policies and plans are insufficient to meet the 6th carbon budget: "The rate of emissions reduction will need to significantly increase for the UK to meet its 2030 NDC and the Sixth Carbon Budget. If the UK is to achieve its NDC, the rate of emissions reduction outside the electricity supply sector must almost quadruple, from 1.2% annual reductions to 4.7%."

The 2023 report specifically commented on the role of planning "the planning system must have an overarching requirement that all planning decisions must be taken giving full regard to the imperative of Net Zero". It furthermore made specific mention of "inconsistent inspectorate decisions on whether local authorities can set standards (e.g. on energy efficiency in buildings) that go beyond those set in national building regulations".

¹ The Paris Agreement – www.un.org/en/climatechange/paris-agreement

²Climate Change Committee – 2023 Progress Report to Parliament - <u>www.theccc.org.uk/publication/2023-progress-report-to-parliament/</u>

The 2023 progress report also specifically looked at progress cutting emissions within the building sector:

"Policy progress in the buildings sector is not on track, with 77% of the required emissions reduction by the Sixth Carbon Budget period judged to be either at significant risk or with insufficient plans (Figure 5.8, Table 5.2).... "To reach Net Zero, the Government urgently needs to coordinate a shift in how the UK's 28 million homes and two million non-residential buildings use energy. Our assessment of the Government's policy progress for buildings remains largely unchanged from last year. Progress remains broadly insufficient to ensure that the buildings sector reaches zero emissions by 2050."

The Balanced Pathway to Net Zero³, which represents a scenario that places the UK in the best and most realistic position to achieve net zero by 2050, states that <u>all new builds will need to be net zero by 2025</u> at the latest (page 40 – my emphasis).

Given the lack of progress cutting emissions either globally or nationally, the lack of binding zero carbon policies from the UK government, and the overall slow progress at cutting emissions from buildings, the evidence suggests that local authorities must fill the gap through Local Plan policies. We would therefore support the reinstatement, and in fact strengthening of Lancaster's original draft policy to require new buildings to be net zero from adoption.

One cannot fail to see the impacts of global warming already in the system, simultaneously ravaging different parts of the world from just 1.1 °C of warming, with predictions that we will pass 1.5 °C in the near future. Every fraction of a degree of additional warming that is averted by carbon reduction will lessen the increased severity of climate impacts yet to come, the economic, social, and environmental harms and human mortality that will result from them. It is essential that local government is supported and encouraged in securing carbon reductions in addition to the efforts of national government.

Consistent with national policy

The original intention of the Written Ministerial Statement – Planning Update dated 25 March 2015 (HCWS488) was to remove the ability of local planning authorities to set local energy efficiency standards beyond building regulations, to support the introduction of a national zero carbon homes regime, originally planned for 2016. With binding zero carbon standards introduced nationally, locally policies would not be necessary.

However, the Westminster government abandoned the national zero-carbon homes regime, and the amendments to the Energy Act were never enacted. Having first been superseded by the abandonment of the national zero carbon homes regime in 2015, the Written Ministerial Statement was superseded a second time by the recent update to Part L of the building regulations and government plans to introduce the Future Homes Standard.

 $^{^3}$ Climate Change Committee Sixth Carbon Budget (Sector Summary: Buildings - $\underline{www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf}$

The government has repeatedly confirmed that local authorities retain the legal right to require developments to meet higher standards than the current building regulations under the Planning and Energy Act 2008.

In July 2018 in the Government's response to the technical consultation on updates to national planning policy and guidance⁴ (answer to Q33) stated (my emphasis):

"A number of local authority respondents stated the view that the text in the revised Framework restricted their ability to require energy efficiency standards above Building Regulations. To clarify, the Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations. The Government remains committed to delivering the clean growth mission to halve the energy usage of new buildings by 2030".

Again in 2021 the government confirmed in its response to The Future Homes Standard consultation:

'The new planning reforms will clarify the longer-term role of local planning authorities in determining local energy efficiency standards. To provide some certainty in the immediate term, the Government will not amend the Planning and Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes.'

I understand that DLUHC have confirmed the same messages again in response to enquiries from Lancaster Council.

In the Inspectors letter of 22nd December (EX INS 22) the Inspector appears to have interpreted the government's 2021 response to mean that until the longer-term role of local planning authorities is confirmed by government, Local Planning authorities will <u>not</u> retain powers to set local energy efficiency standards for new homes.

It is clear from the government's responses in 2021 and 2018 that this was not the government's intention. To quote their earlier 2018 clarification verbatim, *local* authorities are not restricted in their ability to require energy efficiency standards above Building Regulations.

Exploring the meaning of the government's 2018 statement further, the WMS advised that local plan policies should not be used to set requirements above the

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956094/Government_response_to_Future_Homes_Standard_consultation.pdf

⁴ Government response to the draft revised National Planning Policy Framework consultation - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728498/180724_NPPF_Gov_response.pdf

⁵ Paragraphs 2.39 – 2.42, The Future Homes Standard Consultation - Summary of responses received and Government response: -

equivalent of Level 4 of the Code for Sustainable Homes. This is equivalent to about a 19% reduction in emissions beyond the 2013 building regulations. The Interim Future Homes Standard, brought into force in 2022 result in carbon savings of 31% over the 2013 building regulations, so already exceeding the limit set out in the WMS.

If local government is not restricted in its ability to require energy efficiency standards above Building Regulations, the only logical interpretation is that it is able to set standards requiring greater emission reductions than the currently adopted (2022) building regulations, i.e. requiring more than a 31% reduction in carbon emissions over the previous 2013 iteration of the building regulations. This has the result that the WMS is set aside.

The WMS reflected the policy intentions of the government of the day, led at the time by David Cameron. We have since had four different prime ministers and further reform of building regulations, to which the WMS related. The 2015 written ministerial statement references the Code for Sustainable Homes, which was withdrawn in 2015 and no longer has any meaning. It also pre-dates highly significant revisions to the Climate Change Act⁶ brought in by Theresa May's government in 2019, committing the UK in law to bringing net emissions down to zero by 2050.

The 2015 Written Ministerial Statement should be seen as an artifact from a previous proposed regulatory regime which never came into force and should be given limited weight as a material consideration. The Inspectors examining both the Cornwall Climate Emergency DPD and the Bath and North-East Somerset (B&NES) Local Plan partial update came to precisely this conclusion.

In view of the clear repeated government statements which would support this view and the judgements of other planning inspectors, the position taken by the Inspector to effectively block policy DM30a appears unreasonable and irrational.

The attached Open legal advice from Estelle Dehon KC at Cornerstone Barristers⁷ furthermore establishes that LPA's have statutory authority to set energy efficiency targets which exceed the baseline in national Building Regulations. Nothing in law or national policy prevents them from doing so or limits the amount by which they may exceed the baseline, provided that the relevant policies are reasonable, properly prepared, and do not conflict with any other national planning policies.

In conclusion, MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by other legislation. It is not positively prepared as it ignores the urgency demanded by unimpeachable climate

⁶The Climate Change Act 2008 (2050 Target Amendment) Order 2019 - www.legislation.gov.uk/ukdsi/2019/9780111187654

⁷ Open legal opinion - In the matter of the Building Regulations, Part L 2021 and the Planning and Energy Act 2008 www.essexdesignguide.co.uk/media/2647/essex-open-legal-advice-energy-policy-and-building-regulations.pdf

science. It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster District will have to be retrofitted in the future to achieve net zero, which is more expensive than building to high standards in the first place, and means that occupants of new homes in the district will need to spend more on their heating bills than people in similar homes in Cornwall or Bath.

MM14 should therefore be dropped entirely, and the wording should return to that originally proposed by Lancaster City Council, or further strengthened to ensure that new homes are net zero in operation from the adoption of the plan.

We would like to register to speak at the examination in public.

Regards

Daniel Stone MaTP MRTPI

Senior Planner for Net Zero

Centre for Sustainable Energy

IN THE MATTER OF THE BUILDING REGULATIONS, PART L 2021 AND THE PLANNING AND ENERGY ACT 2008

Re: Ability of local planning authorities to set local plan policies that require development to achieve energy efficiency standards above Building Regulations

OPEN ADVICE	

INTRODUCTION AND SUMMARY

- 1. I am asked to advise Essex County Council ("**the Council**") and the Essex Climate Action Commission ("**ECAC**") on the ability of local planning authorities ("**LPAs**") to set local plan policies mandating energy efficiency standards for new buildings which exceed those in the Building Regulations, Part L, and also go beyond the 19% improvement over Building Regulations standards¹ referred to in a Written Ministerial Statement on plan-making, published in 2015 ("**the 2015 WMS**").
- 2. For the reasons set out in detail below:
 - 2.1 The Planning and Energy Act 2008 ("**PEA 2008**") empowers LPAs, through their local plan policies, to set higher targets for energy performance standards for development in their area than the national baseline, provided such standards are "reasonable" and comply with the usual plan-making requirements of section 19 of the Planning and Compulsory Purchase Act 2004.
 - 2.2 Some confusion over the ability of LPAs to set standards above the national baseline seems to have arisen due to:
 - a. an amendment to the PEA 2008, which was enacted as part of the Deregulation Act 2015 but never brought into force; and

¹ Conservation of fuel and power: Approved Document L, March 2014, updated February 2023, https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l.

- b. the 2015 WMS, which set out the government's expectation that local plan policies should not be used to set requirements above the equivalent of Level 4 of the Code for Sustainable Homes (19% above the national baseline in the Building Regulations, Part L 2013) and which is still reflected in the Planning Practice Guidance on Climate Change.²
- 2.3 However, the Department of Levelling Up, Housing and Communities has confirmed that the 2015 WMS is otiose in light of the 2021 updates to the Building Regulations and that there are no plans to bring the 2015 amendment to the PEA 2008 into force, or otherwise to amend the Act. Accordingly, the 2015 WMS should not be accorded any weight.
- 2.4 With one exception, LPAs which have sought to include policies in their local plans mandating energy efficiency standards above the national baseline have been successful, and inspectors have been satisfied that such policies will not have an unreasonable impact on the viability or deliverability of development.
- 2.5 The exception the draft Area Action Plan for Salt Cross, found unsound in a report published on 1 March 2023 is based on a misunderstanding of both national policy and the PEA 2008. There is therefore nothing in the Salt Cross decision which should dissuade an LPA from seeking to adopt net zero policies requiring high new build fabric efficiency standards, provided the LPA evidence such policies thoroughly and clearly indicates an awareness of the impact of the proposed policies on the viability of development.

2

Planning update, March 2015, https://www.gov.uk/government/speeches/planning-update-march-2015; Planning Practice Guidance: Climate Change, June 2014, updated March 2019, https://www.gov.uk/guidance/climate-change.

REASONS

3. This opinion has the following structure:

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FACTUAL BACKGROUND

4. In October 2018, the Intergovernmental Panel on Climate Change ("IPCC") reported in its *Special Report on Global Warming of 1.5°C* (the "SR1.5 Report"), that human activities had caused the Earth's surface to warm by more than 1°C since the industrial period of 1851-1900.³ The SR1.5 Report made two further significant findings: (i) the climate impacts of 2°C of warming would be very much more serious than those of 1.5°C of warming; and (ii) there were then only 12 years in which to take action to prevent global temperature rise above 1.5°C.

³ IPCC 2018 Special Report on Global Warming of 1.5°C, Summary for Policymakers ("SPM") A1 https://www.ipcc.ch/sr15/.

- 5. On 9 August 2021 the IPCC published the contribution of Working Group I to the IPCC's Sixth Assessment Report, regarding the physical science basis of climate change. Its key findings of fact can be summarised as follows:⁴
 - a. It is unequivocal that human influence has warmed the atmosphere, ocean and land. Widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred.
 - b. The scale of recent changes across the climate system as a whole and the present state of many aspects of the climate system are unprecedented when compared to the globe's climate over many thousands of years.
 - c. Human-induced climate change is already affecting many weather and climate extremes in every region across the globe; evidence of observed changes in extremes such as heatwaves, heavy precipitation, droughts, and tropical cyclones and, in particular, their attribution to human influence, has strengthened since the IPCC published its Fifth Assessment Report in 2013.
 - d. Global warming of 1.5° C and 2° C will be exceeded during the 21^{st} century unless deep reductions in CO_2 and other greenhouse gas emissions occur in the coming decades.
 - e. Limiting human-induced global warming to a specific level requires limiting cumulative CO₂ emissions, reaching at least Net Zero CO₂ emissions, along with strong reductions in other greenhouse gas emissions.⁵ Strong, rapid and sustained reduction in CH₄ (methane) emissions would also limit the warming effect resulting from declining aerosol pollution and would improve air quality.
- 6. The IPCC estimates a remaining carbon budget of 500 gigatonnes of CO₂ ("**GtCO**₂") (from 2020) for a 50:50 chance of restricting warming to 1.5°C, i.e., a little over

⁴ IPCC, 2021: SPM in *Climate Change 2021: The Physical Science Basis Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*, Cambridge University Press https://www.ipcc.ch/report/ar6/wg1/.

IPCC, 2018: Annex I: Glossary defines Net Zero CO₂ emissions as being achieved when global CO₂ emissions are balanced by CO₂ removals. Note that Net Zero CO₂ emissions and carbon neutrality have different meanings and can only be used interchangeably at a global scale. At a regional, national, local, or sectoral level, Net Zero requires the reduction of emissions to a level as close to zero as possible, while carbon neutrality can rely on offsetting elsewhere. See IPCC, 2022, Technical Summary ("TS") in Climate Change 2022: Mitigation of Climate Change, Working Group III, Box TS.6, fn. 19.

420GtCO₂ from the start of 2022.⁶ This new budget represents just over ten years' worth of global emissions at pre-pandemic (2019) levels (a level that 2021 broadly matched).

7. On 17 January 2022, the UK Government published its *UK Climate Change Risk Assessment 2022*. This details the effects currently being felt across the UK from impacts such as flooding, wildfires, sea level rise, coastal erosion and heating. It also sets out that, even under low warming scenarios, the UK will be subject to a range of significant and costly impacts unless accelerated further action is taken now. For eight of the risks identified, economic damage by 2050 under 2°C of warming could exceed £1 billion per annum. It states:

"The evidence shows that we must do more to build climate change into any decisions that have long-term effects, such as new housing or infrastructure, to avoid often costly remedial action in the future." ¹⁰

- 8. On 27 February 2022 the IPCC published the contribution of Working Group II to the IPCC's Sixth Assessment Report. Its key findings of fact are:
 - a. The extent and magnitude of climate change impacts are larger than estimated in previous assessments;¹¹
 - b. Climate change has caused increased heat-related mortality; hot extremes including heatwaves have intensified in cities, where they have aggravated air pollution events and limited functioning of key infrastructure; 12
 - c. Continued and accelerating sea level rise will encroach on coastal settlements and infrastructure, 13 and, combined with storm surge and heavy rainfall, will increase compound flood risks; 14

⁶ IPCC, 2021, Table SPM2 and paras D.1.3-D.1.8.

UK Climate Change Risk Assessment 2022 (17 January 2022)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1047003/climate-change-risk-assessment-2022.pdf

⁸ Ibid, pg 3.

⁹ Ibid, pg 4.

¹⁰ Ibid, pg 4 and pg 9.

¹¹ IPCC, 2022, SPM in *Climate Change 2022, Impacts, Adaptation and Vulnerability, Working Group II contribution*, para SPM.B.1.2 https://www.ipcc.ch/report/ar6/wg2/.

¹² Ibid, SPM B.1.1 and SPM.B.1.5.

¹³ Ibid, SPM.B.3.1.

¹⁴ Ibid, SPM.B.5.1.

- d. There have been irreversible losses, for example through species extinction driven by climate change;¹⁵
- e. "The cumulative scientific evidence is unequivocal: Climate change is a threat to human well-being and planetary health. Any further delay in concerted anticipatory global action on adaptation and mitigation will miss a brief and rapidly closing window of opportunity to secure a liveable and sustainable future for all." 16
- 9. On 20 March, the IPCC published its Synthesis Report, which draws together conclusions and recommendations from its detailed reports produced over the last six-year reporting cycle.¹⁷ It emphasises that deep, rapid, sustained, and immediate reductions in greenhouse gas emissions are needed to avoid dangerous and irreversible consequences for human and natural systems.¹⁸ A wide range of co-benefits would accompany rapid and sweeping emissions reductions, especially in terms of air quality and public health.¹⁹ It sets out that substantial emissions and policy gaps presently exist, with implemented policies being on track for warming of 3.2°C, with a range of 2.2°C to 3.5°C.²⁰ Importantly, it emphasises that even the smallest increments of warming matter.²¹ Every fraction of a degree will increase the severity and frequency of floods, droughts, storms, heatwaves, and other extreme weather events.
- 10. ECAC is an independent body, set up by Essex County Council in May 2020. There are currently 30 commissioners, drawn from a range of public, private, and third sector organisations. In July 2021, ECAC published its report 'Net Zero: Making Essex Carbon Neutral', in which it set out a series of recommendations, which were adopted in full by the County Council. Among these was the recommendation that all new homes and commercial buildings granted planning permission in Essex

¹⁵ Ibid, SPM.B.1.2.

¹⁶ Ibid, SPM.D.5.3.

¹⁷ IPCC 2023 AR6 Synthesis Report https://www.ipcc.ch/report/ar6/syr/.

¹⁸ Ibid, C.2.1 pg 27.

¹⁹ Ibid, C.2.3 pg 27.

²⁰ Ibid, figure 5 pg 23.

²¹ Ibid, B.2.2 pg 15 and figure 4 pg 18.

should be zero carbon by 2025, and carbon positive by 2030.²² These targets do not have statutory authority, but through leadership and information sharing, ECAC and the County Council, working with district council Chief Planners, are seeking to influence LPAs to adopt energy performance policies in their local plans, and developers to commit to higher standards of energy efficiency.

11. The Essex Developers Group ("**EDG**") has signed up to a Developers Climate Action Charter in June 2022, in support of the ECAC targets. The Charter has been adopted by the EDG as well as Homes England, the South East Local Enterprise Partnership and the Essex Planning Officers Association (representing the 15 local authorities of Essex).²³

LEGAL AND POLICY BACKGROUND

12. The Courts in the UK have recognised the "very great importance" and "significance" of climate change, "with its consequences for human and other life on this planet": R (BAAN) v SSLUHC [2023] EWHC 171 (Admin) at §§1 and 258. The Divisional Court has accepted that the impact of global heating is "potentially catastrophic": R (Spurrier) v Secretary of State for Transport [2020] PTSR 240 at §560. The Court of Appeal has recognised that the "issue of climate change is a matter of profound national and international importance of great concern to the public—and, indeed, to the Government of the United Kingdom": R (Plan B Earth) v Secretary of State for Transport [2020] PTSR 1446 at §277.

Statutory obligation to reach Net Zero by 2050

13. The United Kingdom is subject to a statutory obligation to ensure that its net carbon account for the year 2050 is at least 100% lower than the 1990 baseline, pursuant to section 1(1) of the Climate Change Act 2008 ("CCA 2008"), as amended by the Climate Change Act 2008 (2050 Target Amendment) Order 2019. Under sections 4 and 9 of the CCA 2008, the Secretary of State must set regular

²² ECAC, 'Net Zero: Making Essex Carbon Neutral', pg 33, https://www.essexclimate.org.uk/sites/default/files/DS21 7178%20ECAC Commission Report-Final.pdf.

²³ Essex Developers' Group Climate Action Charter, https://www.essexdesignguide.co.uk/climate-change/net-zero-evidence/net-zero-carbon-viability-and-toolkit-study/

carbon budgets for each succeeding five-year period, taking into account advice from the Climate Change Committee ("CCC"), and ensure that the net UK carbon account for each budgetary period does not exceed the carbon budget.

- 14. The duties of the CCC are set out in Part 2 of the CCA 2008 and include obligations to advise the Secretary of State on the setting of carbon budgets (section 34) and to make annual reports to Parliament on the progress that has been made towards meeting the carbon budgets and the 2050 Net Zero target (section 36).
- 15. The Fourth Carbon Budget, for the period 2023-2027, is set at 1,950 million tonnes carbon dioxide equivalent ("MtCO₂e") and requires an average of a 51% reduction in emissions compared with 1990 levels.²⁴ It was set so as to be on track for the previous target of an 80% reduction in greenhouse gas emissions by 2050. The Fifth Carbon Budget (2028-32), set on the same basis, is 1,725 MtCO₂e, which requires an average of a 57% reduction.
- 16. The CCC published its Sixth Carbon Budget recommendation and report in December 2020. The Government accepted the recommendation and enshrined the budget in law by the Carbon Budget Order 2021. It sets a target of 965 MtCO₂e for the period 2033–2037, which would equate to a 78% reduction in emissions by 2035, relative to the 1990 baseline.²⁵
- 17. The adoption of the Sixth Carbon Budget has clear implications for the Fourth and Fifth Carbon Budgets, which were set in line with the previous 'at least 80% reduction' target for 2050 rather than the revised 'at least 100%' target now found in Section 1 of the CCA 2008. In its December 2020 report, the CCC calculated a difference of at least 28-68 MtCO₂e a year in 2030 between the average emissions allowed by the Fifth Carbon Budget, and the CCC's "Balanced Pathway", which is a

²⁴ CO₂ equivalent emission is a common scale for comparing emissions of different greenhouse gasses, though it does not imply equivalence of the corresponding climate change responses. It is defined in IPCC 2018, Annex 1: Glossary.

²⁵ CCC, *The Sixth Carbon Budget – The UK's path to Net Zero*, December 2020, https://www.theccc.org.uk/publication/sixth-carbon-budget/.

trajectory that if followed would allow the UK to meet the Sixth Carbon Budget and the 2050 Net Zero target.²⁶

18. The CCC has advised that the Fifth Carbon Budget will need to be significantly outperformed to stay on track to meet the Sixth Carbon Budget and the 2050 Net Zero target.²⁷

Climate change and planning policy

- 19. The National Planning Policy Framework 2021 ("NPPF") recognises that the duties under the CCA 2008 are relevant to planning for climate change. Paragraph 153 provides that plans should "take a proactive approach to mitigating and adapting to climate change" (emphasis added). Footnote 53 makes clear this must be "in line with the objectives and provisions of the Climate Change Act 2008". Policies "should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts". Energy efficiency policies clearly fall within the proactive approach to mitigation and making communities and infrastructure more resilient to climate change.
- 20. DHLUC has indicated that there is no intention to amend these provisions of the NPPF in the proposed current reforms to national planning policy,²⁸ and the direction of travel of future reform recognises that planning "can make an important contribution to…the vitally important task of mitigating and adapting to climate change". The consultation document indicates that future reform will explore how planning measures can do more to measure and reduce emissions in the built environment,²⁹ including delivering significant reductions in operational carbon emissions from the built environment.³⁰ The consultation also recognises the importance of work by LPAs who are frontrunners by innovating and leading

²⁶ Ibid, pg 432.

²⁷ Ibid, pgs 24 and 430-433.

²⁸ Consultation, Levelling Up and Regeneration Bill: reforms to national planning policy (22 December 2022), https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy.

²⁹ Ibid, Chapter 2 §5.

³⁰ Ibid, Chapter 7 §12.

the way in addressing climate change through planning.³¹ Finally, the draft revised text of the NPPF contains a new provision at §161 that "to support energy efficiency improvements, significant weight should be given to the need to support energy efficiency improvements through the adaptation of existing buildings, particularly large non-domestic buildings, to improve their energy performance".³²

The Net Zero Strategy suite of documents

- 21. On 18 July 2022, the Net Zero Strategy for meeting the carbon budgets up to and including the Sixth Carbon Budget was found unlawful. In *R(Friends of the Earth Ltd) v Secretary of State for the Business, Energy and Industrial Strategy* [2022] EWHC 1841 (Admin); [2023] 1 WLR 225, Holgate J held the Secretary of State had not been briefed with sufficient information to enable him to be satisfied that the policies and proposals included in the Net Zero Strategy would allow the UK to meet the Sixth Carbon Budget (§§202–204, 211–217, 256–257). The Net Zero Strategy was required to be re-drafted by 31 March 2023.
- 22. On 30 March 2023, the Government published its revised strategy to deliver its Net Zero obligations.³³ Rather than a single Net Zero Strategy, a suite of 50 documents were published, including 19 policy documents. The most important of the policy documents is the Carbon Budget Delivery Plan,³⁴ which will be presented to Parliament pursuant to the section 14 of the CCA 2008 and which is the most direct response to the *Friends of the Earth* judgment.
- 23. The Carbon Budget Delivery Plan sets out 191 quantified measures across all sectors of the economy (table 5) and indicates that these policies would meet Carbon Budgets Four and Five, but would only provide 97% of the carbon savings required to meet the Sixth Carbon Budget (2033-2037), amounting to a shortfall of 32 million tonnes of CO₂e over the budget period (see Table 1 in particular). Table 6 of the Plan lists another 143 "unquantified" policies and proposals, where

³¹ Ibid, Chapter 7 §4.

National Planning Policy Framework: draft text for consultation, §161, https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy.

^{33 &}lt;u>https://www.gov.uk/government/publications/powering-up-britain.</u>

^{34 &}lt;u>https://www.gov.uk/government/publications/carbon-budget-delivery-plan.</u>

the impact has not been calculated, in some cases because they are at an "early stage" or because they are very high level.

- 24. The Carbon Budget Delivery Plan also makes it clear that it delivers only 92% of the emissions cuts needed to meet the UK's 2030 nationally determined contribution under the Paris Agreement, which is a commitment to reduce economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels.
- 25. The documents which were promoted as the centrepiece of the new Net Zero package are titled "Powering Up Britain" and include an Overview³⁵ of the government's plans as well as the UK's new Energy Security Plan³⁶ and Net Zero Growth Plan.³⁷ While these publications largely consolidate existing Government policies, a number of "new" initiatives were announced across various key vectors in the energy transition, including renewables, nuclear, hydrogen, carbon capture, heat and energy efficiency, as well as indications on the direction of travel with respect to reforms for electricity networks and energy markets.
- 26. The main measures targeted at buildings refine existing energy efficiency support, in particular by rebranding an insulation scheme to upgrade around 300,000 of the country's least energy efficient homes and support the rollout of heat pumps.

Progress towards Net Zero target

27. The CCC will respond to the Carbon Budget Delivery Plan and the new suite of Net Zero Strategy documents in its progress report to Parliament in June 2023. Until that formal response is made, there is conflicting information about whether the UK is on track to meet the Fifth Carbon Budget, or the 'outperformance' of that budget needed for compliance with the Sixth Carbon Budget. On 18 October 2022, the then Department for Business Energy and Industrial Strategy ("BEIS"), now

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147340/powering-up-britain-joint-overview.pdf.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147339/powering-up-britain-energy-security-plan.pdf.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147338/powering-up-britain-net-zero-growth-plan.pdf.

the Department for Energy Security and Net Zero, released its *Updated Energy Projections*, analysing and projecting future energy use and greenhouse gas emissions in the UK, which allow the monitoring of progress towards meeting the carbon budgets.³⁸ These showed that:

- a. The Fifth Carbon Budget will be missed by 73 MtCO₂e, achieving a 56% reduction on 1990 level rather than the required 58% level, meaning the UK is off track to outperform this carbon budget; and
- b. The Sixth Carbon Budget will be missed by 976 MtCO₂e, only achieving a 54% reduction on 1990 levels, rather than a 77% reduction.
- 28. The Updated Energy Projections 2022 include policies that have been implemented or where funding has been agreed. They include schemes to make public buildings, private homes and social housing more energy-efficient and install clean heating systems, phase out coal and support renewables, and faster uptake of electric vehicles. It is not clear how the analysis made in the Updated Energy Projections in October 2022 aligns with that made in the Carbon Budget Delivery Plan in March 2023, given that the Plan mostly restates policies already announced.
- 29. In June 2022, the CCC found in its previous progress report to Parliament that either significant risks or policy gaps exist in relation to 38% of the emissions reductions required to meet the Sixth Carbon Budget.³⁹ This was particularly so in relation to land use and the energy efficiency of buildings.⁴⁰ The CCC also highlighted that, under the current Building Regulations, "the UK continues to build new homes to standards which do not align with the Net Zero target."⁴¹
- 30. In a letter to Chancellor Jeremy Hunt in November 2022, the CCC recommended that the government consider bringing forward the date for the introduction of the

³⁸ https://www.gov.uk/government/collections/energy-and-emissions-projections.

³⁹ CCC, Progress Report, June 2022, pg 22, https://www.theccc.org.uk/publication/2022-progress-report-to-parliament/.

⁴⁰ CCC, Progress Report, pg 14.

⁴¹ CCC, Progress Report, pg 180.

Future Homes Standard from 2025.⁴² This recommendation was not followed in the Carbon Budget Delivery Plan, which still envisages regulation from 2025 (policy 97, pg 78). A similar recommendation made in the independent Net Zero Review, carried out by former energy minister Chris Skidmore MP,⁴³ was rejected.⁴⁴ The Government intends to consult on the specification in 2023, then legislate in 2024 ahead of implementation in 2025. As part of the consultation the Government will "explore what transitional arrangements are appropriate to make sure that as many homes as possible are built to the new standard as quickly as possible.".⁴⁵

31. In a further letter to the Under Secretary of State for Levelling Up, Housing and Communities, dated 2 February 2023, the Chair of the CCC, Lord Deben, also highlighted the problems inherent in using the current rating metrics for domestic Energy Performance Certificates ("EPCs") to assess the energy efficiency of buildings. 46 At present, these metrics reflect energy costs and carbon emissions per square metre, but do not provide a direct measurement of fabric efficiency. The fact that energy costs form the basis for one of the two metrics used to inform current EPC ratings has given rise to perverse incentives. For example, a home heated by a modern gas boiler will usually achieve a better EPC rating than one heated via low-carbon technology such as heat pumps. The letter recommended that the metrics be improved, to support better the delivery of national climate policy targets, and that they be used to measure: 1) energy use intensity; 2) space heating demand intensity; 3) heating system type; and 4) energy cost intensity. It appears this recommendation has not been followed in the Carbon Budget Delivery Plan or the Powering Up Britain documents.

⁴² CCC, Letter: Reducing energy demand in buildings in response to the energy price crisis, November 2022, https://www.theccc.org.uk/publication/letter-reducing-energy-demand-in-buildings-in-response-to-the-energy-price-crisis/.

Mission Zero: Independent Review of Net Zero, January 2023, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1128689/mission-zero-independent-review.pdf.

⁴⁴ Responding to the Independent Review of Net Zero's Recommendations, March 2023, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file /1147370/responding-to-independent-review-of-net-zero.pdf.

⁴⁵ Ibid, pg 54, response 108.

⁴⁶ CCC, Letter: Reform of domestic EPC rating metrics, February 2023, https://www.theccc.org.uk/publication/letter-reform-of-domestic-epc-rating-metrics-to-lee-rowley-mp/.

- 32. National policy gaps, including on the energy efficiency of buildings, do not mean that LPAs are prevented from taking action now, or in advance of national policy. On the contrary: localised action is all the more important for keeping the UK on track to meet its Sixth Carbon Budget and the 2050 Net Zero target. Local authorities, commercial developers and associated partners, and third sector organisations all have a role to play in delivering higher energy performance standards in new development.
- 33. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that, "if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise." This makes local development plans a crucial avenue for promoting higher standards in new development and ensuring that homes built today will not require expensive retrofits in years to come.
- 34. On the consumer side, there is a growing market among buyers and renters for more sustainable homes and workplaces, and a potential 'green premium' to be enjoyed by developers who deliver high standards of energy efficiency:
 - a. In 2021 and 2022, Royal Institution of Chartered Surveyors measured global occupier and investor appetite for green and sustainable buildings and found that there is a net balance of +48%, pointing to a pick-up in occupier and investor appetite for climate adapted real estate; a figure which was continuing to rise across the globe.⁴⁷
 - b. Research by Legal & General and YouGov among a UK representative sample of 2,405 adults open to buying or renting a new home, found that 62% saw investment in energy efficient homes as an attractive or very attractive option to address the cost of living crisis, that renters were willing to pay a 13% premium for a low carbon property, and buyers a

⁴⁷ RICS Sustainability Report 2022 https://www.rics.org/news-insights/current-topics-campaigns/sustainability.

10.5% premium, rising to 20% for Gen Z future buyers (i.e. those born after 1997). The research also found a 34% uptick in online searched for eco-friendly homes.⁴⁸

- c. Polling carried out by Opinium and Santander of 2,000 UK representative adults, 175 estate agents, and 108 mortgage brokers found that 79% of potential buyers said that increased energy costs had made them think more about the importance of energy efficiency, that those who were willing to pay more for an energy efficient home put a 9.4% premium on the price of such a property and that estate agents reported buyers spending an average of 15.5% more on energy efficient properties. Santander concluded that this 'green premium' equated to an average of £26,600 over and above the average UK house price.⁴⁹
- d. Shakespeare Martineau found that 77% of 500 potential buyers surveyed would consider purchasing a green home, rising to 80% for first time buyers.⁵⁰
- e. On the commercial side, research by Knight Frank and BRE Group on 2,701 buildings found that Central London office space which had a BREEAM Outstanding certification commanded a 12.3% rental premium when controlling for other property characteristics.⁵¹
- 35. Some developers, such as the members of the EDG who signed the Developers Climate Action Charter, have recognised this 'green premium' and voluntarily committed to higher standards for energy efficiency. Initiatives such as

⁴⁸ Legal & General/YouGov Research, July–August 2022: https://group.legalandgeneral.com/media/vm0g2fvp/low-carbon-homes-release-final.pdf

⁴⁹ Santander, Buying into the Green Homes Revolution, October 2022, https://www.santander.co.uk/about-santander/media-centre/press-releases/a-green-premium-house-buyers-willing-to-pay-almost-10.

⁵⁰ Shakespeare Martineau Green Homes Report: https://www.housinglin.org.uk/ assets/ Resources/ Housing/OtherOrganisation/Green-Homes-Report-FINAL.pdf.

Knight Frank, The Sustainability Series, September 2021, https://content.knightfrank.com/research/2311/documents/en/the-sustainability-series-september-2021-8395.pdf.

developers' charters are important statements of intent, even though they have no power legally to bind their signatories.

36. A number of leading developers also favour approaches to projects which address climate change more robustly than present legislation, standards and policy require. For example, Berkeley Group stated that they achieved carbon neutrality via emissions reductions and offsetting in 2018 and has committed to a target of Net Zero carbon emissions across scopes 1, 2 and 3 by 2040.⁵² Commitments of this nature are partly driven by investors and funders and their approach to ESG (Environmental, Social and Governance) requirements. The "E" in ESG is ever more focused on carbon reduction, which is arguably the most pressing concern for the industry.

2021 updates to the Building Regulations

- 37. Approved Documents F (Ventilation) and L (Conservation of Fuel and Power), which provide guidance on how compliance with the Building Regulations can be achieved with respect to energy efficiency, were updated in 2021 with measures which came into effect in June 2022. A new Approved Document O (Overheating) was also published.
- 38. The new measures essentially function as staging posts on the way to the introduction of the government's Future Homes Standard and Future Buildings Standard in 2025. They mandate that carbon emissions from new residential buildings must be 31% lower and those from new non-residential buildings 27% lower than the previous 2013 baseline. The updated guidance also includes a range of new energy efficiency standards and metrics in relation to components of the fabric and heating systems of new buildings to achieve the required overall emissions reductions.

⁵² Berkeley Group, Our Vision 2030, https://www.berkeleygroup.co.uk/our-vision/climate-action.

39. It should be noted that, with this update to the Building Regulations, Part L, the national baseline for emissions from new buildings is now lower than Level 4 of the Code for Sustainable Homes, against which the 2015 WMS was benchmarked.

LEGAL POSITION ON ENERGY EFFICIENCY TARGETS BEYOND NATIONAL MINIMUM STANDARDS

40. Local authorities are empowered by statute to set their own standards for energy efficiency of new dwellings and other buildings in excess of Building Regulations, provided that such standards do not conflict with national policy. As set out below, confusion around this power has been caused by: a statutory amendment which was never brought into force; the 2015 WMS, which has now been overtaken by events; and the Planning Practice Guidance on Climate Change, which has not been updated to reflect the latest revisions to the Building Regulations. Nevertheless, the statutory power exists in primary legislation and LPAs can exercise that power with confidence.

Planning and Energy Act 2008

- 41. The power for LPAs to set their own energy efficiency standards derives from the PEA 2008. Section 1 of this statute provides that:
 - "(1) A local planning authority in England may in their development plan documents, corporate joint committee may in their strategic development plan, and a local planning authority in Wales may in their local development plan, include policies imposing reasonable requirements for—
 - (a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development;
 - (b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development;
 - (c) development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations.

[...]

- (4) The power conferred by subsection (1) has effect subject to subsections (5) to (7) and to—
 - (a) section 19 of the Planning and Compulsory Purchase Act 2004 (c. 5), in the case of a local planning authority in England; [...]

- (5) Policies included in development plan documents by virtue of subsection (1) must not be inconsistent with relevant national policies for England."
- 42. The PEA 2008 therefore establishes that LPAs may set higher standards for energy efficiency in their local plan policies than the baseline required by the Building Regulations provided that such policies are: a) reasonable, b) not inconsistent with national policies; and c) compliant with the usual provisions around planmaking found in section 19 of the Planning and Compulsory Purchase Act 2004.
- 43. Accordingly, while local energy efficiency policies cannot be inconsistent with national policies, there is nothing in national policy or in law to prevent LPAs from setting higher standards than the national baseline under the Building Regulations, provided that such policies are reasonable.

Why the Deregulation Act 2015 and the Written Ministerial Statement 2015 do not undermine local planning authorities' powers

44. Two potential sources of confusion around the extent of LPAs' powers under the PEA 2008 arise in the form of section 43 of the Deregulation Act 2015, and the 2015 WMS. Section 43 of the Deregulation Act 2015 would have inserted a new section 1A into the PEA 2008, excluding the construction or adaptation of residential dwellings from the scope of section 1(c). This provision was never brought into force. The then Ministry of Housing, Communities and Local Government, now the Department for Levelling Up, Housing and Communities ("DLUHC"), clarified in January 2021, in its response to Future Homes Standard consultation, that there are no plans ever to bring the provision into force, or otherwise to amend or repeal the PEA 2008.⁵³ This was re-confirmed on 22 June 2022, as discussed further below.⁵⁴

⁵³ The Future Homes Standard: summary of responses, and government response, January 2021, https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings.

⁵⁴ Bath and North East Somerset, Examination Note on Local Energy Efficiency Targets, §1.5, https://beta.bathnes.gov.uk/sites/default/files/EXAM%2010%20Note%20on%20Local%20Energy% 20Efficiency%20Targets%20FINAL.pdf.

45. The other potential source of confusion over the extent of LPAs' powers under the PEA 2008 arises out of the 2015 WMS. This statement indicated that local plan policies could not be used to set requirements above the equivalent of Level 4 of the Code for Sustainable Homes, which was 19% above the national baseline in the Building Regulations, Part L 2013. Despite having been overtaken by the updated baseline from June 2022, which now exceeds Code Level 4, this outdated piece of guidance is still included in the Planning Practice Guidance on Climate Change, which has not been updated since March 2019.

Confirmation of local planning authorities' powers by Ministers and Planning Inspectors

46. Confirmation that LPAs have the power to set their own standards for energy efficiency has come from national government in the form of the Future Homes Standard consultation response, which stated:

"2.33 At present, local planning authorities may include policies in their local plans which require developers to comply with energy efficiency standards for new homes that exceed the minimum requirements of the Building Regulations.

"2.34 The Planning and Energy Act 2008 was amended in 2015 to provide Government with powers to stop local planning authorities from being able to exceed the minimum energy efficiency requirements of the Building Regulations, but this amendment has not been commenced. In the same year, the then Government set out in a Written Ministerial Statement an expectation that local planning authorities should not set energy efficiency standards for new homes higher than the energy requirements of Level 4 of the Code for Sustainable Homes, which is equivalent to a 19% improvement on the Part L 2013 standard.

"2.35 The Future Homes Standard consultation recognised that the current position has caused confusion and uncertainty for local planning authorities and home builders, alike. While some local planning authorities are unclear about what powers they have to set their own energy efficiency standards and have not done so, others have continued to set their own energy performance standards which go beyond the Building

Regulations minimum and in some cases beyond the Code for Sustainable Homes" (emphasis added).

- 47. To ensure absolute clarity, when preparing their new local plan, Bath and North East Somerset Council wrote to DLUHC and received the following reply by letter dated 22 June 2022 from Jonathan Mullard, Minister at the then Department for Business, Energy and Industrial Strategy, who confirmed that he was empowered to speak for DLUHC and that:
 - "- Plan-makers may continue to set energy efficiency standards at the local level which go beyond national Building Regulations standards if they wish.
 - Local planning authorities have the power to set local energy efficiency standards through the Planning and Energy Act 2008.
 - In January 2021, we clarified in the Future Homes Standard consultation response that in the immediate term we will not amend the Planning and Energy Act 2008, which means that local planning authorities still retain these powers."55
- 48. Finally, in his 'Report on the Examination of the Cornwall Council Climate Emergency Development Plan Document', dated 10 January 2023, Inspector Paul Griffiths BSc (Hons) BArch IHBC recognised that:

"166. Provisions to allow Councils to go beyond the minimum energy efficiency requirements of the Building Regulations are part of the Planning and Energy Act 2008. The WMS of 25 March 2015 says that in terms of energy performance, Councils can set and apply policies which require compliance with energy performance standards beyond the requirements of the Building Regulations until the Deregulation Bill gives effect to amendments to the Planning and Energy Act 2008. These provisions form part of the Deregulation Act 2015, but they have yet to be enacted. Further, the Government has confirmed that the Planning and Energy Act 2008 will not be amended. The result of all this is that

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⁵⁵ Bath and North East Somerset, Examination Note on Local Energy Efficiency Targets, §1.5, https://beta.bathnes.gov.uk/sites/default/files/EXAM%2010%20Note%20on%20Local%20Energy%20Efficiency%20Targets%20FINAL.pdf.

Councils are able to set local energy efficiency standards for new homes, without falling foul of Government policy.

167. The WMS of 25 March 2015 has clearly been overtaken by events. Nothing in it reflects Part L of the Building Regulations, the Future Homes Standard, or the Government's legally binding commitment to bring all greenhouse gas emissions to net zero by 2050. In assessing the Council's approach to sustainable energy and construction, the WMS of 25 March 2015 is of limited relevance" (emphasis added).⁵⁶

49. Accordingly, despite the 2015 WMS remaining extant and despite the failure to update the Planning Practice Guidance, it is clear that the Government does <u>not</u> consider that they constrain LPAs and that the PEA 2008 empowers LPAs to set energy efficiency standards at the local level which go beyond national Building Regulations standards if they wish. This is the correct approach in law. In my view, the right approach is that adopted in the Report on the Examination of the Cornwall Council Climate Emergency Development Plan Document: the 2015 WMS should not be accorded any weight.

Conclusion

50. Local authorities have a clear power, in sections 1-5 of the PEA 2008, to adopt planning policies that set higher targets for energy performance standards for development in their area than the national baseline, provided such standards comply with the usual plan-making requirements of section 19 of the Planning and Compulsory Purchase Act 2004 and are reasonable, in that they do not affect the viability of new development to an unreasonable extent.

ENERGY EFFICIENCY POLICY CASE STUDIES

51. Six case studies illustrate the fact that a range of LPAs — from densely populated urban centres such as London and Reading, to rural authorities like South Gloucestershire, Cornwall, Bath and North East Somerset, and the three local

⁵⁶ Cornwall Climate Emergency DPD, Inspector's Report, 10 January 2023, https://www.cornwall.gov.uk/media/10pmiq1e/appendix-1-cornwall-climate-emergency-dpd-final-report-1.pdf.

authority areas that comprise Central Lincolnshire — have successfully included energy efficiency and/or other emissions reduction requirements beyond those of the Building Regulations in development plan documents which have passed examination.

- 52. These case studies are important in light of the well-established principle of consistency in planning decision-making. It is important and in the interests of developers, third parties and local planning authorities alike, because it serves to maintain public confidence in the operation of the development control system. Whilst it is open to the decision maker to depart from the reasoning in a previous decision, clear reasons for the departure should be given: *North Wiltshire DC v. Secretary of State for the Environment* (1992) 65 P & CR 137 at 145.
- 53. In summary, while like cases do not have to be decided alike, a departure from a sufficiently similar decision requires a "clear explanation": *Hallam Land Management Ltd v Secretary of State for Communities and Local Government* [2019] JPL 63 at §74. As consistency in planning decision-making is important, there will be cases in which it would be unreasonable for the Secretary of State not to have regard to a relevant appeal decision bearing on the issues in the appeal he is considering: *DLA Delivery Limited v Baroness Cumberlege of Newick* [2018] JPL 1268 at §34.

Energy efficiency policies which have passed examination

- 54. The London Plan 2021 and the Reading Borough Local Plan 2019 both include policies for energy efficiency which are benchmarked against the Building Regulations and exceed them by a fixed percentage for different types of development.
- 55. Policy SI 2 of the London Plan 2021 on 'Minimising greenhouse gas emissions' provides that:

"Major development should be net zero-carbon. [...] A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per

cent, and non-residential development should achieve 15 per cent through energy efficiency measures.".⁵⁷

- 56. These requirements were based on the Building Regulations 2013, but the policy provided for the threshold to be reviewed if the regulatory requirements were updated.⁵⁸ The threshold was updated via the GLA Energy Assessment Guidance, published June 2022, such that the targets under Policy S1 2 now relate to the baseline in the Building Regulations 2021.⁵⁹
- 57. Policy H5 of the Reading Borough Local Plan on 'Standards for new housing' provides that:

"New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable [...]

- c. All major new-build residential development should be designed to achieve zero carbon homes.
- d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations." 60
- 58. Policy PSP6 of the **South Gloucestershire Policies**, **Sites and Places Plan** ("**PSP**") (adopted November 2017) on 'Onsite renewable and low carbon energy' includes a mandatory emissions reduction target over and above Building Regulations standards, though no mandatory fabric efficiency requirement. It provides that all development proposals will:
 - "1. be encouraged to minimise end-user energy requirements over and above those required by the current building regulations through energy reduction and efficiency measures, and in respect of residential for sale and

⁵⁹ GLA Energy Assessment Guidance, June 2022, https://www.london.gov.uk/sites/default/files/gla energy assessment guidance june 2022 0.pdf

⁵⁷ London Plan 2021, https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021, pgs 342–343.

⁵⁸ London Plan, 2021, p. 342, fn. 152.

Reading Borough Local Plan 2019, https://www.reading.gov.uk/planning-and-building-control/planning-policy/new-local-plan/, pg 82, with guidance at pg 84.

speculative commercial development offer micro renewables as an optional extra, and

2. be expected to ensure the design and orientation of roofs will assist the potential siting and efficient operation of solar technology.

In addition, all major greenfield residential development will be required to reduce CO2 emissions further by at least 20% via the use of renewable and/or low carbon energy generation sources on or near the site providing this is practical and viable."⁶¹

- 59. Cornwall and Bath and North East Somerset collaborated to develop local planning policies which set quantified limits on space heating and total energy consumption (regulated and unregulated), rather than benchmarking against the Building Regulations. Both Cornwall's Climate Emergency Development Plan Document ("DPD") and Bath and North East Somerset's Local Plan Partial Update ("LPPU") include requirements that all new development have a space heating demand of no more than 30kWh/m2/yr and a total energy consumption of no more than 40kWh/m2/yr.⁶² These policies also require residual energy requirements to be met from renewable sources, in what is seemingly a creative application of the LPAs' powers under sections 1(a)–(b) of the PEA 2008 to require that a proportion of energy for development in the area come from renewable or low carbon source, in combination with their powers to mandate energy efficiency standards above the national baseline under section 1(c).
- 60. Finally, the **Central Lincolnshire Local Plan**, adopted in April 2023, contains Policy S7 requiring residential development to achieve a site average space heating demand of 15-20kWh/m2/yr and a site average total energy demand of 35 kWh/m2/yr, and Policy S8 requiring non-residential development to achieve space heating and total energy demands of 15-20kWh/m2/yr and 70 kWh/m2/yr

⁶¹ South Gloucestershire Policies, Sites and Places Plan 2017, https://beta.southglos.gov.uk/static/326a821580d49330ee788f663103b1b8/PSP-Plan-Nov2017.pdf, pg 19, with guidance at pgs 19–20.

Bath and North East Somerset Local Plan Partial Update, December 2021, https://beta.bathnes.gov.uk/lppu-core-documents; Cornwall Climate Emergency DPD, February 2023, https://beta.bathnes.gov.uk/lppu-core-documents; Cornwall Climate Emergency DPD, February 2023, https://beta.bathnes.gov.uk/lppu-core-documents; Cornwall Climate Emergency DPD, February 2023, https://beta.bathnes.gov.uk/lppu-core-documents; Cornwall Climate Emergency DPD, February 2023, https://beta.bathnes.gov.uk/lppu-core-documents; Cornwall Climate Emergency DPD, February 2023, <a href="https://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://bttps://btt

respectively.⁶³ These policies also require residual energy consumption to be met via onsite renewable energy sources. There are caveats for development in areas of especially low land value or on brownfield sites, which do not have to demonstrate full policy compliance but where the applicant must still submit an Energy Statement detailing the extent to which the relevant policy requirements have been complied with.

61. These policies are part of a wider suite of policies designed to mitigate and adapt to the effects of climate change, with the introductory text to Chapter 3 on Energy, Climate Change and Flooding stating at §3.1.14:

"The Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) is rising to [the] challenge as set by parliament. No longer will planning decision makers in Central Lincolnshire merely 'encourage' development proposals to achieve certain standards, or only 'welcome' development that goes a little beyond certain building regulation basic minimums. Development in Central Lincolnshire must do, and can do, far better than that. We are legally obliged to do more. And, for future generations, we are morally obliged to do more."

The Salt Cross Decision

62. The draft Area Action Plan for Salt Cross, a proposed new garden village in West Oxfordshire, included a Net Zero policy which, among other requirements, would have capped space heating requirements for all new development at 15kWh/m2/yr and total energy use requirements for residential development at 35kWh/m2/yr. In a letter dated 26 May 2022, the Inspectors examining the Area Action Plan indicated their view that the policy was unsound and recommended significant modification of the policy.

63. The Inspectors' Report, published on 1 March 2023, set out the bases for their decision that the policy was unsound:

⁶³ Central Lincolnshire Local Plan, April 2023, pgs 30–34, https://www.n-kesteven.gov.uk/sites/default/files/2023-04/Local%20Plan%20for%20adoption%20Approved%20 by%20Committee.pdf.

- a. It was inconsistent with the 2015 WMS and the PPG, which in their view still represented current national policy, notwithstanding "various Government consultations linked with the Future Homes Standard [which] have signalled potential ways forward".64
- b. The prescriptiveness of the policy was not justified on the basis of the evidence submitted, specifically the reliance on generic typologies in the viability appraisal.⁶⁵
- 64. The lawfulness of the inspectors' decision was challenged by way of pre-action correspondence before the publication of the report. A claim for judicial review has since been issued.⁶⁶ The TCPA also indicated in its public response to the decision letter that it believed it to be based on a misunderstanding of national policy.⁶⁷ This remains the TCPA's view.⁶⁸
- 65. Given the reliance in the Inspectors' Report on the 2015 WMS and the PPG, and in light of the legal position set out at §§40–51 above, I am of the opinion that the TCPA was correct that the inspectors misunderstood both national policy and the proper extent of the LPA's powers, derived from primary legislation. In my view, there is therefore nothing in the Salt Cross decision which should dissuade an LPA from seeking to adopt net zero policies requiring high new build fabric efficiency standards, provided the LPA evidences such policies thoroughly and clearly indicates an awareness of the impact of the proposed policies on the viability of development.

⁶⁴ Report on the Examination of the Salt Cross Garden Village Area Action Plan, 1 March 2023, https://www.westoxon.gov.uk/media/djkhe03s/salt-cross-aap-inspectors-report-main-mods-appendix-final.pdf.

⁶⁵ Inspectors' Report, §§131–138.

^{66 &}lt;a href="https://www.leighday.co.uk/news/news/2023-news/rights-and-climate-collective-issues-high-court-challenge-after-planning-inspector-dilutes-west-oxfordshire-council-s-net-zero-plans-for-salt-cross-garden-village/">https://www.leighday.co.uk/news/news/2023-news/rights-and-climate-collective-issues-high-court-challenge-after-planning-inspector-dilutes-west-oxfordshire-council-s-net-zero-plans-for-salt-cross-garden-village/">https://www.leighday.co.uk/news/news/2023-news/rights-and-climate-collective-issues-high-court-challenge-after-planning-inspector-dilutes-west-oxfordshire-council-s-net-zero-plans-for-salt-cross-garden-village/.

The application of net zero in local plan policy: A statement from the Town and Country Planning Association, July 2022, <u>20220714-climate-statement-W-0x.docx (live.com)</u>.

⁶⁸ https://www.tcpa.org.uk/planning-inspectorate-west-oxfordshire/.

- 66. It should be noted that the mere fact that the Inspectors erred in law in may not result in a legal challenge which is successful overall in quashing the decision. The Secretary of State may resist a challenge on the basis of discretion: even if a Court were satisfied that the decision was unlawful, were it to find that the outcome of the decision would necessarily have been the same if the error had not occurred, the decision would not be quashed. On the basis of the issues with the evidence base on viability, which the inspectors identified at §§131–138 of their report, the Secretary of State might be able to mount a successful 'no difference' discretion argument that the policy would still have been found to lack justification even if it had been found to be consistent with national policy.
- 67. Accordingly, the only circumstance in which the advice set out above would change as a result of the legal challenge to the Salt Cross decision would be if the High Court were to make findings on LPA's legislative powers in the PEA 2008 and on national policy which undermine those set out in §§40–51 above.

CONCLUSION

- 68. In light of the above, LPAs have statutory authority to set energy efficiency targets that exceed the baseline in national Building Regulations, and to mandate that a proportion of the energy used in development in their area be from renewable and/or low carbon sources in the locality of the development. Nothing in law or national policy prevents them from doing so, or limits the amount by which they may exceed the baseline, provided that the relevant policies are reasonable, properly prepared, and do not conflict with any other national planning policies.
- 69. The amendment limiting the scope of section 1(c) of the PEA 2008 will not be brought into force, nor are any other amendments to the Act planned. The 2015 WMS has been overtaken by events and regard does not need to be paid to it, nor to the portion of the PPG on Climate Change which cites it. Government ministers and planning inspectors alike have recognised the power of LPAs to set ambitious energy efficiency targets through their local plans.

70. A summary of my advice is given in §2 above. Please do not hesitate to contact me if anything requires clarification, or if I can be of further assistance.

28 April 2023

ESTELLE DEHON KC



2-3 GRAY'S INN SQUARE LONDON, WC1R 5JH estelled@cornerstonebarristers.com



Mr M Brophy – Head of Service (CELPR Main Mods Consultation) Planning and Climate Change Team Lancaster City Council Lancaster Town Hall PO Box 4 Lancaster LA1 1PJ

Sent by Email - planningpolicy@lancaster.gov.uk

13 July 2023

Dear Mr Brophy,

RE: Lancaster District Climate Emergency Review of the Local Plan - Main Modifications Consultation.

Representation on Main Modification 14 (MM14), Part 2 – DM, Policy DM30a, page 71, Paragraph 3 (Sustainable Design and Construction)

This representation is made on behalf of the Essex Planning Officers Association (EPOA) which represents the 15 local authority Chief Planning officers in Essex. We respectfully request that Modification 14 (MM14) is removed and that the original proposed Policy DM30a, with a requirement for net zero homes, is retained.

All 15 authorities in Essex are committed to mitigating and adapting to a changing climate. We are ambitious, innovative and want to take effective, co-ordinated climate action in Essex. To help with this the independent Essex Climate Action Commission (ECAC) have advised the Essex partners on a programme for ambitious climate change action. The commission published its report 'Net-Zero: Making Essex Carbon Neutral' in July 2021, and this set challenging recommendations and targets to give focus to addressing Climate Change within Essex. One of the strands of the Commission's work was the Built Environment.

EPOA has worked closely with the Climate Commissioners and assisted with the commissioning of technical evidence which identified six key areas of work we need to address, working with both the local authorities and construction sector, to successfully implement the ECAC target of all new homes to be Net zero carbon by 2025. One of the 6 key areas related to having *a consistent policy position on Net Zero*, which could be incorporated into new Local Plans and/or Reviews.

It is with regard to the need for a 'consistent policy position' that we make this representation.

In Essex, collaborative working on planning policies between all the Local Planning Authorities is strong and has led to a robust, evidence-based approach (published), and the development of a consistent net zero policy that aligns with national and local climate targets.

The <u>Essex Design Guide</u> is being used to bring together the evidence available to support the development of 'net zero' planning policy in Essex local plans. Work to date includes:

- Legal advice Energy Policy and Building Regulations (Cornerstone Barristers, April 2023).
- Net Zero Carbon Viability Study for Essex (Three Dragons consultancy, August 2022)
- Net Zero Policy Development Study (Introba, Etude, Currie & Brown, July 2023)

Based on our evidence, the emerging planning policy for net zero carbon (in operation) development in Essex will ensure that all homes are ultra-low energy buildings that are fossil fuel free, generate renewable energy to match predicted annual energy demand and achieve net zero carbon in operation from the outset (including both regulated and unregulated energy uses). Our evidence studies show that this approach is technically feasible, financially viable and legally justified (https://www.essexdesignguide.co.uk/climate-change/net-zero-evidence/).

In terms of the legal justification, we would draw your attention to the 'open legal advice' provided by Estelle Dehon KC of Cornerstone Barristers which is published here: <u>Essex Open Legal Advice – Energy Policy and Building Regulations | Essex Design Guide (https://www.essexdesignguide.co.uk/climate-change/net-zero-evidence/essex-open-legal-advice-energy-policy-and-building-regulations/).</u>

The advice clearly sets out the legal justification for LPAs to be able to set energy performance standards beyond the national baseline (Part L Building Regulations) in their local plans, and beyond the 19% improvement over Building Regulations standards referred to in the 2015 Written Ministerial Statement (WMS).

In particular, Paragraph 2.3 of the legal advice concludes that as 'the Department of Levelling Up, Housing and Communities (DLUHC) has confirmed that the 2015 WMS is otiose in light of the 2021 updates to the Building Regulations and that there are no plans to bring the 2015 amendment to the Planning and Energy Act 2008 into force, or otherwise to amend the Act' then '...the 2015 WMS should not be accorded any weight'.

Paragraphs 19 and 20 specifically cover climate change and planning policy, including highlighting that the NPPF 2021 paragraph 153 provides that plans should 'take a proactive approach to mitigating and adapting to climate change', and that footnote 53 makes clear this must be 'in line with the objectives and provisions of the Climate Change Act 2008'. In the consultation on the Levelling up and Regeneration Bill reforms to national planning policy (22 December 2022), DLUHC indicated there is no intention to amend these provisions of the NPPF and the direction of travel is that planning 'can make an important contribution to … the vitally important task of mitigating and adapting to climate change'. Furthermore, the consultation also recognises the importance of work by LPAs who are frontrunners by innovating and leading the way in addressing climate change through planning.

Paragraph 40 summarises the legal position on setting energy efficiency targets beyond national minimum standards and confirms that 'the statutory power exists in primary legislation and LPAs can exercise that power with confidence'. In relation to the 2015 WMS, paragraph 45 explains that the WMS 'indicated that local plan policies could not be used to set requirements above the equivalent of Level 4 of the Code for Sustainable Homes, which was 19% above the national baseline of the Building Regulations Part L 2013.' However, the WMS has now been 'overtaken by the updated national baseline from June 2022 (Part L Building Regulations 2021) which now exceeds Code Level 4.'

Paragraph 48 of the legal advice goes on to highlight the findings of Cornwall's Inspector and states that the conclusion from that Inspector was: 'The WMS of 25 March 2015 has clearly been overtaken by events. Nothing in it reflects Part L of the Building Regulations, the Future Homes Standard, or the Government's legally binding commitment to bring all greenhouse gas emissions to net zero by 2050. In assessing the Council's approach to sustainable energy and construction, the WMS of 25 March 2015 is of limited relevance'.

The legal advice concludes in paragraph 49: 'Accordingly, despite the 2015 WMS remaining extant and despite the failure to update the Planning Practice Guidance, it is clear that the Government does <u>not</u> consider that they constrain LPAs and the PEA 2008 empowers LPAs to set energy efficient standards at the local level which go beyond national Building Regulations standards if they wish. This is the correct approach in law. In my view, the right approach is that adopted in the Report on the examination of the Cornwall Council Climate Emergency development plan document: the 2015 WMS should not be accorded any weight.'

It is clear from the Essex legal advice that the WMS is out of date and has been overtaken by events. Therefore, as the Inspector uses the WMS as the basis for modification 14 (MM14), then it is our view — supported by the robust and sound evidence provided in the Essex legal advice - that MM14 should be abandoned, and that the original wording of Policy DM30a should be retained. This would also be consistent with the approach taken by other Inspectors (Cornwall, Bath & North East Somerset and Central Lincolnshire) who have ruled that local authorities can set much higher energy standards than building regulations and aim for net zero residential buildings ahead of national Government policy. A consistent approach from the Planning Inspectorate is greatly needed to enable LPAs to confidently include policies to robustly mitigate and adapt to climate change in their local plans, which is consistent with national legally binding climate targets.

In conclusion, it is our view that the original policy DM30a was positively prepared, justified, effective, and consistent with National Policy, that is the Climate Change Act 2008 (as amended 2019) which commits the UK to achieve net zero by 2050 and the 2021 uplift in the Building Regulations.

It is our view that MM14 is not justified and not consistent with current national policy as it relies on an outdated WMS that has been overtaken by updated Building Regulations and other legislation as set out in the Essex legal advice. It is not positively prepared as it ignores the urgency demanded by the climate emergency (as highlighted in the latest warnings contained in the IPPC report of March 2023). It is not effective nationally, as it reflects an inconsistent approach from the Planning Inspectorate in terms of policies for energy efficiency in new homes and creates confusion for local planning authorities. It is not effective locally, as it will mean that new homes in Lancaster will have to be retrofitted in the future to achieve net zero.

MM14 should therefore be dropped entirely, and the wording of Policy DM30a should return to that originally proposed by Lancaster City Council.

Yours sincerely

Graham Thomas

Vice Chair - Essex Planning Officers Association (ECAC - Built Environment – Climate Change Lead)



Our ref: PL00763562 Your ref: PL00766402

Date:

5 July 2023

Dear Planning Policy Team

planningpolicy@lancaster.gov.uk

Consultation on the Lancaster Climate Emergency Review Local Plan and Sustainability Appraisal – Main Modification

Thank you for your email dated 19 June regarding the proposed main modification consultation.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We do not have any comments to make on the proposed modifications to the Plan.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Emily Hrycan Historic Environment Planning Adviser (North West)

Historic England

Telephone: 0161 242 1423

e-mail: emily.hrycan@HistoricEngland.org.uk





Date: 06 July 2023 Our ref: 439011



Planning and Housing Strategy Team Planning & Climate Change Lancaster City Council

BY EMAIL ONLY

Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Dear Sir/Madam

Consultation on the Climate Emergency Review of the Local Plan Main Modifications

Thank you for your consultation received by Natural England on 16 June 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have reviewed the following documents:

- M_01_Schedule of Main Modifications Consultation Report (June 2023)
- M_02_ Schedule of Consequential Changes to Policies Map Consultation Report (June 2023)
- SA Report Addendum: Appraisal of Modifications (AECOM, May 2023)
- Habitat Regulations Assessment (HRA) Main Modifications (AECOM, May 2023)

Natural England has no objection or detailed comment to make on the to the Schedule of Proposed Main Modifications.

We concur with the c conclusions of the SA Report Addendum and HRA conclusions that the proposed modifications to the Local Plan will not have a likely significant effect on European sites, and do not change the conclusions of the HRA of the submitted Lancaster District Climate Change Review Local Plan.

If you have any queries relating to the advice in this letter please email consultations@naturalengland.org.uk. quoting the reference number at the top of this letter.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely
Alice Watson
Sustainable Development Lead Adviser
Cheshire, Greater Manchester, Merseyside & Lancashire

Lancaster District Climate Emergency Review of the Local Plan

Comments of Lancaster Civic Vision

Lancaster Civic Vision commend the City Council on their farsighted approach to tackling climate change at a local level by the production of this document. We consider that It is entirely appropriate that a Local Authority that has designated a Climate Emergency should demonstrate their commitment to tackle the issue through the local plan process.

It is for this reason that we consider Local Plan Main Modifications comply with legal requirements and meet the tests of 'soundness'. It is critical that democratically elected local authorities are able to utilise the local planning system to pursue their overriding responsibilities with regard to the economic, social, and well-being of their area established by the Local Government Act 2000.

We generally support the proposed modifications and believe that this document has been produced at an opportune time. However, we have concerns that some of these policies will be difficult to enforce. You will be aware of the difficulties that local authorities have had with regard to ensuring compliance with Part L of Building Regulations. We consider that the Local Planning Authority should carry out a parallel review of the how these new policies are effectively enforced.

In June Lancashire County Council announced that plans for the South Lancaster Growth Catalyst had been suspended. On 25th August 2021 the City Council agreed to sign a Collaboration Agreement with the County Council to draw down huge amounts of Housing Infrastructure Fund (HIF) Grant which potentially opened the doors to a further 9000 new homes in South Lancaster. We welcome this announcement and believe that the emerging local area action plan for South Lancaster should be prepared in accordance with the policies of the Emergency Review of the Local Plan.

From: Emily Rubin

Sent: Tuesday, July 11, 2023 1:45 PM

To: planningpolicy <planningpolicy@lancaster.gov.uk>

Subject: Consultation on the Climate Emergency Review of the Local Plan Main Modifications

Dear Sirs,

I am writing on behalf of Cornwall Council with a response to the current consultation on the Climate Emergency Review of the Lancaster Local Plan Main Modifications. Our representation is below.

Yours faithfully,

Emily Rubin

MM14: Cornwall Council supports the purpose of Policy DM30a; that is: "Development should contribute to both mitigating and adapting to climate change to reduce greenhouse gas emissions. Development must utilise the landform, layout, building orientation, massing and landscaping to minimise energy consumption and maximise energy efficiency measures." This is consistent with the NPPF para 152 which supports "radical reductions in greenhouse gas emissions". The national legal commitment to net zero greenhouse gas emissions by 2050 has been set to reflect the 2015 Paris Agreement and avoid the worst impacts of manmade climate change. The importance of the 2050 target has been affirmed by the 2023 Skidmore Review.

It is recognised that just heating homes and workspaces accounts for almost a third of UK carbon emissions (BEIS Net Zero Strategy, 2021). New buildings must therefore play their part and not contribute to the burden of retrofitting existing buildings which will be costly, complex and therefore uncertain. Meanwhile there is concern that the forthcoming Future Homes Standard will not go far enough to achieve true net zero operational emissions. This has triggered local authorities to set their own net zero operational standards for new buildings through planning policies in recognition that current actions through Building Regulations alone will not be sufficient to achieve the legislated national greenhouse gas reduction.

Cornwall Council would support Lancaster City Council having the opportunity to set specific energy thresholds over and above those in place through the Building Regulations regime in line with their evidence. We understand that the principle of local planning authorities being able to set their own energy standards beyond Building Regulations has been established and reiterated through a number of documents prepared by or on behalf of the Government including three reports by three Planning Inspectors allowing Bath and North East Somerset, Cornwall Council and Central Lincolnshire local planning authorities to adopt net zero operational energy standards. The key documents are listed chronologically below with salient extracts from their conclusions:

The Government's response to the 2021 Future Homes Consultation (dated January 2021):
 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment data/file/956094/Government response to Future Homes Standard consultation.pdf

 2.33 At present, local planning authorities may include policies in their local plans which require developers to comply with energy efficiency standards for new homes that exceed the minimum requirements of the Building Regulations.

2.34 The Planning and Energy Act 2008 was amended in 2015 to provide Government with powers to stop local planning authorities from being able to exceed the minimum energy efficiency requirements of the Building Regulations, but this amendment has not been commenced. In the same year, the then Government set out in a Written Ministerial Statement an expectation that local planning authorities should not set energy efficiency standards for new homes higher than the energy requirements of Level 4 of the Code for Sustainable Homes, which is equivalent to a 19% improvement on the Part L 2013 standard. 2.35 The Future Homes Standard consultation recognised that the current position has caused confusion and uncertainty for local planning authorities and home builders, alike. While some local planning authorities are unclear about what powers they have to set their own energy efficiency standards and have not done so, others have continued to set their own energy performance standards which go beyond the Building Regulations minimum and in some cases beyond the Code for Sustainable Homes...

 Email from central Government (Department of Levelling Up, relayed through BEIS) (dated 22 June 2022) within Bath and North East Council's Note on Local Energy Efficiency Targets: https://beta.bathnes.gov.uk/sites/default/files/EXAM%2010%20Note%20on%20Local%20Energy%20Efficiency%20Targets%20FINAL.pdf

We regret that due to the Secretary of State's quasi-judicial role in the planning system, we are unable to comment on the details of a specific Local Plan. However, we can provide the following general comments:

- The recent 2021 uplift to the Building Regulations will deliver a meaningful reduction in carbon emissions, while ensuring high-quality homes that are in line with our broader housing commitments.
- Plan-makers may continue to set energy efficiency standards at the local level which go beyond national Building Regulations standards if they wish.
- Local planning authorities have the power to set local energy efficiency standards through the Planning and Energy Act 2008.
- In January 2021, we clarified in the Future Homes Standard consultation response that in the immediate term we will not amend the Planning and Energy Act 2008, which means that local planning authorities still retain these powers.
- 3. <u>Planning Inspector's Report for Bath and North East Somerset Local Plan Partial Update</u> (dated 13 December 2022):

https://beta.bathnes.gov.uk/sites/default/files/2022-12/EXAM24%20Inspectors%20Report.pdf

84. The WMS 2015 has clearly been overtaken by events and does not reflect Part L of the Building Regulations, the Future Homes Standard, or the legally binding commitment to bring all greenhouse gas emissions to net zero by 2050.

85. I therefore consider that the relevance of the WMS 2015 to assessing the soundness of the Policy has been reduced significantly, along with the relevant parts of the PPG on Climate Change, given national policy on climate change. The NPPF is clear that mitigating and adapting to climate change, including moving to a low carbon economy, is one of the key elements of sustainable development, and that the planning system should support the transition to a low carbon future in a changing climate. Whilst NPPF154b sets out that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards, for the reasons set out, that whilst I give the WMS 2015 some weight, any inconsistency with it, given that it has been overtaken by events, does not lead me to conclude that Policy SCR6 is unsound, nor inconsistent with relevant national policies.

4. <u>Planning Inspector's Report for Cornwall Council's Climate Emergency DPD (dated 10 January 2023):</u>

https://www.cornwall.gov.uk/media/10pmiq1e/appendix-1-cornwall-climate-emergency-dpd-final-report-1.pdf

166. Provisions to allow Councils to go beyond the minimum energy efficiency requirements of the Building Regulations are part of the Planning and Energy Act 2008. The WMS of 25 March 2015 says that in terms of energy performance, Councils can set and apply policies which require compliance with energy performance standards beyond the requirements of the Building Regulations until the Deregulation Bill gives effect to amendments to the Planning and Energy Act 2008. These provisions form part of the Deregulation Act 2015, but they have yet to be enacted. Further, the Government has confirmed that the Planning and Energy Act 2008 will not be amended. The result of all this is that Councils are able to set local energy efficiency standards for new homes, without falling foul of Government policy. 167. The WMS of 25 March 2015 has clearly been overtaken by events. Nothing in it reflects Part L of the Building Regulations, the Future Homes Standard, or the Government's legally binding commitment to bring all greenhouse gas emissions to net zero by 2050. In assessing the Council's approach to sustainable energy and construction, the WMS of 25 March 2015 is of limited relevance. The Framework makes clear in paragraph 152 that the planning system should support the transition to a low carbon future in a changing climate. Whilst paragraph 154 b) of the Framework requires that any local requirements for the sustainability of buildings should reflect the Government's national technical standards, for the reasons set out, the WMS of 25 March 2015 has been superseded by subsequent events. While it remains extant, any inconsistency with its provisions does not mean that the approach the Council has taken lacks justification. In that sense, there is nothing in the Council's approach that raises issues of soundness.

 Planning Inspector's Report for Central Lincolnshire's Local Plan (dated 28 March 2023): https://www.n-kesteven.gov.uk/sites/default/files/2023-03/STA033%20Central%20Lincs%20Local%20Plan%20-%20Inspectors%20Report%20-%20FINAL.pdf

176. However, notwithstanding the different views presented on the interpretation of the WMS and the PPG, critically, in June 2022 changes to the Building Regulations were introduced that require a 31% reduction from Part L 2013. This is a material change in circumstances and means that all new residential development already has to exceed the previous Code for Sustainable Homes Level 4 equivalent (a 19% reduction over Part L 2013). The changes brought into effect in 2022 are intended to be an interim measure before the introduction of the Future Homes Standard, which will see all new homes 'zero carbon ready' from 2025 onwards.

177. In summary therefore, we conclude that the approach of Policy S7, which seeks to go above and beyond the requirements of the Building Regulations, is not inconsistent with national planning policy for the purposes of the Planning and Energy Act 2008. When read as a whole, it is also consistent with the Framework which states that the planning system should support the transition to a low carbon future in a changing climate and help shape places in ways that contribute to radical changes in greenhouse gas emissions. Whilst we find conflict with national planning practice guidance, both the PPG and the 2015 WMS have clearly been overtaken by existing and proposed changes to the Building Regulations brought into force in 2022. MMs are therefore not necessary to require the Plan to adhere to Code for Sustainable Homes Level 4 equivalent standards, which are now exceeded by the Building Regulations.

<u>energy-policy-and-building-regulations/</u>) provides a thorough review of the ability of local planning authorities to set their own energy standards above Building Regulations, including the context of the Written Ministerial, Planning and Energy Act 2008 and Planning Practice Guidance referred to in the five documents listed above. It concludes:

68. In light of the above, LPAs have a statutory authority to set energy targets that exceed the baseline in national Building Regulations, and to mandate that a proportion of the energy used in development in their area be from renewable and/or low carbon sources in the locality of the development. Nothing in law or national policy prevents them from doing so, or limits the amount by which they may exceed the baseline, provided that the relevant policies are reasonable, properly prepared, and do not conflict with any other national policies.

69. The amendment limiting the scope of section 1(c) of the PEA [Planning and Energy Act] 2008 will not be brought into force, nor are any other amendments to the Act planned. The 2015 WMS has been overtaken by events and regard does not need to be paid to it, nor to the portion of the PPG on Climate Change which cites it. Government ministers and planning inspectors alike have recognised the power of LPAs to set ambitious energy efficiency targets through their local plans.

Emily Rubin | Principal Development Officer

Cornwall Council | Planning & Sustainable Development



By email

Lancaster City Council

planningpolicy@lancaster.gov.uk

Direct Dial:

Email:

Your Ref:

Our Ref: RGA/00293456/5

Date: 20 July 2023

Dear Lancaster City Council

Climate emergency review of local plan – main modifications consultation

We act for Rights: Community: Action ("RCA"), which is a collaboration of campaigners, lawyers, planners, facilitators, writers and scientists, united by a shared commitment to tackle the climate emergency. RCA have been working alongside the Town and Country Planning Association ("TCPA") to monitor the work being done by local planning authorities such as yours to address the climate emergency in their development plan documents. They were greatly encouraged by the policies which your authority had proposed as part of its climate emergency local plan review.

It was therefore disappointing to read the inspector's letter dated 23 March 2023 indicating that in her view Policy DM30a: Sustainable Design and Construction was inconsistent with national policy, and in particular the Written Ministerial Statement dated 25 March 2015 (the "WMS"). As you might know, a similar approach was taken by the inspectors examining the Salt Cross Garden Village Area Action Plan ("AAP") being promoted by West Oxfordshire District Council ("WODC"). The inspectors' report in that case was published on 7 March 2023, recommending the adoption of the Salt Cross AAP with significantly watered-down requirements in relation to energy efficiency and other matters. The inspectors in that case adopted very similar reasoning to that taken by Ms Gilbert to your plan.

It is our view, supported by counsel, that that approach is wrong in law. It proceeds on the basis of a misinterpretation of the WMS. The interpretation of planning policies is a

Leigh Day

question of law rather than planning judgment and therefore falls to the courts to determine (*Suffolk Coastal v Hopkins Homes* [2017] UKSC 37 at [22], citing *Tesco Stores Ltd v Dundee City Council* [2012] UKSC 13).

RCA have issued a claim for judicial review in respect of the inspectors' report on the Salt Cross AAP, partly on the basis that the inspectors' interpretation of the WMS is incorrect and unlawful, and a rolled-up hearing has been ordered to be listed in the autumn. We enclose the statement of facts and grounds for that case with this letter, which sets out the reasons to why an interpretation of the WMS which prohibits local planning policies from setting energy performance requirements exceeding the Building Regulations is incorrect. At its core, the argument is as follows:

"61. The WMS states that "local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015".

62. The amendments have not commenced, and the government has confirmed that this will remain the case in the immediate term. Thus, far from proscribing local plan policies that exceed the Building Regulations, the WMS actively endorses them. The Inspectors, however, failed to understand that."

The claim for judicial review also argues that the inspector was wrong in law to take an approach which was inconsistent with that taken in the examinations for the Bath and North East Somerset local plan update and the Cornwall climate emergency development plan document, because that approach fails to respect the principle of consistency in planning decision-making (see *North Wiltshire District Council v Secretary of State for the Environment* (1993) 65 P&CR 137 at 145). The same legal error infects the inspector's approach in the present examination.

The submissions in the Salt Cross case are consistent with open advice by Estelle Dehon KC published by Essex County Council¹.

We appreciate that following the inspector's letter the council had no option but to consult on the main modifications proposed by the inspector or withdraw the plan. This was the same unenviable position that the inspectors in the Salt Cross examination

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¹ https://www.essexdesignguide.co.uk/media/2647/essex-open-legal-advice-energy-policy-and-building-regulations.pdf

Leigh Day

put WODC in. However, given that two of the very same legal principles will be considered by the court in the Salt Cross judicial review, it would be reasonable for the council to pause the current consultation until these legal issues have been settled at the end of this year. While that will inevitably cause delay to the local plan process, a pause now might save considerably more delay if the court determines that an approach such as that adopted by Ms Gilbert is unlawful, meaning that you are able to revert to the original drafting of Policy DM30a. In the alternative, it might make sense to issue a further consultation notice which notes that the justification for the inspector's proposed modifications remains to be tested in the High Court and that it is therefore possible that the council might revert to the previous drafting of Policy DM30a.

The defendant Secretary of State in the Salt Cross case has argued that our claim for judicial review of the inspector's report should only have been brought following the adoption of the plan, even though WODC has welcomed RCA's claim for judicial review given that it avoids the council having to choose between adopting a plan it does not support or withdrawing the plan entirely. Given the Secretary of State's arguments in that case, RCA will be monitoring how the Lancaster plan develops closely.

We suggest that this letter is shared with the inspector so that she is aware of the issues in the Salt Cross case. We find it surprising that different inspectors are willing to take completely opposing approaches to the interpretation of planning policy, which contradicts the principle of consistency in planning decision-making. This is an issue which we would expect the Planning Inspectorate to take a corporate view on. That is not a matter for your council, but you may wish to flag this letter to them.

Finally, given RCA's view that the inspector's approach to Policy DM30a is incorrect, RCA's position in terms of the main modifications consultation is that the council should revert to the previous wording of the policy.

Yours faithfully

Leigh Day

Enc.

Claim no

IN THE HIGH COURT OF JUSTICE PLANNING COURT

IN THE MATTER OF AN APPLICATION FOR JUDICIAL REVIEW

BETWEEN:

R (RIGHTS COMMUNITY ACTION LTD)

Claimant

and

SECRETARY OF STATE FOR LEVELLING UP, HOUSING AND COMMUNITIES

Defendant

and

WEST OXFORDSHIRE DISTRICT COUNCIL

and

GROSVENOR DEVELOPMENTS LTD

Interested Parties

STATEMENT OF FACTS AND GROUNDS

References to [CB:X] mean page x in the core bundle, [SB:X] means pages in the supplementary bundle.

Recommended reading (estimated 2 hrs): - (1) PAP correspondence [CB:64-89], (2) C's witness statements [CB:90-98], (3) Inspectors' Report [CB:50-63], (4) Written Ministerial Statement [CB:118-123].

Introduction

- 1. In a report dated 1 March 2023 and published on 7 March 2023, the examining Inspectors of the Salt Cross Garden Village Area Action Plan ("the AAP") concluded that policies in that plan which set energy efficiency standards that exceed the energy requirements of building regulations were "unsound". By this claim, the Claimant submits that conclusion was erroneous in law.
- 2. Section 1 of the Planning and Energy Act 2008 (which is an important provision set out further below) provides:

(1) A local planning authority in England may in their development plan documents... include policies imposing reasonable requirements for—

..

(c) development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations.

. . .

- (5) Policies included in development plan documents by virtue of subsection (1) must not be inconsistent with relevant national policies for England.
- 3. Several Inspectors appointed by the Secretary of State to examine local plans¹ have accepted that policies in local plans setting energy efficiency standards that exceed the energy requirements of the Building Regulations are not inconsistent with relevant national policies for England and are not unsound. However, the examining Inspectors of the Salt Cross Garden Village Area Action Plan ("the AAP") took a different approach to several of their Inspectorate colleagues [CB:58 ff.]. They found that Policy 2 of the AAP, concerning Net Zero Carbon Development, was not consistent with national policy and further held it was not justified: and accordingly that it was "unsound."
- 4. West Oxfordshire's Local Plan was adopted by West Oxfordshire District Council ("the Council") in 2018. The Local Plan included Policies OS2 and EW1 [SB:72-84], which identified the development of a self-contained settlement based on garden village principles, subsequently known as Salt Cross, to be delivered through an AAP that was to be the subject of separate examination.
- 5. Policy 2 of the AAP, as submitted to the Inspectorate by the Council, imposed a number of requirements on new development at Salt Cross, including that development should demonstrate net zero credentials through ultra-low energy fabric specification, overheating mitigation requirements, energy efficiency key performance indicators (KPIs), and being fossil fuel-free [CB:162-]. However, following the main modifications required by the Inspectors to make the policy sound, most of these requirements will have

[SB:29].

¹ See, e.g. the Report of Inspector Lewis to Bath and North East Somerset Council dated 13 December 2022 [SB:11]; the Report of Inspector Paul Griffiths to Cornwall Council dated 10 January 2023 following examination of the Cornwall Council Climate Emergency Development Plan Document [SB:19]; the Report of Inspectors Matthew Birkinshaw and Clive Coyne regarding the Central Lincolnshire Local Plan Review (28 March 2023)

been removed and accordingly the environmental ambition of Policy 2 as amended is much reduced.

6. By this claim the Claimant contends that, in making their recommendations to the Council regarding (mandatory) modifications of Policy 2, the Inspectors erred in law in the following ways:

GROUND 1. The Inspectors' recommendations that Policy 2 would be unsound without modification were materially influenced by an erroneous understanding of the 2015 Written Ministerial Statement on Plan Making dated 25 March 2015 ("the WMS") [CB:118].

GROUND 2. The Inspectors failed to provide a clear reason for departing from the position of several of their Inspectorate colleagues, who concluded that the WMS had in any event been overtaken by events and could be given limited weight.

GROUND 3. The Inspectors' conclusions on the required Main Modifications were reached in a procedurally unfair manner that did not allow the Council or the Claimant a fair opportunity to address the Inspectors' concerns, in breach of Inspectorate guidance on conducting examinations.

7. This claim is supported by evidence from the Town and Country Planning Association, the oldest charity in the UK concerned with planning, housing and the environment.² It is understood that the Council also support this claim.

Aarhus Convention Claim

8. This is an Aarhus Convention claim and the Claimant seeks costs protection under CPR Part 45 (VII). Pursuant to CPR 45.42(b), the Claimant has filed and served with the claim form a schedule of the Claimant's financial resources, including details of the Claimant's significant assets, liabilities, income and expenditure, and financial support (provided or likely) [CB:95].

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² See the witness statement of Hugh Ellis [CB:99].

Statement of Facts

The Claimant

9. The Claimant is a non-governmental organisation incorporated as a limited company in January 2019 involved in community planning, particularly the formation of local development plans, and which participated in the examination of the AAP. Specifically, on 25 July 2022, the Claimant wrote to the Planning Inspectorate explaining why the approach set out in the Inspectors' interim conclusions was wrong as a matter of law and policy and requested an explanation to allow stakeholders such as itself to understand why the proposed Main Modifications were needed [CB:238]. The Planning Inspectorate responded on 29 July 2022 declining to provide any further reasons [CB:244]. The Claimant submitted a consultation response to the consultation on the Main Modifications in late 2022 (see further below) [CB:257].

The AAP

- 10. West Oxfordshire's 2018 Local Plan includes Policy OS2, which identifies the development of a self-contained settlement based on garden village principles to the north of Eynsham that is to be delivered as part of the overall distribution of housing set out in Policy H1 [SB:73]. Policy EW1 sets out more detailed policy for the comprehensive development of a free-standing exemplar Garden Village that is to be led by an Area Action Plan, which was the subject of the recent examination [SB:81].
- 11. Core objective GV3 of the AAP states:

"To design buildings fit for the future, mitigating the impact of Salt Cross on climate change by achieving zero-carbon development through ultra-low energy fabric and 100% use of low and zero-carbon energy, with no reliance on fossil fuels."

12. Policy 2 as submitted for examination was in the following terms [CB:162]:

"Policy 2 - Net Zero Carbon Development

Proposals for development at Salt Cross will be required to demonstrate net zero operational carbon on-site through ultra-low energy fabric specification, low carbon technologies and on-site renewable energy generation. An energy strategy will be required with outline and detailed planning submissions, reconfirmed pre-

commencement, validated pre- occupation and monitoring post-completion demonstrating alignment with this policy.

Building Fabric

Proposals will need to use ultra-low energy fabric to achieve the KPI for space heating demand of <15 kWh/m2.yr, demonstrated through predicted energy modelling. This should be carried out as part of any detailed planning submission, reconfirmed precommencement, validated pre-occupation and monitored post-completion.

Overheating

Thermal comfort and the risk of overheating should be given full consideration in the earliest stages of design to ensure passive-design measures are prioritised over the use of more energy-intensive alternatives such as mechanical cooling. At outline planning stage, overheating should be mitigated through appropriate orientation and massing and at the detailed planning stage, a modelling sample proportionate to development density will be required to demonstrate full compliance with CIBSE TM59 for residential and TM52 for non-residential development, addressing overheating in units considered at highest-risk. Overheating calculations should be carried out as part of the detailed planning submission and reconfirmed pre-commencement.

Energy Efficiency

Energy budgets (EUI targets) must be demonstrated using predicted energy modelling. The following KPI targets will apply:

- Residential <35 kwh/m2.yr
- Office <55 kwh/m2.vr
- Research labs <55-240 kwh/m2.yr*
- Retail <80 kwh/m2.yr
- Community space (e.g. health care) <100 kwh/m2.yr Sports and Leisure <80 kwh/m2.yr
- School <65 kwh/m2.yr

To ensure best practice, an accurate method of predictive energy modelling, agreed in consultation with the District Council, will be required for a cross-section of building typologies (e.g. using Passive House Planning Package - PHPP or CIBSE TM45 or equivalent). This modelling should be carried out with the intention of meeting the target EUIs as part of the detailed planning submission, be reconfirmed pre-commencement, validated pre-occupation and monitored post-completion.

Fossil Fuels

The development will be expected to be fossil-fuel free. Fossil fuels, such as oil and natural gas should not be used to provide space heating, hot water or used for cooking.

Zero Operational Carbon Balance

100% of the energy consumption required by buildings on-site should be generated using on-site renewables, for example through Solar PV. The quantum of proposed renewable energy for the whole site (outline planning) and each phase (detailed

planning) should be shown in kWh/yr. The amount of renewable energy should equal or exceed the total energy demand for the development in order to achieve net zero operational carbon as a whole.

The energy strategy should state the total kWh/yr of energy consumption of the buildings on the site and the total kWh/yr of energy generation by renewables to show that the zero-carbon operational balance is met. An explanation should be given as to how these figures have been calculated.

Renewable energy contribution calculations should be carried out as part of the outline and detailed planning submissions, be reconfirmed pre-commencement, validated pre-occupation and monitored post-completion.

A detailed low- and zero-carbon viability assessment should be carried out in support of the energy strategy detailing the selection of on-site low- and zero-carbon energy technologies.

Embodied carbon

Development proposals will need to demonstrate attempts to reduce embodied carbon to meet the following KPI:

< 500 kg CO2/m2 Upfront embodied carbon emissions (Building Life Cycle Stages A1-A5). Includes Substructure, Superstructure, MEP, Facade & Internal Finishes.

As part of the submission of any planning application, a report should be prepared which demonstrates the calculation of the expected upfront embodied carbon of buildings. Full lifecycle modelling is encouraged.

Embodied carbon calculations should be carried out as part of the outline and detailed planning submission, be reconfirmed pre-commencement, and validated pre-occupation."

The examination and the Inspectors' interim response

- 13. Following submission of the AAP to the Secretary of State, the sole Inspector appointed at that time, Mr D McCreery, issued a list of matters, issues and questions ("MIQs") to be explored during the examination. Matter 7 related to various environmental matters, including net-zero carbon development. In the MIQs the Inspector asked for the sources of evidence to justify the Council's environmental policies, including policy 2.
- 14. The Council's response referred the Inspector to the evidence base submitted with the AAP, in particular the expert report it had commissioned 'Assessing the trajectory for

- net-zero buildings for the Oxfordshire Cotswolds Garden Village' (EV17), referred to as the "net zero carbon report" in the AAP.
- 15. During the course of the examination hearing sessions, held between 28 June and 8 July 2021, Policy 2 was discussed. The promoters of the site, the Second Interested Party, Grosvenor Developments Ltd ("GDL"), objected to Policy 2 based on previous representations made. The matters raised by GDL included (inter alia) criticisms on the grounds that the net zero obligations included in Policy 2 were inconsistent with National Policy, and that the evidence as to the deliverability and viability of the requirements was lacking.
- 16. During and following the hearing sessions, however, no further MIQs were issued by the Inspector as to the sufficiency of the net zero carbon report or the wider evidence base underlying Policy 2. Nor did the Inspector request that further evidence be provided. The only relevant agreed action points following the hearing sessions, was for the Council to "provide details of other plans that have taken a similar approach to AAP policy 2" [CB:265].
- 17. By contrast, on 27 July 2021, the Inspector did pause the examination process to allow the Council to prepare further evidence related to infrastructure phasing and delivery that he considered necessary in order to render the AAP's approach to infrastructure sound.
- 18. On 26 May 2022, nearly a year after the oral hearings had finished and the examination had been paused, the Inspectors wrote to the Council to confirm that the AAP would progress to the Main Modification and Reporting stage. By this time, a second Inspector has been appointed. For the first time they indicated Policy 2 was not, in their view, sound:

"Our conclusions on the issues and the reasons for Main Modifications will be set out fully in our report and we will take account of consultation responses, updated sustainability appraisal and other relevant information before reaching a final conclusion. As such, any detailed reasoning for recommending a specific Main Modification is best left to our report. Notwithstanding this, we anticipate that our conclusions in relation to Policy 2 (Net Zero Carbon Development) will come as a disappointment. As such, we will say at this stage that we are not satisfied that Policy 2 is either consistent with national policy or justified. As such, we are unable to conclude that the policy is sound. Our fuller reasoning on this matter will be set out in our report." [CB:234

19. The Inspectors did not explain either why Policy 2 did not accord with Government Policy or why it was not justified.

The consultation

- 20. In accordance with section 20(7C) of the Planning and Compulsory Purchase Act 2004 ("the 2004 Act"), the Council requested that the Inspectors should recommend any Main Modifications necessary to rectify matters that they considered would otherwise make the AAP unsound and thus incapable of being adopted The draft Main Modifications received by the Inspectors included the requirement to significantly 'dilute' the prescriptive elements of Policy 2 [CB:238].
- 21. The Council wrote in response on 19 July 2022 to express concerns that the Inspectors had not provided sufficient reasons to enable it to understand why these main modifications to Policy 2 were required, and that interested parties would be unable to respond effectively to the proposed changes if no explanation was given as to why they were necessary [CB:236-237]. The Council requested that the Inspectors explain why the policy as proposed did not accord with national policy and why it was not justified and that this was necessary for consultation on the proposed main modifications to be effective. The Council drew attention to the Inspectorate's own procedural guidance for the main modifications stage. The Council pointed out that the Inspectors had not followed their own guidance which states [SB:64]:
 - "6.4. The Inspector will aim to ensure that the LPA has a reasonable understanding of why all the potential main modifications are likely to be needed. Wherever possible the Inspector will seek to communicate this during the hearing sessions, but if there are issues for which this is not possible the Inspector will do so in writing as soon as possible afterwards. However, the Inspector's final recommendations, and the reasons for them, will be set out in the Inspector's report at the end of the examination."
- 22. On 19 July 2022, the Inspectors replied as follows [CB:236]:

"Policy 2 was discussed at length during the Hearing sessions, with views heard from a number of parties. The potential need for modification to the policy was also raised by the Inspector and prompted the Council to document an action relating to the policy and the question of whether it was inconsistent with national policy. These actions by the Inspector were sufficient to meet the aim of ensuring that the Council had a reasonable understanding that potential main modification was likely to be needed, in line with the best practice set out in the Procedure Guide.

It is not usual practice for Inspectors to share more detailed reasoning ahead of Main Modifications being identified and consulted upon. This is because any final conclusions are subject to the outcome of that consultation. However, in this instance, as the Inspectors knew the issue was of particular importance to the Council, as a courtesy they took the step of providing some additional explanation in the letter of 26 May [Insp17].

The consultation on the Main Modifications is on the substance of modifications themselves. It is not on whether parties agree or not with the Inspector's reasoning for saying that a Modification is needed. As such, the full reasoning is not required in order to take part in the consultation. Providing such reasoning would instead pre-empt the outcome of the consultation."

- 23. The only action identified for the Council to take was to provide examples of similar policies in other plans. This it had done. The Inspectors' position that it was not usual to explain to the Council why they considered main modifications were necessary was contrary to paragraph 6.4 of the guidance which had been drawn to their attention.
- 24. On 25 July 2022, the Claimant wrote separately to the Inspectorate expressing frustration that the Inspectors had failed to provide any reasonable understanding as to why the tests for soundness had not been met in relation to Policy 2. The letter provided [CB:238]:

"It is extremely frustrating that you have failed to provide any reasons for your finding that the council's draft of Policy 2 is unsound other than that it is inconsistent with national policy and unjustified. Without further explanation it is impossible for either the council, stakeholders, or members of the public to have a reasonable understanding of whether your analysis of the legal and policy position is correct, and therefore how to respond to any consultation on the MMs. It is particularly disappointing that you have taken this approach when Policy 2 is such a fundamental part of the draft AAP and is being looked closely at by other authorities who are attempting to address the climate emergency in their local plans.

We consider that you have acted in breach of the Planning Inspectorate ("PINS") procedural guide for local plan examinations..."

- 25. The letter goes on to reference paragraph 6.4 of the Inspectorate guidance [CB:240].
- 26. The Inspectorate responded to the Claimant on 29 July 2022 enclosing the same response that had been sent to the Council [CB:244].
- 27. The consultation on the Main Modifications took place from 23 September 2022 to 4 November 2022.

The Inspectors' Report

- 28. The Inspectors' report dated 1 March 2023 was published on 7 March 2023 [CB:50]. The report explains why, in the Inspectors' view, the recommended Main Modifications are necessary.
- 29. The Inspectors recommended that the AAP was sound subject to a number of finalised Main Modifications including the following summary:

"Revise Core Objective GV3 and Policy 2 in relation to net zero-carbon development to remove prescriptive detail and enable a more pragmatic approach for the necessary transition to a low carbon future (...)" [CB:53]

The modified policy removes the requirement in Policy 2 that the development at Salt Cross will be "required to demonstrate net zero operational carbon on-site" and the detail as to how that will be secured:

"Proposals for development at [sic] will be required to align with the District Council's ambition for achieving net zero carbon at Salt Cross. An ambitious approach must be demonstrated to the use of renewable energy, sustainable design and construction methods, with a high level of energy efficiency in new buildings. An energy statement will be required for all major development, which should demonstrate the following:

- Low energy use minimising the amount of energy consumed including in relation to building fabric performance. The use of ultra-low energy building fabric, appropriate and measurable targets for space-heating demand and energy use intensity (EUI) targets for different land-uses; West Oxfordshire District Council, Salt Cross Garden Village Area Action Plan, Inspector's Report 1 March 2023
- Thermal comfort thermal comfort and the risk of overheating in the earliest stages of design, including the use of passive design measures and the use of overheating modelling;
- Low and zero carbon energy supply maximising the use of onsite renewable energy and minimising the use of fossil fuels to zero;
- Embodied carbon reducing the impact of construction by minimising the amount of upfront embodied carbon emissions including appropriate embodied carbon targets. A calculation of the expected upfront embodied carbon of buildings and full lifecycle modelling;
- Measurement and verification appropriate arrangements for measuring and publicly reporting on the 'in-use' energy consumption of the different land-uses at Salt Cross postconstruction (e.g. for a period of 5-years)."

30. Regarding Issue 4, the soundness of Policy 2, the Inspectors' reasoning is at paragraphs 117-146 [CB:58-63]. The key part of their reasoning is that the Policy was unsound because, in going further than the Building Regulations, it was inconsistent with the 2015 WMS. At paragraph 145 they explain:

"There is also an absence of robustness and credibility to justify departing from national standards, which leads us to conclude that Policy 2 is inconsistent with national policy."

- 31. The Inspectors also considered the Policy was not justified. The Inspectors' concerns over the evidence base were as follows:
 - a) The Inspectors considered there is a question over the appropriateness of the selected typologies in the evidence base in terms of whether they satisfactorily demonstrate that the requirements of Policy 2 could be met.
 - b) The Inspectors considered there is an absence of detailed site-specific consideration in the evidence base to show that delivery and other challenges at Salt Cross have been identified and properly considered in relation to Policy 2, including at the science and technology park where more detailed consideration is required.
 - c) The Inspectors considered there is a lack of more detailed explanation relating to how the building typologies, KPIs, and other standards were selected in preference to alternatives.
 - d) The Inspectors considered there is a failure in the evidence base supporting Policy 3 to respond to the specific location and development for which the policies of the AAP will be applied.
 - e) The Inspectors considered there is a failure in the detailed policy requirements to provide flexibility in the context of the evolving nature of zero carbon building policy, where standards inevitably will change in response to technological and market advancement and nationally set standards.

Applicable law and policy

Examination of development plan documents

- 32. The procedure by which development plan documents must be prepared and adopted is set out in the 2004 Act and the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the 2012 Regulations") [SB:55].
- 33. The 2004 Act provides, so far as relevant [SB:38ff]:

"19 Preparation of local development documents

(1A) Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.

. . .

- (2) In preparing a development plan document or any other local development document the local planning authority must have regard to—
- (a) national policies and advice contained in guidance issued by the Secretary of State;

• • •

20 Independent examination

(1) The local planning authority must submit every development plan document to the Secretary of State for independent examination.

. . .

- (4) The examination must be carried out by a person appointed by the Secretary of State.
- (5) The purpose of an independent examination is to determine in respect of the development plan document—
- (a) whether it satisfies the requirements of s.19 and 24(1), regulations under s.17(7) and any regulations under s.36 relating to the preparation of development plan documents;
- (b) whether it is sound; and
- (c) whether the local planning authority complied with any duty imposed on the authority by s.33A in relation to its preparation.
- (6) Any person who makes representations seeking to change a development plan document must (if he so requests) be given the opportunity to appear before and be heard by the person carrying out the examination.

. . .

- (7B) Subsection (7C) applies where the person appointed to carry out the examination—
- (a) does not consider that, in all the circumstances, it would be reasonable to conclude that the document satisfies the requirements mentioned in subsection (5)(a) and is sound, but

- (b) does consider that, in all the circumstances, it would be reasonable to conclude that the local planning authority complied with any duty imposed on the authority by section 33A in relation to the document's preparation.
- (7C) If asked to do so by the local planning authority, the person appointed to carry out the examination must recommend modifications of the document that would make it one that—
- (a) satisfies the requirements mentioned in subsection (5)(a), and
- (b) is sound.
- (8) The local planning authority must publish the recommendations and the reasons."
- 34. A development plan document cannot be adopted without the recommended main modifications: s.23(4) of the 2004 Act.
- 35. The 2004 Act contains no definition of the term "sound". The term is defined in paragraph 35 of the NPPF:

"Plans are 'sound' if they are:

. .

- b) **Justified** an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."

Jurisdiction to hear this claim

- 36. Section 113 of the 2004 Act [SB:48] provides that a development plan document or a revision to it must not be questioned in any legal proceedings except insofar as provided in that section: that is, before the end of a six-week period beginning with the day after the document's adoption (s.113(3B) and (11)(c)).
- 37. Manydown Co Ltd v Basingstoke and Deane BC [2012] JPL 1188 was a judicial review challenge to a Council's decision to approve its selection of sites proposed for allocation in its pre-submission draft Core Strategy. Lindblom J held at [86]-[87] that the Court could entertain a claim for judicial review in the run-up to a statutory process (the preclusive provisions of section 113 not applying). He held, "In principle it cannot be

- wrong to tackle errors that are properly amenable to judicial review, when otherwise they would have to await the adoption of the plan before the court can put them right."
- 38. In *R.* (*IM Properties Development Ltd*) *v Lichfield DC* [2014] PTSR 1484, Patterson J took a different view, holding that a document becomes a development plan document once submitted for examination and therefore the preclusive provisions of section 113 would not allow the court jurisdiction to hear a challenge until after adoption of the plan by the local authority.
- 39. However, as is suggested by the authors of the Planning Encyclopaedia at 2-4598-18, the more detailed reasoning that a challenge such as this may be brought before adoption of the plan in *R* (*CK Properties* (*Theydon Bois*) *Ltd*) *v Epping Forest DC* [2019] PTSR 183 is to be preferred. In that case, the Claimant challenged the lawfulness of the Council's decision to publish a draft local plan in accordance with reg 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and thereafter submission to the Secretary of State for examination under s.20 of the 2004 Act. Supperstone J held at [50] that "only a challenge to an adopted local plan is precluded by s.113(2) otherwise than by a challenge made under the provisions of s.113." His reasoning was based in part on the fact that s.17(8) of the 2004 Act states that a document is a "local development document" only in so far as it is "adopted by resolution of the local planning authority as a local development document" or approved by the Secretary of State under s.21 or s.27 of the 2004 Act.
- 40. It follows that, in accordance with the *CK Properties* case and the analysis in the Planning Encylopaedia, the Court has jurisdiction to hear this claim, as it is not a challenge to an adopted development plan document. That is also the conclusion most conducive to good administration since compelling this challenge to await the Council adopting the AAP with the modifications imposed would add a further period of uncertainty after adoption.

Climate change policies in the NPPF

41. Paragraph 8 of the NPPF provides that achieving sustainable development includes 'an environmental objective', namely "mitigating and adapting to climate change, including moving to a low carbon economy." [SB:95]

- 42. Paragraph 11a) of the NPPF provides that the presumption in favour of sustainable development means, in the context of plan-making, "all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects." [SB:96]
- 43. Paragraph 20 of the NPPF provides that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for "planning measures to address climate change mitigation and adaptation." [SB:97]

44. Paragraph 152 of the NPPF provides that:

"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure." [SB:99]

45. Paragraph 153 of the NPPF provides that:

"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure." [SB:99]

46. Paragraph 154 of the NPPF provides that:

"New development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards." [SB:99]

The Planning and Energy Act 2008

47. Section 1 of the Planning and Energy Act 2008 provides:

"1 Energy policies

- (1) A local planning authority in England may in their development plan documents... include policies imposing reasonable requirements for—
- (a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development;
- (b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development;
- (c) development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations.
- (2) In subsection (1)(c)—
- "energy efficiency standards" means standards for the purpose of furthering energy efficiency that are—
- (a) set out or referred to in regulations made by the appropriate national authority under or by virtue of any other enactment (including an enactment passed after the day on which this Act is passed), or
- (b) set out or endorsed in national policies or guidance issued by the appropriate national authority;
- "energy requirements", in relation to building regulations, means requirements of building regulations in respect of energy performance or conservation of fuel and power.

. . .

- (4) The power conferred by subsection (1) has effect subject to subsections (5) to (7) and to—
- (a) section 19 of the Planning and Compulsory Purchase Act 2004 (c. 5), in the case of a local planning authority in England;

. .

(5) Policies included in development plan documents by virtue of subsection (1) must not be inconsistent with relevant national policies for England.

. . .

- (7) Relevant national policies are—
- (a) national policies relating to energy from renewable sources, in the case of policies included by virtue of subsection (1)(a);
- (b) national policies relating to low carbon energy, in the case of policies included by virtue of subsection (1)(b);
- (c) national policies relating to furthering energy efficiency, in the case of policies included by virtue of subsection (1)(c)." [SB:52]
- 48. Section 43 of the Deregulation Act 2015 ("the 2015 Act"), had it been brought into force, would have had the effect of disapplying s.1(1)(c) of the Planning and Energy Act 2008

in certain circumstances, namely as it applies to development in England consisting of the construction or adaptation of buildings to provide dwellings, or the carrying out of any work on dwellings. In other words, energy efficiency standards for dwellinghouses would be centrally set, and LPAs would not be able to exceed the energy requirements of the Building Regulations. However, the government has confirmed that these provisions will not be brought into effect.

The WMS and subsequent government policy on energy efficiency

49. The 2015 WMS stated as follows [CB:122]:

"For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015.

This is expected to happen alongside the introduction of zero carbon homes policy in late 2016. The government has stated that, from then, the energy performance requirements in Building Regulations will be set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4. Until the amendment is commenced, we would expect local planning authorities to take this statement of the government's intention into account in applying existing policies and not set conditions with requirements above a Code level 4 equivalent."

- 50. The above is summarised in the 2019 PPG on Climate Change (Paragraph: 012 Reference ID: 6-012-20190315 Revision date: 15 03 2019) [SB:70].
- 51. Both the WMS and paragraph 12 of the PPG pre-date significant policy and legislative changes, including:
 - a) The government's confirmation that it will not bring s.43 of the 2015 Act into force. In its January 2021 response to the consultation on the Future Homes Standard, the government said the following (emphasis added) [SB:92]:
 - "2.39 All levels of Government have a role to play in meeting the net zero target and local councils have been excellent advocates of the importance of taking action to tackle climate change. Local authorities have a unique combination of powers, assets, access to funding, local knowledge, relationships with key stakeholders and democratic accountability. This enables them to drive local progress towards our national climate change commitments in a way that maximises the benefits to the communities they serve. As part of this, the Government wishes to ensure that we have a planning system in place that enables the creation of beautiful places that will stand the test of time,

protects and enhances our precious environment, and supports our efforts to combat climate change and bring greenhouse gas emissions to net zero by 2050.

- 2.40 We recognise that there is a need to provide local authorities with a renewed understanding of the role that Government expects local plans to play in creating a greener built environment; and to provide developers with the confidence that they need to invest in the skills and supply chains needed to deliver new homes from 2021 onwards. To provide some certainty in the immediate term, the Government will not amend the Planning and Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes."
- b) The amendment made to s.1(1) of the Climate Change Act 2008 by the Climate Change Act 2008 (2050 Target Amendment) Order 2019, which came into force on 27 June 2019, setting the new "net zero" by 2050 target and the associated Carbon Budget Order setting the sixth carbon budget;
- c) Amendments to Part L of the Building Regulations in 2021 which have set energy efficiency standards for homes at a level exceeding Level 4 of the Code for Sustainable Homes;
- d) The government's announcement that it intends to introduce a Future Homes Standard by 2025 for new-build homes, in which energy efficiency standards will be increased even further;
- e) The government's January 2022 response to the Select Committee report on Local government and the path to net zero, where it said [SB:89] (emphasis added):

"The National Planning Policy Framework (NPPF) is clear that the planning system should support the transition to a low-carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low-carbon energy and associated infrastructure. The NPPF expects Local Plans to take account of climate change over the longer term; local authorities should adopt proactive strategies to reduce carbon emissions and recognise the objectives and provisions of the Climate Change Act 2008.

Local authorities have the power to set local energy efficiency standards that go beyond the minimum standards set through the Building Regulations, through the Planning and Energy Act 2008. In January 2021, we clarified in the Future Homes Standard consultation response that in the immediate term we will not amend the Planning and Energy Act 2008, which means that local authorities still retain powers to set local energy efficiency standards that go beyond the minimum standards set through

the Building Regulations. In addition, there are clear policies in the NPPF on climate change as set out above. The Framework does not set out an exhaustive list of the steps local authorities might take to meet the challenge of climate change and they can go beyond this."

Consistency in decision-making

- 52. The principle of consistency in planning decision-making is well-established. It has been endorsed many times by the senior courts. The classic statement of the principle can be found in the Court of Appeal judgment of Mann LJ in *North Wiltshire District Council v Secretary of State for the Environment* (1993) 65 P&CR 137 at 145.
- 53. In summary, while like cases do not have to be decided alike, a departure from a sufficiently similar decision requires a "clear explanation": *Hallam Land Management Ltd v Secretary of State for Communities and Local Government* [2019] JPL 63 at [74]. Where an Inspector differs from an earlier decision-maker on a crucial issue, he must "grasp the intellectual nettle of the disagreement" and give his reasons for it (see e.g. *R (Angus Bates) v Maldon DC* [2019] EWCA Civ 1272 at 19(viii)). Where an examining Inspector departs from the earlier decision of another Inspector on an issue of critical importance to his conclusions on soundness, he must similarly give reasons for doing so (*Dylon 2 v Bromley LBC* [2019] EWHC 2366 (Admin) ("*Dylon 2*")).
- 54. As consistency in planning decision-making is important, there will be cases in which it would be unreasonable for a decision-maker not to have regard to a relevant decision bearing on the issues she is considering, even where that decision had not been specifically brought to his attention, so long as the circumstances are such that she should have been aware of the decision and its relevance: *DLA Delivery Limited v Baroness Cumberlege of Newick* [2018] JPL 1268 at [34].

Guidance on conducting examinations

55. The procedure by which local plans will be prepared and adopted is set out in the 2004 Act and the 2012 Regulations. Further procedural guidance as to how an Inspector should conduct an examination is set out in the NPPG, published by the Secretary of State, and the Planning Inspectorate's *Procedure Guide for Local Plan Examinations* ("the Procedure Guide"). This guidance is in place to ensure that the examination process is conducted in a procedurally fair and transparent way.

56. The NPPG provides as follows:

"What is the role of the examination?

[...]

The Inspector will need to work proactively with the local planning authority. Underpinning this is the expectation that:

issues not critical to the plan's soundness or other legal requirements do not cause unnecessary delay to the examination of the plan

Inspectors should identify any fundamental concerns at the earliest possible stage in the examination and will seek to work with the local planning authority to clarify and address these

where these issues cannot be resolved within the examination timetable, the potential of pausing the examination should be fully considered, with the local planning authority having an opportunity to assess the scope and feasibility of any work needed to remedy these issues during the pause, so that this can be fully considered by the Inspector.

[...]

Paragraph: 050 Reference ID: 61-050-20190315

Revision date: 15 03 2019"

57. Similarly, the Procedure Guide says the following:

"5.21. As Section 3 above makes clear, the Inspector will raise any fundamental flaws in the plan or the evidence base with the LPA as soon as possible. In some cases, however, it may not be possible for the Inspector to determine whether or not fundamental problems exist until the evidence has been thoroughly tested at the hearing sessions. It may therefore be necessary, after the hearing sessions have concluded, for the Inspector to write to the LPA asking them to undertake further work on the evidence base...The Inspector will seek to agree a timetable with the LPA for this further work and any necessary SA, HRA and consultation. A pause in the examination (see Section 9 below) will usually be necessary to allow the further work to take place."

58. The Procedure Guide also makes clear that Inspectors should seek to ensure that local planning authorities understand why any Main Modifications have been proposed:

"6.4. The Inspector will aim to ensure that the LPA has a reasonable understanding of why all the potential main modifications are likely to be needed. Wherever possible the Inspector will seek to communicate this during the hearing sessions, but if there are issues for which this is not possible the Inspector will do so in writing as soon as possible afterwards. However, the Inspector's final recommendations, and the reasons for them, will be set out in the Inspector's report at the end of the examination."

59. The guidance also makes clear that a local planning authority, which will have invested much time and many resources into formulating a plan, is informed as to any deficiencies in its evidence base at the earliest opportunity, and also given every opportunity, at the earliest possible stage, to remedy any such deficiencies, and, where necessary, pausing the examination process to enable such evidence to be obtained.

GROUNDS OF CHALLENGE

Ground 1: Misinterpretation of the Written Ministerial Statement

- 60. The Inspectors' conclusions on the soundness of the plan proceeded on a flawed interpretation of the WMS.
- 61. The WMS states that "local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015" [CB:122].
- 62. The amendments have not commenced, and the government has confirmed that this will remain the case in the immediate term. Thus, far from proscribing local plan policies that exceed the Building Regulations, the WMS actively endorses them. The Inspectors, however, failed to understand that. They held, for example, at paragraph 124 that the WMS and 2019 NPPG meant that:

"[local] policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes (approximately 20% above the 2013 Building Regulations across the build mix). The 2015 WMS remains an extant expression of national policy."

- 63. That interpretation of the WMS led to the conclusion at paragraph 125 of the report that:
 - "... the standards in Policy 2 would amount to a significant uplift on the 2013 Building Regulations. The approach in Policy 2 therefore conflicts with national policy set out in the 2015 WMS."

The Inspectors' interpretation of the WMS, and therefore of the consistency of the AAP with the WMS is in error.

- 64. The WMS does provide that, following the then-proposed introduction of zero carbon homes policy in late 2016, the energy performance requirements in Building Regulations would be set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4 (approximately 20% above the 2013 Buildings Regulations across the build mix): and the government "would expect" local planning authorities "to take this statement of the government's intention into account in applying existing policies and not set conditions with requirements above a Code level 4 equivalent." The Inspectors alighted upon this in their discussion at paragraph 124 of their Report [CB:59]. However:
 - a) This relates to the setting of planning conditions where existing planning policies apply (see the recent 2023 Report of Inspectors Birkinshaw and Coyne, paragraph 174 [SB:34]).
 - b) This statement only applied "until amendment is commenced." The zero carbon homes policy has been abandoned, and the government has confirmed the amendment will not take place.
 - c) It is not a hard requirement. The WMS only requires this "*intention*" to be taken into account.
 - d) In any event, as the Inspectors accepted in their report at paragraph 125, the proposals in Policy 2 do not have a direct relationship with the Building Regulations that allows a percentage above the Regulations to be easily generated [CB:59]. Thus it is impossible to say that the requirements in Policy 2 would exceed the existing requirements by 20%, even if that was the test.
- 65. The Inspectors therefore adopted an incorrect reading of the WMS. They wrongly took the WMS to prohibit requirements in local planning policies that go further than the Building Regulations, which it does not.
- 66. That was an error which infected their reasoning in relation to:
 - a) The requirements of s.1 of the Planning and Energy Act 2008: because they wrongly assumed Policy 2 was contrary to the WMS, at paragraph 130 they wrongly concluded that s.1 of the 2008 Act did not apply and could not be relied on.

- b) Their interpretation of paragraph 154(b) of the NPPF: which provides that "Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards." The Government's policy for energy efficiency standards is that local planning authorities are entitled to exceed the requirements of the Building Regulations.
- c) Their assessment of the Council's evidence base at paragraph 140 [CB:62]:
 - "Overall, the evidence base does not justify the approach in Policy 2 as an appropriate strategy, even on a proportionate basis. There is also an absence of robustness and credibility to justify departing from national standards, which leads us to conclude that Policy 2 is inconsistent with national policy."
- 67. Finally, the Inspectors' interpretation of the WMS must be wrong because, on their view, the effect of the WMS where section 43 of the Deregulation Act 2015 was not brought into force was the same as if it had been brought into force. Although the WMS says in terms that "local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015", on the Inspectors' interpretation of the WMS, the very exceedance of energy performance standards set by the Building Regulations to which Policy 2 is aimed is inconsistent with the WMS and consequently, on the Inspectors' view, section 1(1)(c) of the Planning and Energy Act 2008 did not apply.

Ground 2: Failure to provide clear reasons for inconsistency with the interpretation of the WMS in other examination reports

- 68. The Inspectors' conclusions on the WMS are inconsistent with:
 - a) The interpretation set out in the Report of Inspector Lewis to Bath and North East Somerset Council ("BANES") dated 13 December 2022, where he said [CB:17]:
 - "84. The WMS 2015 has clearly been overtaken by events and does not reflect Part L of the Building Regulations, the Future Homes Standard, or the legally binding commitment to bring all greenhouse gas emissions to net zero by 2050.
 - 85. I therefore consider that the relevance of the WMS 2015 to assessing the soundness of the Policy has been reduced significantly, along with the relevant parts of the PPG on

Climate Change, given national policy on climate change. The NPPF is clear that mitigating and adapting to climate change, including moving to a low carbon economy, is one of the key elements of sustainable development, and that the planning system should support the transition to a low carbon future in a changing climate. Whilst NPPF154 sets out that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards, for the reasons set out, that whilst I give the WMS 2015 some weight, any inconsistency with it, given that it has been overtaken by events, does not lead me to conclude that Policy SCR6 is unsound, nor inconsistent with relevant national policies."

- b) the Report of Inspector Paul Griffiths to Cornwall Council dated 10 January 2023 following examination of the Cornwall Council Climate Emergency Development Plan Document, where he said [CB:22]:
 - "166. Provisions to allow Councils to go beyond the minimum energy efficiency requirements of the Building Regulations are part of the Planning and Energy Act 2008. The WMS of 25 March 2015 says that in terms of energy performance, Councils can set and apply policies which require compliance with energy performance standards beyond the requirements of the Building Regulations until the Deregulation Bill gives effect to amendments to the Planning and Energy Act 2008. These provisions form part of the Deregulation Act 2015, but they have yet to be enacted. Further, the Government has confirmed that the Planning and Energy Act will not be amended. The result of all this is that Councils are able to set local energy efficiency standards for new homes, without falling foul of Government policy.
 - 167. The WMS of 25 March 2015 has clearly been overtaken by events. Nothing in it reflects Part L of the Building Regulations, the Future Homes Standard, or the Government's legally binding commitment to bring all greenhouse gas emissions to net zero by 2050. In assessing the Council's approach to sustainable energy and construction, the WMS of 25 March 2015 is of limited relevance. The Framework makes clear in paragraph 152 that the planning system should support the transition to a low carbon future in a changing climate. Whilst paragraph 154 b) of the Framework requires that any local requirements for the sustainability of buildings should reflect the Government's national technical standards, for the reasons set out, the WMS of 25 March 2015 has been superseded by subsequent events. While it remains extant, any inconsistency with its provisions does not mean that the approach the Council has taken lacks justification. In that sense, there is nothing in the Council's approach that raises issues of soundness."
- 69. Moreover, while not something that the Inspectors could have taken into account as it post-dated their decision, the unlawful and problematic nature of their position on the WMS is also exhibited by its inconsistency with the Report of Inspectors Matthew Birkinshaw and Clive Coyne regarding the Central Lincolnshire Local Plan Review (28 March 2023) [CB:35]:

"In summary therefore, we conclude that the approach of Policy S7, which seeks to go above and beyond the requirements of the Building Regulations, is not inconsistent with national planning policy for the purposes of the Planning and Energy Act 2008. When read as a whole, it is also consistent with the Framework which states that the planning system should support the transition to a low carbon future in a changing climate and help shape places in ways that contribute to radical changes in greenhouse gas emissions. Whilst we find conflict with national planning practice guidance, both the PPG and the 2015 WMS have clearly been overtaken by existing and proposed changes to the Building Regulations brought into force in 2022. MMs are therefore not necessary to require the Plan to adhere to Code for Sustainable Homes Level 4 equivalent standards, which are now exceeded by the Building Regulations."

70. The Council expressly drew the BANES and Cornwall Plans to the Inspector's attention during the examination process. The Inspectors in the present case in their examination of Policy 2 were clearly aware that there were at least some other decisions that took a different view to them, as they noted at paragraph 139 of their report [CB:62]:

"There are inconsistencies between the approach in Policy 2 and national policy around exceeding the Building Regulations. We acknowledge that there are examples of plans that impose standards relating to the performance of buildings exceeding Building Regulations beyond the extent set out in the 2015 WMS. Some of these examples have been highlighted by the Council [WODC EXAM 06] and additionally in response to the proposed Main Modifications. Where the highlighted policies have been examined and adopted, they have been found sound on the basis of their own evidence base which, unlike the evidence underpinning Policy 2, was found to be robust. In addition, none of the examples provided set standards that are as prescriptive as submitted for Policy 2, and with the same degree of inflexibility."

- 71. However, what that response fails to do is give a "clear reason" why a completely different approach to the *interpretation* and *continuing relevance* of the WMS was taken. Legal questions of the meaning and effect of policy do not turn on case-specific evidence bases. Concerns regarding the evidence base or the prescriptiveness of Policy 2 are different issues that cannot affect the policy starting position, which must be established *before* applying the policy to the facts of a given case.
- 72. The relevance and status of the WMS 2015 as current national policy and the PPG in assessing whether Policy 2 was or was not consistent with national policy was clearly an issue of critical importance to the soundness of the policy (*Dylon 2*). Notwithstanding this, the Inspectors failed to explain clearly (or at all) why they reached the opposite conclusion to the BANES and Cornwall Inspectors on that question. Nor did the Inspectors explain why, in the circumstances identified by the BANES and Cornwall

- Inspectors, s.1(5) of the 2008 Act was engaged so as to prevent the Council exercising its powers under s.1(1) of that Act.
- 73. This inconsistency has prejudiced the Claimant, who cannot understand how these wildly different conclusions have been reached by different Inspectors. Moreover, local authorities are now faced with a position where some Inspectors consider the WMS to be extant and will give it full weight whereas others do not. This is untenable.

Ground 3: procedural fairness

- 74. The requirements of procedural fairness will depend on the context in which a decision is taken, its nature, and the seriousness of its consequences (*R* (*Howard League for Penal Reform*) *v Lord Chancellor* [2017] 4 WLR 92 at [39]).
- 75. During the course of the examination, the Inspectors' approach to Policy 2 was procedurally unfair to the Council.
- 76. The Inspectors clearly had a "fundamental concern" (NPPG paragraph 050) as to the adequacy of the evidence base underlying Policy 2. Notwithstanding this, the Inspectors, contrary to their own guidance and contrary to the principles that govern procedural fairness, failed to explain the nature of those concerns to the Council either before, during or after the hearing sessions or at any stage up to the issuing of their report. They only did so when they produced their report, at a stage when it was too late to provide an opportunity to the Council to remedy its evidence base.
- 77. At no point prior to their report did the Inspectors explain the nature of their concerns despite repeated requests to do so nor did they request that further evidence be produced, either at the hearing sessions or thereafter. The only action required by the Inspectors was for the Council to produce other examples of local plan policies similar to Policy 2 which it did.
- 78. Even in May 2022 when the Council was first informed of the Inspectors' views that Policy 2 was not justified, they refused to provide any meaningful reasons as to why. This was despite being asked to do so by both the Council, the Claimant, and the TCPA. Instead, the Inspectors waited until production of the Report to explain why they

considered Policy 2 not to be justified when it was too late for the Council to seek to

make good the suggested deficiencies.

79. The Inspectors' approach was clearly contrary to the guidance set out in both the NPPG

and the Procedure Guide, cited above, which advise that Inspectors should identify

significant issues in the evidence base at an early stage; consider pausing examinations

in order to allow the production of further evidence where issues do arise; and provide

local planning authorities with a reasonable understanding of why proposed main

modifications may be needed so that they may seek to remedy identified deficiencies.

Conclusion

80. For the reasons set out above the claim passes the arguability threshold and should

proceed to a final hearing.

81. By way of final relief, the Claimant will seek:

a) An order quashing the Inspectors' report;

b) Alternatively, a declaration that the report proceeded on an error of law and that

accordingly Policy 2 can be adopted unamended,

c) Costs.

ALEX GOODMAN KC

ALEX SHATTOCK

Landmark Chambers

12.04.2023



Main Modifications Consultation Representations Statement

On behalf of:

Derwent Development Management Ltd

In respect of:

Lancaster Local Plan: Climate Emergency Review

Examination in Public

Company No: 08677630

Date:

July 2023

Reference:

MA/DDML/o18-11/Roo1m

Tel: 01457 872 240

1.0 Introduction

- 1.1 This Statement is submitted by Aylward Town Planning Ltd ("ATP") on behalf of our client Derwent Development Management Ltd ('DDML').
- Lancaster City Council has resolved to commence consultation on Main Modifications to the submitted Local Plan Climate Review. This was informed by a key letter from the Inspector (EX/INS/09) and then a resultant letter (EX/INS/10) which was a response to Council submissions in terms of the credibility of proposed revisions to Policy DM30a. The resultant Schedule (M-01) represents the scope of the consultation exercise.
- 1.3 This Statement is submitted in respect of our response to these Main Modifications. For completeness we confirm that we make no substantive comments in respect of revisions to the Policies Map and the SA/HRA. The Schedule comprises reference to 32 different Main Modifications (MM1-MM32). We confirm that our comments in this respect only deal with:

Main Modification 1 - Policy CC1 Paragraph 3;

Main Modification 1 - Policy CC1 Paragraph 4;

Main Modification 4 - Policy SG7 Criterion VII;

Main Modification 5 - Policy SG₉ Criterion VI;

Main Modification 6 - Policy SG11 Criterion VI;

Main Modification 14 - Policy DM30a Paragraph 7;

Main Modification 14 - Policy DM30a Paragraph 9;

Main Modification 14 - Policy DM30a Paragraph 12;

Main Modification 14 - Policy DM30a Paragraph 8A;

Main Modification 16 - Policy DM3oc Paragraph 1;

Main Modification 17 - Policy DM31 Paragraph 35;

Main Modification 30 - Policy DM62 Paragraph 5.

- 1.4 We have of course submitted representations to the emerging Local Plan Climate Review and provided evidence to thematic hearing sessions including the validity of the Policy DM30a approach which was outlined at submission and argued by the Council during relevant hearing sessions and into correspondence.
- 1.5 This statement is made in the context of available evidence. We reserve our right to provide additional commentary in the light of updated evidence that is made available or alternative arguments put forward by third parties. Should third parties raise adverse comments to Main Modifications which we have "supported", we reserve the right to comment and rebut.

2.0 Main Modifications Schedule

As set out within Section 1 of this statement, the M-o1 Schedule identifies 32 Main Modifications, many of which include sub-comments accordingly. We confirm that we make no comment in respect of the majority of these. However, we do make comments in regard to the following and we identify whether these are to support or otherwise seek amendments to address our concerns and to secure soundness:

MAIN MOD REF	POLICY REF	PAGE/ PARA NO.	TOPIC	COMMENT	RECOMMENDATION
MM1	CC1	Paragraph 3	Climate Change	Comment "should" used	Support
MM1	CC1	Paragraph 4	Climate Change	Comment "should" used.	Support
MM4	SG ₇	Criterion VII	Sustainable Construction	Comment "practices" used.	Support
MM ₅	SG ₉	Criterion VI	Sustainable Construction	Comment "practices" used.	Support
MM6	SG11	Criterion VI	Sustainable Construction	Comment "practices" used.	Support
MM14	DM3oa	Paragraph 7	Energy Statements	Comment "new build" used.	Support
MM14	DM3oa	Paragraph 9	Energy Statements	Comment re "change in the energy status" used.	Support
MM14	DM3oa	Paragraph 12	Energy Statements	Comment re "change in the energy status" used.	Comment
MM14	DM3oa	Paragraph 8A	Energy Statements	Comment re "change in the energy status" used.	Support
MM16	DM3oc	Paragraph 1	Energy Statements	Comment re "change in the energy status" used.	Support
MM17	DM31	Paragraph 35	Air Quality	Comment re lack of any exceedances used.	Support
ММ30	DM62	Paragraph 5	EV Charging	Removal of arbitrary requirements	Support

MM1 Policy CC1 Paragraph 3

- 2.2 MM1 Policy CC1 Paragraph 3 includes an adjustment to the phrasing of the policy insofar that it clarifies that adherence to these principles is welcomed and preferred but is not strictly necessary. It recognises that the components of the CC1 objectives are a positive starting point but also that a rigid approach could impact upon the opportunity to deliver sites and embrace design flair.
- 2.3 We support this change.

MM1 Policy CC1 Paragraph 4

2.4 MM1 Policy CC1 Paragraph 4 includes an adjustment to the phrasing of the policy insofar that

it provides a "where appropriate" caveat to recognise that adherence will not always be necessary and appropriate.

2.5 We support this change.

MM4 Policy SG7 Criterion VII

- 2.6 MM4 Policy SG7 Criterion VII includes an adjustment to the phrasing of the policy to provide clarity that it should be cross-referred to the policy requirements of Policies DM3oA-DM3oC inclusive. We have set out elsewhere that we have concerns with respect of the proposed Main Modification that would relate to Policy DM3oA Paragraph 12. Subject to our proposed revision and also the adoption of all other proposed main modifications re the DM3oA and DM3oC frameworks, then we raise no concerns with this approach.
- 2.7 On the basis outlined above, we support this change.

MM5 Policy SG9 Criterion VI

- 2.8 MM5 Policy SG9 Criterion VI includes amended phrasing of the policy to provide greater clarity re the need to cross-refer to policy requirements of Policies DM3oA-DM3oC inclusive. We have clearly highlighted our concerns re the proposed Main Modification to Policy DM3oA Paragraph 12. Subject to our revision and adoption of other proposed main modifications re the DM3oA and DM3oC frameworks, then we are satisfied with this approach.
- 2.9 On the basis outlined above, we support this change.

MM6 Policy SG11 Criterion VI

- 2.10 MM6 Policy SG11 Criterion VI provides greater clarity through cross-reference to policy requirements of Policies DM3oA-DM3oC inclusive. We have flagged our concerns re the suggested Main Modification to Policy DM3oA Paragraph 12. Subject to our revision and adoption of other main modifications re DM3oA and DM3oC, then we are content.
- 2.11 On the basis outlined above, we support this change.

MM14 Policy DM30a Paragraph 7

- 2.12 MM14 Policy DM3oA Paragraph 7 includes an adjustment to policy phrasing by clarifying that it is only applicable in the context of "new build" development.
- 2.13 We support this change.

MM14 Policy DM30a Paragraph 9

- 2.14 MM14 Policy DM30A Paragraph 9 includes key clarifications in the policy name and its content by ensuring it is clear that these requirements would only be triggered in the context of works to existing buildings that would be so substantial to create a change in the energy status of the building itself.
- 2.15 We support this change.

MM14 Policy DM30a Paragraph 12

- 2.16 Paragraph 12 does include text that recognises that the adherence to these policy objectives should be encouraged but a rigid compliance requirement is unnecessary and unjustified. However, it might be argued to conflict with the main modifications in terms of major non-residential development insofar that it does not refer to whether it is applicable to existing buildings where there is no change to the energy status.
- 2.17 <u>We object to this change as currently phrased.</u> It would regrettably oblige schemes for changes of use or other minor works to existing buildings to provide supporting documentation that has otherwise been agreed to be unnecessary.
- 2.18 We would recommend the following revisions and confirm that upon this being agreed that we would withdraw our objection accordingly:

"The submission of an Energy and Carbon Statement will be required to demonstrate how a development seeks to address the aims of this policy for all new residential development and qualifying major non-residential development (including residential institutions- Class C2 and C2A and the non-residential part of mixed use developments)."

MM14 Policy DM30a Paragraph 8a

- 2.19 Paragraph 8a is entirely new and clarifies the approach re energy status. It is clear that these requirements would only be triggered in the context of works to existing buildings that would be so substantial to create a change in the energy status of the building itself.
- 2.20 We support this change.

MM16 Policy DM3oc Paragraph 1

- 2.21 MM16 Paragraph 1 provides an aligned clarification in terms of the approach re energy status and the scope of physical works being undertaken.
- 2.22 We support this change.

MM17 Policy DM31 Paragraph 35

- 2.23 MM17 provides a clarification in terms of Policy DM31 which provides appropriate context. We do agree that it would be reasonable for development that would result in air quality exceedances to provide detailed consideration of air quality impacts. It would however be unreasonable for assessment to be required (or mitigation delivered) where no exceedances exist. As such, the contextual position which is that there are no exceedances in terms of PL10 and PM2.5 levels is important.
- 2.24 We support this change.

MM30 Policy DM62 Paragraph 5

- 2.25 MM3o Paragraph 3 comprises the deletion of text which had previously identified a requirement for the delivery of a quantum of EV charging points that far exceeded the position reached through recent changes to Building Regulations.
- 2.26 We provided evidence to the Examination in this respect, including reference to the Government's Impact Assessment that provision at these levels would not be reasonable or consistent with envisaged market requirements.
- 2.27 We support this change.



Planning and Housing Strategy Team
Planning and Place Service
Directorate for Economic Growth and Regeneration
Lancaster City Council
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SENT BY EMAIL planningpolicy@lancaster.gov.uk 21/07/2023

Dear Planning Policy Team,

LANCASTER LOCAL PLAN: CLIMATE EMERGENCY REVIEW MAIN MODIFICATIONS

- Thank you for consulting with the Home Builders Federation (HBF) on the Lancaster Local Plan Climate Emergency Review Main Modification consultation.
- 2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Strategic Policies and Land Allocations Development Plan

MM1: Policy CC1: Responding to Climate Change and Creating Environmental Sustainability

- 3. The Council proposes to amend paragraph 3 of this Policy to add 'should', so the policy now states that 'all development should integrate the principles of sustainable design and construction'. The Council also propose to amend paragraph 4 to add 'where appropriate'.
- 4. The HBF continues to consider that this policy is unsound as it is not consistent with national policy as it doesn't serve a clear purpose or avoid unnecessary duplication. The HBF continues to consider that the policy should be deleted.
- 5. However, if the policy is to be retained the HBF considers that the proposed additional flexibility that is incorporated by including 'should' and 'where appropriate' is an improvement to the original policy and would be in line with our previous recommendations.

Home Builders Federation HBF House, 27 Broadwall, London SE1 9PL Tel: 0207 960 1600

Email: info@hbf.co.uk Website: www.hbf.co.uk

Twitter: @HomeBuildersFed

<u>Development Management Development Plan</u>

MM13: Policy DM29: Key Design Principles

6. The HBF continues to consider that it is not necessary for part VII to refer to the need to meet the requirements of Policies DM30a, b and c, it is assumed the Plan is to be read as a whole. The HBF considers that this part of the policy should be deleted.

MM14: Policy DM30a: Sustainable Design

- 7. The Council proposes to delete part of this policy that requires a minimum 75% reduction in carbon emissions by 01/01/2025 and the net zero emissions by 01/01/2028. The HBF considers that this amendment is appropriate.
- 8. The Council proposes to make amendments to paragraph 11, 12 and 13 of the Policy in relation to the Energy and Carbon Statement. The HBF continues to consider that requirements for a Sustainable Design Statement, including the Energy and Carbon Statement, are unnecessary, however, if the Council does decide to go ahead with this requirement it should ensure that the requirement is not overly onerous and is proportionate to the scale of the development.

MM18: Policy DM 33: Development and Flood Risk

- 9. The Council proposes to amend paragraph 1 of this policy to delete the reference to access/egress, play/recreation areas and gardens. The HBF considers that this is appropriate and in line with the guidance set out in the PPG.
- 10. The Council also proposes to amend paragraph 2 of the policy so the development will have to take account of the Council's Flood Risk Sequential Test and Exception SPD rather than being in accordance with it. The HBF considers that this is an appropriate amendment.

MM19: Policy DM34: Surface Water Run-Off and Sustainable Drainage

11. The Council proposes to amend the third paragraph of this policy to delete reference to 'above ground'. The HBF considers that this amendment is appropriate, as it allows for flexibility in relation to how SuDs are provided when considering an appropriate layout, particularly in relation to other planning policy requirements, the efficient use of land and the individual site circumstances. This flexibility is a fundamental aspect of the Sustainable Drainage Hierarchy. However, the HBF considers that the bullet points which also form part of this paragraph will also need consideration particularly in relation to the requirements for all SuDS to incorporate landscape and amenity enhancement and environmental and biodiversity benefits, which may not be possible in relation to underground attenuation.

MM30: Policy DM62: Vehicle parking provision and electric vehicle charging points

12. The Council proposes to delete the text that states that 'all new development and changes of use with associated car parking shall provide as a minimum one charging unit for each dwelling with an associated space and 20% of communal parking spaces to be provided with standalone charging'. The HBF considers that this an appropriate deletion and is appropriate in light of Building Regulations for EV Charging Points.

Future Engagement

- 13. I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
- 14. The HBF would like to be kept informed of the adoption of the Local Plan and all forthcoming consultations upon the Development Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

Joanne Harding Planning Manager – Local Plan (North)

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229



Planning and Housing Strategy Team Lancaster City Council Lancaster Town Hall PO Box 4 Lancaster LA1 1PJ

27th July 2023

Letter by email only

Dear Sir/Madam,

Climate Emergency Review of the Local Plan Main Modifications

Thank you for consulting Sport England on the above document.

Sport England considers that certain sites identified in the document should be consistent with our Playing Fields Policy. This is especially important where Sport England would be a statutory consultee on developments that would prejudice the use of playing fields as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595) in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more, or that it is on land that allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement.

Sport England would wish to avoid a situation where an adopted sites allocation document encourages certain types of planning applications which Sport England later has to object to as they are not consistent with our Playing Fields Policy.

Sport England's Playing Fields Policy contains five exceptions where we will not object to a planning application which prejudices the use of playing fields. These exceptions are:

 E1 A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.

OISABLED

Sport England, SportPark, 3 Oakwood Drive, Loughborough, Leicestershire, LE11 3QF, T: 020 7273 1777, E: planning.southeast@sportengland.org, www.sportengland.org



- E2 The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.
- E3 The proposed development affects only land incapable of forming, or forming part of, a playing pitch and does not result in the loss of or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facilities on the site.
- E4 The playing field or playing fields that would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development.
- E5 The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.'

Sport England's Playing Fields Exceptions reflect paragraph 99 of the NPPF which states:

"99. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."

Sport England's comments on the Climate Emergency Review of the Local Plan Main Modifications are set out in the table below.

Once again, thank you for consulting Sport England and we hope that you consider the comments made in this letter and the attached table.





If you require any further information or clarification, please do not hesitate to contact the undersigned on the detail listed below.

Yours sincerely

Pauline Shearer Planning Manager

Tel: 07833215549

e-mail: pauline.shearer@sportengland.org

<u>Please note</u>: Any allocation/policy that includes, or prejudices the use of, playing field or any other sport facility that has not been commented on in the table below should not in any way be interpreted that Sport England accepts its loss. This is merely an oversight and such sites should still be considered against paragraph 97 of the NPPF.





M_01_Schedule of Main Modifications Consultation [June 2023]

Sport England Detailed Representations

		ed Representati		
Modification Number	Page No.	Paragraph / Table / Figure	Response	Comment
MM1	29	Paragraph 3 of CC1	No comment	
MM1	29	Paragraph 4 of CC1	No comment	
MM2	40	Final bullet point SP4	No comment	
MM3	52	Paragraph 1 of SP8	No comment	
MM4	82	Criterion vii of SG7	No comment	
MM5	89	Criterion vi of SG9	No comment	
MM6	97	Criterion vi of SG11	No comment	
MM7	187	Paragraph 24.5	No comment	
MM8	191	Figure 24.1	Comment	Active Design – please see *at end of table
MM9	195	New paragraph 23	Comment	Active Design – please see *at end of table
MM10	201	Appendix A: GofT	No comment	
MM10	201	Appendix A: GofT	No comment	
MM10	204	Appendix A: GofT	No comment	
MM10	205	Appendix A: GofT	No comment	
Mm11	213	Appendix C: NP list of	No comment	
MM12	224	Appendix F: Monitoring Framework	No comment	
MM12	228	Appendix F:	No	







		T	T	
		Monitoring Framework	comment	
MM12	229	Appendix F:	Comment	Active Design –
		Monitoring		please see *at end
		Framework		of table
MM12	231	Appendix F:	Comment	Active Design –
		Monitoring		please see *at end
		Framework		of table
MM12	234	Appendix F:	No	
		Monitoring	comment	
		Framework		
MM12	234	Appendix F:	No	
		Monitoring	comment	
		Framework		
MM12	234	Appendix F:	No	
		Monitoring	comment	
		Framework		
MM12	235	Appendix F:	No	
		Monitoring	comment	
		Framework		
MM12	235	Appendix F:	No	
		Monitoring	comment	
		Framework		
MM12	236	Appendix F:	No	
		Monitoring	comment	
		Framework		
MM12	237	Appendix F:	No	
		Monitoring	comment	
		Framework		
MM12	239	Appendix F:	No	
		Monitoring	comment	
N 40 4 4 0	0.40	Framework	.	
MM12	240	Appendix F:	No	
		Monitoring	comment	
N 4 N 4 4 O	0.40	Framework	N.I.	
MM12	243	Appendix F:	No	
		Monitoring	comment	
NANA40	044	Framework	Na	
MM12	244	Appendix F:	No	
		Monitoring	comment	
NANA40	64	Framework	No	
MM13	64	Criterion II of	No	
NANA42	64	DM29	comment	
MM13	64	New Criterion	No	







	1	Τ.	T	1
		between	comment	
		Criterion II		
		and III of DM29		
MM13	64	Criterion VII	No	
IVIIVITS	04	of DM29	comment	
MM13	64	Criterion VIII	Comment	Active Design –
IVIIVITO	04	of DM29	Comment	please see *at end
		OI DIVIZS		of table
MM13	64	Criterion IX of	No	or table
		DM29	comment	
MM13	66	Paragraph	No	
		immediately	comment	
		following		
		DM29		
MM13	67	Paragraph	Comment	Active Design –
		9.6		please see *at end
N 40 4 4 C	07			of table
MM13	67	Paragraph	Comment	Active Design –
		9.7		please see *at end
MM14	70	Dorograph 2	No	of table
IVIIVI I 4	70	Paragraph 2 of DM30a	comment	
MM14	71	Paragraph 3	No	
IVIIVIII	' '	of DM30a	comment	
MM14	71	Paragraph 7	No	
10110111	' '	of DM30a	comment	
MM14	72	Paragraph 9	No	
		of DM30a	comment	
MM14	72	Paragraph 11	No	
	<u></u>	of DM30a	comment	
MM14	72	Paragraph 12	No	
		of DM30a	comment	
MM14	72	Paragraph 13	No	
	_	of DM30a	comment	
MM14	72	End of	No	
D AD A 4 4	70	DM30a	comment	
MM14	72	New	No	
		paragraph 7 of DM30a	comment	
MM14	73	New	No	
IVIIVI I T	13	paragraph 8	comment	
		of DM30a		
MM14	73	Paragraph 8	No	
<u> </u>			1 -	1







		& 9 of DM30a	comment	
MM14	70	New	No	
		paragraph 9,10,11,12,13 of DM30a	comment	
MM14	74	New paragraph 14 of DM30a	No comment	
MM14	75	New paragraph 15 of DM30a	No comment	
MM14	75	New paragraph 19 of DM30a	No comment	
MM14	76	New paragraph 19 of DM30a	No comment	
MM14	76	New paragraph 20 of DM30a	Comment	The Council should note that the use of renewable and low carbon sources of heating and power, particularly ground source heating, will be subject to assessment under Sport England's Playing Field Policy where they affect playing fields.
MM14	76	New paragraph 21 of DM30a	Comment	The Council should note that the use of renewable and low carbon sources of heating and power, particularly ground source heating, will be subject to assessment under Sport England's Playing Field







				Policy where they affect playing fields.
MM14	76	New paragraph 21 & 22 of DM30a	Comment	Active Design – please see *at end of table
MM14	77	New paragraph 22b of DM30a	Comment	The Council should note that the use of renewable and low carbon sources of heating and power, particularly ground source heating, will be subject to assessment under Sport England's Playing Field Policy where they affect playing fields.
MM14	77	New paragraph 24 of DM30a	No comment	
MM14	77	New paragraph 25 of DM30a	No comment	
MM15	78	Paragraph 4 of DM30b	No comment	
MM16	79	Paragraph 1 of DM30c	No comment	
MM17	83	New paragraph 35	No comment	
MM18	85	Paragraph 1 of DM33	No comment	
MM18	85	Paragraph 2 of DM33	No comment	
MM18	85	Paragraph 4 of DM33	No comment	
MM18	85	Criterion III of DM33	No comment	
MM18	85	Criterion III.f of DM33	No comment	







	1	1	1	
MM18	85	Criterion III.g	No	
		of DM33	comment	
MM18	85	Criterion IV of	No	
		DM33	comment	
MM18	85	Criterion V of	No	
		DM33	comment	
MM18	85	Criterion VI of	No	
		DM33	comment	
MM18	85	Criterion IX of	No	
		DM33	comment	
MM19	90	Paragraph 3	No	
		of DM34	comment	
MM19	91	Paragraph 6	No	
		of DM34	comment	
MM19	92	Footnote B of	No	
	02	DM34	comment	
MM20	111	DM34	No	
IVIIVIZO	' ' '	DIVIO+	comment	
MM21	113	1 st paragraph	No	
IVIIVIZ I	113	of DMCCH1	comment	
MM21	113	Criterion III of	No	
IVIIVIZ I	113	DM34	comment	
MM21	113	New	No	
IVIIVIZ I	113	_	_	
MM21	113	paragraph 47 New	comment No	
IVIIVIZ I	113	_	_	
MM21	114	paragraph 48 New	No Comment	
IVIIVIZ I	114	_		
MM21	114	paragraph 49	comment	
IVIIVIZ I	114	New	No	
NANA 24	114	paragraph 50	comment	
MM21	114	New	No	
MM22	114	paragraph 51	comment	
IVIIVIZZ	114	Criterion II of	No	
MANAGO	111	DMCCH2	comment	
MM22	114	Criterion III of	No	
NANAOO	111	DMCCH2	comment	
MM22	114	New	No	
NANAOO	115	paragraph 52	comment	
MM22	115	New	No	
NANAOO	440	paragraph 53	comment	
MM23	116	Paragraph 1	No	
NANAO 4	404	of DM43	comment	0(5
MM24	124	Paragraph 1	Comment	Sport England
		of DM45		would want to







				allow flexibility in
				this policy wording
				where it affects the
				delivery,
				management and maintenance of
				sports facilities.
MM24	127	Paragraph	No	
N 4 N 4 O E	4.40	11.27	comment	
MM25	143	Criterion 1 of DM53	No comment	
MM25	144	Paragraph 5	No	Any proposals that
		of DM53	comment	would prejudice
				the use of playing
				fields as defined in
				the Town and Country Planning
				(Development
				Management
				Procedure)
				(England) Order
				2015 (Statutory
				Instrument 2015
				No. 595) will be
				subject to an
				assessment under Sport England's
				Playing Field
				Policy
MM25	145	Paragraph 13	No	
NANAOE	450	of DM53	comment	
MM25	152	Wind Energy Opportunity	No	
		Area Map	comment	
MM25	152	Wind Energy	No	
	102	Opportunity	comment	
		Area Map	20	
MM25	153	Wind Energy	No	
		Constraints	comment	
		Мар		
MM25	153	Wind Energy	No	
		Opportunity	comment	
NANAOG	150	Area Map	No	
MM26	159	Criterion V of	No	







		DM57	comment	
MM27	162	Paragraph 4	No	
MM28	168	of DM58 Criterion II of DM60	Comment Comment	Active Design – please see *at end of table
MM28	169	Criterion III of DM60	Comment	Active Design – please see *at end of table
MM29	170	Criterion IV of DM61	Comment	Active Design – please see *at end of table
MM29	170	Paragraph 3 of DM61	Comment	Active Design – please see *at end of table
MM29	171	Paragraph 4 of DM61	Comment	Active Design – please see *at end of table
MM29	171	Paragraph 6 of DM61	Comment	Active Design – please see *at end of table
MM29	173	New paragraph 69	Comment	Active Design – please see *at end of table
MM30	174	Paragraph 5 of DM62	No comment	
MM30	175	New paragraph 71 of DM62	No comment	Active Design – please see *at end of table
MM31	182	Appendix A - GofT	No comment	
MM31	183	Appendix A - GofT	No comment	
MM31	185	Appendix A - GofT	No comment	
MM31	186	Appendix A - GofT	No comment	
MM32	193- 95	Appendix C - GofT	No comment	

No comment to make with regard to the Proposed Additional Modifications.







No comment to make with regard to the addendum to the Sustainability Appraisal.

<u>The following relates to the policies with the comment - Active Design - please see *at end of table:</u>

*Sport England considers that this policy provides an ideal opportunity to incorporate the principles of Active Design. The Active Design guidance can be viewed on this <u>link.</u>

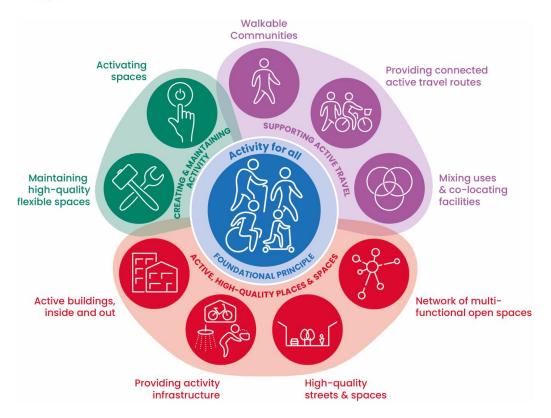
Where we live, work, travel and play has a major role in shaping our activity choices. By applying Active Design's 10 principles to our built and natural environments, we can create active environments that encourage people to be active through their everyday lives. With a shared belief and commitment to the great value that well designed places can have on health and wellbeing, Sport England has worked with Active Travel England (ATE) and the Office for Health Improvement and Disparities (OHID) to produce this updated version of the Active Design guide.

The guide seeks to help planners, designers and everyone involved in delivering and managing our places to create and maintain active environments. The foundation principle of 'Activity for all' is supported by the remaining principles which are brought together under the three themes of 'Supporting active travel,' 'Active, high-quality places & spaces' and 'Creating & maintaining activity.'

Active Design 3: 10 Principles















LANCASTER LOCAL PLAN CONSULTATION CLIMATE CHANGE REVIEW

Main Modifications Consultation Representations

26 July 2023

Prepared for: Story Homes

Prepared by: Matthew Dawber

Project Number: 333100113

Lancaster Local Plan Consultation Climate Change Review

Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
V1	DRAFT	MD	17/07 /23				
V2	DRAFT	MD	17/07 /23				
V3	FINAL	MD	26/07 /2023	DM	26/07/2 023	DM	26/07/2 023

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Lancaster Local Plan Consultation Climate Change Review

The conclusions in the Report titled Lancaster Local Plan Consultation Climate Change Review are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

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Prepared by:		
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Reviewed by:	· ·	
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	Dan Mitchell	
	Printed Name	
Approved by:	•	
	Signature	
	Dan Mitchell	
	Printed Name	

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Project Number: 333100113

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2	BACKGROUND TO STORY HOMES AND INTERESTS IN LANCASTER	. 2
3	REPRESENTATIONS ON PROPOSED MAIN MODIFICATIONS	. 4
4	SUMMARY AND CONCLUSIONS	. 8

1 Introduction

- 1.1 Stantec UK Ltd (Stantec) is instructed by Story Homes Ltd (Story Homes) to submit representations on the Local Plan for Lancaster District 2020-2031: Climate Change Review Schedule of Main Modifications consultation (LPMM).
- 1.2 Story Homes has engaged with the preparation of the Local Plan Climate Change Review throughout its preparation. This engagement is summarised below:
 - Issues and Options 17 November 2020;
 - Regulation 18 Consultation 15 September 2021;
 - Regulation 19 Consultation 14 March 2022;
 - Hearing Statements on Matters 2, 3, 4, 6, 7, and 8 1 September 2022; and
 - Participation in Hearing Sessions on Matters 3, 4, 6 and 7 October 2022.
- 1.3 As such, Story Homes is keen to continue to work with the Council in order to ensure that the Main Modifications proposed result in a Plan that meets the requirements set out in paragraph 34 of the NPPF. It is in that context that these representations sit.
- 1.4 Where necessary reference will be made to previous representations issued on behalf of Story Homes. However, these will not be repeated verbatim and as they are within the examination library they will not be provided as appendixes. They are available on request if required.
- 1.5 Specific issues associated with the proposed modifications are set out in these representations as per the Planning Inspectorate's stated requirements. However, as an overarching point, the main concern relates to a continued lack of viability evidence to support additional policy requirements for development within Lancaster. Until such evidence is available, the additional requirements stated within the Climate Change Review are unjustified and not consistent with national planning policy.

2 Background to Story Homes and Interests in Lancaster

Story Homes has significant land interests in Lancaster, both in terms of developed schemes and those yet to be developed.

- 2.1 Story Homes was a key party in the redevelopment of the grounds of the former Lancaster Moor Hospital for residential development. This comprised 197 homes, which helped to facilitate the development and subsequent conservation of the former hospital building.
- 2.2 The development was the recipient of the coveted 5-star award for 'Best Residential development in Lancashire at the United Kingdom Property Awards 2014/15, demonstrating Story's commitment to outstanding design and build quality for sites in the City.
- 2.3 Story Homes has also submitted a planning application (Reference: 23/00324/FUL) for land allocated for residential development within the adopted Lancaster Local Plan Part 1 at Grab Lane.
- 2.4 This application comprises 232 homes as well as open space and a children's play area. The design proposed follows the same principles of high quality as that at Lancaster Moor Hospital and demonstrates Story Homes' ongoing commitment to securing a high standard of housing within the City.
- 2.5 Story Homes also has several other land interests within Lancaster with a total indicative capacity of over 1,000 homes at various stages of the planning process. This includes Sites at Ashton Road, Lancaster (Planning Application reference 20/00305/OUT), Whinney Carr, Lancaster, Low Road in Halton, , and Manor Lane, Slyne.
- 2.6 While there has been a postponement of Council and County Council work on the Bailrigg Garden Village, Story Homes remains committed to its delivery and working in partnership with relevant parties to achieve this.
- 2.7 Story Homes has made a national commitment to deliver, through sustainable construction and design considerations, new and sustainable communities using its knowledge and skills to enhance the environment.
- 2.8 Story Homes has a background of supplying sustainable development and seeks to enhance the environment through the prevention of pollution, reduction of waste and ensuring efficient use of material, energy and water.



Lancaster Local Plan Consultation Climate Change Review 2 Background to Story Homes and Interests in Lancaster

- 2.9 For example, Story Homes has installed over 20 sustainable urban drainage systems across the north of England and Scotland and 100% of Story homes are provided with energy efficient lighting.
- 2.10 Furthermore, recent Story Homes schemes have included the provision of electric vehicles charging points. Indeed, Story Homes' head office also has charging points to encourage staff to move towards zero emission vehicles.

2.11

3 Representations on Proposed Main Modifications

- 3.1 The following section will set out the representations on the proposed changes suggested as part of the Council's LPMM.
- 3.2 These are discussed below and set out using the Main Modification numbers within the LPMM.

MM1 - Element Proposed for Change: Policy CC1

- 3.3 The changes proposed are welcomed in the sense that it has increased flexibility in order that the Policy can respond to more types of development, and also acknowledges that the requirements of it are not always appropriate.
- 3.4 However, the wording proposed does not address the fundamental issue that Policy CC1 is a mission statement with no clear use in the decision taking process. MM1 should be amended to remove CC1 as a policy.
- 3.5 CC1 therefore remains not consistent with paragraph 16 of the NPPF and is therefore unsound.

MM3 - Element Proposed for Change: Policy SP8

- 3.6 Development being 'expected to provide' rather than 'must provide' is welcome and responds to some of the comments made on behalf of Story Homes in the Regulation 19 representations and Hearing Statements.
- 3.7 However, the Policy continues to be proposed without any understanding of the viability implications of it. This is particularly the case for biodiversity net gain requirements.
- 3.8 To resolve this issue, viability work should be updated to reflect the implications of this Policy and the proposed amendments to it. The addition of flexibility to the wording of the Policy to account for viability difficulties also needs to be added.
- 3.9 As currently worded SP8 remains unsound as it is not justified and is not consistent with national policy.

MM9 - Element Proposed for Change: Supporting Text to Policy T4



Lancaster Local Plan Consultation Climate Change Review 3 Representations on Proposed Main Modifications

- 3.10 As the Council will be aware, £140 million of Housing Infrastructure Fund (HIF) monies earmarked for transport improvements, including in south Lancaster, has recently been returned to Government.
- 3.11 One identified outcome of this spending was the improvement of public transport services along the A6 between the University and City Centre. This project has therefore been stalled.
- 3.12 The amendment proposed as part of MM9 states that the definition of 'frequent' (6 or more services an hour) was taken from the County Council's Bus Service Improvement Plan. However, to reach this level of service, investment is highly likely to be required. With the HIF monies not available, it will be up to individual developments to contribute towards funding this level of service.
- 3.13 The current viability work has not included adequate costings for these public transport interventions, which are likely to be substantial in order to reach such a high level of service.
- 3.14 Away from the key urban routes, a frequency of 2 services per hour is stated to be the minimum require to support development. However, again, this is not viability tested anywhere as to how realistic it is.
- 3.15 As a general point on the viability work provided and its relationship with transportation matters, the 3 Dragons work excludes Bailrigg Garden Village, but does include anticipated HIF monies for improvements to the city centre and gyratory. The impact of the loss of funding needs to be considered in detail as these improvements are now likely to require a higher level of direct contribution from individual developments.
- 3.16 This change in circumstance renders an already deficient viability evidence base out of date.
- 3.17 Until such time that this viability information is provided the requirements are not justified and not consistent with national policy.
- 3.18 The definition proposed in terms of 'High Quality Bus Service' is welcomed. However, it is unclear how developers would be able to contribute towards improving the fleet of buses to provide USB charging points and onboard Wi-Fi.
- 3.19 The lack of meaningful guidance provided with the Plan means that developers and decision takers will be unclear as to what constitutes an acceptable level of service when determining planning applications.

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Lancaster Local Plan Consultation Climate Change Review 3 Representations on Proposed Main Modifications

3.20 Such uncertainty has the potential to delay the determination of allocated residential development sites at a time when this is crucial in helping to remediate an acute shortfall in the housing land supply.

MM13 - Element Proposed for Change: Policy DM29

- 3.21 In terms of Criterion II, additional flexibility should be added by adding 'where appropriate at the start of the paragraph. The change from 'maximise' to 'optimise' is welcomed.
- 3.22 The addition of Criterion III is welcomed.
- 3.23 It is not clear why the proposed addition in terms of 'maximising winter solar gain and minimising summer solar gain' is necessary to make the Policy sound. The term solar gain is self-explanatory, and the suggested clarification is superfluous and not required to make the policy sound, which is the sole reason for a Main Modification.

MM14 - Element Proposed for Change: Policy ~DM30a.

- 3.24 The deletion of the text box is welcomed as it avoids repetition from other regulatory requirements.
- 3.25 The move from requiring carbon reduction to be through the adoption of 'fabric first' methods to being encouraged is welcomed. However, this does not go far enough and reference to fabric first should be deleted for the reasons set out in previous representations at Regulation 19 stage, and within Hearing Statements on this issue.
- 3.26 For completeness the key issues are firstly, the introduction of a dual consenting regime between planning which would encourage fabric first, and building regulations which would require other methods prescribed in Part L of the Building Regulations. Secondly, the use of the fabric first method has not been adequately viability tested.
- 3.27 In terms of the requirements for a Sustainable Design Statement, which includes an Energy and Carbon Statement, it remains unclear what this will achieve above what is requires as part of a Design and Access Statement (national requirement) and an Energy Statement (local validation checklist requirement).
- 3.28 This requirement should be removed from Policy and detail that would be required within an Energy Statement should be incorporated within a revised Validation Checklist.
- 3.29 The removal of the transitional arrangements is agreed.



Lancaster Local Plan Consultation Climate Change Review 3 Representations on Proposed Main Modifications

MM15 - Element Proposed for Change: Policy DM30b

3.30 Encouraging rather than requiring green/blue walls and roofs is welcomed. This is particularly important given the lack of viability information of the implementation of this proposed Policy change.

MM18 - Element Proposed for Change: Policy: DM33

3.31 The deletion of access/egress, play/recreation areas, and gardens is welcomed as it does not align with Annexe 3 of the NPPF in terms of flood vulnerability classification and water compatible uses.

MM19 - Element Proposed for Change: Policy DM34

3.32 The removal of the requirement to use above ground SuDS for all development is welcomed. However, the wording does not go far enough and remains at odds with the drainage hierarchy which states that other solutions, such as the use of underground tank storage and direct discharge into sewers may be acceptable in some specific circumstances.

MM30 - Element Proposed for Change: DM62

- 3.33 The removal of the Electric Vehicle (EV) charging point standards from the policy is supported. However, the wording does not go far enough as the requirement for EV charging facilities to be powered by renewables remains untested in terms of viability, deliverability, and remains at odds with the general onus of the Plan (prioritises carbon efficiencies rather than onsite renewables).
- 3.34 As such, the Policy remains unjustified and inconsistent with national policy.

4 Summary and Conclusions

- 4.1 Stantec on behalf of Story Homes, has provided comments some of the proposed Main Modifications set out by the Council in relation of the Lancaster Local Plan: Climate Change Review.
- 4.2 Many of the changes proposed are welcomed in general terms and correspond to points raised in earlier representations and made verbally at the Hearing Sessions.
- 4.3 However, the changes proposed fail to ensure soundness in some circumstances and further wording changes and / or information on viability implications are required.
- 4.4 Significant concerns remain about the lack of robust viability evidence to underpin the proposed Climate Change Review generally, and the Main Modifications specifically. This is particularly pertinent given that the Council has recently lost £140 million of transport related funding.
- 4.5 The lack of viability evidence renders many of the additional policy requirements as unjustified and not in accordance with national planning policy.
- 4.6 The position is particularly concerning given the current acute shortfall in housing land supply, given that the increased burden on allocated residential development sites may harm their delivery.
- 4.7 Should you require further information on any of the points raised in these representations, please do contact me using the address above.



The Housing and Regeneration Agency



Planning and Housing Strategy Team Lancaster City Council Lancaster Town Hall PO Box 4 Dalton Square Lancaster LA11QR

By email: planningpolicy@lancaster.gov.uk

25th July 2023

Dear Sir / Madam

Consultation on the Climate Emergency Review of the Local Plan Main Modifications

Homes England Response

As a prescribed body, we would firstly like to thank you for the opportunity to comment on the above consultation.

Homes England is the government's housing and regeneration agency. We will drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home.

Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.

Yours faithfully,

P.P Nicola Elsworth Head of Planning and Enabling

Homes England 2nd Floor Three New Bailey Salford M3 5AX

Please send all Local Plan and related consultations to nwlocalplanconsultat@homesengland.gov.uk

0300 1234 500 @HomesEngland www.gov.uk/homes-england





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Our Ref: 0100

Planning Policy Town Hall Dalton Square Lancaster LA1 1PJ

By Email Only Date: 27th July 2023

Dear Sir or Madam,

Representations to Lancaster's Consultation on the Climate Emergency Review of the Local Plan Main Modifications

Asteer Planning LLP ("Asteer Planning") has been instructed by Taylor Wimpey UK Limited ("Taylor Wimpey") to submit representations to Lancaster City Council's ("LCC's") consultation on the Climate Emergency Review of the Local Plan Main Modifications.

Taylor Wimpey has submitted representations to each consultation stage of the Climate Emergency Review of the Local Plan; and, on Taylor Wimpey's behalf, Asteer Planning attended hearing sessions in relation to matters 3, 4, 6, 7, and 8 in October 2022. This statement, like the previous representations submitted by Taylor Wimpey to date, is made in the context of Taylor Wimpey's interest in the North Lancaster Strategic Site, which is allocated for residential-led development in the Lancaster Local Plan (Strategic Policies and Land Allocations DPD - adopted July 2020) under Policy SG9. It should also be noted that Taylor Wimpey is part of a consortium of housebuilders/developers who have engaged Cushman and Wakefield ("C&W") who have also prepared representations to the consultation on the Climate Emergency Review of the Local Plan specifically in the context of the Climate Change Local Plan Review Viability Assessment ("CCLPRVA").

Background

To date, Taylor Wimpey has submitted a hybrid planning application for Phase 1 of the North Lancaster Strategic Site, comprising a full planning application for the erection of 58 dwellings (Use Class C3) with associated landscaping, infrastructure, public open space and access arrangements, and an outline planning application for extra care (Use Class C3) and a local centre (Use Class E) development with associated landscaping, open space, and infrastructure (LPA reference: 21/00722/HYB). The application is currently pending determination.

Taylor Wimpey has also led on the preparation of a Comprehensive Masterplan for the North Lancaster Strategic Site. The Comprehensive Masterplan was acknowledged by the Local Plan Review Group on 4th July 2023 and the Chair of the Local Plan Review Group confirmed that the requirement of Policy SG9 had been met with regard to the preparation of a Comprehensive

Masterplan. The Comprehensive Masterplan will be uploaded to the Council's website in due course.

Taylor Wimpey understands that, following LCC's declaration of a climate emergency in January 2019, LCC has re-visited policies in the SPLA DPD and DM DPD to see if the performance of the policies in climate change mitigation and climate change adaptation can be improved.

Taylor Wimpey also has its own climate change targets and is reducing the carbon footprint of its business and working with its suppliers to help bring about wider change. Furthermore, Taylor Wimpey is the first homebuilder to have achieved the Carbon Trust Standard for its overall approach to carbon management. Therefore, Taylor Wimpey is generally supportive of LCC's intentions to explore the opportunities in the SPLA DPD and DM DPD to improve climate change mitigation and adaptation. However, Taylor Wimpey could not support any amendment to the adopted local planning policies that would unnecessarily or unreasonably threaten the viability or deliverability of the North Lancaster Strategic Site or housing sites in general.

Part 1 - SPLA DPD - Taylor Wimpey's Comments on Modifications Proposed

This section considers the proposed main modifications to the relevant policies of the SPLA DPD in light of the publication of the Schedule of Main Modifications following the hearing sessions of the Examination in Public of the Climate Emergency Review of the Local Plan.

Policy SG9

Regarding the North Lancaster Strategic Site, Taylor Wimpey notes the minor change proposed to criterion VI of Policy SG9 (Modification Number: MM5), which refers to "Policies DM30a, b and c", as opposed to "Policy DM30", and which the Inspector states is required for effectiveness. Taylor Wimpey is committed to the delivery of the North Lancaster Strategic Site, as demonstrated by the submission of a hybrid planning application for Phase 1 of the Strategic Site and the successful preparation of the Comprehensive Masterplan, as required by the current, and emerging, site-specific policy (Policy SG9). The development of the North Lancaster Strategic Site represents an important opportunity to deliver a quality residential-led development in a sustainable location, which will make a positive contribution to meeting LCC's housing need.

Further Comments on Proposed Modifications

Taylor Wimpey's further comments on the other SPLA DPD main modifications are summarised below:

Modification Number	Taylor Wimpey's Comment
MM1	Taylor Wimpey notes the main modifications proposed to Policy CC1. Taylor Wimpey acknowledges that the word "will" has been removed, as requested by Taylor Wimpey in its Regulation 19 representations. However, its replacement with the word "should" means that Taylor Wimpey's previous comments still stand in that the policy as worded could impact on the viability of new housing development, thus, reducing the rate of housing delivery. Therefore, Taylor Wimpey considers that the policy wording should revert to, "All development should take opportunities to integrate the principles of sustainable design and construction into the design of proposals" to ensure
	that Policy CC1 is effective.

Modification Number	Taylor Wimpey's Comment		
	Taylor Wimpey is supportive of the addition of the phrase "where appropriate" to paragraph 4 of Policy CC1, which it is understood has been added for the reason of effectiveness.		
MM2	Taylor Wimpey notes the main modification proposed to Policy SP4, which it is understood is simply a correction and has been made for the reason of effectiveness.		
MM3	Taylor Wimpey notes the main modification proposed to Policy SP8 and is supportive of the removal of "must" and the addition of the phrase "where possible", which it is understood has been added for the reason of effectiveness.		
MM7	Taylor Wimpey notes the main modification proposed to the supporting text to Policy T1, which it is understood has been made for the reason of effectiveness.		
MM8	Taylor Wimpey notes the main modification proposed to Figure 24.1, which it is understood has been made for the reason of effectiveness.		
MM9	Taylor Wimpey notes the main modification proposed to the supporting text to Policy T4.		
	It is understood that the proposed wording to follow new paragraph 12 is intended to provide a definition on the policy wording 'frequent high quality public transport' and an explanation as to how 'deficiencies in existing services' will be identified.		
	Taylor Wimpey is supportive of the acknowledgement within new paragraph 12 that the frequency of services and the provision of facilities will be determined on a "case-by-case basis". As stated in Taylor Wimpey's representations to the Regulation 19 consultation on the Climate Emergency Review of the Local Plan, it is not possible in all cases of a current deficiency, to provide new or enhanced services. This often requires public transport operators to be supportive of, and willing/able to provide additional services. In Taylor Wimpey's experience, a lack of willingness/ability from such providers renders new services unimplementable, even with willing developers, local planning authorities and highways authorities. Therefore, it is Taylor Wimpey's view that a bespoke package of sustainable measures should be developed on a site-by-site basis, rather than setting out a 'one-size-fits-all' approach, and that the wording of the policy and supporting text should omit reference to the specific requirements of public transport provision.		
	As an aside, if the new wording is carried through to the final version of the plan, the third word of the second Main Modification paragraph ('infers') is used incorrectly and should presumably be 'implies'.		
MM10	Taylor Wimpey notes the main modifications proposed to Appendix A: Glossary of Terms (adding in a definition of a pedestrian), which it is understood have been made for the reason of effectiveness.		
MM11	Taylor Wimpey notes the main modification proposed to Appendix C: Neighbourhood Planning – List of 'Strategic Policies' (adding in Policy CC1 to the list of policies), which it is understood has been made for the reason of effectiveness.		
MM12	Taylor Wimpey notes the main modifications proposed to Appendix F: Monitoring Framework (Pages 228 and 239), which it is understood have been made for the reason of effectiveness.		

Modification Number	Taylor Wimpey's Comment
	Taylor Wimpey is supportive of the deletion of the phrase "above ground" in relation to SuDs, as this will allow greater flexibility when developing suitable drainage designs for sites.

Part 2 - DM DPD - Taylor Wimpey's Comments on Modifications Proposed

This section considers the proposed main modifications to the relevant policies of the DM DPD in light of the publication of the Schedule of Main Modifications Consultation following the hearing sessions of the Examination in Public of the Climate Emergency Review of the Local Plan.

Policy DM29

Under the main modifications to Policy DM29 (Modification Number: MM13), the word "maximise" has been deleted from criterion II of Policy DM29 and that this has been replaced with the word "optimise". Furthermore, the following phrase (italics and underlined) is proposed to be included in the supporting text to Policy DM29, which requires layout and design to be optimised for energy and heat production "including maximising winter solar gain and minimising summer solar gain".

Taylor Wimpey is not supportive of the aforementioned proposed main modifications for the following reasons, as detailed in C&W's representations to the Regulation 19 consultation on the Climate Emergency Review of the Local Plan,

"Whilst certain dwellings on any given scheme may potentially be orientated to prevent overheating or maximise solar gain, this will not be possible for every plot without adversely impacting on layout and site densities. Less efficient use of land through lower densities would impair site viability. Further, there may be technical constraints on each specific site which restrict orientation of dwellings and the ability to achieve energy efficiencies through solar gain etc."

Therefore, as emphasised in Taylor Wimpey's previous representations, where the Climate Emergency Review of the Local Plan seeks to introduce additional policy requirements that could threaten the viability and/or delivery of housing, there must be a robust and flexible mechanism whereby these additional requirements and/or other requirements (such as affordable housing or other developer contributions) can be relaxed if viability is threatened.

Taylor Wimpey is supportive of the addition of the new criterion between criteria II and III of Policy DM29, which states that the Council will expect development to, "Optimise the efficient use of land and density". However, as noted above, the need to 'optimise' or 'maximise' winter solar gain and to 'minimise' summer solar gain will likely have an adverse impact on the layout and densities of sites, which is contrary to the stated intention for development to optimise the efficient use of land and density. This point is particularly important as the wording of the policy currently suggests that development will be expected to meet all the criteria listed owing to the word "and" being used. Nevertheless, as detailed above, it would not be possible to optimise the efficient use of land and density whilst also optimising solar gain.

Policy DM30a

Taylor Wimpey previously submitted representations objecting to the additional policy requirements of Policy DM30a. Taylor Wimpey notes the correspondence between the Inspector

¹ Cushman & Wakefield, 2022, Lancaster City Council: Climate Change Local Plan Review Viability Assessment, Consultation Representation, paragraph 7.40

and the Council in March 2023 regarding the main modifications, and Taylor Wimpey supports the Inspector's position regarding her concerns in relation to Policy DM30a.

Taylor Wimpey agrees with the Inspector that Policy DM30a is inconsistent with national policy and the Written Ministerial Statement on Plan Making (25th March 2015), with the Written Ministerial Statement clarifying the use of plan policies and conditions on energy performance for new housing developments and setting out the government's expectation that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes. Level 4 of the Code for Sustainable Homes has now been superseded by Part L of Building Regulations (effective as of 15th June 2022) requiring new dwellings to achieve a 31% reduction in carbon emissions. No evidence has been provided to supersede these standards and, therefore, Policy DM30a does not accord with the aforementioned Written Ministerial Statement. Consequently, the proposed main modifications to paragraph 3 of Policy DM30a (Modification Number: MM14) are necessary to ensure that the policy is sound, and, thus, Taylor Wimpey is fully supportive of the Inspector's proposed main modifications in this respect.

Taylor Wimpey is supportive of the use of the words "encourages" and "encouraged" within the new paragraph 8 and new paragraph 15 of the supporting text to Policy DM30a, as it is recognised that developers will not be required to meet an indiscriminate policy requirement with regard to sustainable design and construction. However, the references to "optimise solar gain" and to "maximise solar gain in winter and minimise solar gain in summer" should be removed from the supporting policy text of Policy DM30a for the reasons detailed above.

Taylor Wimpey notes the new paragraph proposed between paragraphs 21 and 22, which relates to Sustainable Design Statements. However, Taylor Wimpey requests that further clarity is provided which details what the Sustainable Design Statement should comprise. Taylor Wimpey reserves the right to comment on this matter further once additional information/guidance has been provided.

Policy DM30b

Taylor Wimpey notes the main modifications proposed to Policy DM30b (Modification Number: MM15).

Regarding Policy DM30b, Taylor Wimpey previously raised concerns regarding the requirement to "maximise" water efficiency measures owing to the impact of this requirement on the viability of development. It is noted that the proposed main modification (Modification Number: MM15) replaces reference to "maximise" with the word "optimise". Although Taylor Wimpey welcomes the removal of the word "maximise", "optimise" is not defined within the policy or supporting policy text. Therefore, Taylor Wimpey remains concerned that the requirement to 'optimise' water efficiency measures would add to the cost of development and would, thus, impact on viability.

Furthermore, as evidenced within C&W's Regulation 19 representations, the Climate Emergency Review of the Local Plan proposes several changes to policies which could have direct or indirect viability impacts and which have not been accounted for in the CCLPRVA, such as the requirement for the design of new developments to maximise the inclusion of water efficiency and consumption measures, as stated in Policy DM30b.

Taylor Wimpey supports the addition of the following sentence to Policy DM30b, "The use of green/blue walls and roofs is encouraged", in that green/blue walls and roofs are "encouraged" rather than being required by policy.

Policy DM58

Taylor Wimpey notes the main modifications to Policy DM58 (Modification Number: MM27), which the Inspector states are required for effectiveness. However, as stated in Taylor Wimpey's representations to the Regulation 19 consultation on the Climate Emergency Review of the Local Plan, Policy DM58 should not be ringfenced. Instead, the viability flexibility mechanism in Policy DM58 should apply to all of the new policy requirements that this review is seeking to introduce in relation to climate change and sustainability, otherwise, the Policy will not be effective as it will remove the necessary scope for development to deviate from the policy requirements within the Climate Emergency Review of the Local Plan for practical and/or viability reasons, thus removing flexibility that is critical to ensuring the delivery of development.

Further Comments on Proposed Modifications

Taylor Wimpey's comments to the other DM DPD main modifications are summarised below:

Modification	Taylor Wimpey's Comment
Number	Taylor Wimpey's Comment
MM17	Taylor Wimpey notes the main modifications proposed to the supporting text to Policy DM31, which it is understood has been added to make the policy justified and for the reason of effectiveness.
MM18	Taylor Wimpey supports the main modifications proposed to the supporting text to Policy DM33, which it is understood have been made to ensure consistency with national policy and for the reason of effectiveness.
MM19	Taylor Wimpey notes the main modifications proposed to Policy DM34. Taylor Wimpey is supportive of the deletion of the phrase "above ground" in relation to SuDs, as this will allow greater flexibility when developing suitable drainage designs for sites.
MM20	Taylor Wimpey notes the main modification proposed to Policy DM42, which it is understood has been added for the reason of effectiveness. However, it should be made clear that any archaeological work required must be considered on a case-by-case basis. Furthermore, for clarity, the following text (underlined) should be added to the proposed policy wording, "Where remains are identified, the above requirements of Policy DM42 will apply".
MM23	Taylor Wimpey notes the main modification proposed to Policy DM43 and is supportive of the addition of the phrase "where possible", which it is understood has been added for the reason of effectiveness. However, although Taylor Wimpey agrees in principle with the incorporation of Green and Blue infrastructure on housing sites, such infrastructure would need to be proportionate to the development proposed and take into account site-specific considerations. Taylor Wimpey does not support any Green and Blue infrastructure requirement that would threaten the viability and/or deliverability of the North Lancaster Strategic Site or housing sites in general. Where the Climate Emergency Review of the Local Plan seeks to introduce additional policy requirements that could threaten the viability and/or delivery of housing, there must be a robust and flexible mechanism whereby these additional requirements and/or other requirements (such as affordable housing or other developer contributions) can be relaxed if viability is threatened.
	Further to the above, Taylor Wimpey has prepared a Comprehensive Masterplan for the North Lancaster Strategic Site, which has been acknowledged by the Local Plan Review Group and will shortly be uploaded onto the Council's website. A detailed strategy in relation to ecology and Green and Blue infrastructure is provided within the Comprehensive Masterplan,

Modification Number	Taylor Wimpey's Comment		
	including Green Infrastructure and Indicative Blue Infrastructure plans. These demonstrate a scheme which is complementary to the Lancaster Green and Blue Infrastructure Strategy, notably the mapped Green Blue Corridor and the associated Knight, Kavanagh & Page Open Space. The proposed development interface with the Lancaster Canal incorporates a landscape buffer which has been agreed with GMEU, and built form is proposed to actively front and create an attractive setting to the canal route. Therefore, it is critical that any additional policy requirements proposed through the Climate Emergency Review of the Local Plan do not undermine the delivery of the Comprehensive Masterplan for the North Lancaster Strategic Site, which has been prepared collaboratively with several stakeholders and submitted to the Council ahead of the adoption of any revised Local Plan.		
MM24	Taylor Wimpey notes the main modifications proposed to Policy DM45 (adding in 'hedgerows'), which it is understood have been made for the reason of effectiveness.		
MM26	Taylor Wimpey notes the main modification proposed to Policy DM57 and is supportive of the addition of the phrase "where possible", which it is understood has been added for the reason of effectiveness.		
	Further to the above, Taylor Wimpey has prepared a Comprehensive Masterplan for the North Lancaster Strategic Site, which has been acknowledged by the Local Plan Review Group and will shortly be uploaded onto the Council's website. The Comprehensive Masterplan includes an Access and Movement Strategy for the Strategic Site, which is predicated on the desire to maximise the potential for residents/employees/visitors to travel by sustainable modes of transport and to ensure a permeable environment is created for pedestrians and cyclists. An Access and Movement Plan is contained within the Comprehensive Masterplan, which illustrates the access and movement strategy for the Strategic Site. Therefore, it is critical that any additional policy requirements proposed through the Climate Emergency Review of the Local Plan do not undermine the delivery of the Comprehensive Masterplan for the North Lancaster Strategic Site, which has been prepared collaboratively with several stakeholders and submitted to the Council ahead of the adoption of any revised Local Plan.		
MM28	Taylor Wimpey notes the main modifications proposed to Policy DM60, which it is understood have been made to ensure consistency with national policy and for the reason of effectiveness.		
MM29	Taylor Wimpey notes the main modifications proposed to Policy DM61, which it is understood have been added for reason of effectiveness.		
MM30	Taylor Wimpey notes the main modification proposed to Policy DM62, which it is understood has been added to ensure that the policy is justified. It is noted that the majority of the text relating to Electric Vehicle Charging Points has been deleted. However, as stated in Taylor Wimpey's representations to the Regulation 19 consultation on the Climate Emergency Review of the Local Plan, Taylor Wimpey seeks clarification from the Council as to the specification that will be required for charging points as this could have an impact on viability or electricity network capability. Furthermore, Taylor Wimpey reserves the right to comment on the forthcoming 'Provision of Electric Vehicles and Associated Charging Infrastructure' Supplementary Planning Document at the appropriate time.		
MM31	Taylor Wimpey notes the main modifications proposed to Appendix A: Glossary of Terms (to add in various definitions of terms), which it is understand have been added for the reason of effectiveness.		

Proposed Additional Modifications

Taylor Wimpey acknowledges the Proposed Additional Modifications to the Climate Emergency Review of the Local Plan; the majority of which have been made to correct grammatical errors and to provide clarity for the end user of the Plan.

Conclusion

These representations have been prepared by Asteer Planning on behalf of Taylor Wimpey to LCC's consultation on the Climate Emergency Review of the Local Plan Main Modifications.

Overall, Taylor Wimpey is generally supportive of LCC's intentions to explore the opportunities in the SPLA DPD and DM DPD to improve climate change mitigation and adaptation. However, Taylor Wimpey would not support any amendment to the adopted local planning policies that would unnecessarily or unreasonably threaten the viability or deliverability of the North Lancaster Strategic Site or housing sites in general.

Fundamentally, where the Climate Change Emergency Review of the Local Plan seeks to introduce additional policy requirements that could threaten the viability and/or delivery of housing, there will need to be a robust and flexible mechanism whereby other requirements (such as affordable housing or other developer contributions) can be relaxed if viability is threatened. In this context, Taylor Wimpey has reviewed the Schedule of Main Modifications, and the Proposed Additional Modifications, and has commented further on specific modifications proposed to both the SPLA DPD and DM DPD. Therefore, Taylor Wimpey respectfully requests that these representations are considered fully and wishes to be kept informed of any further progress on the Climate Emergency Review of the Local Plan.

Yours faithfully,

Paul Nellist
Associate Partner
07805 251 848
paul.nellist@asteerplanning.com

For and on behalf of Asteer Planning LLP



Town and Country Planning AssociationWorking to secure homes, places and communities where everyone can thrive

17 Carlton House Terrace London, SW1Y 5AS www.tcpa.org.uk July 2023

Lancaster City Council Climate Emergency review of the Local Plan Representation on MM14, Policy DM30a

The Town and Country Planning Association (TCPA) is a national charity that works to challenge, inspire and support people to create healthy, sustainable and resilient places that are fair for everyone. Informed by a long history of practical and progressive action addressing significant challenges, one of our key objectives is to support new and transform existing places to be adaptable to current and future challenges including the climate crisis.

We deliver well regarded guidance, training and research to enable planners and built environment professionals to address climate change and advocate strongly that this should be a central outcome of the planning system and a priority for planning professionals.

It is therefore incredibly disheartening to see Lancaster City Council's efforts to address the climate emergency through their local plan thwarted by the Planning Inspectorate, particularly as this is based on a misinterpretation of national policy.

In our view, main modification 14 to Policy DM30a should be deleted and the policy as worded in the draft local plan reinstated to be found sound.

Proposed MM14 waters down the policy intention to such a level that it would become ineffective. The removal of targets would also make Policy DM30a vague and ambiguous, which is directly contrary to NPPF policy on plan-making (para 16d).

Consistency with national policy

National policy is clear¹ that plans should take a 'proactive approach' to mitigating and adapting to climate change 'in line with the objectives and provisions of the Climate Change Act 2008.' This means that plans must be in line with the required 80% carbon reduction by 2035 and net zero by 2050. In its response to a recent Environmental Audit Committee inquiry, the government said 'We must intensify our efforts and eliminate virtually all emissions arising from the built environment if we are to meet our legally binding target of net zero emissions by 2050.'2 Given the time horizon of the local plan, and the phased introduction of emissions reductions targets, Lancaster City Council's preferred policy approach must be seen as aligned to government ambition to eliminate emissions from the built environment, whilst ensuring that new buildings are not required to undergo retrofit just a few years after completion.

¹ See paragraphs 152 to 154 of the NPPF, read with footnote 53

² Building to net zero: costing carbon in construction: Government Response to the Committee's First Report. https://cached.offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/download.pdf

What we build today will be with us in 2050 and should wherever possible be fit for zero carbon living. For the avoidance of doubt, it is also our emphatic view that a local authority can lawfully set local energy efficiency requirements for new homes above building regulations (by 20% or otherwise), provided it is justified by evidence in the usual way.

Whilst the national policy context is complex, the briefing prepared by Bath & North East Somerset (B&NES) Council³ as part of the recent examination on their local plan partial update explains clearly why the 2015 Written Ministerial Statement on Plan Making must be considered out of date and given very little weight.

This briefing also illustrates that this same view was confirmed by central government in the context of B&NES local plan examination, after B&NES sought clarity on this issue, and the response dated 22 June 2022 included the text below:⁴

- 'Plan-makers may continue to set energy efficiency standards at the local level which go beyond national Building Regulations standards if they wish.
- Local planning authorities have the power to set local energy efficiency standards through the Planning and Energy Act 2008.
- In January 2021, we clarified in the Future Homes Standard consultation response that in the immediate term we will not amend the Planning and Energy Act 2008, which means that local planning authorities still retain these powers.'

This position was accepted by the Planning Inspector, and policies setting ambitious net zero targets have also recently been through examination in the Cornwall Council Climate Emergency DPD.⁵ In neither case have the Inspectors required main modifications to these exemplar policies.

Legal compliance

The Essex Climate Action Commission and Essex County Council have recently commissioned legal advice on whether local planning authorities are able to set policies that set standards beyond building regulations. This legal advice considers the matter and concludes that 'LPAs have statutory authority to set energy efficiency targets that exceed the baseline in national Building Regulations.' There is nothing in law or

³ Note on the setting of local energy efficiency standards for new build development. Available from: https://beta.bathnes.gov.uk/sites/default/files/EXAM%2010%20Note%20on%20Local%20Energy%20Efficiency%20Targets%20FINAL.pdf

⁴ Ibid. (Paragraph 1.5)

⁵ See https://www.cornwall.gov.uk/planning-and-building-control/planning-policy/adopted-plans/climate-emergency-development-plan-document/#examination

⁶ Essex Open Legal Advice – Energy policy and building regulations. April 2023. Available: <u>https://www.essexdesignguide.co.uk/climate-change/net-zero-evidence/essex-open-legal-advice-energy-policy-and-building-regulations/</u>

national policy that prevents Lancaster City Council from retaining the ambitious, clear, and justified policy as originally drafted in DM30a.

The Inspector's concerns regarding policy DM30a's consistency with national policy are therefore unfounded, and we encourage the Inspector to remove MM14 from the final version of the local plan and reinstate the policy as intended.

Yours sincerely,

Hugh Ellis Director of Policy, TCPA

Celia Davis Projects and Policy Manager, TCPA

Email: celia.davis@tcpa.org.uk

Tel: +44 (0)2081 325480



Planning and Housing Strategy Team Planning & Climate Change Lancaster City Council

Phone: Email:

01772 534588

Date:

Our ref: MH/RT/KM 28 July 2023

planningpolicy@lancasterpp.org.uk

Dear Sir/Madam,

Climate Emergency Review of the Local Plan Main Modifications Consultation

Thank you for consulting Lancashire County Council on the above planning document and I make this response on behalf of the County Council's Schools Planning Team and the lead Local Flood Authority.

School Planning Team

The County Council's School Planning Team recognises the value of engaging with Local and City Councils at the earliest stage of their plans to ensure the future needs of education are highlighted and documented within the local plan policies. The value of local knowledge can help to define and shape the future of local communities. ensuring the right level of infrastructure is achieved to meet the growth of housing and employment.

The School Planning Team has worked closely with colleagues at Lancaster City Council over a number of years as they develop Local Plans, Strategic Policies, Land Allocation Development Plans (SPLA DPD) and Development Management Development Plans (DM DPD) to ensure the infrastructure requirements are included within the policies to support the successful delivery of sustainable housing development, including the allocation of land for new school provision.

The School Planning Team also request that as part of the amendments to the M01 Schedule of Main Modification Consultation Lancaster City Council take into consideration the new County Council School Site Criteria as part of infrastructure delivery especially in relation to Biodiversity Net Gain which is a new statutory requirement from November 2023. Additionally, the site must not be within flood zone 2 or 3 or subject to ground water flooding.

The County Council's School Planning Team looks forward to further engagement in the future to ensure we work towards making all new schools Carbon Neutral and all school sites meet the County Council's School Site Criteria which includes

Lancashire County Council

PO Box 100, County Hall, Preston, PR1 0LD

environmental impact mitigation, supporting Lancaster City Council's Climate Emergency Review.

Lead Local Flood Authority

The Lead Local Flood Authority is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Comments provided in this representation are advisory and it is the decision of the Local Planning Authority whether any such recommendations are acted upon. The comments given have been composed based on the extent of the knowledge of the Lead Local Flood Authority and information provided at the time of this response.

Lead Local Flood Authority Position:

The Lead Local Flood Authority has reviewed the main modifications proposed under MM18 and MM19 in the schedule of main modifications, regarding policies DM33 and DM34. We do not wish to raise any concerns with the modifications proposed, however, the Local Planning Authority may wish to clarify the following:

MM19 amendment to footnote B in policy DM34. The revised wording of this
may be unclear to the reader which climate change allowance should be
applied. You may wish to clarify that the 'Peak Rainfall Intensity' climate
change allowance is required, as per the original text.

I trust that you find the above comments valuable and should you wish for further information or clarification on the contents of this letter please contact me at the email address provided.

Yours faithfully,

Marcus Hudson Acting Head of Planning and Environment (Planning and Transport)



Please return completed forms no later than 5pm on 28 July 2023

- Email to: planningpolicy@lancaster.gov.uk; or,
- Post to: Planning and Housing Strategy Team I Lancaster City Council PO Box 4 I Lancaster Town Hall I Dalton Square I Lancaster I LA1 1QR

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- Part A: Personal Details
- Part B: Your representations (questions about the whole Plan)
- Part C: Notification request

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NOTE:

We cannot accept anonymous representations. Therefore please fill in Part A and sign the Data Protection Act section at the end of the form, before returning it to us.

If you are making representations on more than one proposed Main Modification you will need to complete a separate form for each representation. However, you only need to complete Part A: Personal Details and Part C: Notification request once.

Part A: Personal Details

*If an agent is appointed, please complete only the Name and Organisation boxes for the client in 'Your Details', but complete the full contact details of the agent.

	Your Details	Agent's Details* (if applicable)
Name (including title):	Paul Morris	Helen Clarkson, Associate Director
Organisation (where relevant):	Lancaster University	CBRE Limited
Address:	Bailrigg Lancaster	10 th Floor One St Peters Square Manchester
Post Code:	LA1 4YW	M2 3DE
	,	0404 000 5440
Telephone number:	n/a	0161 233 5418
	n/a	helen.clarkson@cbre.com
Email address:		

NOTE:

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Your responses on the above documents will be sent to the Planning Inspector without prejudice to the Inspectors final report.

You should not repeat or re-submit your previous representations, these have already been considered by the Inspector during the examination process.

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PART B: Your representations

Please use a separate form for each representation to a main modification.

B1. To which proposed Main Modification does your representation relate?

Please state the relevant reference number that you are commenting
on from the Schedule of Proposed Main Modifications (e.g. DM / PM
or SPLA): Example: SPLA MOD 02, Chapter 7, Policy SP3, Page
28, Paragraph 7.18
- · · · · · · · · · · · · · · · · · · ·

DM_ MOD_25

Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)

Supporting text (map) to Policy DM53, page 153, Wind Energy Constraints Map

Please complete a separate form for each representation.

B2. Do you consider this proposed Main Modification is:

Legally compliant? Please select one answer	Yes	X	No		
Sound? Please select one answer	Yes		No	Х	

B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

'Sound' means: is the Main Modification justified, effective, positively prepared and consistent with national policy?

Positively prepared? Please select one answer	Yes n/a	No	
Justified? Please select one answer	Yes n/a	No	
Effective? Please select one answer	Yes	No X	_
Consistent with national policy? Please select one answer	Yes n/a	No	

Consistent with national policy?

B4. In light of the proposed Main Modifications please set out what modification(s) you consider necessary to resolve your objection and make the Local Plan legally compliant or sound, having regard to the matter(s) you have identified. It will be helpful if you could provide your suggested revised wording of any policy or text.

CBRE Limited, on behalf of Lancaster University, has previously submitted representations in relation to Lancaster City Council's (LCC) Climate Emergency Local Plan Review (CELPR) 2020-2031. CBRE Limited (hereafter referred to as 'CBRE') acts on behalf of Lancaster University in relation to its wider estate in Lancaster.

Representations have been made to the following stages of the CELPR to date:

- Scoping Consultation (November 2020);
- Regulation 18, Draft version (letter dated 17th September 2021);
- Regulation 19, Publication version (letter dated 14th March 2022 and completed Regulation 19 Response Forms); and
- Hearing Statement (ref. HS/M3/SD&RE/2 CBRE obo Lancaster University).

The proposed Main Modification (MM25) (Supporting text (map) to Policy DM53, page 153, Wind Energy Constraints Map) states that Figure 13.1b will be amended to remove the 350m buffer around the adopted housing land allocations and add the M6 Motorway, as shown in Appendix 3 of the schedule of Main Modifications.

The footnote to the map shown in Appendix 3 (denoted by an asterisk) refers to a 150m buffer around roads, railways and public rights of way; however, there is no corresponding single asterisk in the Legend and this buffer is not shown on the map in Figure 13.1b. Therefore, the text referencing this should be removed.

Figure 13.1b shows that the area of land owned by Lancaster University (both to the west and east of the M6) is white land i.e. is unconstrained. The only relevant designation is 'SG1/SG3 – Lancaster South Broad Location for Growth'; however, this is not a constraint to wind energy as Figure 13.1a shows parts of the SG1/SG3 allocation in blue i.e. 'Suitable for Wind Energy'.

No explanation has been provided as to why large parts of the University estate, particularly land to the east of the M6, are not considered suitable for wind energy (as there is no constraint shown on Figure 13.1b which would explain this).

This Main Modification has not addressed the concerns expressed in the representations to date, particularly regarding the soundness of Policy DM53.

In order to address these concerns, we consider that Figure 13.1b should be updated to remove reference to the 150m buffer from roads, railways and public rights of way, as this is not shown in Figure 13.1b and the asterisk does not relate to any part of the Figure or legend.
Please be as precise as possible.

PART C: Notification request

Representations made may be accompanied by a request to be notified at a specified address of the publication of the recommendations of the planning inspector and/or of the adoption of the Local Plan.

C1. Please indicate by Yes X	No No
Planning) (England) Regu publicly available. The C its website but will not pu	be treated in confidence. The Town and Country Planning (Local ulations 2012, requires copies of all representations to be made ouncil will also publish names and associated representations on olish personal information such as telephone numbers, or email g a representation you confirm that you agree to this and accept
Signature:	Date: 27/07/23
	Please sign and date your representations.



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Part A: Personal Details

*If an agent is appointed, please complete only the Name and Organisation boxes for the client in 'Your Details', but complete the full contact details of the agent.

	Your Details	Agent's Details* (if applicable)
Name (including title):	Paul Morris	Helen Clarkson, Associate Director
Organisation (where relevant):	Lancaster University	CBRE Limited
Address:	Bailrigg Lancaster	10 th Floor One St Peters Square Manchester
Post Code:	LA1 4YW	M2 3DE
Telephone number:	n/a	0161 233 5418
	,	
Email address:	n/a	helen.clarkson@cbre.com

NOTE:

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PART B: Your representations

Please use a separate form for each representation to a main modification.

B1. To which proposed Main Modification does your representation relate?

Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. DM / PM or SPLA): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18

DM_MOD_25

Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)

Supporting text (map) to Policy DM53, page 152, Wind Energy Opportunities Map

Please complete a separate form for each representation.

B2. Do you consider this proposed Main Modification is: Legally compliant? Please select one answer Yes X No No X Please select one answer

B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

'Sound' means: is the Main Modification justified, effective, positively prepared and consistent with national policy?

Positively prepared? Please select one answer	Yes n/a	No
Justified? Please select one answer	Yes	No X
Effective? Please select one answer	Yes	No X
Consistent with national policy? Please select one answer	Yes	No X

Consistent with national policy?

B4. In light of the proposed Main Modifications please set out what modification(s) you consider necessary to resolve your objection and make the Local Plan legally compliant or sound, having regard to the matter(s) you have identified. It will be helpful if you could provide your suggested revised wording of any policy or text.

CBRE Limited, on behalf of Lancaster University, has previously submitted representations in relation to Lancaster City Council's (LCC) Climate Emergency Local Plan Review (CELPR) 2020-2031. CBRE Limited (hereafter referred to as 'CBRE') acts on behalf of Lancaster University in relation to its wider estate in Lancaster.

Representations have been made to the following stages of the CELPR to date:

- Scoping Consultation (November 2020);
- Regulation 18, Draft version (letter dated 17th September 2021);
- Regulation 19, Publication version (letter dated 14th March 2022 and completed Regulation 19 Response Forms); and
- Hearing Statement (ref. HS/M3/SD&RE/2 CBRE obo Lancaster University).

The proposed Main Modification (MM25) (Supporting text (map) to Policy DM53, page 152, Wind Energy Opportunities Area Map) states that Figure 13.1a will be amended to remove the 350m buffer around the adopted housing land allocations and add the M6 Motorway, as shown in Appendix 2 of the schedule of Main Modifications.

The footnote to the map shown in Appendix 2 (denoted by an asterisk) refers to a 150m buffer around roads, railways and public rights of way; however, there is no corresponding single asterisk in the Legend and this buffer is not shown on the map in Figure 13.1a. Therefore, the text referencing this should be removed.

Furthermore, the urban area depicted in pink on the amended Wind Energy Opportunities Area Map (Figure 13.1a), Appendix 2, does not match the urban area shown on the Wind Energy Constraints Map (Figure 13.1b), Appendix 3 to the Main Modifications schedule. This is particularly apparent around the area of the Lancaster University estate. The urban boundary is much larger on Figure 13.1a and exceeds the urban boundary as defined in the adopted Local Plan Policies Map (and that of the Climate Emergency Review of the Local Plan).

The urban area should be amended on Figure 13.1a to reflect Figure 13.1b and the adopted Policies Map.

This highlights that the area around the University campus, including its current wind turbine off Hazelrigg Lane, should be within the 'Suitable for Wind Energy' area, as it is not constrained by the urban boundary.

As well as not being located within the urban boundary, further reasons which explain the suitability of the University estate for a wind turbine are detailed in the submitted representations to date. This response to the Main Modifications consultation does not seek to reiterate previous comments (as requested in the 'Schedule of Proposed Main Modifications Consultation Guidance Notes'); however, this representation should be read alongside the previous representations made.

The submitted representations show that throughout the Climate Emergency Local Plan Review process there have been inconsistencies regarding the areas of the authority which are (or not) identified as being suitable for wind energy.

For the reasons given in the representations submitted on behalf of Lancaster University to date, including the location of the existing wind turbine and the suitability of land to the east of the M6, we consider that Figure 13.1a should be amended to reflect that areas of the University estate are suitable for wind energy.

As the University estate is not covered by a constraint in relation to wind energy (as shown on Figure 13.1b), it logically would follow that the area **is** suitable for wind energy, and should be depicted as such on Figure 13.1a and the Policies Map.

No explanation has been provided as to why this area is not considered suitable (as there is no constraint shown on Figure 13.1b which would explain this).

This Main Modification has therefore not addressed the concerns expressed in the representations to date, particularly regarding the soundness of Policy DM53.

For the reasons given in the previous representations submitted by CBRE Limited, on behalf of Lancaster University, the Main Modification does not address issues of soundness, which mean that this remains in our view to fail the tests to be justified, effective and consistent with national policy, as detailed below:

- **Justified:** The inconsistencies and inaccuracies (in relation to the urban boundary) between Figures 13.1a and 13.1b show that the policy and accompanying maps showing areas which are suitable for wind energy are not based on evidence and are not presenting an appropriate strategy:
- **Effective:** The inconsistencies detailed in this representation mean that the Policies Map is not an effective tool to implement Policy DM53 for the plan period;
- Consistent with national policy: As detailed in the representations submitted to date, the Policies Map and Figure 13.1a are overly restrictive in terms of identifying areas as being suitable for wind energy, which is not consistent with national policy and strategy, which recognise the importance of wind energy in supporting the advance to net zero. The Policies Map and Figure 13.1a would create an overly

restrictive planning policy framework which would hamper the ability to meet national policy requirements regarding reducing emissions and achieving net zero status.

In order to address these concerns, we consider that Figure 13.1a should be updated to accurately reflect the existing urban boundary (i.e. align with the urban boundary shown on Figure 13.1b). Figure 13.1a and the Policies Map should be updated to show the area of the University estate which is not within an area of constraint (Figure 13.1b) as being suitable for wind energy.

Please be as precise as possible.

PART C: Notification request

Representations made may be accompanied by a request to be notified at a specified address of the publication of the recommendations of the planning inspector and/or of the adoption of the Local Plan.

C1. Please indicate below if you wish to be notified:

Yes X	No		
Planning) (England) Regula publicly available. The Couits website but will not publi	treated in confidence. The To tions 2012, requires copies of ncil will also publish names an sh personal information such a representation you confirm the sentations.	f all representation nd associated repr as telephone numl	es to be made resentations on bers, or email
Signature:		Date:	27/07/23
	Please	sign and date your	representations.



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Part A: Personal Details

*If an agent is appointed, please complete only the Name and Organisation boxes for the client in 'Your Details', but complete the full contact details of the agent.

	Your Details	Agent's Details* (if applicable)
Name (including title):	Paul Morris	Helen Clarkson, Associate Director
Organisation (where relevant):	Lancaster University	CBRE Limited
Address:	Bailrigg Lancaster	10 th Floor One St Peters Square Manchester
Post Code:	LA1 4YW	M2 3DE
Telephone number:	n/a	0161 233 5418
Email address:	n/a	helen.clarkson@cbre.com

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PART B: Your representations

Please use a separate form for each representation to a main modification.

B1. To which proposed Main Modification does your representation

relate?	,			
Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. DM / PM or SPLA): Example: SPLA_MOD_02, Chapter 7, Policy SP3, Page 28, Paragraph 7.18			M_3	
Description of the proposed Main Modification (e.g. Page 60, Paragraph Number)	Proposed policies map P_01.1.1			
Please	complete a separate for	m for each re	presentation.	
B2. Do you consider this proposed I	Main Modification i	is:		
Legally compliant? Please select one answer	Yes X	No		
Sound? Please select one answer	Yes	No	Х	
B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to? 'Sound' means: is the Main Modification justified, effective, positively prepared and consistent with national policy?				
Positively prepared? Please select one answer	Yes n/a	No		
Justified? Please select one answer	Yes	No	Х	
Effective? Please select one answer	Yes	No	Х	
Consistent with national policy?	Yes	No	Х	

Consistent with national policy?

B4. In light of the proposed Main Modifications please set out what modification(s) you consider necessary to resolve your objection and make the Local Plan legally compliant or sound, having regard to the matter(s) you have identified. It will be helpful if you could provide your suggested revised wording of any policy or text.

CBRE Limited, on behalf of Lancaster University, has previously submitted representations in relation to Lancaster City Council's (LCC) Climate Emergency Local Plan Review (CELPR) 2020-2031. CBRE Limited (hereafter referred to as 'CBRE') acts on behalf of Lancaster University in relation to its wider estate in Lancaster.

Representations have been made to the following stages of the CELPR to date:

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- Regulation 18, Draft version (letter dated 17th September 2021);
- Regulation 19, Publication version (letter dated 14th March 2022 and completed Regulation 19 Response Forms); and
- Hearing Statement (ref. HS/M3/SD&RE/2 CBRE obo Lancaster University).

The proposed Main Modification (CCPM_3) seeks to amend the Policies Map (P_01.1.1) to remove the 350m buffer around adopted housing land allocations and add the Suitable for Wind Energy layer to all inset maps.

As detailed in the completed Main Modifications Representation Forms in relation to MM25, we consider that the area around the University campus, including its current wind turbine off Hazelrigg Lane, should be within the 'Suitable for Wind Energy' area, as it is not constrained by the urban boundary and buffer.

As well as not being located within the urban boundary, further reasons which explain the suitability of the University estate for a wind turbine are detailed in the submitted representations to date. This response to the Main Modifications consultation does not seek to reiterate previous comments (as requested in the 'Schedule of Proposed Main Modifications Consultation Guidance Notes'); however, this representation should be read alongside the previous representations made.

The submitted representations show that throughout the Climate Emergency Local Plan Review process there have been inconsistencies regarding the areas of the authority which are (or not) identified as being suitable for wind energy.

For the reasons given in the representations submitted on behalf of Lancaster University to date, including that the University estate is not covered by a constraint in relation to wind

energy (as shown on Figure 13.1b), it logically would follow that the area **is** suitable for wind energy, and should be depicted as such on Figure 13.1a and the Policies Map.

No explanation has been provided as to why this area is not considered suitable (as there is no constraint shown on Figure 13.1b which would explain this).

This Main Modification has not addressed the concerns expressed in the representations to date, particularly regarding the soundness of Policy DM53.

For the reasons given in the previous representations submitted by CBRE Limited, on behalf of Lancaster University, the Main Modification does not address issues of soundness, which mean that this remains in our view to fail the tests to be justified, effective and consistent with national policy, as detailed below:

- **Justified:** The inconsistencies and inaccuracies (in relation to the urban boundary) between Figures 13.1a and 13.1b (as detailed in the Representation Form submitted in relation to Main Modification 25) show that the policy and accompanying Policies Map showing areas which are suitable for wind energy are not based on evidence and are not presenting an appropriate strategy;
- **Effective:** The inconsistencies detailed in this representation mean that the Policies Map is not an effective tool to implement Policy DM53 for the plan period;
- Consistent with national policy: As detailed in the representations submitted to date, the Policies Map and Figure 13.1a are overly restrictive in terms of identifying areas as being suitable for wind energy, which is not consistent with national policy and strategy, which recognise the importance of wind energy in supporting the advance to net zero. The Policies Map and Figure 13.1a would create an overly restrictive planning policy framework which would hamper the ability to meet national policy requirements regarding reducing emissions and achieving net zero status.

In order to address these concerns, we consider that Figure 13.1a should be updated to accurately reflect the existing urban boundary (i.e. align with the urban boundary shown on Figure 13.1b). Figure 13.1a and the Policies Map should be updated to show the area of the University estate which is not within an area of constraint (Figure 13.1b) as being suitable for wind energy.

Please be as precise as possible.

PART C: Notification request

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C1.	Pleas	se indicate	e below it	' you wish	to be	e notified:
	Yes	Х	No			

Data Protection Ac	t		
Representations cannot be treated in confidence. The Town and Country Planning (Local Planning) (England) Regulations 2012, requires copies of all representations to be made publicly available. The Council will also publish names and associated representations on its website but will not publish personal information such as telephone numbers, or email addresses. By submitting a representation you confirm that you agree to this and accept responsibility for your representations.			
Signature:		Date:	27/07/23
Please sign and date your representations.			