

Our ref:
Your ref:

G Legg
Carlisle City Council
Investment and Policy Manager
Economic Department

Mrs Lindsay Alder
Assistant Asset Manager
8th floor
Piccadilly Gate
Store Street
Manchester M1 2WD

Direct Line: 0300 470 5117
25 April 2016

Dear Sir

PROPOSED MAIN MODIFICATIONS CARLISLE DISTRICT LOCAL PLAN

Please find attached Highways England response to the above document. Our call off consultant JMP has provided comments on behalf of Highways England.

These comments provide a review of both the schedule of proposed Main modifications (March 2016) and Sustainability Appraisal Addendum (March 2016).

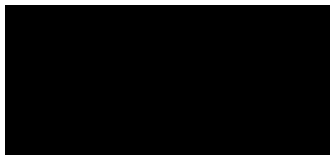
It sets out where it is felt we should support the changes to the policies and the reasons why. It has been recognised there has been no explicit reference in the CCC LP Policy SP3 itself, to the impact and the infrastructure provision at the SRN.

We will continue to work jointly with your selves to assess the impact on the SRN of development at Carlisle South.

There a number of specific recommendations within the report that we feel should be made to CCC and these can be found in the Summary and Conclusion section of the report.

Please feel free to contact me if I can provide any further information on the report provided.

Yours faithfully



Mrs Lindsay Alder
Asset Development Team
Email: lindsay.alder@highways.gsi.gov.uk

Technical Note

Date	13 th March 2016	Job No	W611016-001
Subject	Carlisle City Council, Local Plan Proposed Main Modifications Consultation		

INTRODUCTION

- 1.1 JMP Consultants Ltd [JMP], in their capacity as call-off Consultants to Highways England have undertaken a review of the Carlisle City Council [CCC] Local Plan 2015-2030 Schedule of Proposed Main Modifications [MM], which have arisen through the Local Plan [LP] examination process and are required to ensure that the Plan is 'sound' by the examining Inspector.
- 1.2 The documentation provided for review comprises the following:
 - Schedule of Proposed Main Modifications (March 2016); and
 - Sustainability Appraisal Addendum (March 2016).
- 1.3 JMP has previously reviewed CCC's LP 2015-2030 Proposed Submission Draft document (under job number W612001) and made several recommendations to Highways England, which are used to inform this review. In addition, JMP also provided a review of Carlisle Local Plan Examination in Public submission (job number W612013), whereby CCC issued a letter to Highways England: 'Review of Development Pressures on the Strategic Road Network [SRN] Carlisle' (30th November 2015), which identified the mutual benefits of ongoing joint working between CCC and Highways England with respect to plan making and development management in the Carlisle City Council area.
- 1.4 The Adopted CCC LP will be used to shape future growth and provide a framework for determining future planning applications in Carlisle. The CCC LP MMs have been released for consultation with the objective of seeking comments on the main policy changes. This is likely to be the final stage of the LP's preparation, prior to the publication of the Inspector's report on the soundness of the Plan.
- 1.5 All comments received on this consultation will be reviewed and considered by the Council and Inspector, before CCC submit the LP to the Secretary of State [SoS] for the final stage of Examination, with Adoption anticipated in April 2016 (Local Development Scheme 2015-2018).
- 1.6 The Strategic Road Network [SRN] within CCC is mainly comprised of the M6 between Junctions 42 and 45, and the A69 which provides a strategic route east of the M6 Junction 43 towards the north east of England. The M6 is classified as a motorway, and Highways England is responsible for the capacity, operation and safety of this route.
- 1.7 This review will consider the proposed MMs of the LP, particularly focusing on any potential impact upon the SRN. Additionally, when undertaking this review JMP will take into account the comments of the previous JMP reviews of the Carlisle Local Plan documents and supporting modelling work, which have been cross-referenced to support the recommendations set out in this review.
- 1.8 The structure of this Technical Note begins with a review of the CCC LP Schedule of Proposed MMs document, in particular the sections on 'Strategic Growth and Distribution', 'Housing', 'Infrastructure', 'Appendix 1: Sites Allocated Within Policy HO 1' and 'Appendix 2: Modifications to Site Information contained within Local Plan Appendix 1'. These sections are considered to be most applicable to Highways England.
- 1.9 A brief review of the MM Sustainability Appraisal Addendum has also been undertaken for completeness. Finally, a summary section including recommendations to Highways England concludes this review.

Technical Note

Date 13th March 2016 **Job No** W611016-001

Subject Carlisle City Council, Local Plan Proposed Main Modifications Consultation

MAIN MODIFICATIONS CARLISLE CITY COUNCIL LOCAL PLAN 2015-2030

- 1.10 JMP have reviewed CCC's LP (2015-2030) MMs, alongside the previous JMP Technical Note (W612001) and has identified the following key issues, which have been analysed in the order they are presented.

SPATIAL STRATEGY AND STRATEGIC POLICIES

- 1.11 The Strategic Growth and Distribution policies consist of:

- SP 2: Strategic Growth and Distribution; and
- SP 3: Broad Location for Growth: Carlisle South.

- 1.12 **Table 1** below provides details relating to the CCC LP Policy SP 2 on Strategic Growth and Distribution:

Table 1 Local Plan Policies Main Modifications: Policy SP 2 – Strategic Growth and Distribution

Mod Ref	Page No	Policy / Para	Strategic Growth and Distribution
MM01	34	SP 2	<i>Amend criterion 1 as follows:</i> 1. Sufficient land will be identified to <u>accommodate</u> support the delivery of an annualised average of at least 565 <u>9,606</u> net new homes between 2015 2013 and 2030 including a minimum annualised average of: • <u>478</u> net new homes between 2013 and 2020; and • <u>626</u> net new homes between 2020 and 2030 (adjusted to have regard to delivery in the 2013 – 2020 period).
MM02	34	SP 2	<i>Amend criterion one, sub bullet points a. And b. as follows:</i> a. <u>approximately</u> 70% of this growth will be focused on the urban area of Carlisle, with <u>approximately</u> 30% in the rural area; and... b. specific sites have been identified within the Plan, alongside an allowance for windfall developments, to accommodate the <u>majority of</u> growth required until 2025. Carlisle South has been identified as a broad location to accommodate <u>additional</u> housing growth beyond this period in accordance with Policy SP 3.
MM03	35/36	Para 3.8 – 3.10	<i>Amend Paragraphs 3.8 to 3.10 as follows:</i> 3.8 Policy SP 2 makes provision for an annualised average of at least 565 net new homes between 2015 and 2030, equating to a total minimum of 8,475-9,606 dwellings across this 15-year period between 2013 and 2030. The District of Carlisle... 3.9 The annual housing requirement and time period to which it relates of 565 is consistent with the <u>base date and</u> findings of the Carlisle Strategic Housing Market Assessment (SHMA) Update 2014... 3.10 ...The proposed annual housing requirement pursued by the Plan can be seen to align with the evidence of 565 is both within the ranges of both sets of housing projects identified in the POPGROUP modelling and SHMA and is considered reflective of the requirements set out in paragraph 47 of the NPPF.
MM04	36	New para 3.10	<i>Insert 2 new paragraphs after existing para 3.10:</i> <u>To ensure the supply of new homes does not constrain economic growth, a minimum number equating to an annual average of 478 net new homes is required between 2013</u>

Technical Note

Date 13th March 2016 Job No W611016-001

Subject Carlisle City Council, Local Plan Proposed Main Modifications Consultation

			and 2020. Beyond this and for the remainder of the plan period, between 2020 and 2030, a minimum number equating to an annual average of 626 net new homes is required. This stepped approach reflects that job-growth is generally expected to be stronger post 2020 (and hence a greater increase in population would be required from this point). Aside from aligning with the evidence in the form of the jobs-led projection within the SHMA which has influenced the housing requirements, the introduction of a stepped approach importantly affords an opportunity for the development industry to mobilise and increase its capacity within Carlisle, necessary given the migration from a historically lower housing requirement in preceding plan periods and industry base position. It must be stressed that the 'minimum' requirements are exactly that and should the conditions be in place to exceed these and/or frontload supply earlier in the plan period then such opportunities will be positively responded to. To ensure supply pace with demand it is important that any shortfall within the 2013 to 2020 period is addressed within this same period. Beyond 2020 the annualised average employed for assessment purposes should similarly be adjusted to have regard to any under or over provision in the preceding seven year period.														
MM05	36	3.11	Amend Paragraph 3.11 as follows: 3.11 <u>Excluding Carlisle South</u> The spatial strategy seeks to focus the majority (approximately 70%) of new housing growth <u>within or on the edge of</u> on the City of Carlisle...														
MM06	36	3.12	Amend Paragraph 3.12 to read: 3.12 Specific allocations have been identified within the Local Plan to contribute, alongside existing commitments and an allowance for windfall, to meet the <u>majority of growth required for the first ten years of across</u> the Plan <u>period</u> until 2025. <u>Beyond this</u> Carlisle South, which is subject to the provision of Policy SP 3, has been identified as a broad location to accommodate <u>additional</u> housing growth <u>in the latter years of the Plan and beyond</u> <u>within and beyond the Plan period</u>.														
MM07	37	Table 1	Amend Table 1 to read: Table 1 – Summary of Housing Land Supply (as at 1st October 2014) (as at 1st April 2015) <table><tr><th>Source</th><th>No. Of Dwellings</th></tr><tr><td><u>Delivery to date (2013 – 2015)</u></td><td><u>609</u></td></tr><tr><td>Outstanding Planning Permissions</td><td>4,063 <u>3,884</u></td></tr><tr><td>Proposed Local Plan Allocations*</td><td>3,472 <u>4,017</u></td></tr><tr><td>Windfall Provision [@ 100 dwellings per annum across the plan period]</td><td>1500</td></tr><tr><td>Strategic Allocation – Carlisle South</td><td>1450</td></tr><tr><td>Total Supply</td><td>10,485 <u>11,460</u></td></tr></table> * Excludes the capacity of those allocations which have an outstanding planning permission in place in order to avoid double counting.	Source	No. Of Dwellings	<u>Delivery to date (2013 – 2015)</u>	<u>609</u>	Outstanding Planning Permissions	4,063 <u>3,884</u>	Proposed Local Plan Allocations*	3,472 <u>4,017</u>	Windfall Provision [@ 100 dwellings per annum across the plan period]	1500	Strategic Allocation – Carlisle South	1450	Total Supply	10,485 <u>11,460</u>
Source	No. Of Dwellings																
<u>Delivery to date (2013 – 2015)</u>	<u>609</u>																
Outstanding Planning Permissions	4,063 <u>3,884</u>																
Proposed Local Plan Allocations*	3,472 <u>4,017</u>																
Windfall Provision [@ 100 dwellings per annum across the plan period]	1500																
Strategic Allocation – Carlisle South	1450																
Total Supply	10,485 <u>11,460</u>																
MM08	38	Figure 1	Replace Figure 1 with new trajectory and update caption. New trajectory attached as Appendix One to this schedule.														

- 1.13 JMP recommends that Highways England supports the above policy modifications. The primary modification is the introduction of a stepped approach to housing delivery, which includes increasing the number of housing sites coming forward post 2020. The previous version of the LP contained an

Technical Note

Date 13th March 2016 Job No W611016-001

Subject Carlisle City Council, Local Plan Proposed Main Modifications Consultation

annual average of 565 net new homes between 2015 and 2030. This target has been replaced with an annual average of 478 net new homes between 2013 and 2020 that rises to 626 net new homes, between 2020 and 2030. This appears more aligned with what the evidence shows and the delivery of new homes between 2013-2015. The location of new homes remains the same as the previous version of the LP that was consulted upon. This includes 70% in urban and 30% in the rural Carlisle.

1.14 **Table 2** contains CCC's 'Broad Location for Growth: Carlisle South' policy the details of which are set out below:

Table 2 Local Plan Policies: Policy SP 3 - Broad Location for Growth: Carlisle South

Mod Ref	Page No	Policy / Para	Broad Location for Growth: Carlisle South
MM09	43	SP 3	<i>Amend Paragraph 1 of Policy SP3 to read:</i> A broad location for growth for a <u>major mixed use urban extension development</u>, focusing on housing, is identified on the Key Diagram at Carlisle South. <u>The urban extension is expected to be delivered from 2025 onwards. The release and phasing of Carlisle South will be informed by a Development Plan Document inclusive of an infrastructure delivery strategy.</u> 1. To provide more detail on how <u>and when</u> the strategic ...
MM10	43	SP 3	<i>Amend third paragraph to read:</i> <u>To enable a comprehensive and co-ordinated development approach, Piecemeal or unplanned</u> development proposals within the area which are likely to prejudice its delivery including the large-scale infrastructure required for the area will not be permitted.
MM11	43	SP 3	<i>Amend fourth paragraph to read:</i> The development of this area will be in accordance with a masterplan which will be approved as a Development Plan Document. <u>The study area for the masterplan will include the whole of the undeveloped extend beyond the city's existing southern edge and any existing allocations.</u>
MM12	44	3.31	<i>Amend para 3.31 as follows:</i> 3.31 ... alongside an allowance for windfall developments, to accommodate the <u>majority of growth required until 2025.</u> Policy SP 3 makes provision for the development of <u>additional housing (and associated infrastructure) from 2025 and beyond</u>, by setting out a broad location for growth at Carlisle South.
MM13	44	3.34	<i>Amend para 3.34 as follows:</i> 3.34 ...the scale and nature of the development and its boundaries and <u>consideration afforded to the infrastructure necessary to support growth. This process would also inform the release data and phasing of development in this area.</u> Maintaining adequate distance between any urban...
MM14	45	3.35	<i>Add to paragraph 3.35 as follows:</i> 3.35... It would then set the policy framework for any future planning applications <u>and make clear the requirement for individual applications to demonstrate how they align with the masterplan including how they will contribute to the delivery of strategic infrastructure.</u>
MM15	45	3.37	<i>Amend Paragraph 3.37 to read:</i> 3.37 It would prejudice the strategy of the Plan if individual sites within the Carlisle South area came forward <u>incrementally within the first 10 years of the Plan period until such time as the intended Development Plan Document, inclusive of an infrastructure delivery</u>

Technical Note

Date 13th March 2016 **Job No** W611016-001

Subject Carlisle City Council, Local Plan Proposed Main Modifications Consultation

		strategy, is adopted. It would also prejudice the delivery of infrastructure.
MM16	Various	All references to Carlisle south 'urban extension' to be amended to read 'major mixed used development'.

- 1.15 JMP welcomes CCC's 'Broad Location for Growth: Carlisle South' policy modification and the measures being promoted to support development at Carlisle South. However, JMP recommends that Highways England plans for development in 'Carlisle South' to take place potentially before 2025. It was previously noted in the JMP Review (W612001) of CCC LP that: *"following 2025 all growth will be concentrated in the general area designated as 'Carlisle South'".* The main policy modification to the 'Carlisle South' area in the CCC LP is that new housing growth will be accommodated *"within and beyond the Plan period"*, which is between 2013 and 2030. Consequently, any new housing developments located in 'Carlisle South' coming forward during the plan period (2013-2030), will require access to the SRN M6 Junctions 42 and 43.
- 1.16 The CCC LP has allocated 1,400 dwellings to come forward in 'Carlisle South'. Figure 1 of the CCC LP illustrates the proposed Housing Trajectory for the CCC LP, of which the 'Carlisle South' area has been scheduled to come forward in the years 2025 and 2030. However, the policy modifications to Policy SP3 means that any developer wishing to bring forward housing development zoned within 'Carlisle South' before 2025 will be enabled through the modification of LP Policy SP3, which was not previously accounted for, and hence any impact of the SRN will have to be mitigated sooner.
- 1.17 JMP welcomes the amendment to LP Policy SP3, which states *"the release and phasing of Carlisle South will be informed by a Development Plan Document inclusive of an infrastructure delivery strategy"*. Furthermore, JMP recommends that the forthcoming Development Plan Document (DPD) and Infrastructure Delivery Strategy (IDS) should fully identify and address SRN improvements at M6 Junctions 42 and 44 (required for access to key employment sites from the new housing locations).
- 1.18 The Carlisle South Local Plan DPD is scheduled for Adoption in December 2017 (Local Development Scheme 15-18). It is also noted that in a separate document in the CCC LP 'Examination Document Library', a Statement of Common Ground 'Policy SP 3 – Broad Location for Growth: Carlisle South' is provided (October 2015) and under the section Infrastructure Provision it states that:
- "Additional work on the IDP, evidence base and visioning with respect to Carlisle South increasingly supports the need for the site to be self-reliant which in turn amplifies the importance of a coordinated approach to, and clear delivery strategy with respect to infrastructure. Understanding the implications on the strategic road network and acting to mitigate these to the satisfaction of Highways England is also increasingly evident and reaffirms this position."* (Statement of Common Ground 'Policy SP3 – Broad Location for Growth: Carlisle South' CCC (October 2015)).
- 1.19 The Statement of Common Ground Policy SP3, which was behind CCC LP Policy SP 3 modification (October 2015), provides a useful reference to the SRN and Highways England's position on the planned growth in the 'Carlisle South' area. Unlike the Statement of Common Ground, in the CCC LP Policy SP3 itself, no explicit reference is made to impact and the infrastructure provision at the SRN.
- 1.20 Although the letter received from CCC on 30th November 2015 commits to joint working with Highways England to assess the impact on the SRN of development at Carlisle South (though the DPD process), JMP suggests Highways England may prefer the inclusion of specific wording within LP Policy SP3, in relation to the Carlisle South area's impact on the SRN and implementing infrastructure improvements with Highways England's involvement, to accommodate the planned growth. While the inclusion of the reference to the emerging DPD and IDS is welcome, it is not clear if the emerging DPD and IDS aligns with the potential pre-2025 delivery of the 'Carlisle South' area, as facilitated through LP Policy SP3.

Technical Note

Date 13th March 2016

Job No W611016-001

Subject Carlisle City Council, Local Plan Proposed Main Modifications Consultation

1.21 The next section of this Technical Note reviews CCC's main modifications to Housing policy.

HOUSING

1.22 The LP MMs to Housing policies consist of:

- HO 1: Housing Strategy and Delivery, Windfall Housing Development.

1.23 The MM to LP Policy HO 1 includes, increasing the housing allocations in 'urban' Carlisle from 2,756 dwellings in the previous version of the Local Plan, to 2,776 dwellings. In rural locations there was 1,379 dwellings previously allocated in the Local Plan that has risen to 1,409 dwellings. The LP Inspector has also included Appendix 1 to the CCC LP and provided a new paragraph to LP Policy HO 1 that states: "*proposals should be brought forward having regard to and addressing any issues set out in Appendix 1*" (CCC LP MM: Page 97). The above LP HO 1 policy modification is welcomed by JMP. Alongside the MMs to HO 1 the LP includes amendments to CCC's housing allocations.

1.24 In the previous JMP review (W612001), the following housing allocations that are located closest to the SRN were identified:

- U1 – Land to the south of (217 units) (M6 Junction 44);
- U2 – Land North of California Road east of U1 (200 units) (M6 Junction 44);
- U5 – Land between Carleton Road and Cumwhinton Road (204 units) (M6 Junction 42);
- U10 – Land off Windsor Way (300 units) (M6 Junction 44);
- U18 – Land Opposite Industrial Estate (M6 Junction 43 and A69);
- U 20 – Durrall Road (M6 Junction 43 and A69); and
- R11 – Kingmoor Park Harker Estate (300 units) (M6 Junction 44).

1.25 There are no modifications to the sites listed above in regards to the scale, number of dwellings or plan period timeframes included in the LP Housing Allocations for CCC. There is however, additional text provided in Appendix 1 for U10 – Land off Windsor Way (300 units), which states:

"Highways advice: Highways Authority has expressed some concern over traffic generation, and indicated that a loop road would be required so that a bus service can access the site and the adjoining housing area. Capacity issues are likely with M6 junction 44 and onto Scotland Road, as well as other major junctions to the north of Carlisle. Tarraby Lane is not of sufficient standard to serve the development. Any further development will need improvements to the resilience of the site (i.e. additional access points)." (LP MM: Appendix Two – Modifications to Site Information contained within Local Plan Appendix 1).

1.26 JMP welcomes new site information for site U10 – Land off Windsor Way, which includes specific details relating to likely capacity issues on the SRN at M6 Junction 44. Previously JMP have identified network capacity issues when reviewing the Greymoorhill site (W511031), where junction capacity assessments for M6 Junction 44 were carried out using Linsig. The JMP review at that time suggested that the increase in saturation at M6 Junction 44 was attributed to network growth rather than the proposed development. This will need further assessment when the sites come forward in the future.

1.27 A review of the CCC's LP Appendix 4 'Policy Map Modifications' has identified the following two additional housing sites: U14 'Land North of Carleton Clinic, east of Cumwhinton Drive' and R15 'Land

Technical Note

Date 13th March 2016 **Job No** W611016-001

Subject Carlisle City Council, Local Plan Proposed Main Modifications Consultation

north of Hill Head, Scotby', both in the early years of the Plan, which could potentially impact upon the SRN. The Scotby location has been reviewed by JMP at pre-inclusion stage (Job number W611009).

- 1.28 The main modifications to sites U14 and R15 and the numbers proposed are listed in **Table 3** below:

Table 3 Housing Allocations for Carlisle City Council

Allocated sites Urban Carlisle: Total Capacity (dwellings) 2,756		Area (Ha):	Indicative Yield	Indicative plan period
U 14	Land north of Carleton Clinic, east of Cumwhinton Drive	4.20	126	6-10
U 14	Land north of Carleton Clinic, east of Cumwhinton Drive	9.3	189	0- 5
R 15	Land north of Hill Head, Scotby	2.4	50	6-10
R 15	Land north of Hill Head, Scotby	3.7	90	0-5

- 1.29 The site north of Carleton Clinic, east of Cumwhinton Drive has been extended to include land towards the east of the site that borders the M6. The LP MM provides additional text, with regards to this site:

"The eastern boundary of the site extends to the motorway, and as such significant noise attenuation measures will be required, through layout and design, to mitigation and future adverse impacts on residents." (LP MM: Appendix Two – Modifications to Site Information contained within Local Plan Appendix 1).

- 1.30 JMP welcomes the modification to the site north of Carleton Clinic above. However, the site has been submitted for planning permission, which is currently pending a decision. It is considered that Highways England should have been consulted prior to the site being submitted for planning permission. Therefore, JMP recommends that CCC consult Highways England on this site, because of the scale of the development proposals (189 dwellings), as well as its close proximity to SRN (M6 Junction 42) to determine the site's impact on the capacity, operation and safety at the SRN.

- 1.31 The main modification to the site Land north of Hill Head, Scotby includes extending the site, to include land to the south of A69. It is noted in the LP MM, the rational for expanding the site area is: *"to reflect that progressing this wider site is now the most reasonable and sustainable option following a reappraisal owing to previously identified constraints (in respect of access from Scotby Road) no longer applying)* (LP MM Page 14).

- 1.32 JMP previously reviewed an Access Assessment for Land north of Hill Head, Scotby (W611009) in September 2015, in which the proposed site access was from Scotby Road, south of the Junction with the A69. The LP MM does not provide details of the access arrangements for the site to the Land north of Hill Head, Scotby. JMP considers that direct access to the A69 would be problematic. Furthermore, JMP recommends that specific wording needs to be provided by CCC, to clarify the preferred access to site R15 Land north of Hill Head, Scotby in the LP, and that early consultation with Highways England regarding access arrangements for the two additional housing sites in **Table 3** is required.

- 1.33 The next section of this Technical Note reviews CCC's Infrastructure MMs to the LP.

Technical Note

Date 13th March 2016 Job No W611016-001

Subject Carlisle City Council, Local Plan Proposed Main Modifications Consultation

INFRASTRUCTURE

1.34 The Infrastructure policies consist of:

- SW8: Planning Obligations.

1.35 The precise wording of the SW8: Planning Obligation policy modification is provided in **Table 4** below:

Table 4 Local Plan Policies: Planning Obligations

Mod Ref	Page No	Policy / Para	Planning Obligations
MM57	144	IP8	<i>Amend second paragraph as follows:</i> ...to and necessary to make the development acceptable. This- These will be <u>identified through the development management process and achieved secured through use of</u> planning conditions and obligations."
MM58	144	IP8	Re word penultimate paragraph of Policy IP8 and replace: In accordance with national policy 'small-scale' and 'self-build' development will be exempt from any tariff-style planning obligations). Small scale in the context of the District of Carlisle is defined in the glossary. <u>Certain forms of development, where prescribed by national policy and guidance, will be exempt from any tariff-style planning obligations.</u>

1.36 JMP considers the above policy modification, which relates specifically to Planning Obligations Policy IP8 'Small Scale Development' that comprises of housing developments of '10 units or less', to have little to no impact on the SRN.

1.37 The next section of this review covers the Addendum to Sustainability Appraisal 2015-2030.

ADDENDUM TO SUSTAINABILITY APPRAISAL 2015-2030

1.38 JMP have reviewed the Addendum to Sustainability Appraisal 2015-2030 and considers that no further Sustainability Appraisal work is required for the LP MM. JMP considers the methodology to be appropriate and proportionate, given how the document relates to the LP MM document.

SUMMARY AND CONCLUSION

1.39 In summary, the LP MMs has been reviewed and a number of site-specific recommendations should be made to CCC. Notably, at this final pre-examination stage it is considered that Highways England should aim to guide the final wording of transport-related policy, so as to ensure that the impact on the SRN is adequately addressed and any necessary transport infrastructure to support development in Carlisle is identified and set-out in the LP MMs and supported by related evidence base documents.

1.40 Specifically, there are some recommendations for the modifications of policies through the LP MMs, which must include principles to ensure that development does not adversely impact upon the SRN. It would also be timely to remind CCC of the pledges made regarding assessment of impacts in their letter to Highways England of 30th November 2015, especially in the case of the Carlisle South DPD.

Technical Note

Date 13th March 2016 **Job No** W611016-001

Subject Carlisle City Council, Local Plan Proposed Main Modifications Consultation

- 1.41 CCC will submit the LP MMs to the SoS for the final stage of examination and it is anticipated the LP will be Adopted in April 2016. Highways England will need to review the published LP (containing the MMs) to ensure that the recommendations included in this review have been considered, before publication and submission to the SoS for final examination before the publication of the Inspectors Report and Adoption.

Distribution Lindsay Alder

Name/ Signed Alex Rowe
