

Action 50 – Technical note to explain inclusion of transport impacts as a Sustainability Appraisal criterion in site assessments

This purpose of this note is to address the absence of transport impacts in the Sustainability Appraisal’s assessment of sites.

Background

Table 4.3 of the Sustainability Appraisal (as set out in EXAM 21, page 45 and shown below) is the ‘SA/SEA framework of SA objectives and appraisal criteria’. This table sets out the structure of the overall SA assessment including 16 objectives to assess the sustainability effects of the Local Plan, including a set of questions for to expand the focus of each objective.

SA Objective	Criteria: Will it...
9. To protect water quality and resources, and minimise flood risk.	<ul style="list-style-type: none"> • encourage water efficiency? • protect water quality? • be within the capacity of available water resources, taking into account climate change? • ensure that flood risk is not increased by allowing only appropriate development in flood zones, taking a (flooding) sequential approach, and applying sustainable design, including sustainable drainage systems?
10. To reduce the potential impact of climate change by minimising energy usage, and to develop renewable energy resources, reducing dependency on non-renewable resources.	<ul style="list-style-type: none"> • help to minimise energy usage and encourage energy efficiency? • help to develop the City’s renewable energy resource, reducing the dependency on non-renewable resources? • provide high standards of sustainable design and construction including renewable energy? • reduce the effects of natural hazards (e.g. flooding, subsidence), taking into account climate change?
11. To encourage land use and development that optimises the use of previously developed land & buildings.	<ul style="list-style-type: none"> • help encourage brownfield regeneration? • ensure that greenfield sites with high environmental capital are protected? • maximise the efficient use of land?
12. To make efficient use of existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all, and to ensure that all journeys are undertaken by the most sustainable mode available.	<ul style="list-style-type: none"> • reduce road congestion and the need to travel by private car? • reduce air pollution? • help to protect and enhance the vitality and viability of service centres? • reduce the need to travel for those with the greatest barriers to travel? • help to reduce the distances people have to travel on a regular basis for education, employment and services? • reduce inequalities in access to education, employment and services? • promote safe walking and cycling? • promote safe, convenient, reliable and attractive public transport? • help develop a transport network that minimises the impact on the environment (including electric charging points)?
13. To minimise waste and to increase the re-use, recovery and recycling of waste materials.	<ul style="list-style-type: none"> • increase the reduction, reuse, recovery and recycling of waste? • support a circular economy • ensure the safe disposal of waste? • ensure the efficient use of natural resources and support the use of sustainable products?

14. To create high quality employment opportunities and develop a strong, diverse and stable local economy which attracts and retains investment.	<ul style="list-style-type: none"> provide for the right amount and type of employment land available? help to develop long-term skills and reduce long-term unemployment? tackle deprivation? ensure that the associated infrastructure (roads, public transport, broadband & other services such as electricity & gas), needed to support Leicester's economy is provided in the most sustainable way possible?
15. To support the vitality and viability of the City Centre and other local centres	<ul style="list-style-type: none"> ensure that the city centre remains viable? ensure that local centres remain viable? reduce the use of the car by encouraging the use of sustainable transport? Will the facilities on offer at these centres support the needs of local communities and the future economy?
16. To raise the levels of educational achievement and develop a strong	<ul style="list-style-type: none"> improve equality of access to good quality learning and training opportunities for disadvantaged group? improve the quality of learning and training opportunities?

The objective specific to this note relates to Transport Impacts in objective 12, which is highlighted above.

In order to address the suggested criteria above in relation to site assessments, more focussed criteria were compiled based on the available information and the geographical location of the sites. Table 4.5 (Shown below and on page 49 of the SA EXAM 21) of the Sustainability Appraisal outlines further which specific site criteria have been applied in relation to each SA Objective.

SA objective	Site criteria
1. To ensure that the existing and future housing stock meets the housing needs.	Site proposed for housing Loss of existing housing
2. To improve health and reduce health inequalities.	Distance to GP Infrastructure capacity (GP, schools)
3. To provide better opportunities for people to participate in cultural and recreational activities; and to protect the city's landscape and townscape	Distance from open space Loss of open space: quantity, quality Loss of Green Wedge Loss of playing pitches Loss of allotments
4. To improve community safety, reduce crime and the fear of crime.	Scoped out, as not site related
5. To support diversity, tackle inequality, reduce deprivation, and support the development and growth of social capital across the communities.	Scoped out, as not site related
6. To increase biodiversity levels.	Impact on SSSIs, Local Wildlife Site Presence of protected habitats and species Tree Protection Orders Impact on biodiversity
7. To conserve and enhance the historic environment, heritage assets and their settings	In Conservation Area Impact on heritage assets and their settings
8. To manage prudently the natural resources, and protect and enhance air quality	In AQMA Pollution/contamination issues
9. To protect water quality and resources, and minimise flood risk.	Distance from water body % of site in flood zones 3a, 3b, 2

10. To reduce the potential impact of climate change by minimising energy usage, and to develop renewable energy resources, reducing dependency on non-renewable resources.	Scoped out. Covered under 12, and otherwise not site related
11. To encourage land use and development that optimises the use of previously developed land & buildings.	Previously developed land Agricultural land
12. To make efficient use of existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all, and to ensure that all journeys are undertaken by the most sustainable mode available.	Access to bus Access to rail Impact on road network Access to town centre Access to school
13. To minimise waste and to increase the re-use, recovery and recycling of waste materials.	Scoped out as not site related
14. To create high quality employment opportunities and develop a strong, diverse and stable local economy which attracts and retains investment.	Site proposed for employment Loss of existing employment Access to employment
15. To support the vitality and viability of the City Centre and other local centres	Covered by 'access to town centre' and 'access to local facilities' above
16. To raise the levels of educational achievement and develop a strong culture of enterprise and innovation.	In regeneration area

As can be seen above, access to different services are the key SA criteria applied to site assessments which relate to objective 12.

Justifications for criteria applied

The Council have made assumptions about the number of dwellings proposed and network impacts are addressed within the transport evidence. However, the SA does not assess the precise additional traffic generated by the development of the site. It is noted that the SA document (EXAM 21) did list 'Impacts on the road network' as one of the criteria. However, this is an oversight as this criterion was not applied in SA site assessment, the textual correction is outlined in EXAM 20.

In the absence of this criterion in the SA, the SA assessment of each site considers objective 12 through its consideration of access to services, bus stops, rail, schools and town centres. The reason for applying these criteria is because the criteria represent easy walking/cycling distance to a range of services which can reduce car use, air pollution and inequalities. The council feels that is a strong indication of whether unsustainable transport impacts can be reduced. Furthermore, Air Quality Management Areas are also included as an indication of air pollution created by additional traffic.

Additionally, when the Council have conducted their own site assessment, 'Impacts on road network' is considered within the assessment criteria. This is informed by the Council's transport officer remarks, SA recommendations and past consultation comments. Further detail of the site assessment including the RAG ratings applied can be found in 'Housing Sites Methodology November 2022' (EB/HO/5, page 17). Furthermore, the Council have assessed network effects of the Plan in the submitted Transport Assessments (EB/TR/1-EB/TR/2).

Summary

In summary, reference to transport impacts in the SA assessment of sites is not required. The SA specific criteria mentioned in Table 4.5 are sufficient to address general transport impacts of the sites within the Local Plan in connection with SA Objective 12. 'Impacts on the road network' is reinforced by the Council's own site assessments and evidence base.