

SUPPLEMENTARY PLANNING DOCUMENT

Affordable Housing Contributions arising from Purpose Built Student Accommodation



May 2021

Please also see updated S106 costs at www.nottinghamcity.gov.uk/s106-costs



Nottingham
City Council

Quick Guide to Affordable Housing Contributions arising from Purpose Built Student Accommodation Supplementary Planning Document (SPD):

This document provides guidance on the requirements for the provision of affordable housing contributions from Purpose Built Student Accommodation. In particular, it supplements Policy 8 of the [Nottingham City Aligned Core Strategy – ACS \(2014\)](#) (Part 1 Local Plan) and Policy HO3 of the [Land and Planning Policies Document - LAPP \(2020\)](#) (Part 2 Local Plan).



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1. Foreword

1.1 The two universities in Nottingham, the University of Nottingham and Nottingham Trent University, are major assets that are vital to the City's economy. They make an important contribution to its positive national and international reputation, attracting substantial investment and supporting growth across a range of employment sectors.

1.2 Purpose Built Student Accommodation (PBSA) is an essential element of the housing market helping to provide a viable alternative for a growing student population within the City and in so doing, freeing up homes in multiple occupation for family use, and therefore helping to ensure balanced and sustainable communities. Our adopted Local Plan Part 2 makes provision for planning obligations to be negotiated with PBSA providers to help meet the compelling wider affordable housing need of the City. This policy is firmly established by the Local Plan and this Supplementary Planning Document (SPD) explains how the policy is to be applied by setting out in more detail how the City Council intends to negotiate planning obligations for affordable housing contributions from PBSA developments.



Councillor Linda Woodings Portfolio Holder for Planning, Housing and Heritage

2. Purpose and Status of the Document

- 2.1 In Nottingham the Local Plan comprises the [Nottingham City Aligned Core Strategy](#) (Local Plan Part 1), which was adopted in 2014 and the [Land and Planning Policies Document - LAPP \(2020\)](#) (Local Plan Part 2) which was adopted in 2020. Supplementary Planning Documents (SPDs) provide further detail and explanation to support policy in the Nottingham City Local Plan. SPDs are a material consideration in making decisions on planning applications.
- 2.2 This SPD has been prepared to explain the implications of the Local Plan Part 2 ([Nottingham City Land and Planning Policies Development Plan Document](#), or “LAPP”) Policy HO3: Affordable Housing. In particular, it sets out the mechanism for calculating the commuted sum that will be required in lieu of on-site affordable housing provision from sites providing Purpose Built Student Accommodation (PBSA) within Nottingham City.

3. Introduction

- 3.1 There has recently been a significant growth of privately provided student accommodation across the city, referred to in this SPD as Purpose Built Student Accommodation (PBSA). Such accommodation provides an alternative to traditional housing.

Nottingham's Affordable Housing Need

- 3.2 Nottingham is home to two universities with more than 44,000 full time students living within the city which equates to around 14% of its population. For several years there has been a growth in the numbers of students requiring accommodation in the city, therefore the need for additional student accommodation is recognised. The Council has promoted PBSA in appropriate locations to help meet this additional need and help rebalance communities where there are high concentrations of students. The vitality of the universities themselves is underpinned by students being able to live in safe and suitable accommodation nearby in sustainable locations. PBSA also contributes to the general housing provision of the city, as set out in the Local Plan. Between April 2011 (the base date of the Local Plan) and March 2020 some 9,282 new homes (net) were completed in Nottingham City, and of these 4,606 were student dwellings, equating to just under half of all new homes (49.6%).
- 3.3 Policy HO3 of the Local Plan includes a requirement for 10% of all new residential developments of 10-14 dwellings and 20% of schemes of 15 or more dwellings (or on sites over 0.5 hectares) to be affordable housing. The starting point is that such affordable housing should be provided on site but where it can be robustly justified then a commuted sum may be sought instead. With such a large proportion of new housing in the City being PBSA, it is vital that this form of residential development contributes to meeting the City's affordable housing need¹, otherwise the planned level of affordable housing will not be met, and affordable housing need will not be adequately addressed. Were affordable housing contributions only to be secured from the other forms of new residential development (which, as indicated in paragraph 3.3 above constitute less than half of all new residential development in the City) the Council will not meet its affordable housing targets nor satisfy the City's demonstrated affordable housing need.

¹ New evidence in the [Greater Nottingham and Ashfield Housing Needs Assessment Final Report October 2020](#) confirms at para 1.15 and **Table 1** that Nottingham's affordable housing need is 1,149 homes per annum.

- 3.4 The scale of affordable housing need in Nottingham justifies the approach to require a financial contribution towards affordable housing from PBSA. This will be calculated according to the formula set out in Section 6 of this SPD. Many sites that provide new student accommodation could equally be suitable for non-student homes, from which 10-20% affordable housing would be sought (subject to the size of the scheme). Application of Policy HO3 maintains an appropriate supply of affordable homes and ensures that the provision of ordinary homes is not disadvantaged in the market in comparison with student accommodation. It is reasonable for the plan to require the provision of affordable housing in this way to achieve the planning objective of meeting and balancing the housing needs of all groups in a heavily constrained city such as Nottingham. The requirement is fairly and reasonably related to the PBSA development and should issues of viability arise, these can be addressed in the normal way by developers submitting a suitable viability assessment (see Section 7: General Advice).
- 3.5 The planned growth for Nottingham identified in the Core Strategy and provided by the LAPP anticipates that there would be a need for additional student accommodation and that without affordable housing contributions the affordable housing target could not be met. It follows that to meet the objectives of the Local Plan PBSA should be required to make such contributions and Policy HO3(4) of the LAPP clearly set out this requirement. The principle of seeking affordable housing contributions from PBSA is therefore firmly established in the adopted Local Plan and this SPD sets out the mechanism by which it will be achieved.

Safeguards Land for the Provision of Higher Education

- 3.6 The adopted Local Plan safeguards land for the provision of higher education under Policy LS2 at the following University campuses²;

University	Campus
 The University of Nottingham	University Park
	Jubilee
 NOTTINGHAM TRENT UNIVERSITY	City Site
	Clifton

Schemes for the development of non-student accommodation, (either at market value or as affordable homes) would not therefore be supported on these sites. In these

² Including for Research and Development and Information and Communication Technology Facilities, and ancillary uses such as accommodation and catering facilities for staff and students.

circumstances if a scheme were to come forward for PBSA on these campuses, either on behalf of a University or by a private developer, this would not result in a lost opportunity to achieve affordable housing, and would not fairly and reasonably relate to the development. It is therefore appropriate to make an exception for these defined campus sites and not seek affordable housing contributions from them as development of these sites could not be said to be displacing mainstream housing developments. Other University supported PBSA away from these defined campuses will however still be subject to requirements for affordable housing contributions.



4. Planning Policy Context

4.1 The following section sets out the National and local planning context for this SPD.

National Legislation, Policy and Guidance

National Planning Policy Framework (NPPF)

4.2 The NPPF states at para 59 that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.

4.3 The NPPF states at para 34 that local plans should set out the levels and types of affordable housing provision required, along with other infrastructure. It goes on to state that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required.

National Planning Practice Guidance (NPPG)

4.4 The NPPG clarifies that Councils need to account for housing need from students in their local plans³. It also allows student housing to count towards housing delivery targets, on the basis that it frees up existing housing elsewhere. The NPPG states⁴ that all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply. Such calculations should be based on the average number of students living in student only accommodation, using the published census data, taking steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. Nottingham calculates PBSA studios/1 bed flats to be counted as 1 unit and all other bedspaces in cluster flats to be calculated at a ratio of 2.5 bedspaces to 1 unit for the purposes of monitoring of housing delivery. However, to ensure that this SPD better reflects local circumstances, a ratio of 5 bedspaces to 1 unit for the total number of PBSA bedspaces provided has been used in the formula to calculate the contributions that the Council will seek (see 6.2). This approach thereby aligns the

³ Paragraph: 004 Reference ID: 67-004-20190722

⁴ Paragraph: 034 Reference ID: 68-034-20190722

provision of student bed spaces with the provision of dwellings from other forms of housing development for the purpose of calculating commuted sums.

The Community Infrastructure Levy Regulations 2010

4.5 Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the statutory tests set out in Regulation 122 namely that they are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

4.6 The Council considers the adopted Local Plan policy and this SPD comply with the CIL regulations for the following reasons;

CIL Regulation Requirements	Reasons why the Council considers the adopted Local Plan policy and SPD complies
Necessary to make the development acceptable in planning terms	The Council has identified an acute and pressing need for affordable housing therefore the policy rightly applies the Plan's affordable housing policies to new student accommodation. The policy specifically confirms that the Council will make a request for affordable housing contributions in respect of student dwellings. The Plan, including this policy, was found to be sound following Public Examination. Were contributions to only be secured from other forms of new residential development in the City (50.4% of the total new residential development), the Council's affordable housing needs would not be met. Accordingly without application of this policy the Council will not meet its planned objective nor adequately contribute to the identified affordable housing need.
Directly related to the development	PBSA forms part of the wider housing market and therefore must contribute to meeting the wider housing market's affordable housing needs. Student accommodation comprises a large part of the City's housing delivery and if PBSA did not contribute the Council's affordable housing needs will not be met. The policy is justified by virtue of PBSA development displacing or replacing other forms of residential schemes which would otherwise have made an affordable housing contribution. There are examples of other Councils with similar planning policies to support the Council's general approach including Oxford and Norwich.
Fairly and reasonably related in scale and kind to the development	The methodology set out in the SPD is consistent with affordable housing contributions that the Council seeks on other types of housing development including Private Rented Schemes which have a similar model to PBSA. There is still flexibility within the relevant policies for site specific issues (including viability) to be considered on a case by case basis.

Local Policy Context

Local Plan Part 1 - Nottingham City Aligned Core Strategy (adopted 2014)

- 4.7 The [Core Strategy](#) includes a suite of strategic policies to deliver sustainable development in the City to 2028. The Spatial Objectives of the Core Strategy include delivery of a mix of high quality new housing in terms of type, size and tenure to the benefit of rebalancing the existing housing mix, most notably in areas where neighbourhoods, such as Lenton for example, are dominated by housing in multiple occupation. Policy 8 reaffirms this spatial objective and places emphasis on providing family housing to meet the Sustainable Community Strategy and Housing Strategy objectives. The document also acknowledges that PBSA is an important part of the mix, and that further provision is planned. Policy 19: Developer Contributions sets the general context for the Council to secure developer contributions as a result of development.

Local Plan Part 2 - Nottingham City Land and Planning Policies Development Plan Document (LAPP), (adopted 2020)

- 4.8 This SPD explains the mechanism of how the Council will seek affordable housing contributions in line with Policy HO3: Affordable Housing, specifically in relation to PBSA. The full wording of this policy is provided in [Appendix 1](#). In particular, criterion 4 requires that on sites providing student dwellings, a commuted sum will be required in lieu of on-site affordable housing provision. Para 4.30 goes on to confirm that the approach to commuted sums for student housing will be included in an SPD. The principle is therefore clearly established that the Council can seek affordable housing contributions from PBSA, and this SPD sets out the mechanism for doing so. Policy HO3(4) relates to “ student dwellings “ ie accommodation which provides the facilities for day-to-day private domestic existence and not just C3/C4⁵ residential development.
- 4.9 Policy IN4: Developer Contributions is also relevant and sets the context for how, where necessary planning obligations will be negotiated to support amongst other things affordable housing. The full wording of this policy is also provided, see [Appendix 2](#).

⁵ The [Town and Country Planning \(Use Classes\) Order 1987 \(as amended\)](#) puts uses of land and buildings into various categories known as 'Use Classes'

Nottingham City Council's Affordable Housing Policy and Developers Contributions Supplementary Planning Guidance (2006)

4.10 [The Council's Affordable Housing Policy and Developers Contributions Supplementary Planning Guidance \(2006\)](#) (the 2006 SPD) sets out the Council's current approach to the provision of affordable housing for other residential development. It was written prior to the adoption of Policy HO3 and does not therefore seek contributions from Purpose Built Student Accommodation.

Sustainability Appraisal (SA)

4.11 Sustainability Appraisal is a statutory process that must be undertaken for every new planning document in accordance with the Planning and Compulsory Purchase Act (2004). The purpose of SA is to assess the economic, social and environmental impacts of projects, strategies or plans, so that the preferred option promotes, rather than inhibits sustainable development.

4.12 An SA was carried out as part of the Local Plan Part 2 review including all policies within the document. The appraisals for Policy HO3 and Policy IN4 and further details about the process can be found in [Appendix 3](#).



5. Planning Obligations

- 5.1 Provision of on-site affordable housing within new PBSA is not considered to be practical. PBSA schemes are by their very nature high density and it is not considered appropriate to promote mixed communities in very close proximity due to the potential for conflict with residents with different housing needs and lifestyles. Management agreements and other restrictions (e.g. car parking) are imposed on PBSA schemes which are also not necessarily appropriate to non-student residents.
- 5.2 Direct provision of affordable PBSA bedspaces targeted at students considered to be in need of lower cost rent is also not considered appropriate. PBSA is by its nature provided for students who do not live in the City full time. Affordable PBSA bedspaces would not therefore meet the City's affordable housing need. The process to achieve affordable student accommodation bedspaces would also be complex and would require a mechanism to be agreed by the Universities, PBSA providers and the Council to ensure those students with housing need were able to fairly access such bedspaces. In any event, the wide range of existing rental levels within the PBSA market already encompass some lower priced options that help meet the needs of students with lower incomes.
- 5.3 Seeking financial contributions for affordable homes from PBSA rather than either on site provision or affordable student accommodation bedspaces is therefore justified and Policy HO3 (4) confirms that a commuted sum will be required in lieu of on-site affordable housing provision on sites that provide student dwellings. The Council's preferred approach in PBSA schemes is therefore to seek financial contributions towards off-site affordable housing.
- 5.4 Although each case will be considered on its own merits, this SPD sets the starting point for negotiations relating to the provision of affordable housing contributions from PBSA established by the Local Plan policies.
- 5.5 The City Council will seek to secure affordable housing contributions either through planning conditions or usually through the negotiation of a legal agreement under Section 106 of the Town and Country Planning Act 1990. Where a S106 agreement is entered into, then it will need to be completed prior to the granting of planning consent.

5.6 If an applicant considers that the application of the Council's policies raises issues of viability rendering a proposal undeliverable, then the applicant will be required to submit a robust viability assessment evidencing their case. This will then be independently examined before the scale and nature of any potential reduction of contribution may be agreed.

Commuted Sums used to Support the City Council's Housing Strategy

5.7 Any commuted sums paid under these arrangements will be used to support the City Council's Housing Strategy. In most cases, commuted sum will usually either:

- a) be made available to housing associations / registered providers of social housing, or
- b) used directly by the City Council or its subsidiary companies to implement Council objectives in relation to affordable housing provision.



6. Calculating the Affordable Housing Contribution from PBSA

Requirements for Affordable Housing Contribution from PBSA

- 6.1 PBSA schemes come in an array of formats including studios (small 1 bed rooms) and cluster flats where students have access to shared living spaces/facilities including kitchens, bathrooms etc. or a combination of studios and cluster flats. To account for all of the different types of PBSA formats, the S106 contributions that are to be negotiated will be based on the total number of bedspaces.
- 6.2 As set out in paragraph 0 above the Council equates 5 bedspaces in a PBSA Scheme to 1 dwelling. The Council has used a combination of 2011 census data and the average household size of Houses in Multiple Occupation (HMO) registered on the Council's HMO database and concluded that the approximate average size of a student household in Nottingham (disregarding where the scheme is made up of studios or cluster flats) is 5.
- 6.3 As policy HO3 applies to schemes of 10 dwellings or more the requirements set out in this SPD will therefore apply to all PBSA schemes providing dwellings with 50 or more bedspaces, either new build or conversion. To ensure consistency the thresholds set out in Policy HO3, will also apply to PBSA calculations and result in the following affordable housing requirement levels:

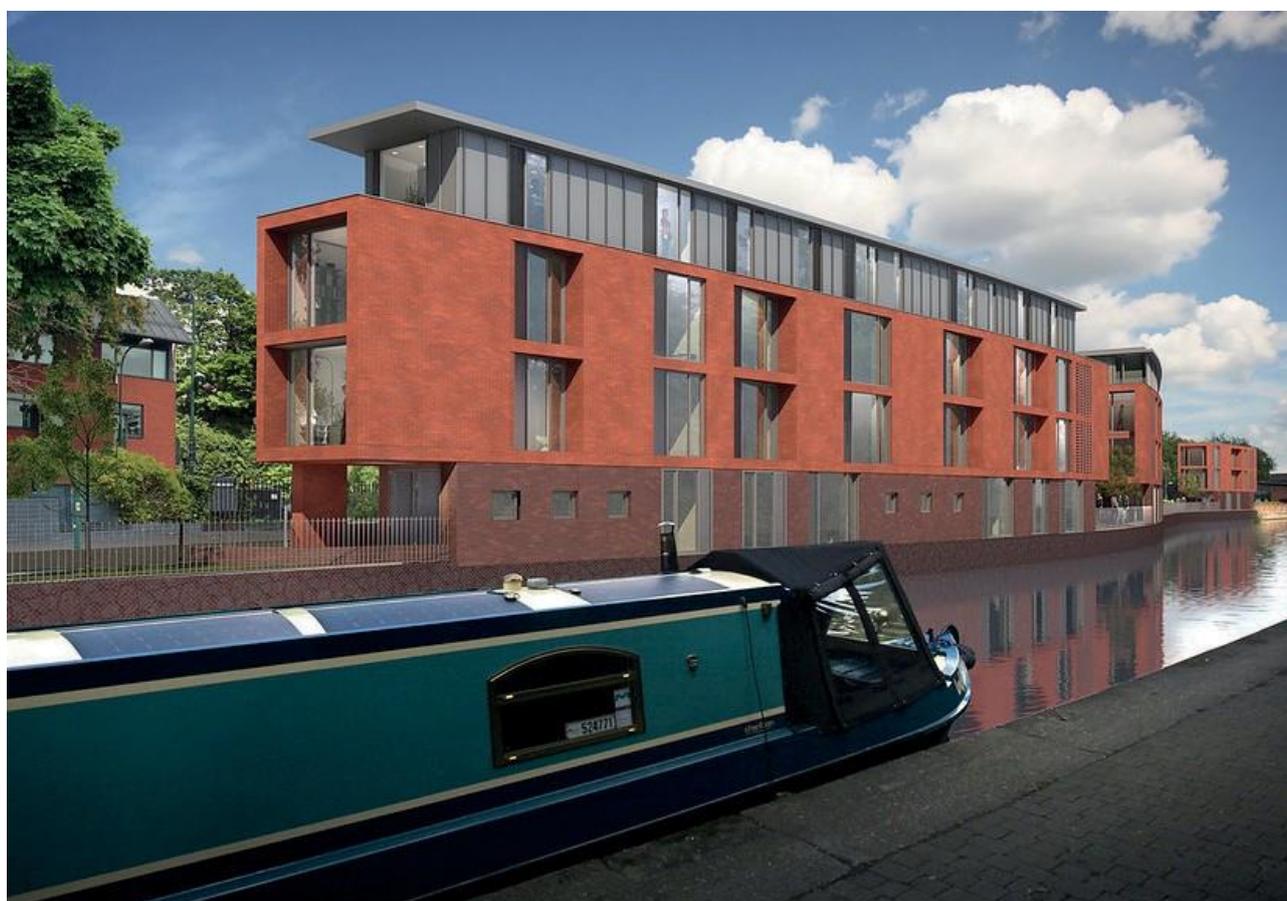
Size of PBSA Scheme	Contribution
≤ 50 Bedspaces	Zero
50-74 Bedspaces	10%
75≥ bedspaces	20%

- 6.4 The Council will also apply the same figure used for the purposes of the 2006 SPD calculation to calculate the amount of contribution required from PBSA. This figure is, at the time of writing, set out in is currently £43,877 per affordable housing unit. This figure will be updated on an annual basis* until a revised Affordable Housing SPD is adopted to replace the 2006 SPD. This (PBSA) SPD does not therefore set out a 'new' formulaic approach but simply seeks to apply the existing approach to commuted sums to the particular (physical) circumstances of PBSA.

* Revised costs are set out on the Council's S106 webpage www.nottinghamcity.gov.uk/s106-costs. Please also see the Council's S106 Estimator at www.nottinghamcity.gov.uk/s106-estimator.

6.5 Set out below are some examples of how the S106 contribution is to be calculated and used as the starting point for negotiation. Note that these figures are based on 2021 figures and will need to be revised annually using Affordable Housing Contributions Annual Update.

Scheme	Total Beds	Total number of Units (assumed)	Affordable housing %	No of Affordable housing units to be negotiated	Total Requirement (£43,877 per unit) ⁶
Example 1	50	10	10%	1	£43,877
Example 2	84	16.8	20%	3.36	£147,426.72
Example 3	222	44.4	20%	8.88	£389,627.76
Example 4	310	62	20%	12.4	£544,074.80



⁶ Figure revised annual see www.nottinghamcity.gov.uk/s106-costs

7. General Advice

- 7.1 Developers and applicants are advised to consult the Development Management Team at the City Council prior to submitting planning applications for any new PBSA to discuss any likely requirements including affordable housing contributions. You can contact them by emailing planning@nottinghamcity.gov.uk.
- 7.2 This SPD will be monitored annually and updated as appropriate. Any new government legislation/guidance will supplement the information contained in this SPD. In particular, the Council's Affordable Housing Contributions will be revised on an annual basis – see www.nottinghamcity.gov.uk/s106-costs.



8. Glossary

Affordable Housing

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers) as defined by the NPPF

Authority Monitoring Report (AMR)

A report produced by local planning authorities assessing progress with and the effectiveness of the Local Plan.

Purpose Built Student Accommodation (PBSA)

Accommodation that is specifically designed to meet accommodation needs of students. Such schemes can consist of studios (small 1 bedroom apartments) or shared cluster flats for a number of students to share facilities including kitchens and living spaces. The whole scheme is managed and often provide additional facilities including a gym, common room, study areas or a cinema. This term also be applied to more traditional halls of residence, which are generally developed by educational institutions for the students of one specific institution.

Section 106 (s106)

the Town and Country Planning Act 1990 allows a Local Planning Authority to enter into a legally binding agreement or planning obligation with a landowner in association with the grant of planning

permission. This agreement is a way of addressing matters that are necessary to make a development acceptable in planning terms and are used to support the provision of services and infrastructure, such as highways, recreational facilities, education, health and affordable housing.

Students

Persons enrolled on a full time course of education for at least one academic year at an educational establishment providing further or higher education.

Student Households

Households which can claim student council tax exemption including those within halls of residence purpose built accommodation.

Supplementary Planning Document (SPD)

Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainability Appraisal (SA)

A mechanism for appraising policies to ensure they reflect sustainable development objectives. An SA considers environmental, social and economic effects of a plan and appraises them in relation to the aims of sustainable development.

Appendix 1: Copy of Policy HO3: Affordable Housing from the Local Plan Part 2

1. Planning permission for new residential developments including conversions will be granted subject to the following affordable housing targets, where viable:
 - a) For development where between 10 and 14 homes will be provided, at least 10% of the homes will be required to be available for affordable home ownership;
 - b) For development where 15 or more homes will be provided, or the site has an area of 0.5 hectares or more, 20% of the homes will be required to be affordable housing, with at least 10% of homes being available for affordable home ownership, the remainder to be other forms of affordable housing.
2. Affordable housing need should be met on-site. However, where it can be robustly justified, off-site provision or a financial contribution will be sought
3. The type of affordable housing to be provided on site will be negotiated having regard to:
 - a) The Government's policy on Starter Homes and other affordable home ownership product requirements;
 - b) the City-wide need for affordable housing, taking into account all other sources and supply of affordable housing;
 - c) levels of affordability in the area; and
 - d) size, type and tenure of housing in the area.
4. On sites providing student dwellings, a commuted sum will be required in lieu of on-site affordable housing provision.

Appendix 2: Copy of Policy IN4: Developer Contributions from the Local Plan Part 2

1. Development will be expected to meet the reasonable costs of new infrastructure or services required as a consequence of the proposal. Where necessary planning obligations will be negotiated to support the following:
 - a) employment and training in accordance with Policy EE4;
 - b) open space in accordance with Policy EN2 and EN3, relevant site allocations;
 - c) drainage and flood protection in accordance with Policy CC3 relevant site allocations;
 - d) transport in accordance with Policies TR1 and TR2, relevant site allocations;
 - e) community facilities including education in accordance with Policy LS5; and
 - f) affordable housing in accordance with Policy HO3, relevant site allocations.
2. Other planning obligations may be necessary to make developments acceptable in planning terms and may include: heritage enhancement and protection, supporting policing/crime reduction and air quality measures. The scale and nature of direct provision will be identified as a result of the need arising from the development.
3. If an applicant considers there to be issues of viability due to the level of contributions being sought which render a proposal undeliverable, they will be required to submit robust viability assessments. These will be independently examined before the scale and nature of any reduction is agreed.

Appendix 3: Sustainability Appraisal (SA)

Sustainability Appraisal (SA) is a statutory process, which must be undertaken for every new planning document in accordance with the Planning and Compulsory Purchase Act (2004). The purpose of SA is to assess the economic, social and environmental impacts of projects, strategies or plans, so that the preferred option promotes, rather than inhibits sustainable development.

In addition to SA, European Directive 2001/42/EC (commonly referred to as Strategic Environmental Assessment or SEA), requires that Local Authorities undertake an 'environmental assessment' of any plans and programmes they prepare that are likely to have a significant effect upon the environment. The requirements of the SEA have been incorporated into the SA for the LAPP.

An SA was carried out on the recently adopted Local Plan Part 2 as an integral part of the plan making process and performed a key role in providing a sound evidence base for the plan. The process appraised the social, environmental and economic effects of the LAPP from the outset through its various preparation stages. In doing so it helped to ensure that the decisions made have contributed to achieving sustainable development.

Furthermore, the SA recommended some changes to help ensure that the LAPP policies and site allocations are as sustainable as possible. It informed the decision making process by facilitating the evaluation of alternatives and also considered the cumulative, synergistic and secondary impacts of the LAPP policies and sites.

The SA also demonstrated that the plan is the most appropriate when considering reasonable alternatives and, where negative impacts were found, suggested suitable mitigation measures to try and overcome them. Monitoring arrangements have also been put in place to ensure that the impact of the policies can be properly evaluated.

This SPD is supplementary to Policy HO3: Affordable Housing and it is not considered that the guidance contained in the SPD will have any significant effects over and above those of the Policy. Policy HO3 has been subject to SA as part of this LAPP preparation process. Full details of the LAPP SA process, methodology and results can be found at [www.nottinghamcity.gov.uk/ localplan](http://www.nottinghamcity.gov.uk/localplan).

An extract of the appraisals for Policy HO3 is provided on the following pages.

Policy IN4: Developer Contribution has also been subject to the same SA process and a copy of the appraisal for the policy is also provided within this appendix.

Appraisal of Policy HO3: Affordable Housing

																	Very major/ important positive
																	Major positive
																	Moderate to major positive
																	Moderate positive
																	Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity & GI	7. Landscape & Townscape	8. Natural Resources & flooding	9. Waste	10. Energy & Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact, not relevant or neutral overall			
																	Minor negative
																	Moderate negative
																	Moderate to major negative
																	Major negative
																	Very major/ important negative

Affordable Housing Contributions arising from Purpose Built Student Accommodation SPD

SA Objectives	Appraisal of Policy HO3: Affordable Housing	Potential Mitigation Measures
1. Housing	The policy aims to secure a proportion of allocated sites for affordable housing to meet the needs of the City so that the housing need for all social groups is met	
2. Health	Policy aims to secure lower income residents access to housing. There is a recognised correlation between increased housing provision and a positive impact on health	
3. Heritage	Negligible impact	
4. Crime	Negligible impact	
5. Social	On-site affordable housing provision results in mixed and diverse communities, in line with NPPF aims	
6. Environment, Biodiversity & Green Infrastructure	Negligible impact	
7. Landscape & Townscape	Negligible impact	
8. Natural Resources & Flooding	Negligible impact	
9. Waste	The policy seeks to achieve a level of affordable housing across the City but not in itself allocate additional housing. This policy would be considered against other policies in the plan which covers waste considerations. Negligible impact	
10. Energy & Climate Change	The policy seeks to achieve a level of affordable housing across the City but not in itself allocate additional housing. This policy would be considered against other policies in the plan for sustainable design, materials and construction technics. Negligible impact	
11. Transport	The policy seeks to achieve a level of affordable housing across the City but not in itself allocate additional housing. These sites should be sustainable due to the compact nature of the city	
12. Employment	Negligible impact	
13. Innovation	Negligible impact	
14. Economic Structure	Negligible impact	
<p>Summary:</p> <p>A very major positive effect was identified for the Housing objective, alongside a moderate positive impact for the Social objective and a minor positive effect predicted for the Health objective. No negative effects were identified.</p>		

Appraisal of Policy IN4: Developer Contributions															
															Very major/ important positive
															Major positive
															Moderate to major positive
															Moderate positive
															Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity & GI	7. Landscape & Townscape	8. Natural Resources & flooding	9. Waste	10. Energy & Climate Change	11. Transport	12. Employment	13. Innovation		14. Economic Structure	? = unknown impact No fill = negligible impact, not relevant or neutral overall
															Minor negative
															Moderate negative
															Moderate to major negative
															Major negative
															Very major/ important negative

Affordable Housing Contributions arising from Purpose Built Student Accommodation SPD

SA Objectives	Appraisal of Policy IN4: Developer Contributions	Potential Mitigation Measures
1. Housing	Policy seeks contributions to deliver affordable housing and directly supports the target for 20% affordable housing on allocated housing sites	
2. Health	Policy may result in increases or improvements to health such as, improvements to open space, health facilities, improved access to and provision of green infrastructure, sustainable travel and measure to improve air quality. There is also a recognised correlation between increased housing provision (affordable housing in this case) and a positive impact on health	
3. Heritage	Policy allows for contributions to be sought for protection and enhancement of heritage assets	
4. Crime	Policy allows for contributions to be sought to support policing and crime reduction measures	
5. Social	Policy allows for contributions to be sought for education, sport facilities, allotments, community facilities and cultural facilities	
6. Environment, Biodiversity & Green Infrastructure	Policy may result in increases or improvements to open space and biodiversity	
7. Landscape & Townscape	Policy may result in increases or improvements to landscape and townscape areas through developer contributions being sought for new or enhanced open space	
8. Natural Resources & Flooding	Policy allows for contributions to be sought for drainage and flood protection	
9. Waste	Negligible impact	
10. Energy & Climate Change	Negligible impact	
11. Transport	Policy seeks contribution towards improvements of sustainable transport	
12. Employment	Policy seeks provision towards employment and training	
13. Innovation	Policy seeks provision towards employment and education	
14. Economic Structure	Negligible impact	
<p>Summary:</p> <p>The Housing objective was considered likely to benefit from a very major positive effect, with a major positive impact also anticipated for the Health objective and a moderate to major positive impact for the Social objective. Further moderate positive impacts were identified for the Heritage, Crime, Environment, Biodiversity & GI, Landscape & Townscape, Natural Resources & Flooding, Transport, Employment and Innovation objectives. No negative impacts were identified.</p>		

