

Equality Impact Assessment

What is being assessed	Purpose-built Student Accommodation (PBSA) Supplementary Planning Document (SPD)	Status	EqlA after public consultation and before finalising and adopting SPD.
Officer completing	Joy Brown	Role	Senior Planner (Policy)
Team	Planning Policy	Directorate	Development and City Services
Senior leadership team sponsor	Nick Austin	Role	Interim Head of Regulatory Services

What are the main aims or purpose of the policy, practice, service or function? *(include links to project briefs, cabinet reports etc)*

The main purpose of the SPD is to supplement Greater Norwich Local Plan ([GNLP](#)) [policy 5](#) and in particular to set out the current position with regards to the need for additional PBSA within the plan period to 2038 as well as providing guidance in order to encourage good quality accommodation in appropriate and sustainable locations where the need for future PBSA is established.

How does it fit with other services and policies, and how does it support our [corporate objectives](#) and [City Vision](#)?

The SPD provides guidance on the implementation and interpretation of policy 5 of the GNLP, which itself was subject to a detailed [Equalities Impact Assessment](#) (October 2023). Whilst few direct impacts were found for protected groups, more generally the GNLP is assessed as having a positive effect towards reducing socio-economic inequality by planning for new homes, jobs, and infrastructure.

The SPD meets several corporate priorities including, 'A prosperous Norwich', 'A fairer Norwich', 'A climate responsive Norwich' and 'A future-proof Norwich'. Norwich has excellent higher education facilities, and it is important to both the city of Norwich and the higher education establishments that an attractive range of good quality accommodation is offered to students.

The SPD also supports the City Vision by:

- seeking to provide suitable accommodation that helps with 'attracting and retaining ambitious young people through our universities'.
- 'providing housing that is fit for the future and meets the changing needs of our people'.

What is the reason for the proposal or change (financial, legal etc)?

The [2019 evidence and best practice advice note for purpose-built student accommodation in Norwich](#) is now out of date as a significant amount of PBSA has been delivered in Norwich and the Greater Norwich Local Plan has been adopted which contains a specific policy on PBSA. The [evidence base](#) has been updated by AECOM. This SPD will provide guidance and will assist developers, educational institutions and the Local Planning Authority in implementing policy 5 of the GNLP.

Who implements, carries out or delivers the policy, practice, service or function?

Norwich City Council planning service (Planning Policy and Development Management)
Private developers
Higher Educational Institutions

What outcomes do we want to achieve, why and for who?

- To ensure that the current stock and future supply of PBSA is sufficient to meet need and to allow an element of choice within the market. However, it is important that the market does not become oversaturated as this could have possible repercussions for occupancy levels, provider finances and student quality of life.
- To set out the factors that the Council will take into consideration in the assessment of relevant planning applications. This includes need, location, scale, external building design, external amenity and landscape design, internal building design, cycle storage, management, partnership/support from Higher Educational Institutions in Norwich, provision of a mix of accommodation, sustainability and energy consumption and flexibility and robustness.
- To set out how an off-site contribution for affordable housing will be calculated.

Will anyone be disproportionately affected by the programme, and/or will it create any benefits? (*customers, employees, groups in the wider community etc*)

- The PBSA SPD will help ensure that sufficient accommodation is provided for students but will also ensure that there is not an oversupply of accommodation. The provision of PBSA when there is no demonstrated need may be at the expense of general needs housing.
- The SPD will ensure that any future PBSA is located sustainably and is of a good standard.
- The provision of an off-site contribution for affordable housing will help address the need for affordable housing and therefore socio-economic disadvantage.

If yes, complete the relevant sections below for any benefits and adverse impacts identified.

Affected group	Key findings from analysis of data and evidence. Identify any gaps in data here	Level & type of impact: low/medium/high, positive/adverse	Justifiable if adverse	Actions to mitigate impacts, maximise benefits or address identified gaps in data	By when
Age	Whilst many students requiring PBSA are young adults, this is not always the case particularly at postgraduate level. The provision of new PBSA accommodation may reduce the provision of new general needs housing. General needs housing will accommodate all ages.	Positive (low)		Permitting PBSA where there is no evidence of need could reduce the provision of general needs housing for which there is currently substantial need for. General need housing built to modern building regulation standards would provide accommodation for those with protected characteristics. Notwithstanding this, being able to secure off site contributions towards affordable housing will help ensure that any new PBSA schemes help provide affordable housing (subject to viability).	
Disability	Some existing PBSA may not be suitable for those with disabilities.	Positive (low) – the SPD aims to ensure that those with disabilities are provided with accommodation that meets their needs.		The following paragraphs are to be included within the SPD: ‘Appropriate provision must be made for accessible rooms and wheelchair access in accordance with the <i>Building Regulations, Access to and Use of Buildings: Approved Document M</i>. Requirements for	Proposed paragraphs are included within the SPD.

				accessible rooms are also addressed in BS 8300:2018 Volumes 1 & 2. Wheelchair users require larger study bedrooms, with room for a wheelchair turning space between furniture and provision of an appropriate ensuite bathroom. Circulation, social and communal spaces should also be accessible. The proportion of rooms designed for wheelchair users shall be agreed with the Local Planning Authority.’ ‘Paragraph 0.16 of ‘Building Regulations Approved Document M: access to and use of buildings, volume 2 – buildings other than dwellings¹’ indicates that purpose-built student living accommodation should be treated as hotel/ motel accommodation in relation to space requirements and internal facilities for wheelchair users.’ ‘Alongside the mixture of tenure types there is increasing demand nationally for an	
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¹ Source: Building Regulations Approved Document M – Volume 2.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441786/BR_PDF_AD_M2_2015.pdf

				element of 'specialist' accommodation types including: • alcohol-free, single-sex, quiet blocks • rooms that can be adapted for ambulatory disability • safeguarding accommodation • accommodation for families.'	
Gender reassignment	N/A	No impact identified	N/A	N/A	N/A
Marriage and civil partnership	N/A	No impact identified	N/A	N/A	N/A
Pregnancy and maternity	N/A	No impact identified	N/A	N/A	N/A
Race/ethnicity	N/A	No impact identified	N/A	N/A	N/A
Religion and belief	N/A	No impact identified	N/A	N/A	N/A
Sex/gender	N/A	No impact identified	N/A	N/A	N/A
Sexual orientation	N/A	No impact identified	N/A	N/A	N/A
Other groups Socio-economic disadvantaged.	There is a substantial need for general needs housing including affordable housing. The provision of new PBSA accommodation may reduce the provision of new general needs housing.	Positive (low)		Permitting PBSA where there is no evidence of need could reduce the provision of general needs housing for which there is currently substantial need. General needs housing built to modern building regulation	The proposed SPD has been amended to better promote the provision of lower cost accommodation.

	There is evidence that a lot of students cannot afford PBSA with maintenance loans not being sufficient to cover rent (and additional living costs).			standards would provide accommodation for those with protected characteristics. Notwithstanding this, being able to secure off site contributions towards affordable housing will help ensure that any new PBSA schemes help provide affordable housing (subject to viability). The SPD has been amended to take into account consultation responses. The amendment promotes the provision of an increased amount of low-priced rooms such as twin rooms or rooms with shared bathroom facilities.	
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What evidence and data has been used for this assessment, including community engagement and consultation?

In November 2024 AECOM produced their final report on PBSA in Norwich ([Norwich Purpose Built Student Accommodation \(PBSA\) Study](#)). This found that the existing supply and pipeline are sufficient to meet need during the GNLP plan period, including ensuring an element of choice within the market.

The SPD provides guidance on the implementation and interpretation of policy 5 of the GNLP, which itself was subject to a detailed [Equalities Impact Assessment](#) (October 2023). Whilst few direct impacts were found for protected groups, more generally the GNLP is assessed as having a positive effect towards reducing socio-economic inequality by planning for new homes, jobs, and infrastructure. The Equalities Impact Assessment for the GNLP has been useful in informing the Equalities Impact Assessment for this SPD.

The draft SPD was subject to a five-week period of consultation which accords with the Statement of Community Involvement for Norwich and the Local Development Regulations. A full report on the consultation will be provided within Appendix 2 of the Sustainable

Development Panel Report/Cabinet Report/Full Council Report. The consultation report sets out the methods which were used, the responses received and, where appropriate, how the SPD has been amended to take account of comments. Comments from both universities concur that there is sufficient supply of PBSA.

As part of the consultation, the new digital tool (Get Talking Norwich) was used. Over 80% of respondents either strongly agreed or agreed that existing and pipeline supply is sufficient to meet the city's needs with less than 10% disagreeing or strongly disagreeing. Other key themes that emerged from the survey included PBSA being unaffordable for many, student accommodation reducing housing provision for families and some PBSA being poorly integrated into the city's architectural and social fabric. Overall, it is considered that the residents of Norwich that responded to the consultation are supportive of the aims and aspirations of the SPD.

How has the equality impact assessment informed or changed the proposal?

The EqIA assessment was carried out after the public consultation but before the SPD was finalised. Very few changes have been made to the document as a result of the EqIA. The EqIA however has helped confirm that the draft SPD considered all relevant issues and has highlighted the importance of only providing new PBSA where there is a need, as the provision of new PBSA could restrict the provision of general needs housing which meets the needs of a wider group of people some of which will have protected characteristics.

What actions have been identified going forward?

The PBSA SPD has been updated following the public consultation and this will be in the public domain as part of committee reports and on the council's website. This equality impact assessment will be revisited if the council determines the need to amend its position in light of new evidence relating to the local need for additional or alternative PBSA.

How will the impact of your proposal and actions be measured moving forward?

Consents and delivery of consented accommodation will be reported annually via the Annual Monitoring Report (AMR) (Plan indicator H8). The Higher Education Statistics Agency (HESA) provides annual figures on student numbers so these should be reviewed on a yearly basis. The decision as to when best to carry out a wider update on the need for more student accommodation will be informed by the above and through discussions with the higher educational institutions. It may also be influenced by the number of planning applications received for PBSA.

It is proposed that the PBSA working group meets regularly to collate and share information to provide an accurate response to the changing climate of student accommodation to best meet the needs of the students, the institutions and the city.

Officer completing assessment	Joy Brown	Date	13/06/2025
Senior leadership team sponsor	Nicholas Austin	Date	16/06/2025
Equality lead (strategy team)	Joe Siggins	Date	13/06/2025