

**CHI-15-268: Technical Advice Note – Student Accommodation**  
**Appendix 1 - Pubic Consultation Results Summary, Officer Response and Actions**

<b>Bruce Ritchie – Acanthus Architects</b>		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
Paragraph 3.9 New student housing developments are being assessed under the Technical Handbook – Non Domestic.	Comments noted and accepted.	Amendment made to paragraph 3.9 stating that student accommodation is assessed under the Technical Handbook – Non Domestic.

<b>Old Aberdeen Community Council</b>		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
Loss of family and affordable housing to HMO market and high numbers of student accommodation in locations which do not address student and transport need.	The TAN promotes a positive and proactive approach to new student accommodation to ensure that they are in the most suitable location in terms of accessibility and amenity impacts on the surrounding area; that they are well managed and are appropriate in size and scale; meet the needs of the further	No modification made.

	education institutes; and that they offer appropriate accommodation. The TAN is aimed at purpose built student accommodation and not Houses in Multiple Occupation (HMOs).	
Paragraph 1.1 Suggest following change: “This Technical Advice Note (TAN) provides advice on new purpose built student accommodation and the change of use of any domestic and other buildings to student accommodation.”	It is accepted that the wording of this sentence could be usefully changed.	Paragraph 1.1 amended to read as follows: “This Technical Advice Note (TAN) provides advice on purpose built student accommodation, be this new build or proposals for change of use.”
Paragraph 1.2 Should apply to any proposed student accommodation, new build or change of use. Change the term “universities” to “further education institutions” in the last line.	Change accepted.	Paragraph 1.2 amended to replace the word “universities” with the term “further education institutes”.
Paragraph 1.3 Community Councils should be included in the list of stakeholders.	Community Councils are made aware of all applications for planning permission via the ‘Weekly List’ of applications made to the Council.	No modification made.
Paragraph 1.6 HMOs should be referenced.	The term ‘shared housing’ includes HMOs.	No modification made.
More accurate to state that University of	Noted and change accepted.	Paragraph 1.6 amended to replace “Old

<p>Aberdeen accommodation is in “Old Aberdeen and its immediate neighbourhood.”</p> <p>Dispute where RGU accommodation is. There are students in Old Aberdeen/King Street/Spring Garden areas. NESCOL students are also in Old Aberdeen/King Street area.</p>	<p>The relevant sentence in this paragraph notes that these are the locations where students are “generally focused”.</p>	<p>Aberdeen Campus” with “Old Aberdeen and its immediate neighbourhood.”</p> <p>No modification made.</p>
<p>Paragraph 1.7 Student’s accommodation aspirations need to change to prevent loss of family and affordable housing to HMOs. This should be promoted in the TAN.</p>	<p>Paragraph 2.1 of the TAN recognises that student accommodation “...help(s) to relieve pressure on the local housing stock and pressures on Houses in Multiple Occupation (HMOs), which account for a proportion of the available rental accommodation in the City and support the student population”</p>	<p>No modification made.</p>
<p>Paragraph 2.1 This para relates to purpose built accommodation and this should be clear. A small proportion of student accommodation is in the rental market and this should be clarified.</p>	<p>Noted and change accepted.</p>	<p>Sentence 1 of Paragraph 2.1 amended to read: “Purpose built student accommodation is essential in contributing to the creation of sustainable communities in Aberdeen as they offer choice to students in the City.”</p>
<p>Paragraph 2.4 Ensure the inclusion of HMOs in “all</p>	<p>Not all HMOs are for student accommodation. It is however accepted</p>	<p>Paragraph 2.4 amended to read “It is essential that all planning applications</p>

planning applications”.	that the sentence could be usefully reworded to be made clearer.	for purpose built student accommodation give due consideration to all relevant policies contained within the adopted Local Development Plan”.
Criterion 3B Revise sentence to: “The development should be in a location that is easily accessible to a specific campus by sustainable transport modes, including pedestrian access.” Student accommodation should not adversely impact public transport.	It would not be appropriate to state that a proposal must only be easily accessible to only a specific campus. Sustainable transport modes are encouraged.	No modification made.
TAN numbering Section numbering jumps from 3 to 5. Missing 4.	Noted.	Numbering of Sections has been updated to reflect.

<b>Froghall, Powis and Sunnybank Community Council</b>		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
Paragraph 1.3 Housing and area plans should also aim to design out the risk of potential nuisance, e.g. distance and landscaping between	The detailed design of proposals, including amenity and landscaping, would be considered during the assessment of a planning application.	No modification made.

residences.		
<p>Paragraph 1.5 Do universities and colleges give advanced notice to the council when intending to increase student numbers? Are these details incorporated into the Council's Structure Plans?</p>	<p>This is not a specific comment on the content of the TAN.</p>	<p>No modification made.</p>
<p>Paragraph 1.7 Have guarantees for student accommodation been honoured in recent years? First time students have previously been in B&amp;Bs.</p>	<p>This is a comment for the Universities, not the TAN.</p>	<p>No modification made.</p>
<p>Paragraph 2.1 Families priced out of housing near the university by buy-to-let purchasers. Led to street degradation and inner city school closures. Renowned garden city now becoming a slum.</p>	<p>New purpose built student accommodation can help to relieve pressures on the local housing stock.</p>	<p>No modification made.</p>
<p>Paragraph 2.4 4 and 5 storey buildings are optimum so no requirement for lifts.</p>	<p>The detailed design of proposals, including height and massing, is considered during the assessment of a planning application.</p>	<p>No modification made.</p>
<p>Paragraph 3.4 This is not carried out. Accommodation on</p>	<p>The detailed design of proposals, including amenity, is considered during</p>	<p>No modification made.</p>

<p>Powis Place extends to site boundary and is flush with the footpath. Proposal at BT site is minimum distance from existing houses on Froghall View, concerning residents. Both could have less impact.</p>	<p>the assessment of a planning application.</p>	
<p>Paragraph 3.6 Optimum building height is 4 or 5 storeys. 5 storey for main roads and wide streets, 4 storeys for smaller streets, so less impact or shade on neighbouring properties. Buildings on Justice Mill Lane are out of proportion whereas East North street is wastefully low rise. Better use should be made of land used by single or 2 storey prefabs, e.g. 3 or 4 floors of student accommodation above retail units in Kittybrewster/Berrysden.</p>	<p>The detailed design of proposals, including height and massing, is considered during the assessment of a planning application. The Proposed Aberdeen Local Development Plan (2015) now includes a specific policy (D3) on 'Big Buildings'. A draft Supplementary Guidance on Big Buildings has also been prepared.</p>	<p>No modification made.</p>
<p>Paragraph 3.8 Rise in bland, sterile car parking spaces in Aberdeen. European countries have landscaping to soften. Agree with developers' plans not to provide student parking but Community Council colleagues think it is difficult to prevent students from owning cars and parking in neighbouring resident's spaces. Limited parking should be for visitors only underneath buildings allowing landscaped spaces. There should</p>	<p>The detailed design of proposals, including parking provision and landscaping, is considered during the assessment of a planning application. The amount of parking is set by the Council's car parking standards.</p>	<p>No modification made.</p>

be a specification for communal gardens.		
Paragraph 3.16 Risk of creating ghettos or dead zone during summer with student only developments. Impact on area should be considered on case by case basis.	As noted within this paragraph, it is considered necessary to limit occupancy to students so as to ensure services, such as education provision, are protected.	No modification made.

<b>Patrick Birchley</b>		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
There is a need for the University of Aberdeen to identify and free land for development near to the campus.	This is a matter for the University to consider, not this TAN. It should be noted that the Dunbar Hall site (OP 101) has been identified as suitable for student accommodation in the Local Development Plan.	No modification made.
The TAN does not set out the desirability for accommodation to be convenient and within walking distance.	This is covered in Section 3B which states that “We would encourage new student accommodation to have direct, attractive, safe and secure pedestrian links to higher education campuses”.	No modification made.
It does not identify the cumulative effect of	The TAN outlines issues that need to be	No modification made.

<p>repeated proposals in one area. There should be an assessment of provision and need in that locality to prevent over concentration.</p>	<p>considered in the decision making process when it comes to student accommodation. Issues relating to cumulative impact and appropriate provision are not appropriate to address via a Technical Advice Note. The respondent's comments are however noted and will be considered by Officer's during the next review of the Local Development Plan to determine whether a specific policy may be required.</p>	
<p>Paragraph 3.10  "Maximum" should be changed to "minimum" so accommodation is flexible to change its use. Provide parking for residential staff will benefit those who don't provide full time management.  Overall, lack of detail in TAN.</p>	<p>This paragraph should be updated to better reflect the content of the Transport and Accessibility Supplementary Guidance.</p>	<p>Sentence 1 of Paragraph 3.10 amended to read: "Existing car parking guidelines for new student accommodation must be considered as part of the development. That is; 1 parking space per resident staff member plus 1 per 10 students in the city centre, the inner city and the outer city areas (see Aberdeen Transport and Accessibility SG). (...) The level of parking proposed in new development must be agreed with the Planning Authority."</p>



<b>Caroline Nutsford, GVA James Barr obo Unite Students</b>		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
Managed accommodation can minimise adverse effect on existing communities associated with residents in HMO properties.	Noted in Paragraph 2.1.	No modification made.
Paragraph 2.1 Should be explicit that it is “purpose built” student accommodation which contributes to sustainable communities and relieves pressure on housing stock and HMOs. There should be greater support for purpose built student accommodation and that it is preferable for students to live within managed student housing over general housing stock.	Noted and change accepted.	Sentence 1 of Paragraph 2.1 amended to read: “Purpose built student accommodation is essential in contributing to the creation of sustainable communities in Aberdeen as they offer choice to students in the City.”
Criterion 3A Question the inclusion of objective as no national planning guidance which supports this requirement. It should identify a need for purpose built student accommodation to meet a shortfall in purpose built bed spaces. This will increase attractiveness of the city for higher education.	This Criterion states that adequate consideration should be given to addressing an identified need for the type of development proposed. Although student accommodation is not addressed by the Scottish Planning Policy is not considered inappropriate within this TAN to encourage developers of student	No modification made.

	accommodation to consider the need and viability of proposals.	
<p>Criterion 3B Areas closest to universities are the most attractive. The encouragement to promote sustainable travel under 3.3 is at odds with ACC's current car parking standards for students.</p>	Existing car parking guidelines for new student accommodation are provided within the Transport and Accessibility Supplementary Guidance and the TAN references this SG in relation to parking provision. It is not considered that the TAN is inconsistent with the content of the SG.	No modification made.
<p>Criterion 3C The suggestion, at 3.6, that most suitable locations are in the city centre should be removed. This contradicts other guidance that recognises university campuses and transport corridors as appropriate locations. Higher density should be acceptable where developments are compatible with existing built areas regardless of whether this is within the city centre or not.</p>	Paragraph 3.6 of the TAN follows from Proposed Aberdeen Local Development Plan (2015) Policy (D3) on 'Big Buildings'. The Proposed Plan is intended to go before Scottish Ministers for Examination later this year. Proposals for 'Big Building' outwith the City Centre and the immediate surrounding area would be considered against the criteria in the Proposed Big Buildings Supplementary Guidance.	No modification made.
<p>Criterion 3D – Open Space Provision Question specifically referring to allotments and to their suitability within student schemes. Students are able to access allotments within the wider city. Large</p>	The detailed design of proposals, including open space provision, would be considered during the assessment of a planning application. The assessment would include consideration of the Open	A signpost to the Open Space Supplementary Guidance has been incorporated into this Criterion.

<p>outdoor sports areas are unlikely to be compatible and such facilities are likely to be available as part of university facilities. It should recognise the requirement for less open space provision than family housing. The open space provision should reflect the accessibility of the development to existing open spaces in surrounding area and take account of internal communal areas.</p>	<p>Space Supplementary Guidance.</p>	
<p>Criterion 3D – Parking Council’s car parking standards for student housing are excessive so welcome 3.10 that these are “maximum” standards. The requirement for 1 space per 10 students does not reflect the accessibility of locations to facilities, the city centre and is at odds with criteria b to promote sustainable travel and minimise car usage. Unite are willing to enter into agreements with City Car Clubs to eliminate the need for parking.</p>	<p>This paragraph should be updated to better reflect the content of the Transport and Accessibility Supplementary Guidance.</p>	<p>Sentence 1 of Paragraph 3.10 amended to read: “Existing car parking guidelines for new student accommodation must be considered as part of the development. That is; 1 parking space per resident staff member plus 1 per 10 students in the city centre, the inner city and the outer city areas (see Aberdeen Transport and Accessibility SG). (...) The level of parking proposed in new development must be agreed with the Planning Authority.”</p>
<p>Criterion 3D – Waste Disposal Facilities The amount of waste storage bins should not be excessive. The TAN should encourage the increase in pick-ups to allow a reduction in bin provision. This will improve the design, reduce the number of</p>	<p>As stated within the TAN, proposals must ensure that waste is disposed of in accordance with the waste hierarchy set out in Policy R6 – Waste Management Requirements for New Development.</p>	<p>No modification made.</p>

bins and increase amenity space.		
<p>Criterion 3D – Flexibility  Not considered necessary to propose restrictive occupancy controls on student accommodation. Such a planning condition will not meet the tests set out in planning legislation. Flexibility in tenure to allow for use out with term time should be considered by operators.</p>	<p>As noted within this paragraph, it is considered necessary to limit occupancy to students so as to ensure services, such as education provision, are protected. Conditions of this type have been used successfully by the Council. Operators may choose to apply to vary this Condition should they so wish.</p>	No modification made.
<p>Criterion 3E  Unite will submit a Student Management Plan with planning applications. Well managed purpose built accommodation will not have an adverse impact on residential amenity of character of the area. A management plan will help the council assess the application.</p>	Noted.	No modification made.

<b>Jacinta Birchley</b>		
<i>Summary of Representation</i>	<i>Officers Response</i>	<i>Action as a Result of Representation</i>
<p>Paragraph 1.2  Insert “and also meet the needs of the local</p>	<p>It is considered that the needs of local communities are recognised via the text</p>	No modification made.

community/residents”.	“amenity impacts on the surrounding area”.	
Paragraph 3.7 This is a judgement and criteria should be stated.	The TAN reflects that these are the type of issues which would be considered during the assessment of planning applications for this type of development. As applications will be subject to site specific criteria it is not considered appropriate to add anything further to this paragraph.	No modification made.
Paragraph 3.8 A guide on the amount of open space per unit/population should be stated.	The detailed design of proposals, including open space provision, would be considered during the assessment of a planning application. The assessment would include consideration of the Open Space Supplementary Guidance.	A signpost to the Open Space Supplementary Guidance has been incorporated into this Criterion.
Paragraph 3.9 & 3.16 If there is a change of use the car parking criteria for any other use could not be achieved.	The detail of any proposals for Change of Use, including parking provision, would be considered during the assessment of any such planning application.	No modification made.
Car Parking 1 space per 10 residents is too little. Private providers charge students to park within premises resulting in students parking in surrounding streets. Contributions from the	The figures provided with the TAN are derived from the Transport and Accessibility Supplementary Guidance.	No modification made.

<p>developer could set up a CPZ to protect local residents who already compete with city centre workers parking and walking to the city centre.</p>		
<p><b>Energy Efficiency</b> Technology is too early to ensure that ground source heat pumps do not make noise. It is noticeable during the night in recent development. A condition should be imposed to assess the impact on the local community after operation.</p>	<p>The requirements stated within the paragraph fall from Local Development Plan Policy R7.</p>	<p>No modification made.</p>
<p><b>Developer Contributions</b> A recent development of 125 flats only required a contribution of £1000 towards a footpath. Surely bigger contributions are required. It should take into account that students don't pay council tax.</p>	<p>Developer Contributions are negotiated during the assessment of planning applications in the context of Local Development Plan Policy I1 and the associated Supplementary Guidance.</p>	<p>No modification made.</p>

<p><b>Old Aberdeen Heritage Society</b></p>		
<p><i>Summary of Representation</i></p>	<p><i>Officers Response</i></p>	<p><i>Action as a result of Representation</i></p>

<p>TAN seems based on Leicester Council advice but the most important parts have been watered down or omitted. The effectiveness of the advice is seriously diminished.</p>	<p>A review of other Local Authority guidelines and policy on Student Accommodation was undertaken as part of the production of this TAN. The TAN is specific to the Aberdeen context and the content is considered appropriate for Technical Advice Note status (i.e. not policy).</p>	<p>No modification made.</p>
<p>The most important criterion has been omitted from the 'best-practice' document being followed. The criterion considers the unacceptable cumulative impact upon surrounding residential neighbourhoods. High concentrations of students potentially having negative impacts. Neighbourhoods dominated by students are known as 'studentification' and is now recognised in reports, guidance and is an important planning consideration. The negative impact is recognised in the LDP SG 'Householder's Development Guide'. This allows the Council to refuse an application and applies to all HMOs. The LDP endorses the SDP objective to 'create sustainable communities'. Both plans are central to the local authority's vision for Aberdeen. Planning circular 3/2012 gives further weight. It requires local authorities to 'interpret carefully' the</p>	<p>The TAN outlines issues that need to be considered in the decision making process when it comes to student accommodation. Issues relating to cumulative impact and appropriate provision are not appropriate to address via a Technical Advice Note. The respondent's comments are however noted and will be considered by Officer's during the next review of the Local Development Plan to determine whether a specific policy may be required.</p>	<p>No modification made.</p>

<p>provisions of the LDP, of which are clear: “to create balanced, sustainable communities”. The TAN must reflect this and include criterion which requires new development not to have an unacceptable cumulative impact upon the surrounding residential neighbourhoods. This should be Criterion F.</p>		
<p>Introduction Fails to balance the findings of the HNDA in terms of the needs of students and the housing needs of the general public. This is significant as recognition to students when assessing applications will neglect the need for general housing. The LDP has identified a chronic need for general housing and this is repeated in the Proposed Plan. If this TAN remains as proposed then preference will be given to student housing over all other kinds of housing without addressing the needs of that particular area. This is contrary to policy. The TAN should include a requirement to address general housing need and consider how a student housing application might deprive the area of general or family housing.</p>	<p>The TAN outlines issues that need to be considered in the decision making process when it comes to student accommodation. As noted above, issues relating to appropriate provision are not appropriate to address via a Technical Advice Note. The respondent’s comments are however noted and will be considered by Officer’s during the next review of the Local Development Plan to determine whether a specific policy may be required.</p> <p>Paragraph 2.1 of the TAN recognises that student accommodation “...help(s) to relieve pressure on the local housing stock and pressures on Houses in Multiple Occupation (HMOs)...”</p> <p>It is not considered that the positive and proactive approach to the provision of new purpose built student</p>	<p>No modification made.</p>



	<p>accommodation in suitable locations put forward by the TAN would in any way impact on the level of new housing identified by the Local Development Plan.</p> <p>It should be noted that the Housing Needs and Demand Assessment (HNDA) is currently being updated and student accommodation provision will be considered as part of this review. The revised HNDA would inform production of the next Strategic Development Plan and Local Development Plan.</p>	
<p>Policy Context – 2.1 How does “offering choice to students” contribute to sustainable communities? If students choose where to live then the demographics of that neighbourhood are altered, leading to unsustainable communities. The first sentence should be replaced with: “Student accommodation is an essential component of the housing mix in Aberdeen, and offers choice to students in the City”.</p>	<p>Students form part of, and actively contribute to, the provision of sustainable communities and are as entitled to a choice in housing as any other resident.</p>	<p>No modification made.</p>
<p>Page 5 – 2.3 This section should include Policy D5 to highlight the requirements in regard to</p>	<p>The TAN notes that the list of policies provided is not exhaustive and, in some case, other policies (such as D5) will be</p>	<p>No modification made.</p>

<p>proposals that are within or adjacent to Conservation Areas.</p>	<p>relevant for Planning Officers to consider in the assessment of applications for planning permission.</p>	
<p>Page 5 – 2.4 The SG ‘Householder Development Guide’ must be included, in recognition of the policy on high concentrations of HMOs. The sensitivity in Conservation Areas should be recognised by the inclusion in this list of Conservation Character Appraisals and Management Plan.</p>	<p>Again, the list stated in this paragraph is not exhaustive, however it is recognised that the text does not specifically state as such.</p>	<p>Sentence 2 of Paragraph 2.4 amended to read “The following Supplementary Guidance documents, along with any others relevant to the proposal, must also be duly considered”</p>
<p>Criterion A 3.2 – Instead of “should give adequate consideration to addressing an identified need” it should read: All proposals for purpose built student accommodation “will be required to provide clear evidence to demonstrate, to the satisfaction of the City Council, that the development would meet an identified need at the time it is submitted.”</p> <p>Instead of “Developers should consider” it should read: “ The council will require that this evidence includes details of the following”</p>	<p>The TAN outlines issues that need to be considered in the decision making process when it comes to student accommodation. It is not appropriate for the TAN to set policy requirements, such as are proposed by the Respondent. The respondent’s comments are however noted and will be considered by Officer’s during the next review of the Local Development Plan to determine whether a specific policy may be required.</p>	<p>No modification made.</p>

<p>Criterion A After “what specific need the proposal is aimed at and why this need is currently unmet” the following should be added: “taking into account other student accommodation proposals already approved, and underway, but not yet completed”.</p>	<p>This is for the market to drive, not the Planning Authority. Although a proposal may have received planning permission it does not guarantee that the development will proceed.</p>	<p>No modification made.</p>
<p>Criterion C Instead of “the general amenity of the surrounding area” it should read: “the general residential environment of the surrounding area”.</p> <p>3.4 – Important to recognise adverse impacts on the surroundings. Noise nuisance should be considered. An extra sentence should be added at the end of 3.4 to read: “Impacts such as noise disturbance should also be considered, and the question should also be asked as to whether approval of a particular application would result in too high a concentration of student accommodation in one area, and so the loss of balance in that community.”</p>	<p>The amenity of other uses, not just residential, are important and the current wording reflects this.</p> <p>Paragraph 3.7 notes that noise will be considered as part of the consideration of applications for planning permission.</p> <p>As noted above, issues relating to appropriate provision are not appropriate to address via a Technical Advice Note. The respondent’s comments are however noted and will be considered by Officer’s during the next review of the Local Development Plan to determine whether a specific policy may be required.</p>	<p>No modification made.</p>
<p>Paragraph 3.5 Policies D4 or D5 should be added to the</p>	<p>It is not considered necessary to specifically reference the noted policies</p>	<p>No modification made.</p>

list.	within this paragraph. Paragraph 2.3 above notes that there are a number of relevant policies to consider in preparing and determining applications for student accommodation, and, where relevant, this would include Policies D4 and D5.	
<p>Paragraph 3.6 Guidance which the TAN is based has been watered down. First sentence should be revised to: "Taller, higher density student accommodation will not normally be appropriate within or adjoining existing residential neighbourhoods".</p>	<p>Paragraph 3.6 of the TAN follows from Proposed Aberdeen Local Development Plan (2015) Policy (D3) on 'Big Buildings'. The Proposed Plan is intended to go before Scottish Ministers for Examination later this year. Proposals for 'Big Building' outwith the City Centre and the immediate surrounding area would be considered against the criteria in the Proposed Big Buildings Supplementary Guidance.</p>	No modification made.
<p>Criterion E After "potential negative impacts from occupants" the wording "or the development, on surrounding properties and neighbourhoods" should be added.</p>	<p>It is recognised that the wording of Criterion E should be reworded to better reflect the text in paragraph 3.18. This paragraph recognises that "Well managed student schemes can significantly minimise negative impacts on surrounding areas" and goes on to state that "The Council will expect all student accommodation schemes to have a Management Plan to ensure a</p>	<p>Criterion E reworded to read as follows: "The development scheme has an appropriate Management Plan in place."</p>

	satisfactory residential environment for existing residential neighbourhoods”.	
<p>Equality Impact &amp; Human Rights Impact Assessment</p> <p>It is stated by the report’s author that: “The TAN advocates for student accommodation to respect the residential amenities of surrounding areas”. Assume that it is “residential amenity” which is meant. The TAN does not fully advocate that statement unless it includes a criterion which would prevent an unacceptable cumulative impact of student accommodation on the neighbourhood.</p>	<p>The TAN outlines issues that need to be considered in the decision making process when it comes to student accommodation. Issues relating to appropriate provision are not appropriate to address via a Technical Advice Note. The respondent’s comments are however noted and will be considered by Officer’s during the next review of the Local Development Plan to determine whether a specific policy may be required.</p>	No modification made.