

Development Management Report

Committee Application

Committee Meeting Date: 10th March 2026

Application Ref: LA04/2025/0973/F

Proposal:

Retrospective change of use from student accommodation to short term lets accommodation (limited to July & August only)

Location:

Bradbury Place
30-44 Bradbury Place,
Belfast,
BT7 1RS

Referral Route: Paragraph 3.8.2 (d) of the scheme of delegation – change of use application involving student accommodation

Recommendation: Approval subject to conditions

Applicant Name and Address:

Bradbury Student Properties Limited
1 Linfield Road
Belfast
BT12 5DR

Agent Name and Address:

Clyde Shanks Ltd
2nd Floor
7 Exchange Place
Belfast
BT1 2NA

Date Valid: 12.06.2025

Target Date: 25.09.2025

Contact Officer: Ciara Reville, Principal Planner (Development Management)

Executive Summary:

The application site is situated at 30-44 Bradbury Place, Belfast, BT7 1RS.

Permission was granted under LA04/2017/2753/F for the Demolition of buildings and erection of a mixed-use development to include purpose built managed student accommodation with 100 en-suite cluster bedrooms and 56 studios (156 total) and ancillary facilities with ground floor retail unit. 5 storeys addressing Bradbury Place and 6 storeys addressing Albion Lane to rear.

The key issues for consideration of the application are set out below:

- Principle of the proposed change of use outside of term time
- Access, movement and parking

One representation was received from the Northern Ireland Hotel Federation. Their concerns are set out below with response.

DFI Roads were consulted and had no objections

A Section 77 to vary the Section 76 of the host approval is necessary and is agreed in principle with Legal Services.

Recommendation

Having regard to the development plan and other material considerations, the proposal is considered acceptable. It is recommended that planning permission is granted subject to conditions. Delegated authority is sought for the Director of Planning and Building Control to finalise the wording of the conditions, resolve the relevant Section 77, and deal with any other issues that arise, provided that they are not substantive.

Officer Report

1.0

Drawings

1.1

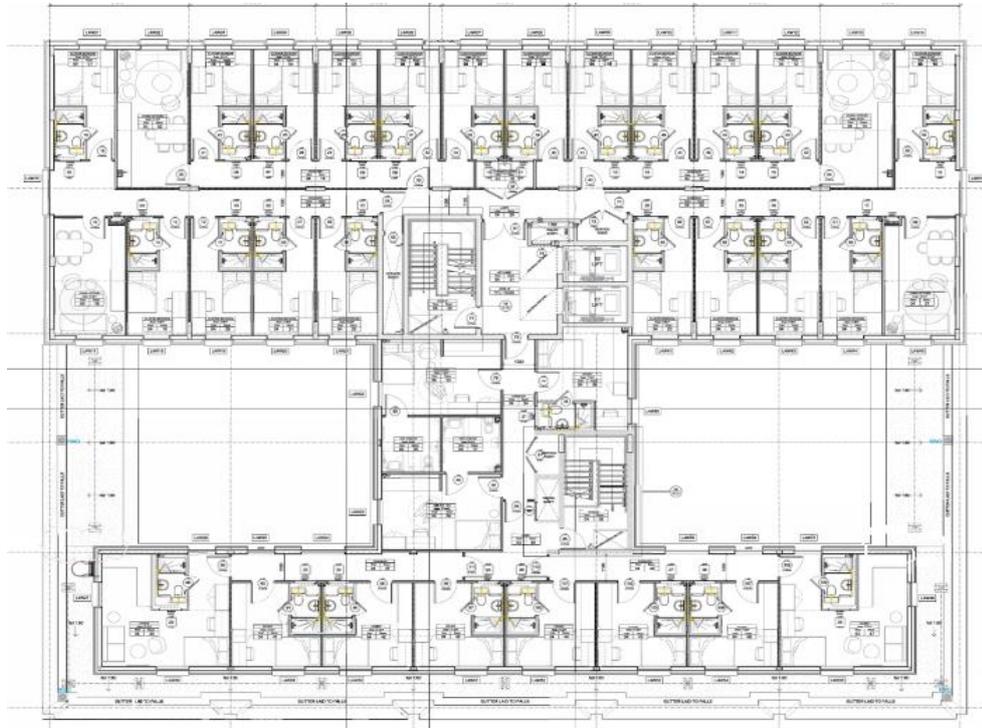
Site Location

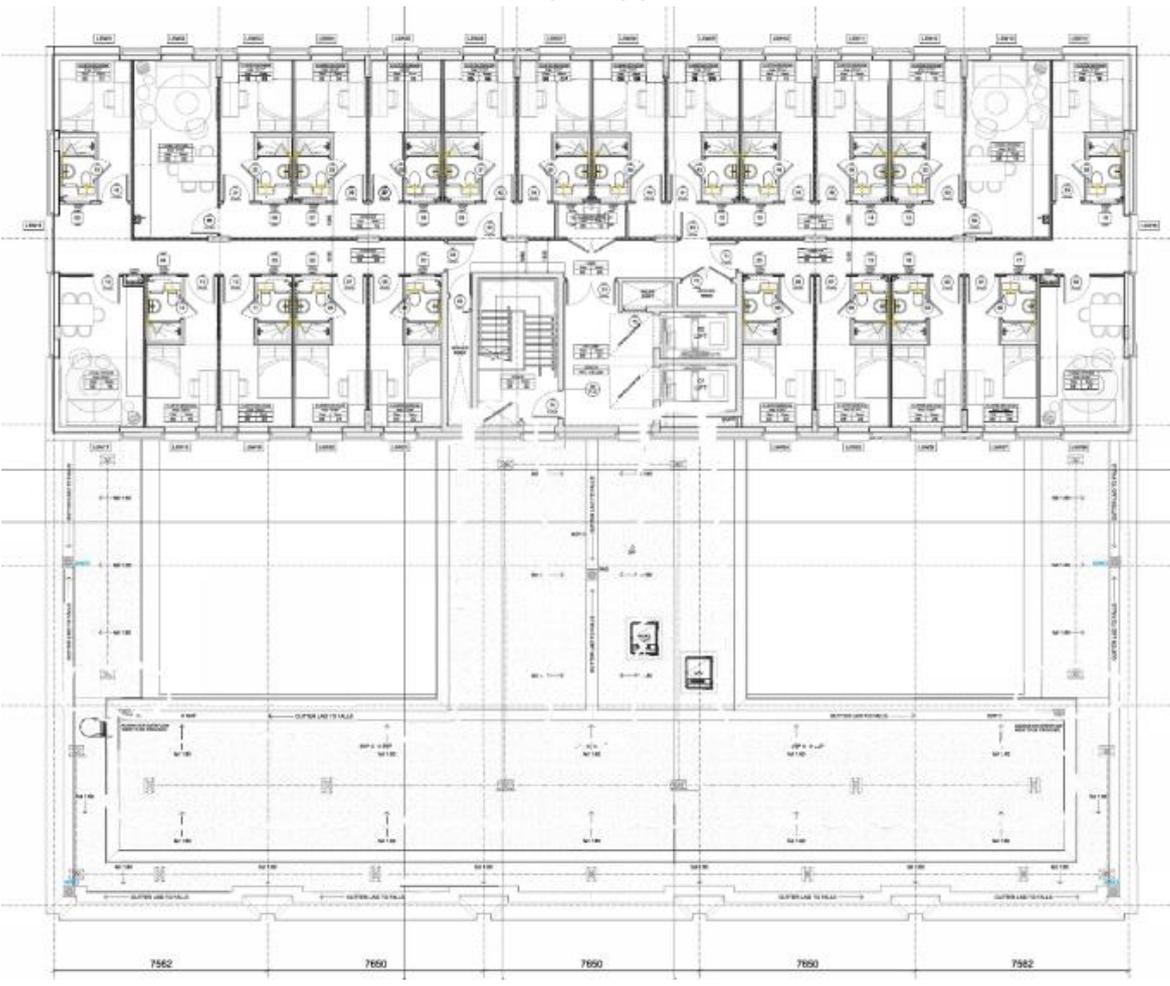


Typical First to Third Floor Layout



Fourth Floor



	<p style="text-align: center;">Fifth Floor</p> 
2.0	Characteristics of the Site and Area
2.1	The site is a multi-story purpose-built student accommodation on Bradbury Place. The surrounding area is commercial in character with retail hotel and bar/restaurant uses dominant.
3.0	Description of Proposal
3.1	Retrospective change of use from student accommodation to short term lets accommodation (limited to July & August only)
4.0	Planning Policy and Other Material Considerations
4.1	Development Plan – Plan Strategy Belfast Local Development Plan, Plan Strategy 2035
4.2	<i>Strategic Policies:</i> Policy SP2 – sustainable development

<p>4.3</p> <p>4.4</p> <p>4.5</p>	<p><i>Operational Policies:</i></p> <p>HOU13 – Short-term let accommodation</p> <p>TLC1 - Supporting tourism leisure and cultural development</p> <p>TLC3 - Overnight visitor accommodation</p> <p>TRAN 8 - Car parking and servicing arrangements</p> <p>Policy ENV1 – Environmental quality</p> <p>Development Plan – zoning, designations and proposals maps</p> <p>Belfast Urban Area Plan (2001) BUAP</p> <p>Draft Belfast Metropolitan Area Plan 2015 (v2004)</p> <p>Draft Belfast Metropolitan Area Plan 2015 (v2014)</p> <p>Regional Planning Policy</p> <p>Regional Development Strategy 2035 (RDS)</p> <p>Strategic Planning Policy Statement for Northern Ireland (SPPS)</p> <p>Relevant Planning History</p> <p>LA04/2017/2753/F Decision: Permission Granted Decision Date: 01 August 2019</p> <p>Proposal: Demolition of buildings and erection of a mixed-use development to include purpose built managed student accommodation with 100 en-suite cluster bedrooms and 56 studios (156 total) and ancillary facilities with ground floor retail unit. 5 storeys addressing Bradbury Place and 6 storeys addressing Albion Lane to rear. (amended scheme)</p> <p>LA04/2025/0245/CA on-going enforcement case relating to Unauthorised use of student accommodation for short-term let during non-term time.</p>
<p>5.0</p>	<p>Consultations and Representations</p>
<p>5.1</p> <p>5.2</p> <p>5.3</p> <p>5.3.1</p>	<p>Statutory Consultations</p> <p>DFI Roads – No Objections subject to conditions</p> <p>Non-Statutory Consultations</p> <p>Northern Ireland Tourist Board – Only comment on major applications.</p> <p>Representations</p> <p>The application has been advertised and neighbours notified. One representation has been received from the Northern Ireland Hotel Federation. Their concerns are as follows:</p> <ul style="list-style-type: none"> • Conflict with intended use and approved consent: The approved consent for this development was for purpose-built managed student accommodation (PBSA) to serve the needs of Queen’s University Belfast and Ulster University students. The proposed change to short-term lets, even if limited to July and August, represents a significant departure from

that approved use and creates a precedent for non-student occupancy in PBSA buildings. This undermines the clarity and purpose of the city's student accommodation strategy. *The proposal will be restricted to July & August months only, a period when the universities are in summer recess. Therefore, the proposal will not significantly impact approved PBSA use.*

- **Impact on the hotel and regulated accommodation sector:** Allowing PBSA stock to convert to short-term lets adds quasi-hotel capacity into an already competitive city-centre visitor market without equivalent regulatory burden, standards, or tax treatment. Hotels operate under strict regulation, incur higher operating costs, and contribute substantially to employment and tourism infrastructure. Introducing additional short-term let supply erodes this regulated framework and risks financial displacement during peak trading months. This accommodation will compete with other certified products including, hotels, hostels, guest accommodation and self-catering accommodation. *The tourism policies within the Plan Strategy 2035 seeks to extend the offer for day and nighttime tourism facilities within the city centre boundary. The proposal complies with policy, financial impacts on existing tourism provision is not a determining factor in assessment.*
- **Policy precedent, compliance concerns and the integrity of PBSA planning.** The conversion of student accommodation to short-term visitor use undermines the city's ability to ensure an adequate, predictable supply of student housing. With growing undergraduate numbers and pressure on the private rented sector, safeguarding PBSA for its original purpose is essential. *As stated previously the proposed use will be limited to July & August only when the PBSA will not be in use as student accommodation.*
- **Evidence of unauthorised use and regulatory loopholes.** This project was certified for tourism use by Tourism Northern Ireland in March 2025 and was actively advertising rooms on online platforms, including Booking.com, by May 2025. At that time, no change-of-use planning consent had been granted, and the property held permission only to operate as purpose-built student accommodation. The NIHF raised this matter and brought it to the attention of both Belfast City Council and Tourism NI. *Section 55 of the Planning Act (NI) 2011 allows for the granting of permission for development already carried out.*
- **Amenity, management and neighbourhood impact** Short-term-lets operate with higher turnover, differing visitor behaviour, and reduced stability. This can lead to noise, disturbance and increased comings and goings, which are not consistent with the controlled management protocols typically required for PBSA. The applicant has not demonstrated how they will maintain equivalent standards of oversight during short-term visitor use. *The application includes a non-term time letting management plan which will be included within the s.77 legal agreement.*
- **Temporal restriction does not adequately mitigate concerns.** A July-August limitation does not eliminate concerns around enforcement,

	<p>management, or market precedent. Experience shows that once a dual-use pattern is established, operators may seek incremental extensions or may drift into additional months with limited oversight. This business traded in the tourism market in May last year. <i>The proposal will be required to operate within the specifics of the planning approval or be subject to legal/enforcement action.</i></p> <ul style="list-style-type: none"> • Strategic and economic implications. Belfast’s accommodation strategy emphasises balanced growth across regulated hotels and guest accommodation. The unmonitored conversion of PBSA into short-term visitor stock risks distorting market conditions, reducing investor confidence, and undermining the city’s long-term tourism planning. <i>This is a statement that cannot be given determining weight in assessment.</i> • Monitoring and Enforcement 1) Who will have responsibility for monitoring and verifying that this property operates solely during July and August? <i>It is the responsibility of the developer/operator to operate in accordance with planning permissioned, breaches of planning management are the responsibility of Planning Enforcement and s76 monitoring teams.</i> 2) How will the current loophole be addressed whereby premises can obtain Tourism Northern Ireland certification without having the necessary planning consent in place, and what steps will be taken to close it? <i>This is not a matter for Planning Service.</i> 3) Does the Council have the required resources and statutory powers to effectively monitor and enforce compliance with the two-month change-of-use restriction? <i>Yes, a planning enforcement and s.76 teams are in place.</i> 4) Which agency will be designated as the enforcement authority, and how will breaches of this planning condition be investigated and addressed? <i>The planning enforcement team are responsible for investigating any complaints relating to breaches of planning condition.</i>
6.0	PLANNING ASSESSMENT
6.1	Development Plan Context
6.1.1	Section 6(4) of the Planning (Northern Ireland) Act 2011 states that in making any determinations under the Act, regard is to be had to the local development plan, and the determination must be made in accordance with the plan unless material considerations indicate otherwise.
6.1.2	Section 45(1) of the Act states that in determining planning applications, the Council must have regard to the local development plan, so far as material to the application, and to any other material considerations.
6.1.3	The Belfast Local Development Plan (LDP), when fully completed, will replace the Belfast Urban Area Plan 2001 as the statutory Development Plan for the city. The Belfast LDP will comprise two parts. Part 1 is the Plan Strategy, which contains strategic and operational policies and was adopted on 02 May 2023. Part 2 is the Local Policies Plan, which will provide the zonings and proposals maps for Belfast and has not yet been published. The zonings and proposals maps in the Belfast Urban Area Plan 2001 remain part of the statutory local development plan (“Departmental Development Plan”) until the Local Policies Plan is adopted.

6.1.4	<p>Operational policies – the Plan Strategy contains a range of operational policies relevant to consideration of the application, which are set out in the following section of this report.).</p>
6.1.5	<p>Proposals Maps – until such time as the Local Policies Plan is adopted, the Council must have regard to the land-use zonings, designations and proposals maps in the Belfast Urban Area Plan 2001, both versions of the draft Belfast Metropolitan Area Plan (v2004 and v2014) (draft BMAP 2015) and other relevant area plans. The weight to be afforded to these proposals is a matter for the decision maker. It is considered that significant weight should be given to the proposals map in draft BMAP 2015 (v2014) given its advanced stage in the development process, save for retail policies that relate to Sprucefield which remain contentious.</p>
6.1.6	<p>Belfast Urban Area Plan 2001 - The site is located within the settlement development limit in the BUAP and is not zoned for any use.</p>
6.1.7	<p>Belfast Metropolitan Area Plan 2015 (2004 and 2014) – The is located within the city centre.</p>
6.1.8	<p>Key Issues</p>
6.1.9	<p>The key issues to be considered in this application are:</p> <ul style="list-style-type: none"> • Principle • Access, movement and parking
6.2	<p>Principle of the proposal</p>
6.2.1	<p>Policy HOU13 relating to short term lets set out a number of key criteria which must be satisfied.</p> <p>Criterion a. requires that the proposal <i>strengthens and diversifies the range of short-stay visitor accommodation in the city</i>. As of June 2024, short-term lets comprise 21% of Belfast City Council’s tourist accommodation. The proposal is for additional rooms outside of term time which would strengthen and diversify the range of short-term visitor accommodation in the city.</p> <p>Criterion b. requires that the proposal <i>is accessible by public transport</i>. The site’s city centre location is highly accessible by public transport.</p> <p>Criterion c. requires that the proposal <i>is sited within an existing tourism cluster or in close proximity to a visitor attraction</i>. The site is within the city centre with several visitor attractions in proximity. City Hall, Queens University and Botanic Gardens are within a 20 min walk.</p> <p>Criterion d. requires that the proposal <i>has appropriate management arrangements in place to ensure a positive and safe living environment whilst minimising any potential negative impacts</i>. The applicant has provided an appropriate</p>

	<p>management plan to the council for consideration. The management plan also addresses the property security, management, booking and vetting and the key operational policies including noise / anti-social behaviour, waste disposal and transportation.</p> <p>Criterion e. requires that <i>the site is not located within a designated HMA (see policy HOU10), unless it can be demonstrated that the development is needed to meet a specific demand in that location.</i> As the site is not located within a designated HMA, this criterion is not applicable.</p> <p>Criterion f. requires that <i>in the case of a change from permanent residential use, part of the property must be retained as permanent residential housing.</i> The existing building is a PBSA therefore this criterion is not applicable.</p>
6.3	<p>Policy TLC1 states that the Council will seek to support tourism, leisure and cultural development that contributes to extending the offer of these forms of development across daytime and nighttime for the visitor. It is also expected that the proposal will lead to improving the quality and accessibility of tourism, leisure and cultural assets to support the city's reputation as an attractive tourism destination.</p>
6.4	<p>Policy TLC3 states that planning permission will be granted for tourism development for new overnight accommodation within the city centre boundary. Although the policy advises that short-term lets are considered under policy HOU13, nonetheless it demonstrates that there is a thrust for tourism development to be located within the city centre.</p>
6.5	<p>Car Parking</p> <p>Policy TRAN8 seeks to ensure that there is sufficient car parking and servicing arrangement for all developments. The development is car free with 42 cycle parking spaces available for short-term guests. Also, a Belfast bike docking station is located on Bradbury Place convenient to the site. Short-term guests will therefore be encouraged to use more sustainable means of transport, such as cycling, walking or take advantage of regular local transport facilities. For short-term guests who do need parking, there is on-street paid parking within the general area of the site.</p> <p>Whilst the approved scheme is not subject to a Travel Plan, a Travel Plan was submitted for this application. The Travel Plan supports the proposal and outlines all travel options available to staff, guests and visitors to the proposed short-term let units i.e. multiple forms of public transport such as Metro, Glider, Goldline and Ulsterbus bus services alongside Translink Train services at Botanic Station, as well as the pedestrian and cycle infrastructure in the surrounding area. It also addresses private car usage in that it will still be a mode of travel to some, with street pay and display parking and other longer duration car parks.</p> <p>DFI were consulted and offered no objection to the development's Travel Plan.</p>
6.6	<p>Section 76 Planning Agreement</p> <p>Application LA04/2017/2753/F was subject to a Section 76 agreement which restricted the use to student accommodation and shall not be rented out or sub-let</p>

6.7	<p>for any other purpose. As such a Section 77 is required to modify the original S76 to ensure that the student use is compliant with its legal obligations.</p> <p>A Section 77 to vary the Section 76 of the host approval has been agreed in principle with Legal Services and delegated authority is sought to resolve the finalisation of same.</p> <p>Conclusion</p> <p>The proposal is, on balance, an appropriate form of development within the city centre, it will provide additional visitor accommodation within the city centre outside of term time, adding to the diversity of visitor accommodation on offer, during peak times. It will also assist with vacancy rates within the building. Approval is recommended.</p>
7.0	<p>Recommendation</p>
7.1	<p>Having regard to the development plan and other material considerations, the proposal is considered acceptable. It is recommended that planning permission is granted subject to conditions.</p>
7.2	<p>Delegated authority is sought for the Director of Planning and Building Control to finalise the wording of the conditions, resolve the Section 77 variation to the host Section 76 planning agreement and deal with any other issues that arise, provided that they are not substantive.</p>
<p>DRAFT CONDITIONS:</p> <ol style="list-style-type: none"> 1. This planning permission has effect from the date which the development hereby approved was carried out. Reason: As required by Section 55 of the Planning Act (Northern Ireland) 2011. 2. The short-term let use hereby permitted, shall only operate between 1st July and 31st August each year. Accordingly, the short term let use will cease on the 31st of August and not recommence until the 1st July the following year. Reason: To ensure the premises are retained as permanent student accommodation during the academic year, 1st September to 30th June. 3. The development shall operate in accordance with the Travel Plan dated June 2025 and uploaded to the Planning Portal. Reason: To encourage alternative modes of transport to the private car. 4. The development hereby permitted shall operate in accordance with the Serving and Waste Management Plan bearing the Belfast City Council Planning Office date stamp 28 August 2018. Reason: In the interests of road safety and the convenience of road users. 	