



# Belfast Local Development Plan

**PBMSA SPG Consultation – Representations report**

**January 2025**

[www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP)



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# Introduction





## Introduction

### 1.1 Purpose of this report

1.1.1 This report details the engagement process undertaken in preparing and consulting on the proposed Purpose-Built Managed Student Accommodation (PBMSA) Supplementary Planning Guidance (SPG)<sup>1</sup>. It outlines the results of this process, including a summary of the key issues raised through representations in relation to the draft SPG. It provides an indication of the Council's view in relation to the key issues in representations made in respect of the SPG consultation.

### 1.2 Background to the consultation

1.2.1. On 2 May 2023, as part of the process of developing the new Local Development Plan (LDP) for Belfast, the Council formally adopted the Plan Strategy (PS). In progressing work towards the adoption of the PS the council consulted on a suite of 17 SPG documents to support the implementation of the adopted PS.

1.2.2. This SPG represents non-statutory planning guidance that supports, clarifies and/or illustrates by example, policies included within the Belfast LDP. The information set out in the SPG should also be read in conjunction with the LDP Plan Strategy (May 2023). These initial 17 SPG were adopted alongside the PS in May 2023 and can be found on the council's website: [www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP)

1.2.3. Following adoption of the PS, the Council have now updated the PBMSA SPG produced in 2016, to ensure it is in line with updated Policy HOU12 of the PS.

### 1.3 Overview of the consultation process

1.3.1. The Council's Statement of Community Involvement sets out its policy for involving the community in the production of the LDP, describing who, how and when the community will be invited to participate in the different stages of the LDP formulation. Section 6.1 of the Statement of Community Involvement informs that SPG will be published for consultation and comment prior to publication of the final draft, with comments received published on the Council's website.

#### Consultation

1.3.2. As part of the consultation process a public notice relating to the SPG was issued in September 2024, appearing in the following newspapers:

- [Newsletter \(6 September 2024\)](#)
- [Irish News \(6 September 2024\)](#)

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<sup>1</sup> SPG represents non-statutory planning guidance, intended to be read in conjunction with the existing planning policy framework, most notably the Strategic Planning Policy Statement (SPPS) for Northern Ireland and the Belfast Local Development Plan Strategy. SPG are intended for use by developers, the public and by planning officers to support the assessment and delivery of planning proposals.

- Belfast Media Group Titles - Andersonstown News (14 September 2024).
- 1.3.3. The formal consultation period commenced on Thursday 29 August 2024 and closed on Thursday 21 November 2024 at 5pm. An online consultation survey (and accompanying hard copy survey form) was made available during this period for the receipt of representations.
  - 1.3.4. The survey was accompanied by a full range of consultation materials, made available to view and download online via the Council's website and were available for inspection at the main reception in Belfast City Hall during normal opening hours.
  - 1.3.5. All of the consultation materials remain available for inspection on the LDP pages of the Council's website.
  - 1.3.6. A copy of all newspaper adverts is included in Appendix B.



# Overview of Responses





## 2.1 Summary of responses received

- 2.1.1 A total of 4 representations were received during the consultation period for the draft SPG. The respondents are categorised as individual (2)<sup>2</sup>, an educational body (1) and private sector (1). The private sector response was a joint response by three planning consultants. They are listed at Appendix A.
- 2.1.2 There were a range of positive comments received about the SPGs in terms of their clarity and intent and there were proposals for a number of minor changes, many of which have been incorporated into the final SPG document. There was general support for the preparation of a revised SPG following the adoption of the Plan Strategy in May 2023, which will supersede the 2016 PBMSA SPG. Comments welcomed the recognition given to the significant contribution made by students studying and living within the city to the local and regional economy and recognition to the need for PBMSA to be well planned/designed, appropriately located and properly managed.
- 2.1.3 A number of more significant comments were made in respect of the understanding of an Established Residential Area (ERA), including requests for greater clarity around criterion a. of Policy HOU12. Several paragraphs on ERAs were re-worked to clarify the intent of criterion a., in that it is a locational test rather than an impact test.
- 2.1.4 There was general support for the requirement for a management plan, while minor adjustments have been made to the SPG to ensure the guidance is in-line with current practice. A mixture of comments were also submitted in relation to the flexible application of design Policies HOU7, RD1 and OS3 to PBMSA development.

## 2.2 Approach to analysis of responses

- 2.2.1 The consultation response form was designed to provide an appropriate format for accurately capturing respondent views in relation to the PBMSA SPG. However, the majority of respondents chose not to utilise the form when submitting their response. Therefore, to aid analysis of the responses, the Council undertook an initial review of each submission to ascertain to which section of the SPG the responses related.
- 2.2.2 In the following sections of this report the main issues raised in relation to the SPG have been summarised and responded to, including the Council's justification where revisions have been made or otherwise.

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<sup>2</sup> Figures in brackets denote the number of respondents within each category classification.



# Council response to key issues raised





## Purpose Built Managed Student Accommodation (PBMSA)

### Summary of Responses

Four (4) respondents made representations in respect of the PBMSA SPG. Of the comments submitted:

- There was **support** for Policy HOU12, and also for the preparation of an up-to-date PBMSA SPG;
- Comments welcomed the recognition that students make a significant contribution while studying and living within the city to the local and regional economy and recognises the **need for PBMSA** to be well planned/designed, appropriately located and properly managed;
- Several comments sought further clarity in the **definitions** of certain terms used throughout the SPG; including but not limited to *interested parties* and *sustainability of an ERA*;
- One comment raised concern over defining **accessibility** to a higher education institution campus (HEIC) weighted against the balance of **over-concentration** of PBMSA development;
- Numerous comments related to **Established Residential Areas (ERAs)** and requests were made to map the existing ERA's in Belfast;
- One comment noted the boundary of a university campus is often expansive and difficult to define;
- Further explanation was requested in relation to **HOU12 policy tests** namely how to establish if a site is, or is not within an ERA;
- Comments related to **cumulative impact, land use** and **design**, including comments of unattractive new builds;
- A comment questioned the **space standards** within criterion c. of Policy HOU12;
- Comments questioned the negative tone of the dSPG relating to **parking and cycle provision** within a PBMSA development;
- There were mixed reviews of guidance on **Policy HOU7**. While some welcomed the flexible approach to provide adaptable accommodation in PBMSA development, another queried its relevance;
- One comment queried the relevance of **Policy OS3** providing open space in PBMSA developments;
- There was a general consensus that **management plans** are required and very useful for PBMSA developments, while a few comments sought minor adjustments to the text in the SPG on this section;
- One comment noted that the market would regulate itself regarding the **need** for PBMSA development, while another comment praised the Council's approach to benchmark Belfast against other UK university cities in relation to the ratio of student numbers to bedspaces;
- One comment requested Council release and maintain a publicly available record relating to **current/future levels of PBMSA** development;

## Council response to key issues raised

- A comment noted a **subservient use** can be utilised in PBMSA development, all year, not limited to outside term time;
- Issues were raised around discrimination against small business class, foreign investment not regarding Belfast local economy, the **consultation process**; and
- Some comments raised minor issues such as formatting queries and suggested wording updates.



Main Issue(s) raised by respondent(s) and Belfast City Council's response

Main issue	Council response
<b>Support</b>	
<p>Welcomes the preparation of an up-to-date SPG for PBMSA following the adoption of the Belfast Local Development Plan: Plan Strategy 2035 (PS 2035) in May 2023.</p>	<p>Support for revised SPG welcomed.</p>
<p>Welcomes the recognition given in PS 2035 to the significant contribution made by students studying and living within the city to the local and regional economy and recognises the need for PBMSA to be well planned/designed, appropriately located and properly managed. Also welcomes the recognition given in PS 2035 to the contribution that PBMSA can make to increasing the residential population in the city centre.</p>	<p>Welcome support for the contribution that PBMSA can make to increasing the residential population in the city centre.</p>
<p>That the Council will negotiate and deal with planning obligations in a timely manner is welcome, particularly in the context where pre-application discussions have taken place on a proposal.</p>	<p>Welcome comments on PBMSA proposals going through PAD process and subsequently, a planning decision being issued in a timely manner.</p>
<p>Welcome the inclusion of a PBMSA Statement. It would be helpful to clarify if this is required at PAD or Full application stage.</p>	<p>A PMBSA Statement is required to be submitted along with the full planning application. However if an applicant has this prepared at the PAD stage, then it is welcomed at this earlier stage in the process.</p>
<b>Definitions</b>	
<p>The definition of <i>'interested parties'</i> as including those who stand to <i>'gain or lose'</i> from a planning proposal or decision is somewhat simplistic and potentially unhelpful.</p>	<p>Footnote 3 to be revised to read as follows; <i>Interested parties may include, people living within the area/neighbourhood, elected representatives, voluntary groups, community forums/groups/umbrella organisations, environmental groups, residents' groups, business interests and developers/landowners.</i></p> <p>The list is taken from paragraph 3.2 of the Statement of Community Involvement (SCI).</p>
<p>No reference to BCCRIS, which seeks to increase the residential population in the City Centre, including "appropriate student housing" in "suitable locations."</p>	<p>BCCRIS definition to be removed from glossary. It was included in previous version of the SPG, however as superseded by the PS it has been removed from the glossary, given there is no reference to BCCRIS in the body of the revised SPG.</p>
<p>"PBSA" developments vs "PBMSA" developments? We are seeing some planning applications coming through as both and would benefit from guidance on differentiating between the two.</p>	<p>The document references PBMSA (Purpose Built Managed Student Accommodation) consistently throughout, which emphasise the importance of the development being managed.</p>

## Council response to key issues raised

Main issue	Council response
	<p>Sometimes an applicant may reference PBSA in an application description, but the acronym used make no difference in the application of policy.</p>
<p>SPG references “higher education campuses” (paras 1.2.4 and 3.4.19) in Northern Ireland... <i>“Higher education campuses in Northern Ireland includes Queen’s University Belfast, The Open University, St Mary’s University College, Stranmillis University College and Ulster University.”</i> This should be amended to make specific reference to “further education colleges” (as per NI Direct website <a href="http://Universities and colleges in Northern Ireland   nidirect">Universities and colleges in Northern Ireland   nidirect</a>).</p>	<p>Policy HOU12 criterion a. refers to ‘higher education Institution campuses’ while the 2016 PBMSA SPG uses the wording ‘higher education campuses’, as does HESA, an online source who publish higher education statistics.</p> <p>Para 1.2.4 is an introduction to HESA whose data are included in the statistics quoted in the following paragraphs. The list of institutions within this paragraph is therefore an statement of fact as to which data is included within the HESA statistics, which does not include any further education colleges, and has therefore not been updated.</p> <p>Other references throughout the document, such as the one within the dSPG paragraph 3.4.19 will be changed to refer consistently to “Higher Education Institution Campus (HEIC)” which is the wording used in the HOU12 policy. The definition for HEIC within the Glossary already includes reference to further education institutions.</p>
<b>Accessibility</b>	
<p>Welcoming the approach to ensure accessibility to higher education institution campuses.</p>	<p>Support welcomed.</p>
<p>The Council should be mindful of the tension between accessible ‘areas’ around a campus and the caution in the SPG around an overconcentration of PBMSA development</p>	<p>Point noted as Council understand there is a tension and the SPG aims to strike a balance in regard to accessibility and overconcentration of PBMSA development. SPG flags both accessibility and overconcentration of PBMSA development as separate issues which need to be considered for any scheme.</p>
<p>University campus areas are relatively expansive. It is difficult to define the boundaries of the campus, and consequently, accurately measure the 1,200m distance from these areas. Mapping of these areas would allow for greater certainty.</p>	<p>As noted by the respondent, HEIC buildings/campuses can be relatively expansive and may change over time. The 1,200m proximity guidance is intended to provide a general indication of accessibility, rather than a definitive measurement and there is therefore no need to map these areas. Instead, PBMSA schemes can help to demonstrate overall accessibility to existing</p>

Main issue	Council response
	HEICs with reference to the general proximity, as well as public transport infrastructure, etc.
Expect Council will consider existing land use, cumulative impacts of PBMSA and accessibility to third level institutions by sustainable transport needs, when defining Intensive Housing Nodes (IHN) in the LPP.	Intensive Housing Nodes (IHN) will be identified in the Local Policies Plan (LPP) which is yet to be published. The Council will consider many factors including accessibility to services and educational institutions when determining IHN's.
<b>Established Residential Areas (ERAs)</b>	
The definition of an ERA should be included within the Glossary to the dSPG with an accompanying footnote to state that there is no geographic delineation of ERAs within planning policy.	The SPG is designed to be read in conjunction with the Plan Strategy and it is made clear within the SPG that an ERA is defined in Appendix B of the PS. It is noted that the definition of an ERA is considerably longer and more complex than other definitions contained within the SPG definition, so could not be easily replicated within the glossary.
<p>Appendix B of the Plan Strategy is in place to provide definition for an ERA. This confirms that the purpose of an ERA is to protect the character of such areas. Appendix B does not seek to 'protect existing residential communities from unacceptable impacts', it is in place to protect character. This goes back to the Addendum to PPS7: Safeguarding the Character of Established Residential Areas which sought to protect areas from inappropriate development which included an analysis of density as a contributing factor to potential harm.</p> <p>An "area" is defined as a specific geographical region or space or particular function, which is measured in terms of its size, extent or characteristics. It is conflicting to say an ERA does not have a geographic delineation when it is an area with set characteristics included. Leaving it to a subjective assessment provides no certainty for development coming forward.</p>	<p>Appendix B is a definition to help determine where an ERA is, and the policy to be applied to any such ERA varies depending on which policy is referencing Appendix B. In Policy RD1 the reference to Appendix B is a character test, whereas in Policy HOU12 the reference to ERA is a locational test, asking whether a site is within an ERA or not. PPS7 no longer applies and has been purposely changed.</p> <p>ERAs will change over time as the city further develops. To try and embed precise geographic delineations for such areas into planning policy, with a 15-year time span, could reduce the reliability and flexibility. Instead, the approach taken in the PS to provide a definition for determining an ERA on a case-by-case basis allows for greater longevity and certainty.</p>
This section of the SPG is profoundly negative towards PBMSA development, creating a pessimistic undertone and failing to acknowledge the benefits that PBMSA development can have in terms of supporting local services, bringing	The SPG as a whole attempts to strike a balance between the benefits of student accommodation and the need to manage potential negative impacts associated with such developments. For example, paragraph 3.2.8 of the dSPG is highlighting potential impacts of PBMSA which could be harmful to

## Council response to key issues raised

Main issue	Council response
<p>vibrancy to the city centre and increasing the residential population of Belfast.</p>	<p>the sustainability of an ERA and, although this may be perceived as overly negative, the dSPG states in introducing this in the previous paragraph, <i>that high-quality PBMSA can make a positive contribution to the local environment, supporting regeneration through renewal of vacant/derelict sites and boosting local populations to sustain facilities and amenities.</i></p> <p>However, given the feedback provided regarding the overall tone of this section, paragraphs 3.2.6 to 3.2.18 of the draft SPG have been fundamentally re-written to help provide greater clarity in terms of the fundamental policy test in criterion a. of Policy HOU12; namely whether a site is located within an ERA, or not.</p>
<p>The 'sustainability' of an ERA must be defined in the SPG to understand what applicant's need to consider when bringing forward an application.</p>	<p>As noted above, this section of the SPG has been fundamentally re-worked to provide greater clarity. As part of this, reference to the 'sustainability' of an ERA has been removed, so no formal definition is required.</p>
<p>Paragraph 3.2.9 underestimates the value of management plans.</p>	<p>Paragraph 3.2.9 of the dSPG was not intending to undermine a PBMSA management plan, but rather was trying to explain that a management plan cannot always address all issues, and in the day-to-day operation, some pressures may still remain given the high-density form of development.</p> <p>Management arrangements create a significant difference between PBMSA and students living in the more traditional form of student accommodation in the private rented sector. However, even with effective management, PBMSA has many distinct characteristics that distinguish them from smaller-scale housing and raise many different planning issues from other forms of housing that can have significant implications for the orderly and consistent development of the City.</p> <p>For clarity, this section no longer references management plans, with Section 3.5 of the SPG remaining as the main source of additional guidance in relation to the use of management arrangements in PBMSA development.</p>



Main issue	Council response
<p>Further explanation required in relation to the note <i>'surrounded on more than two sides by residential uses'</i> in paragraph 3.2.13. This attempts to create a policy test that goes beyond HOU12 whilst attempting to define an ERA beyond Appendix B. There is much more to understanding the extent of an ERA than it being surrounded on more than two sides by residential properties. If that were the case then surely the council could identify the areas on a map. However, it is noted that criterion a. of Policy HOU 3, an important policy, refers to <i>'surrounding residential uses'</i>.</p>	<p>Paragraph 3.2.13 of the draft SPG (now paragraph 3.2.9) has been added to and amended to address this point and provide greater clarity. It now draws more extensively on the wording to the Appendix B definition, whilst retaining broad guidance regarding the surrounding context of a site. However, paragraph 3.2.10 of the SPG continues to acknowledge that whether or not a site falls within an ERA must be judged on a case-by-case basis. This strikes a better balance between providing more practical guidance to elucidate the policy, without introducing any additional policy 'tests'.</p> <p>For additional clarity, the references to Policy HOU3: Protection of residential stock in paragraph 3.2.12 of the draft SPG have been re-phrased and moved to paragraphs 3.2.15-3.2.16 of the SPG, to provide clarification on the relevance of this policy to PBMSA development.</p>
<p>An analysis of the impact as requested in paragraph 3.2.18 (supporting information) is not addressing any policy test and has not been a consideration in PBMSA development to date, for that reason. It is completely misplaced to seek to introduce this as a requirement through guidance.</p>	<p>Although part of the reasoning for the locational test for PBMSA not being located within an ERA includes the impact of the proposed development, this section of the SPG has been revised, as outlined above, to clarify that the policy test contained within criterion a. of Policy 12 is not an impact test. The requirement for supporting information contained within this section has therefore also been revised accordingly.</p>
<p>The Council should consider the application of this part of the policy within the city centre which is one area where the Plan Strategy wants to increase density. This runs contrary to that and to the pattern of PBMSA development to date.</p>	<p>As noted, the PS does seek to support high density residential accommodation in appropriate locations within the City Centre. For example, Policy SD3 City Centre seeks to support new economic and residential development to create a compact and vibrant city centre and notes that the 'Innovation District' should seek to build on the Ulster University city campus investment to promote the development of a lively mixed-use district to secure employment and residential opportunities for graduates and entrepreneurs.</p> <p>The SPG recognises at paragraph 3.2.3 that PBMSA is likely to be desirable in a highly accessible location such as the city centre, but also acknowledges that other locational factors need to be considered, such as</p>

## Council response to key issues raised

Main issue	Council response
	<p>established residential areas, other zonings and designations or the protection of the Retail Core. As with all planning decisions, a number of competing factors often have to be held in tension when reaching a decision on a case-by-case basis.</p>
<p><b>Cumulative impact</b></p>	
<p><i>The cumulative impact of PBMSA developments outside of residential areas or within the City Centre may lead to an over-concentration relative to other land uses in a specific locality...</i> and that <i>this will be considered on a case-by-case basis...</i>. It is noted that this approach is emphasised in 3.2.17 the dSPG and is, it is considered, a sound approach.</p> <p>In that context, the statement in para 3.2.15 related to <i>'ensure the balanced communities are achieved'</i> could be re-phrased to <i>'ensure that the impact on existing communities is carefully assessed'</i>. In the absence of the definition of a balanced community in the dSPG it is unclear how a balanced community might be achieved.</p>	<p>Support welcomed on assessing potential PBMSA development on a case-by-case basis.</p> <p>Comment taken on-board and will be formally factored into SPG paragraph 3.2.12 (previously paragraph 3.2.15), which will read; <i>For PBMSA development, consideration will be given to the cumulative impact of PBMSA, to ensure that the impact on existing communities is carefully assessed.</i></p>
<p>Paragraph 3.2.17 has no policy basis in the Plan Strategy and no evidence is provided to substantiate this statement. It creates nothing but uncertainty to future development. The council must consider how this sits with a policy criterion that is seeking to concentrate PBMSA within a prescribed distance from a higher education campus.</p>	<p>Paragraph 3.2.14 of the SPG (previously paragraph 3.2.17) which has been reworded.</p>
<p><b>Land Use</b></p>	
<p>The draft SPG identifies how PBMSA is residential in nature yet it is also not an appropriate use on zoned residential land. The LDP in its wholly adopted form can safeguard potential future residential development opportunities and sites. The SPG cannot act as a safeguard in the interim position.</p>	<p>The reference to safeguarding zoned residential land in the dSPG paragraph 3.2.13 was provided in the context of the wider LDP objective of safeguarding future residential development opportunities and alongside Policy HOU3: protection of existing residential accommodation. Although it is recognised that PBMSA is residential in nature, planning legislation acknowledges PBMSA is a more intensive land use, and so is a 'sui generis' use class. Given the need to protect existing residential accommodation and the LDP requirement to identify and zone a supply of housing land that is sufficient to meet the population growth</p>

Main issue	Council response
	<p>projections for the Belfast district, PBMSA may not always be appropriate on zoned housing land. Nevertheless, as noted above, this section of the SPG has been revised to provide greater clarity.</p>
<b>Design</b>	
<p>Ballooning of such ugly new-builds in some cases overshadowing beautiful Victorian, Georgian or Edwardian architecture, e.g. Bradbury Place.</p>	<p>Paragraph 3.4.2 of the SPG makes clear that the nature, layout and design of proposed schemes should be appropriate to the location and context and should not result in an unacceptable impact on local character, environmental quality or residential amenity. Further to this, criterion a. of Policy HOU12 states <i>'is not within an established residential area'</i> ensuring there is no detriment to existing, established communities.</p>
<p>If it were the case that 30 units was the same as 200 occupants, then that should have explicitly been set out in the Plan Strategy. This guidance is not the place to add this as a policy test.</p>	<p>Paragraph 3.4.15 of the SPG has been reworded for clarity purposes. It is not stating that 30 units (apartments) is the same as 200 student occupants. It is suggesting that a PBMSA development, which under criterion b. will have a minimum of 200 occupants, would be of such a scale as to share characteristics with a larger apartment development.</p>
<p>Policy OS3 ancillary open space has not been recited in full, which misses the clear differentiation between open space (for all new development proposals) and public open space. There is no requirement within Policy HOU12 or OS3 for the provision of public open space for PBMSA development.</p>	<p>Policy OS3 will be applied flexibly to PBMSA development. The Council is not encouraging balconies, but listing possible ways of providing open space dependant on the context of a development site with reference to regional guidance provided in Creating Places.</p> <p>Paragraph 3.4.17 of the SPG reads; <i>In accordance with the advice provided for apartment/flat developments in 'Creating Places', private communal open space may take the form of gardens, court yards, patios, balconies, recessed balconies or terraces, depending on the characteristics of the development proposed and surround context.</i></p> <p>Therefore, Council recognise open space will be varied depending on the development site, size and surrounding context.</p>
<b>Space Standards</b>	
<p>Complying with criterion c. of HOU12 only requires you to meet the requirements of Appendix C of the Plan Strategy, nothing more.</p>	<p>Criterion c. of Policy HOU12 is concerned with a quality residential environment, which includes a requirement to meet the space standards for HMOs as set out in Appendix C.</p>

## Council response to key issues raised

Main issue	Council response
<p>Appendix C does not specify what should be included within the space and provides no guidance on amenity space size, design quality, parking, waste and recycling etc.</p>	<p>In addition, PBMSA development has to meet requirements of a range of PS policies including a number that relate to the design of residential development. Section 3.4 of the SPG therefore seeks to address all of these things collectively under the requirement to provide a quality residential environment.</p>
<p><b>Parking/cycle provision</b></p>	
<p>The specific characteristics of PBMSA developments, both in their nature and location, should be car-free. In this context, the description that the provision of PBMSA without any parking provision as a 'risk' because it could lead to increased demand for on-street parking is inappropriate. The 'risk' of PBMSA without any parking provision should be replaced with a section on the 'benefits' of PBMSA without any parking provision.</p>	<p>As suggested, Paragraph 3.4.10 of the SPG has been reworded to remove 'risk' and have a more positive tone.</p>
<p>Accessibility requirements should extend to cycle parking provision, which should also meet the accessibility requirements and comply with DDA to ensure disabled cyclists can easily access and store their bikes. The SPG should make reference to the preferred guidance i.e. LTN 1/20 and 'Wheels for Wellbeing.</p>	<p>Specific guidance on the provision and design of cycles storage is relevant for all residential developments and is already provided within the Residential Design SPG, which reads; <i>Storage for cycles should be in a location convenient to all users and routes to the cycle storage should have level access and adequate illumination to allow for safe passage.</i></p> <p>There is therefore no need to replicate such guidance specifically within the PBMSA SPG.</p>
<p>Paragraph 3.4.11 suggests that a Transport Assessment (TA) and Travel Plan (TP) are provided to support PBMSA developments. The SPG does not refer to the completion of a Transport Assessment Form (TAF) to understand the transport impacts of a development.</p>	<p>As suggested, paragraph 3.4.11 of the SPG has now been revised to align with current practice and the Council's draft Planning Application Validation Checklist. This now refers to the use of a Transport Assessment Form to help establish if a detailed Transport Assessment is required. The list of supporting information under paragraph 3.4.28 of the SPG has also been amended accordingly.</p>
<p><b>Adaptable accommodation</b></p>	
<p>It is agreed, as noted in para 3.4.25, that the policy should be applied flexibly as PBMSA accommodation is not intended for use throughout an individual's lifetime.</p>	<p>Welcome support on adaptable accommodation for students.</p>
<p>The application of Policy HOU7 is misplaced. It clearly refers to 'new homes' in the policy. This is not applicable to PBMSA development.</p>	<p>Paragraph 3.4.25 of dSPG states; <i>As PBMSA is residential in nature, Policy HOU7 is applicable. However, given that PBMSA is explicitly targeting students and that the accommodation would not therefore</i></p>



Main issue	Council response
	<p><i>be intended for use throughout an individuals' lifetime, it is accepted that the policy should be applied flexibly.</i></p> <p>Both Policy HOU7 and RD1 refer to residential developments, and therefore will both be applied flexibly to PBMSA proposals, which is residential in nature. Most of the PBMSA developments will meet the Policy HOU7 requirements as per Building Regulations.</p>
<b>Management plans</b>	
<p>The critical importance of a PBMSA Management Plan is fully recognised. However, it is considered that the dSPG should focus on the critical elements of a Management Plan rather than the prescriptive detailed list set out in the dSPG.</p>	<p>A definition for a Management Plan has been added to the Glossary.</p> <p>The list is not intended to be prescriptive or exhaustive but does help to clarify what would be required to address this policy requirement and has therefore been retained in the final SPG.</p>
<p>While it is welcome to acknowledge fluctuations in the student residential population outside of term time, it would also be helpful if PBMSA applications addressed how periods of reduced occupancy will be managed to prevent negative impacts on the surrounding area.</p>	<p>Point acknowledged and will be included as an additional bullet point in SPG paragraph 3.5.2.</p>
<p>The guidance needs to reflect that at the point of making an application, an end operator may not be known. However, it is common for a final management plan to be submitted to the council for agreement. That will include that the operator is or becomes accredited within one year of occupation.</p>	<p>Paragraph 3.5.3 of the sPG has been reworded to reflect the fact that an operator may not be known at the time of submitting a planning application to Council, with a clause included to submit a final management plan, prior to occupation.</p>
<p>PBMSA development have the requirement for greater levels of engagement with the local community, coordinated by their management teams and secured through legal agreements. This supports community cohesion and engagement with local community and student residents. However, we disagree that there should be direct engagement between students and the local community, but rather, if liaison is to take place, this should come from the operator/management of the PBMSA.</p>	<p>Paragraph 3.5.8 of the SPG has been reworded to clarify that the formal engagement should be co-ordinated through the operator, rather than the students themselves.</p>
<b>Need</b>	
<p>The market will decide if there is a need for further PBMSA development. BCC</p>	<p>Whilst the market should regulate itself in terms of PBMSA delivery, the LDP as a whole seeks to seek to address current and future</p>

## Council response to key issues raised

Main issue	Council response
<p>should recognise that the industry will regulate itself if demand is not there.</p>	<p>residential needs by ensuring sufficient land is made available to meet all future housing requirements and Policy HOU12 requires an assessment of need for the type of accommodation proposed. Therefore information is required on the profile of local student demand and the state of current and future accommodation supply to ensure the successful delivery of student housing to meet current and future need.</p>
<p>To support planning applications, Councils should make information pertaining to current or future levels of PBMSA development available publicly upon request. This would involve the Council, maintaining a record and it would inform those wanting to come forward with PBMSA development.</p>	<p>The Council monitors PBMSA developments which have been completed since 2015 on an annual basis, including those developed, under construction, with planning approval, pending approval, and those refused planning permission, etc. This information will be made publicly available via an online map viewer when the revised PBMSA SPG is formally published.</p>
<p>The universities are often unwilling to share the information they hold on accommodation needs. This can make it difficult to understand the baseline and future trends. If university or financial institution support cannot be provided, it should not be assumed that there is no need for a development.</p>	<p>The list does state university support, if it is available. Therefore, it would not be considered necessary.</p>
<p>The Council should continue the approach of comparing Belfast to other major university cities in the UK</p>	<p>Council agrees this is a valid way of considering the need for PBMSA developments. This is acknowledged under paragraph 3.6.9 of the SPG. In recent consultation responses on proposed PBMSA development in Belfast, the Council has made comparison to other UK cities, and compared student numbers to bedspaces, to gauge market saturation.</p>
<p>Bank funding will often be dependent on planning permission being granted so it would not be possible to submit this information during the planning application process. This is not a prerequisite for planning, and therefore this reference should be removed.</p>	<p>The PBMSA Statement relating to the assessment of need will be revised to remove this point from the list under paragraph 3.6.9 of the SPG.</p>
<p><b>Subservient Use</b></p>	
<p>The use of PBMSA for non-student guests both during and outside of term time should be assessed on a case-by-case basis subject to the use remaining subservient to the main function of providing accommodation for students.</p>	<p>Paragraph 4.1.3 of the SPG has been reworded to remove the references to term-time.</p>

Main issue	Council response
<b>Planning Agreement - S76/condition</b>	
A more appropriate timing for the payment of the monitoring fee would be on occupation of the development rather than commencement of development.	The Council is required to monitor delivery of development in accordance with any s76 Agreement so, as is common practice, the monitoring fee is paid on or before the date of commencement of development.
<b>Miscellaneous</b>	
Policy HOU12 can be perceived as discrimination against a small business class that was actually reflective of the demographics of the city.	The purpose of the PBMSA SPG is to supplement and clarify Policy HOU12 of the PS. The PS was subject to Independent Examination (IE) and was found to be sound. It was subsequently adopted in May 2023.
Foreign investment into PBMSA not having regard for Belfast local economy.	There is a recognised need for PBMSA in the city, and therefore the PBMSA SPG (2016) is being updated to reflect Policy adopted in the Plan Strategy (PS) – namely Policy HOU12. Additionally, the origin of an investor is outside the scope of planning.
The wording used in relation to 'Community Benefit' should reflect the SPPS (para 5.71) which states that <i>'In some circumstances, community benefits may be offered voluntarily by developers to communities likely to be affected by a development.'</i>	Paragraph 4.4.1 of the SPG has been revised as suggested.
SPG should also extend to the protection of high value employment-generating sites within the City Centre.	Any land which is zoned for employment use would be protected and would not be suitable for PBMSA.
Throughout the SPG, any references to University should be referred to consistently "higher education campuses"	Any reference to university/college will be revised to higher education institution campus (HEIC), for consistency.
<b>Consultation process</b>	
Consultation is not democratic and is easily subverted by commercial vested interests.	The consultation for the dSPG ran for 12 weeks up until Thursday 21 November 2024, inviting anyone to provide comments. The dSPG was advertised in the Newsletter, Andersonstown News and the Irish News for broad circulation in the city and was also advertised on the Council website. The process was intended to be informative, user friendly, inclusive and conducted in an open and transparent way. Every effort is be made to engage the community, record views and provide feedback.

## **Appendix A: Respondents**

The following organisations/individuals provided a response to the consultation on the proposed SPG documents:

### **Individual**

- Anonymous – Respondent No 1
- Anonymous – Respondent No 2

### **Educational body**

- Queens University Belfast (QUB)


### **Private Sector**

- Turley, TSA Planning & Clyde Shanks



## Appendix B: Copy of Newspaper Adverts

- Newsletter (6 September 2024)



**Belfast  
City Council**

### Local Development Plan

#### Draft Purpose Built Managed Student Accommodation (PBMSA) Supplementary Planning Guidelines (SPG)

Belfast City Council has prepared draft Supplementary Planning Guidelines (SPG) associated with Policy HOU12: Large Scale Purpose Built Managed Student Accommodation (PBMSA) contained in the Belfast Local Development Plan (LDP) Plan Strategy. SPG represents non-statutory planning guidance that supports and clarifies planning policies and is intended to assist policy implementation.

The Council is publishing the draft PBMSA SPG for public consultation. The draft SPG will be available for public inspection from Thursday 29 August 2024 and submissions may be made during the public consultation period, which will close at 5pm on Thursday 21 November 2024. Submissions received after this time will not be considered.

The draft SPG will be available online at [www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP) from Thursday 29 August 2024. It will also be available for inspection at the Cecil Ward Building, 4-10 Linenhall Street, Belfast, BT2 8BP during normal public opening hours. Submissions can be submitted online using the Belfast City Council consultation site accessible at [www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP) - submissions may also be made by email to: [localdevelopmentplan@belfastcity.gov.uk](mailto:localdevelopmentplan@belfastcity.gov.uk) or by post to: Local Development Plan, Belfast Planning Service, Cecil Ward Building, 4-10 Linenhall Street, Belfast, BT2 8BP.

If you have any queries on the draft SPG, Belfast Planning Service may be contacted on 028 9050 0510 or [planning@belfastcity.gov.uk](mailto:planning@belfastcity.gov.uk) (Monday to Friday) at Belfast City Council, Planning Service, Cecil Ward Building, 4-10 Linenhall Street, Belfast, BT2 8BP.

Copies can be obtained, by writing to the above address, emailing [planning@belfastcity.gov.uk](mailto:planning@belfastcity.gov.uk) or calling 028 9050 0510.

[www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP)





- Belfast Media Group Titles - Andersonstown News (14 September 2024)

14 September 2024

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**Belfast City Council** **Local Development Plan**

**Draft Purpose Built Managed Student Accommodation (PBMSA) Supplementary Planning Guidelines (SPG)**

Belfast City Council has prepared draft Supplementary Planning Guidelines (SPG) associated with Policy HDU12: Large Scale Purpose Built Managed Student Accommodation (PBMSA) contained in the Belfast Local Development Plan (LDP) Plan Strategy. SPG represent non-statutory planning guidance that supports and clarifies planning policies and is intended to assist policy implementation.

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[www.belfastcity.gov.uk/LDP](http://www.belfastcity.gov.uk/LDP)

**LICENSING OF PLACES OF ENTERTAINMENT RENEWAL APPLICATION FOR AN ENTERTAINMENTS LICENCE pursuant to Art. 3 of the Local Government (Misc Provisions) (NI) Order 1985**

TAKE NOTICE that an application dated 14th September 2024 was made for a 7 day annual entertainment licence for: **ARDYNE WORKING MENS CLUB, 98 Kerr or a Street, Belfast BT14 7E.**

Permitting: Dancing, singing or music or any entertainment of a like kind. Equipment for the playing of billiards, pool, snooker or other similar game.

Representation in relation to this application may be made by giving notice to the Head of Building Control, 5th Floor, 9 Lanyon Place, Belfast, BT1 3LP, stating in general terms the nature of the representation, no later than 28 days after the date of the application.

Brendan Mallory,  
24 Flux Street, Belfast, BT14 7EJ

**Deadline 4pm  
Tuesdays for the  
Andersonstown News  
and North  
Belfast News.**

**Log onto  
[www.belfastmedia.com](http://www.belfastmedia.com)**

**LICENSING (NORTHERN IRELAND) ORDER 1996 (Article 22, Schedule 5, paras. 1 and 2)**  
Notice of application for the transfer of a licence  
Petty Sessions District of Belfast Magistrates Court  
County Court Division of Belfast

TAKE NOTICE that I, Gerard Carfike, intend at the magistrates' court sitting at Belfast Magistrates Court on 8th October 2024 at 10.00 am to apply for the transfer to me of a licence at present held by Sarah Louise Carfike for the premises at Unit 2, 6 Kennedy Centre, Belfast at 504-503 Inis Road, BT1 8AE being premises of the following kind according to the Licensing (Northern Ireland) Order 1996, namely premises specified in Article 5 (1)(e) - a restaurant, i.e., premises (other than those referred to in Article 5(1)(a) of the Order) substantially adapted and used, or intended to be used, for the purpose of providing persons frequenting the premises with a main table meal at midday or in the evening, or both; The present licence is due to expire on 30th September 2027

TAKE NOTICE that at the same time I intend to apply to the court to renew the licence

Dated this 4th September 2024

**"Counseling has given me the tools to still be sitting here today."**

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**CANCERlifeline** VISIT OUR SHOPS AT 56 KING ST (02890 744975)

Funded by: **DfC** Department for Communities, [www.communities.ni.gov.uk](http://www.communities.ni.gov.uk)

**Joseph's Deaf Centre** Belfast

**Interested in learning Sign Language?**

Adult courses in Joseph's Centre for the Deaf, Zoom and Course for Community groups:

**Face-to-face and Zoom courses**

BSL & ISL for beginners and BSL Intermediate.

- \*Every Day Signs for Community Groups (6wks beginner)
- Introduction to Sign language (10wk BSL beginner)
- Intermediate sign language (10wk BSL beginner)
- Introduction to Irish Sign Language (10wk ISL beginner)
- Zoom taster course (4wk course)

Courses run from Sept 2024 – March 2025

\*Community Groups interested in running a 6wk sign language course: contact 07963697134 or [josephscentreforthedeaf@yahoo.com](mailto:josephscentreforthedeaf@yahoo.com)

Day - Saturday	Introduction to British Sign Language (BSL) date:
Sat: 10.30-12.30pm	21 <sup>st</sup> Sept – 30 <sup>th</sup> Nov

Day - Saturday	Introduction to Irish Sign Language dates: (ISL)
10.30-12.30pm	12 <sup>th</sup> Jan – 22 <sup>nd</sup> March 2025

Day - Saturday	Intermediate sign language course dates
Sat: 1pm – 3pm	11 <sup>th</sup> Jan – 22 <sup>nd</sup> March 2025

Day - Saturday	ZOOM- 4wk taster course
Sat: 11am – 12pm	9 <sup>th</sup> Nov – 30 <sup>th</sup> Nov      28 <sup>th</sup> Jan – 8 <sup>th</sup> Feb

For more information contact:  
 Yaphair: 07963697134, [josephscentreforthedeaf@yahoo.com](mailto:josephscentreforthedeaf@yahoo.com) or  
 Website: [www.josephscentreforthedeaf.co.uk](http://www.josephscentreforthedeaf.co.uk)

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**[www.pipscharity.com](http://www.pipscharity.com)**

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**[belfastmedia.com](http://belfastmedia.com)**