Outlook

HMO Policy Comments

From D AGNEW [redacted]
Date Tue 29/09/2026 18:02
To Local Development Plan <ldp@derrystrabane.com>

Dear Sir / Madam,

We wish to give our backing to the 10% HMO cap, as per the comments in the following document which addresses points 4.3 to 4.7 of your POP.

We agree with all the responses and are strongly opposed to any further increase in the number of HMO's in Derry.

https://acrobat.adobe.com/id/urn:aaid:sc:EU:56877aba-a782-479c-91f4-608b19119e09?viewer%21megaVerb=group-edit

Kind regards

Daniel Agnew
Angela Agnew
Thomas Agnew
[redacted] De Burgh Terrace, BT48 7LQ

	Council Preferred Option	Our Preferred Option
4.3 Percentage Cap	Option 1: 10% cap during transition period and 10% outside future HMO Management Areas.	**Option 1: Fully support.** • 10% is recognised as a tipping point above which communities are adversely affected. • 10% still allows for HMO development distributed in a more equitable way. • The evidence on which the council proposed 30% is now recognised as out of date and inaccurate (EVB 16b).
4.4 HMO Management Areas	Option 2: Designate HMO Management Areas where up to 30% HMOs would be permitted.	**Option 1: 10% everywhere** • We believe 10% should apply everywhere in the city and district. This is fair to everyone who lives here. • A 10% threshold coupled with other forms of accommodation including PBSA can satisfy housing demand.
4.5 Concentration / Sandwiching	Option 3: Anti-sandwiching and adjoining-HMO controls, without a radius test.	**Option 2: Bristol-style approach.** • This option introduces anti-clustering and anti-sandwiching protections, and considers the impact of HMO in adjoining streets. • This approach provides a clearer and quantifiable method for calculating HMO density.
4.6 Definition of Dwelling Units / Houses	Option 2: Exclude flats/apartments, blocks of flats and short-term lets from the denominator.	**Option 3:** exclude flats/apartments ≤100m², short-term lets, NIHE/HA dwellings, etc. • This option better records the impact on residential communities of ALL types of transient housing which have the same impact as HMO (such as holiday lets or emergency housing).

		•
4.7 Definition of Street / Area	Option 2: Consider adjacent and nearby streets using professional judgement.	**Option 3: Defined radius or wider area assessment.** • Similar to 4.5 option 3 gives a 10% HMO cap across the city and district. • Option 3 introduces a 50m boundary that prevents reliance by planners on 'professional judgement' or the use of ambiguous terminology, for example 'nearby' and 'adjoining' as a way of calculating HMO numbers.