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Sent: 30 September 2026 18:27
To: Local Development Plan
Subject: HMO consultation response Ulster University
Attachments: HMO Consultation Response September V2. .docx

Please find attached the university response.

Thanks,

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Ulster University response to the proposed revision of Policy HOU 13

Ulster University does not support the proposed reduction of the interim HMO threshold from 30% to 10%. The Council has not demonstrated that sufficient alternative accommodation will be available to meet student demand during the transition to the Local Policies Plan. Introducing this restriction before HMO Management Areas are designated risks constraining accommodation in locations that may subsequently be considered suitable for a higher concentration.

The University supports the protection of residential amenity and recognises residents' concerns about noise, parking, waste and property management. It accepted the existing policy as a reasonable balance between those concerns and the need for shared housing. Retaining the 30% threshold would continue to allow individual applications to be assessed against the wider planning requirements; it would not give applicants an automatic right to approval.

Student growth and accommodation demand

The University, Magee Taskforce and Northern Ireland Executive remain committed to a campus of 10,000 students. The January 2026 Taskforce update records projected enrolment of 6,505 for 2025/26, compared with 4,065 in 2021/22—growth of approximately 60%. Applications increased by 21% for 2025/26. Reaching 10,000 will require a further increase of almost 3,500 students.

Accommodation is already affecting recruitment. University waiting lists, reports of sofa surfing and students commuting because they cannot secure suitable housing demonstrate the pressure on supply. Taskforce minutes from September 2025 also record that some students were unable to accept places because accommodation was unavailable.

The January 2026 update identifies shortages of both purpose-built student accommodation (PBSA) and HMOs as a significant constraint on expansion. The December 2024 Action Plan estimated demand for a further 3,600 residential units to support 10,000 students. Although that estimate requires updating, the scale of the requirement is clear.

HMOs remain essential, particularly for returning students seeking independent accommodation and those requiring different rents, contract lengths and living arrangements. PBSA may contribute to future supply, but cannot be assumed to replace shared housing at the same cost or within the required timeframe. In addition there is no evidence to suggest that PBSA will be developed at the affordable rates required to be accessible to students unlike the development of HMO accommodation.

The evidence for a lower threshold

The Planning Appeals Commission's May 2024 examination report, paragraph 4.42, accepted the 30% transitional threshold and found that a 10% threshold would prevent HMOs in suitable locations. The Council should explain what new evidence justifies departing from that finding.

The consultation's reference to approximately 1,100 proposed PBSA units does not establish whether those units will be developed, how they will be funded or whether it will be affordable. Similarly, applying a percentage to the number of properties near campus establishes theoretical capacity, rather than accommodation that landlords are willing and able to provide.

Before relying on these estimates, the Council should assess actual opportunities street by street, taking account of existing HMOs, property suitability, the proposed exclusions and clustering rules, conversion costs and demand from other households. PBSA supply should be assessed against confirmed funding, construction programmes and expected rents, including the consequences of delayed delivery.

Response to the consultation options

The University's position is as follows:

- **Percentage threshold:** retain the existing 30% transitional threshold. A 20% alternative should be tested against local evidence; it should not be adopted simply as a compromise.
- **Management areas:** retain and progress HMO Management Areas, with boundaries informed by accommodation demand, accessibility and residential character.
- **Clustering and sandwiching:** support proportionate protection for neighbouring households, subject to clear definitions and an assessment of the combined effect on housing supply.
- **Counting dwelling units:** retain consistent counting of substantive residential dwellings unless exclusions are justified. Excluding flats could increase the calculated HMO concentration without any additional HMOs being created.
- **Street boundaries:** allow consideration of immediately adjacent streets where justified, using published rules and mapped calculations. References to "nearby" streets must not introduce uncertainty or an undefined wider restriction.

The Council should also clarify the implications for existing lawful HMOs, licence renewals, ownership transfers and pending applications. It should assess whether restrictions could encourage alternative uses, including short-term letting, rather than assume that affected properties will return to settled family occupation.

The University asks the Council to retain the current transitional arrangements while completing a joint assessment of accommodation demand, deliverable supply, affordability and neighbourhood impacts. Any subsequent tightening should be linked to accommodation becoming available and should include annual monitoring and review.

Magee's expansion is a shared commitment. The HMO policy must protect established communities while providing a practical route to house the students on whom that expansion depends.