Derry City and Strabane District Council
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To:

DCSDC Local Development Team

98 Strand Road, Derry, BT48 7NN

August 27th, 2026

From:

Thé Gateway Community Group

% Maureen Moriarty

[redacted] Abercorn Terrace, L,Derry, BT48 6SE

Email: [redacted]

Re: LDP HMO Policy Options Paper 2026 consultation submission

Thank you to the DCSDC Local Development Team and Planning Committee Members for the opportunity to put our views forward at this time.

No doubt that the focus is on the bumps in the road for Magee's expansion. We, too, recognize the need for this expansion. We sincerely hope that this is only a bump that will soon be smoothed out!

Our goals in this submission are as follows:

!. To save the fabric of our residential community

2. To establish a 70% level of long-term residents on each residential street in the Gateway Community area. The other 30% is to cover Tourism, Tradespeople and Students.

3. That our residents can truly have the trust needed to maintain a stable, safe and secure area where they feel 'connected' to their neighbors.

4. That this type of care will be taken when planning decisions are made.

5. To support the elected representatives, statutory bodies and agencies who are focusing on finding the proper and sustainable support needed to help the vulnerable overcome the obstacles they face and to eventually be able to be placed in a permanent housing situation that they can really call Home.

The Gateway Community Group was formed in August 2023 after many anti-social incidents occurred. These incidents emanated from occupiers of several houses that were operating in HMO style both with and without HMO licenses. Over 100 residents attended the Guildhall to draw the attention of the Mayor and Council to the many problems that were occurring.

Since that time, representatives from the Gateway Group have met with MLAs, City Councillors, Planning Committee, Housing Executive, City Centre Initiative and PSNI Representatives. A comprehensive survey of residents' views was submitted to Council in the spring of 2024. Many submissions of objections to certain HMO planning applications have been sent to the Planning Committee over the past three years.

We have had some improvement in that there is now a 4-bedroom cap and for the Council's recognition of the need for a 10% limit on HMOs. We have noted and appreciate the members of Council who are helping with this endeavour.

While recognizing that we are where we are and that Derry/Northern Ireland is not alone in the housing crisis, we believe that Temporary Housing for the vulnerable needs to be avoided as much as possible. Investment in proper treatment centres for substance abuse and other long-term mental health issues is a growing need. This needs to be followed by some form of employment activity and an independent Permanent residence that they can truly call home with support services provided on sight in the long run if needed. We would point to Finland as one example where notable success has been achieved. Although not perfect, it is far ahead of other countries. Although the same goals are listed under 'Housing First' here, the housing /support practices are lacking in practice, possibly due to funding priorities? (Finnish Institute for Health and Welfare)

<u>In the Draft Preferred Options Paper for Revision of LDP Plan Strategy re HMO Policy HOU 13:</u>

Page 9. 10 'Effective community...to make submissions, so as to strengthen

the evidence base...'

We do hope that the Council and Planning Dept. have saved the Gateway Community Group's correspondence over the last three years to use as evidence. We do have copies but hopefully the extra work involved in producing them again will not be needed.

Page 20. 3.25 'but further supportive evidence will be required '.

Please clarify what will be needed to substantiate the points.

Draft POP cont..

Page 21 3.30 Comment: 'The definition of HMO is different'...

We agree. We prefer some of the standards within the Bristol report.

Proposals must not create:

-The sandwiching of a single self-contained house or flat between two HMOs;

-Or more than 2 HMOs within a run of 20 properties on either side of the road.

(The point being that occupants of HMOs placed too close to each other have in the past taken over streets with noise and running in and out throughout the night because access was so convenient. This occurred in the past with students in Abercorn Place.)

The evidence from Doncaster showed that 57% of known HMOs generated complaints and required formal intervention from the Enforcement Team in the previous 5 years. This is compared to 9.4% of other domestic properties in the same time period.

The Doncaster Council introduced additional licensing in 2018.

The Gateway Community Group wants specific licensing for HMOs.

Tourism/Short contract Tradespeople/Asylum combined as one license.

Students/ Off Peak School term for Tourism/Short contract Tradespeople combined.

We do not want bail housing in the Gateway Community Group area. We are an area of predominately middle-aged to older people, many who are affected with the health problems that older age brings.

We have experienced having an intimidating murderer, a couple of paedophiles, a stabbing. A hijacked pizza delivery van and many people with addictions being placed here. There have been needles and liquor bottles in the streets, the park and in the back lanes. There has been fighting in our streets, unwarranted door knocking, a fire in an unlicensed HMO type of house, drug fumes leaking into adjacent homes, unauthorized entries and other attempted entries. There are quite a few incidents that go unreported due to fears of reprisals, both material and physical.

While things did quiet down for a while, there have been 4 disturbing reports lately.

-20th July, 2026-Derry woman, determined by the District Judge to be' too high risk to be let out into the community'. This woman's address was given as Abercorn Road. She

was previously barred by the court from this area after attacking a resident and the police. She was remanded until September 4th.

-12th August- Derry man resident in Carlisle Road accused of actual bodily harm, affray and making threats to kill. He has 33 previous convictions. He was remanded in custody.

-August 17th – A woman placed in John Street assaulting two women occasioning actual bodily harm and charged with a drug connection. 26 previous convictions. Remanded until Sept. 10th.

- August 21st - A 23 year-old man of Abercorn Road in court for 4 charges of assault on a male, assault on Police, disorderly behaviour, criminal damage to a Police vehicle. He received 200 hours of community service.

-22nd August – A man found lying on the ground, vomit around his face.

=26th August – Last night, loud disturbance at [redacted] Abercorn Road at midnight. Intoxicated female occupant of [redacted] shouting. When asked to go inside and tone it down by a local resident she replied coming up to his face in a tirade of 'Fs' and continued shouting at another female occupant of [redacted] Two boys/young men took her over to the park area and then eventually the other woman got her back into [redacted]

[redacted] at First Housing was contacted. She said she would pick-up a colleague and come out. They arrived at1 a.m. and stayed only a couple of minutes. Today a mother and a very young child were placed in [redacted] with the other occupants.

Would this not be a child welfare issue?

We hope that you can empathize with local long-term residents' reluctance to report ASB activities. Their fears are not without evidence of harmful behaviour.

Adding even more injury and insult to long-term residents, the 'material considerations' in planning applications for HMOs do not take into consideration the fact that having an HMOs nearby devalues their home financially by 10 to 30%. This deduction of tens of thousands of pounds is being transferred to investors and has not only depleted family homes availability but substantially reduces the amount of inheritable wealth that

could otherwise be passed on within the working class. Some local adult children of long-term residents have said they see no future here after their parents are gone.

Northern Ireland is being well advertised in the UK and other countries as a great opportunity for higher yield profits. This is a business with many forming limited companies.

HMOs are predominately placed in lower priced housing areas.

The Prime Minister Andy Burnham has intentions to place HMOs in higher income areas. It will be interesting to see if his intentions succeed.

The long-term effects of using housing as a commodity, a business opportunity, are

-Widening the division between economic classes. People who do not have sufficient financial backing from their family have been and are being pushed further away from ownership.

- Tenants are increasingly paying 30 to 40% of their income on rent alone, leaving little or nothing to save for that rainy day or a future home purchase. This is a downward spiral.

- As well as depleting the availability of family homes, it is determining who can leave home to start a necessary, independent, confident and fulfilling life.

-It delays the start of a family, which also affects schools and related institutions.

Inequality leads to social unrest.

Our view is that land wealth should be a long-term sustainable benefit to a wider society. We support affordable social housing where the government has controlling shares. We believe this will deliver a better economy, both locally and nationally.

As it stands at the moment, the housing market is failing the people. HMO living is not comfortable for most people. We consider them to be a desperate temporary solution to a housing crisis and not a desirable way to live long-term. Shared bathrooms and kitchens present many problems and are considered by most occupiers as only a very temporary measure. The older the occupier, the more uncomfortable they become with the shared living circumstances.

Nonetheless, we are where we are and we accept that some HMOs are needed at this point in time. We would like to see apprentice training programmes for revitalizing our vacant homes for occupancy.

There needs to be a moral core.

We have heard the Pontius Pilate defense and the 'we must deliver the highest return for our clients' argument from the different sections of the housing market and decision makers ... the majority of whom do not reside in the Gateway Community area.

Developers, Planning agents, Estate agents, Management agencies,

HMO owners, potential buyers and sellers.

All the above should take account of the stated goals of Policy HOU13...

-To prevent creeping unmanaged HMOs in standard residential streets and

the applicants must include a detailed Planning Statement tracking local street counts and proof that thresholds are respected.

Neither of these goals/rules appear to have been applied in the GCG area where many houses were used in HMO style and oversaturation in concentrated areas have already taken place.

Care needs to be taken as to how we fill our houses! Desktop surveys are not showing the reality of the situation.

Ref: Preferred Options Paper (POP) for Revision of LDP Plan Strategy re HMO Policy HOU 13 July 2026

Page 24. Which Policies to Revise?

The other issues, concerns and interpretations mentioned are very much part of our consideration in choosing our choice of options as they have had a detrimental impact on our living conditions. We look forward to having them satisfactorily addressed.

We are also asking that a person from the Gateway Community Group should be included in the decision making in circumstances where 'Professional Judgement is being used in 'Exceptional Circumstances' as we view local knowledge to be necessary.

4.3 What Percentage Cap?

We agree with your Preferred Option 1 of a 10% cap for the transition period. The Gateway Community Group does not approve of being included in a 30% area.

4.4 What Geographical Area(s) Should the Percentage Cap(s) Apply In?

We believe that it is unreasonable to ask this question and unreasonable for us to be able to answer it until we have a clear, written response from Council as to the placement of people by the Housing Executive and the Department of Justice is going to be handled. We do not want to put the cart before the horse in this scenario.

The Gateway Community Group area is rich in history of manufacturing, historical events, notable people, connections to outside countries...we want our area to be developed in ways that protect the residential character and the heritage of the past. We do not want it to be used as it has been in recent and current times.

4.5 Should the PS-R Include Policy Restrictions on Concentrations/Sandwiching?

Our choice is Option 2. Apply a Bristol type of policy. Again, if a GCG member is included in the decision, a more accurate and less complicated picture of the area surrounding the application can be obtained.

4.6 Should the PS-R Amend/Clarify the Definitions of Dwelling Units...?

Our choice is Option 3. Exclude existing and approved future numbers of planned flats/apartments, short-term lets, NIHE and HA dwellings. The NIHE/First Housing placements, in particular, have been the source of many of the ASB incidents.

4.7 Should the PS-R Amend/Clarify the Definitions of 'Street/Area'...?

We cannot choose any of the three options as given.

The Bristol type of radius measurement would better protect from oversaturation.

For example: the Mountjoy Street HMO is very close to the one in Upper Bennett Street. Both are very close to Victoria Place, St. Joseph's Ave., Harding Street and Abercorn Road. Therefore, a radius would need to be applied to avoid oversaturation rather than including all the houses on nearby streets. Including all houses on nearby streets would skew the percentage numbers lower when in reality oversaturation would occur.

SUMMARY:

The Gateway Community Group wants to retrieve and maintain a peaceful, safe, secure and sustainable area. We have had to endure too many upsetting ASB incidents over the past four years. The developments of John Street and Abercorn Road are bringing hundreds of new residents.

We hope to build community connectivity with the new residents. We have found this to be a one-sided transaction with the majority of HMO/temporary and Emergency house occupants. We will continue that endeavor.

It is always important that we care for our existing residents and housing stock, to protect them from further harm, even more so in times of financial restrictions being placed on us by outside factors.

We hope that you find our submission helpful to you in backing up the need for a 10% cap on HMOs.

Best regards,

The Gateway Community Group

H. Mc Auley-Chair

N. Kelly-Vice Chair

M. Moriarty – Secretary

E. McCallion, Treasurer