Outlook

LDP Plan Strategy Revision (PS-R): CC&G Response

From Sharon Mulhern [redacted] >
Date Tue 29/09/2026 12:17
To Local Development Plan <ldp@derrystrabane.com>

1 attachment (214 KB)
DC&SDC POP Consultation re HMO Policy council response 290926.pdf;

Good afternoon,

Please find the attached response on behalf of the Council.

Kind regards.

Sharon

Sharon Mulhern

Principal Planning Officer

Development Plan/Protected Trees/Conservation Area Manager

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[redacted]

Causeway Coast & Glens Borough Council

RTPI Chartered Town Planner

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Causeway Coast & Glens Borough Council

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Date: 25th September 2026

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Dear Proinsias,

Re: Derry City & Strabane District Council LDP Plan Strategy Revision (PS-R) Preferred Options Paper (POP)

Thank you for your letter dated 9th September 2026 in relation to the above. I wish to respond on behalf of the Council.

The Council notes that the principal proposed change is to reduce the current interim HMO threshold from 30% to 10% across the District pending adoption of the Local Policies Plan (LPP). Following adoption of the LPP, the proposed approach would retain HMO Management Areas within which a 30% threshold could apply, with the 10% threshold applying elsewhere.

The Council also notes that additional controls relating to the spatial concentration of HMOs, including restrictions on sandwiching and adjoining HMOs, together with revisions to how dwelling units and the geographical area are defined for percentage calculations.

The Council acknowledges the rationale for reviewing the policy in light of changed circumstances since the original HMO evidence base was prepared. In particular, the POP identifies the longer than anticipated period before adoption of the LPP, increasing development pressure associated with the planned expansion of the Ulster University at Magee, and concerns regarding the concentration of HMOs and their potential effects on residential amenity and established communities.

It is noted that the existing 30% interim threshold was considered through the Independent Examination of the Plan Strategy, where the Planning Appeals Commission accepted the Council's position that a 30% threshold was appropriate during the transitional period and that applying 10% could prevent HMOs in otherwise suitable locations. The proposed departure from this recently examined position should therefore be supported by a robust and proportionate evidence base demonstrating the material change in circumstances and the justification for the particular threshold selected.

The POP identifies an important balance to be demonstrated. HMOs provide an important source of accommodation for students, single-person households, young professionals and migrant workers. The Magee Expansion Taskforce has identified constrained student accommodation supply as a potential limitation on future university growth. However, concentrations of HMOs should not adversely affect residential amenity or the character and balance of established residential areas.

In this regard, while the POP identifies local resident concerns it also acknowledges that further evidence is required to substantiate a number of these matters. Any revision should demonstrate the relationship between the identified impacts and the particular policy measures proposed, including the evidence supporting 10% as the appropriate threshold, rather than an alternative percentage.

The proposed clarification of how HMO percentages are calculated is welcomed in principle, particularly where this would improve consistency and certainty in decision-making. Implications likely to arise from excluding flats/apartments and short-term lets from the denominator, and of extending consideration to adjoining or nearby streets, should be clearly evidenced and defined to ensure that the resulting policy is transparent, easy to understand and capable of consistent application.

Overall, the Council raises no objection in principle to the review of Policy HOU 13. Any resulting revision should be underpinned by robust, locally-specific evidence demonstrating both the need for this intervention and the justification for the particular form and level of restriction proposed. This will be important in demonstrating that the revised policy is sound, proportionate and consistent with the wider objectives of the Council's LDP, including the provision of housing and support for sustainable economic and university-led growth

Please do not hesitate to contact me should you have any queries regarding this.

Yours faithfully,

Sharon Mulhern

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Principal Planning Officer

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