

c/o Blackett, Hart & Pratt, LLP  
Aire House  
Mandale Business Park  
Belmont  
Durham, DH1 1TH  
18 October 2023

**DM/23/02504/FPA**

**Alterations and extensions to the existing property with change of use  
to provide 4 no. total C4 small Houses in Multiple Occupation (1 no. existing)  
45A Sunderland Road Gilesgate Durham DH1 2QH**

Dear Ms Penman

The City of Durham Trust is of the view that this application is so puzzling and inconsistent that it must be refused.

The application is described as being a “change of use to provide 4 no. total C4 small Houses in Multiple Occupation (1 no. existing)” but the Planning Statement speaks of just a C3 flat and a separate bungalow.

The NDSS Statement states that the standards “have been applied to the two flats which form the content of the current application”. Again, only two dwellings are referenced but this time they are both flats with no mention of a bungalow.

The Design and Access Statement’s vague formulation is “Two additional units proposed for young professional rental.”

There is no consistency among these statements and none of them correspond to an application “to provide 4 no. total C4 small Houses in Multiple Occupation.”

If, however, we consider the application as described in the title, the addition of 3 C4 HMOs to an existing HMO would be ruled out by the fact that the HMO percentage within 100m of the property is 36.7%. (CDP Policy 16.3). This is presumably why the applicant is trying to muddy the waters with the various descriptions of what is proposed.

Further evidence of confusion or deliberate obfuscation is the fact that their Planning Statement is at pains to claim that CDP Policy 16 should not apply to this application, but they base their claims on an assessment of Part 2 of the policy which relates to PBSAs and not to HMOs.

# THE CITY OF DURHAM TRUST

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**This application is just the latest in a long series of applications seeking to increase the HMOs at this property. DM/20/00493/FPA was refused. DM/20/03655/FPA & DM/22/02837/FPA were both withdrawn.**

**The City of Durham Trust maintains that the current application is equally unacceptable and must be refused.**

**Yours sincerely**

**John Lowe  
Chair, City of Durham Trust**