

# THE CITY OF DURHAM TRUST

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

**DM/23/02700/FPA**  
**58 Bradford Crescent, Durham**

Dear Ms Hurton

I am writing to object to the application to convert this C3 family home into a C4 HMO.

The obvious place to start is with County Durham Plan (CDP) Policy 16.3 which blocks such conversions where the percentage of HMOs within 100m radius is 10% or more. In this case the stated percentage is 9.4%. This is so close to the tipping point that it is worth re-checking the figures, particularly because the official notice says that there is an unimplemented consent at no.61 Bradford Crescent while the letter from no.60 Bradford Crescent says that this is already occupied as a HMO. Perhaps there are inaccuracies in the data.

However, Policy 16 is not the only policy relevant to the introduction of HMOs in any neighbourhood. There are available a number of environmental policies that carry the same weight and should also be used to make a balanced decision on any application. These policies include Part 12 of the NPPF and CDP Policy 29.

Part 12 of the NPPF is a baseline policy that sets the platform to achieve well-designed places. It offers guidelines as to how this target can be reached by requiring sustainable buildings and by making certain that developments will always add to the overall quality of an area, not just for the short term but over the lifetime of the development.

CDP Policy 29a requires developments to “contribute positively to an area’s character, identity, townscape and landscape features”, and “to create and reinforce locally distinctive and sustainable communities”. There is ample evidence from local residents in Bradford Crescent that the conversion of family homes to HMOs has had the opposite effect. Similar criticisms can be made of HMOs’ failure to comply with the requirement of CDP 29e to provide “high standards of amenity and privacy and minimise the impact of development upon the occupants of existing adjacent and nearby properties”.

The large number of objections from local residents, local Councillors and the MP is testimony to the fact that converting family homes to HMOs has already damaged the amenities of local residents and any further conversions would only make matter worse.

Yours sincerely

John Lowe, Chair

City of Durham Trust