

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

Web site: <https://durhamcity.org/>

26 April 2026

Mr Mike Allum  
Strategy and Delivery Manager – Regeneration, Economy and Growth  
Durham County Council Planning Department  
PO Box 274  
Stanley  
County Durham  
DH8 1HG

Email to: [strategyanddelivery@durham.gov.uk](mailto:strategyanddelivery@durham.gov.uk)

Dear Mr Allum

**DCC consultation on an Interim Planning Policy on HMOs for the rest of the county  
outside the existing Article 4 areas of Durham City**

The City of Durham Trust welcome this consultation. Whilst almost all of the known HMOs are in Durham city, we support the proposal for an interim policy for the rest of County Durham prior to a statutory policy emerging in the new County Durham Plan.

We strongly support the introduction of a planning policy that protects family homes from being ‘sandwiched’ by HMOs either side, or the area becoming unbalanced through an over-representation of HMOs, and at the same time sets good standards of accommodation.

We do, however, notice from the public register for East Durham postcodes that the properties we sampled on the register were all described as “property let to a single household”; we did not find any that were described as “property let to multiple occupants.” There must be some, but it does bring into question whether a policy on HMOs will successfully address the issues described in the public debates prior to the Article 4 Direction and the Interim Policy.

There is another important point to be made: not all HMOs are problematic; for many people, renting with others is the most realistic way of affording a home. HMOs can be part of a balanced community and serve a good and worthwhile purpose.

Our principal suggestions on the draft Interim Policy are as follows.

(1) The ‘local over-concentration’ component of the Interim Policy sets too generous a threshold in our opinion. Policy 16.3 of the CDP sets the limit at 10% of all residential properties within 100 metres of a proposed HMO, whereas the draft Interim Policy could allow up to about 20% in our estimation. The proposed Interim Policy also has the problem of not

# THE CITY OF DURHAM TRUST

---

being derived from the well-established evidence and application of the National HMO Lobby and of proving successful at appeals. This can be resolved if the Interim Policy is amended to:

**a) it would not lead to three or more of the twenty nearest properties being HMOs (as identified through mandatory and selective licensing data plus all Class N Council Tax student exemptions and the Private Rented Sector Database introduced under the Renters Rights Act 2025, when available);**

(2) Not all of the County is covered by the Selective Licensing regime and, in the areas not covered, only Licensed HMOs may be known to the County Council. Communities not covered by the Selective Licensing Scheme will potentially suffer from the threat of HMOs coming forward that the Council could not refuse. The Trust suggests that this shortcoming can be tackled either by introducing a County-wide Additional Licensing Scheme so that all HMOs are captured and counted, or by drawing upon other data sources such as Council Tax records and the new Private Rented Sector Database under the Renters' Rights Act 2025 currently expected to become mandatory in 2027.

(3) It is vital to avoid the deliberate ruse whereby landlords obtain permission for HMOs but delay letting them until more conversions have been approved. In this way, they intend that these permitted but empty HMOs are not counted when the proposed Interim Policy is being applied to a further HMO application. The Trust strongly believes that unimplemented permissions, whether granted under this Interim Policy or under Policy 16.3 of the County Durham Plan, must be included in the count.

(4) We are very supportive of the high standards of accommodation proposed in the Interim Policy and would welcome these standards being applied within the existing Durham City Article 4 areas too. There may be a need to reconcile these standards with the requirements set out in the County Council's adopted Housing Needs Supplementary Planning Document.

Thank you again for the opportunity to comment on this Interim Policy.

Yours sincerely,

**John Lowe**

Chair, City of Durham Trust

[chair@durhamcity.org](mailto:chair@durhamcity.org)

**Celebrating, Protecting and Enhancing the City of Durham**