THE CITY OF DURHAM TRUST

Web site:https://durhamcity.org/

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

20 August 2026

Jess White
Durham County Council
Planning Department
PO Box 274
Stanley
County Durham
DH8 1HG

Dear Ms White,

DM/26/01812/FPA - 6 High Wood Terrace, Durham, DH1 3DS

First floor rear extension over existing kitchen offshoot to create 2no shower rooms with associated internal alterations to existing C4 HMO

The Trust notes that since 01 September 2024 this property has been licensed for a maximum of 5 occupants and both the extension and internal alterations set out in this application are solely necessary to make the property compliant with the Council's HMO standards for 6 occupants.

As such, the application is seeking to provide one additional bedspace, contrary to CDP Policy 16.3a) and 16.3b) should the percentage of HMOs within the surrounding 100m be greater than 10%. Alternatively, should it transpire that the percentage is less than 10%, the Trust considers that the property lies on the route from the recently approved PBSA in Hallgarth Street to the University Library, the western flank of the Science Site and the Teaching & Learning Centre on South Road, in which case the proposal would fail to comply with Policy 16.3c).

Accordingly, the Trust objects to the application based on a failure to comply with Policy 16 under either scenario, but it is essential that the relevant HMO percentage is published without delay so that it is clear exactly which policy sub-clause applies.

Additionally, Policy 29 requires all development proposals to achieve well designed buildings and provide high standards of amenity, while Policy 31 requires the proposal to demonstrate that future occupiers of the proposed development will have acceptable living and/or working conditions.
In respect of these requirements, it is accepted by the LPA that the NDSS is a relevant measurement against which to assess the suitability of internal space provided within all residential development in the context of Policy 29(e). Indeed the adopted Housing Needs SPD confirms that the NDSS should be regarded as a guide to best practice when considering all C4 applications. Furthermore, the Housing Needs SPD states, under the heading 'Use Class C4/Sui Generis', "For this type of use, properties must also meet DCC HMO licensing standards".

However, two of the proposed bedrooms are not compliant with these criteria: Bedroom 3 on the first floor measures only 1.7m wide, considerably less than the minimum 2.15m required by the NDSS; and, in the loft, Bedroom 6 has a minimum ceiling height of 2.15m over only 41% of the eligible floor area (2.8m^2 out of 6.8m^2) compared with the Council's requirement for a minimum of 50%. Consequently, the Trust also objects to the application on the basis that the proposals do not conform with either Policy 29 or Policy 31.

In passing, it is unclear why the Housing Multiple Occupation team has not been included as a consultee for this application, a situation that should be rectified as soon as possible since their comments may be relevant.

To summarise, the Trust objects to this application based on non-compliance with CDP Policies 16, 29 and 31 and consequently asks that it be refused.

Yours sincerely,

John Lowe
Chair, City of Durham Trust
trust@durhamcity.org

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