

Central Lancashire Local Plan

Article 4 Direction:

Houses in Multiple Occupation (HMOs)

Evidence Document

February 2025

Removal of permitted development rights for the change of use from Use Class C3 (dwelling-houses) to Use Class C4 (House in Multiple Occupation)

TABLE OF CONTENTS

TABLE OF CONTENTS.....	1
LIST OF TABLES.....	1
LIST OF FIGURES	2
1. INTRODUCTION	3
2. LEGISLATIVE CONTEXT	3
3. NATIONAL PLANNING POLICY CONTEXT	4
4. LOCAL PLANNING POLICY CONTEXT.....	4
5. DEFINING HOUSES OF MULTIPLE OCCUPATION (HMOs).....	7
6. EVIDENCE BASE	9
7. JUSTIFICATION AND PROPOSED ARTICLE 4 DIRECTION AREA.....	32
8. PUBLIC CONSULTATION	35
9. NON-IMMEDIATE ROUTE OPTION AND TIMETABLE OF INTRODUCTION	36
APPENDIX 1: TABLE OF CHANGE OF USE PLANNING APPLICATIONS (2010-to-2015)	37
APPENDIX 2: TABLE OF CHANGE OF USE PLANNING APPLICATIONS (2016-to-2024)	38
APPENDIX 3: TABLE OF CERTIFICATE OF LAWFULNESS FOR EXISTING CLASS C4 USE (2010-TO-2015)	42
APPENDIX 4: TABLE OF CERTIFICATE OF LAWFULNESS FOR EXISTING CLASS C4 USE (2016-TO-2024)	43
APPENDIX 5: PROPOSED ARTICLE 4 DIRECTION AREA.....	44

LIST OF TABLES

Table 1 Distribution of Licenced and Licence Exempt HMOs by Ward	10
Table 2 Number of additions to the HMO licence register from 2017 to 2024.	11
Table 3 Number of student HMOs by postcode, registered under Council Tax	12
Table 4 Planning Approvals for HMO properties from 2010 to 2024 (up to 5th August 2024).	15
Table 5 Summary table of HMO applications which have been approved/certificate granted and the number of additions to the mandatory HMO licence register.	16
Table 6 Housing Register - Self-Assessment Applications (Below)	21
Table 7 Housing Register - Verified Need.....	22

Table 8 Housing Register Self-Assessment No. of Applications linked to HMOs for requests to move due to Anti-Social 29

Table 9 Housing Register Verified Need - No. of Applications linked to HMOs for requests to move due to Risk of Violence 29

Table 10 Table of Risk and Mitigation Measures associated with bringing the proposed Article 4(1) Direction into force..... 34

LIST OF FIGURES

Figure 1 Existing Article 4 HMO Directions within Preston..... 7

Figure 2 Distribution of Licenced and Licence Exempt HMOs within Preston **Error! Bookmark not defined.**

Figure 3 Images taken from the Fishergate Hill and Avenham CAAs, showing key impacts of HMOs within the Conservation Areas..... 13

Figure 4 Map showing the extent of the Extant Article 4 Direction (HMO) within the Fishergate Hill CAA and the Recommended area for an additional Article 4 Direction (HMO) within the Conservation Area..... 14

Figure 5 Map of IMD (2019) overlaid with Preston’s ward boundaries and HMO clusters 18

Figure 6 Indicators of deprivation, housing and living environment at ward, district and country level (Source) 19

Figure 7 Percentage of overcrowding with the Lancashire-14 area, 2021 census (Dashboard) 22

Figure 8 Map showing overcrowding vs HMO count 23

Figure 9 Median house price (£) (2021) and HMO distribution 24

Figure 10 Map showing economic activity (Employed %) vs HMO distribution (Source) 26

Figure 11 Crime rate per 1000 and HMO distribution across the City..... 28

Figure 12 Alcohol Profile for Preston (Source: Office for Health Improvement & Disparities)..... 31

Figure 13 Proposed Article 4 Direction Area 33

1. INTRODUCTION

- 1.1. This evidence document sets out the national and local policy context and supporting evidence as to justify the introduction of a new Article 4 Direction HMO within the defined urban area of the Preston.
- 1.2. Under the [Town and Country Planning \(General Permitted Development\) \(England\) Order 2015](#) (GPDO) the introduction of the Article 4 Direction will remove permitted development rights for the change of use from dwelling-houses (Use Class C3) to houses in multiple occupancy [HMOs] (Use Class C4) for 3 to 6 persons.

2. LEGISLATIVE CONTEXT

- 2.1. The [Town and Country Planning \(Use Classes\) \(Amendment\) \(England\) Order 2010](#) describes use ‘Class C4 as houses in multiple occupation’ (HMO) which is defined as ‘use of a dwellinghouse by not more than six residents’. These are shared houses occupied by unrelated individuals as their only, or main residence, who share basic amenities.
- 2.2. HMOs with seven or more occupants fall into the Use Class ‘Sui Generis’. As these are referred to as large scale, a change of use from a dwellinghouse to a large HMO already requires planning permission.
- 2.3. Usually a proposed change of use, from a dwellinghouse (Class C3) to Class C4 HMO (not more than six residents), would meet the definition of Schedule 2, Part 3, Class L of [The Town and Country Planning \(General Permitted Development\) \(England\) Order 2015](#), giving permission to carry out works under permitted development, subject to conditions.
- 2.4. An Article 4 Direction withdraws automatic planning permission granted by the [General Permitted Development Order](#). Therefore, implementing an Article 4 Direction will result in any proposed change of use of a property, covered by the direction, from Class C3 to Class C4 requiring planning permission from the Local Planning Authority.
- 2.5. [Schedule 3 of The Town and Country Planning \(General Permitted Development\) \(England\) Order 2015](#) sets out the procedures for Article 4 Directions. Paragraph 1 is applicable for introducing Article 4 Directions without immediate effect, this

outlines the consultation process and procedures required which will be covered in section 8 of this document.

3. NATIONAL PLANNING POLICY CONTEXT

3.1. *National Planning Policy Framework*

3.1.1. Paragraph 54 of the [National Planning Policy Framework \(NPPF\)](#) (December 2024) states the following:

3.1.2. The use of Article 4 Directions to remove national permitted development rights should:

- a) where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 Direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre);
- b) in other cases, be limited to situations where an Article 4 Direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 Directions to require planning permission for the demolition of local facilities);
- c) in all cases, be based on robust evidence, and apply to the smallest geographical area possible.

3.2. Further guidance is set out in Planning Practice Guidance. The introduction of an Article 4 Direction must be justified for its extent and a purpose to remove specific permitted development rights with temporary or permanent effect. This does not restrict development, rather it provides the opportunity to the Local Planning Authority to consider the proposal through the planning process.

4. LOCAL PLANNING POLICY CONTEXT

4.1. *Adopted Preston Local Plan (2012-2026)*

4.1.1. The [Preston Local Plan](#) (2012-26), adopted July 2015, contains 'Policy HS7 – Houses in Multiple Occupation'. The policy states that the Council will allow proposals for the conversion of buildings into HMOs provided that it meets the requirements set out. Proposals must consider amenity,

character, appearance, over-concentration, parking, waste facilities and future flooding risk.

4.1.2. Paragraphs 5.64 and 5.65 of the Local Plan explain that high concentrations of HMOs can lead to adverse impacts on the amenity of residents. Therefore, the Council is proposing an Article 4 Direction to establish control over the concentration in those areas which are most vulnerable.

4.2. ***Adopted Preston City Centre Plan (2016-2026)***

4.2.1. 'Policy OP2 Winckley Square' of the [Preston City Centre Plan](#) states proposals for HMOs will be resisted within the 'Inner Zone' as they would detract from the character and amenity of the Square, and, by virtue of their intensity of use, would serve to undermine the plan's aspirations to conserve and enhance the appearance and economic potential of the area.

4.3. ***Supplementary Planning Documents and Planning Advisory Notes***

4.3.1. Preston City Council do not have any Supplementary Planning Documents or Planning Advisory Notes relating to HMOs within Preston's Local Development Framework.

4.4. ***Emerging Central Lancashire Local Plan (2023-2041)***

4.4.1. The emerging Central Lancashire Local Plan is proposing a specific HMO policy, restricting the number of HMOs across the district and expansion of existing properties in Preston.

4.4.2. Draft Policy HS10: Houses in Multiple Occupation (HMOs) of the emerging Central Lancashire Local Plan proposes the following policy as to provide additional planning controls as to restrict the growth of HMOs within Preston and the Central Lancashire areas:

Policy HS10: Houses in Multiple Occupation (HMOs)

1. Outside of the 'Preston Houses in Multiple Occupancy (HMO) Article 4 Direction area' (which removes permitted development rights allowing conversion of dwellings to HMOs), proposals to convert properties into HMO's will be supported, subject to compliance with Policy EN4: Amenity and subject to the following criteria;
 - a) the property is suitable for conversion without substantial extension;
 - b) the proposal would not 'sandwich' a dwelling between two HMO's or create a block of three or more adjoining HMO's.
 - c) the development would provide appropriate facilities for the storage and screening of refuse;
 - d) the proposal would provide adequate levels of car parking reflective of the site's location, number of residents and local highway conditions; and
 - e) the proposal would enable active travel, through on-site covered cycle storage for use by occupiers.
2. Within Preston's Article 4 Direction area, proposals to convert properties into HMO's or expand existing HMO's will not be permitted.

4.5. *Existing Article 4 Directions (HMO)*

4.5.1. In December 2010, the City Council in its capacity as Local Planning Authority (LPA) determined to make an Article 4(1) Direction in relation to the restriction on the permitted change of use from Class C3 dwellinghouses to Class C4 house in multiple occupation (HMOs) under the then [Town and Country Planning \(General Permitted Development\) \(England\) Order 1995 \(as amended\)](#).

4.5.2. The extent of the Direction covered seven Wards within the inner parts of Preston; predominantly terraced housing areas; areas with minimal off-street parking; and properties with small areas for refuse/recycling storage. The existing Article 4 Direction can be seen below in figure 1.

4.5.3. The Article 4(1) Direction was confirmed following public consultation, on the grounds that a high concentration of HMOs can lead to issues relating to parking, noise and disturbance and impacts on amenity, which can cause concern to local communities, and further control by the LPA over such conversions was considered necessary. The Article 4(1) Direction came into force on 18th February 2012.

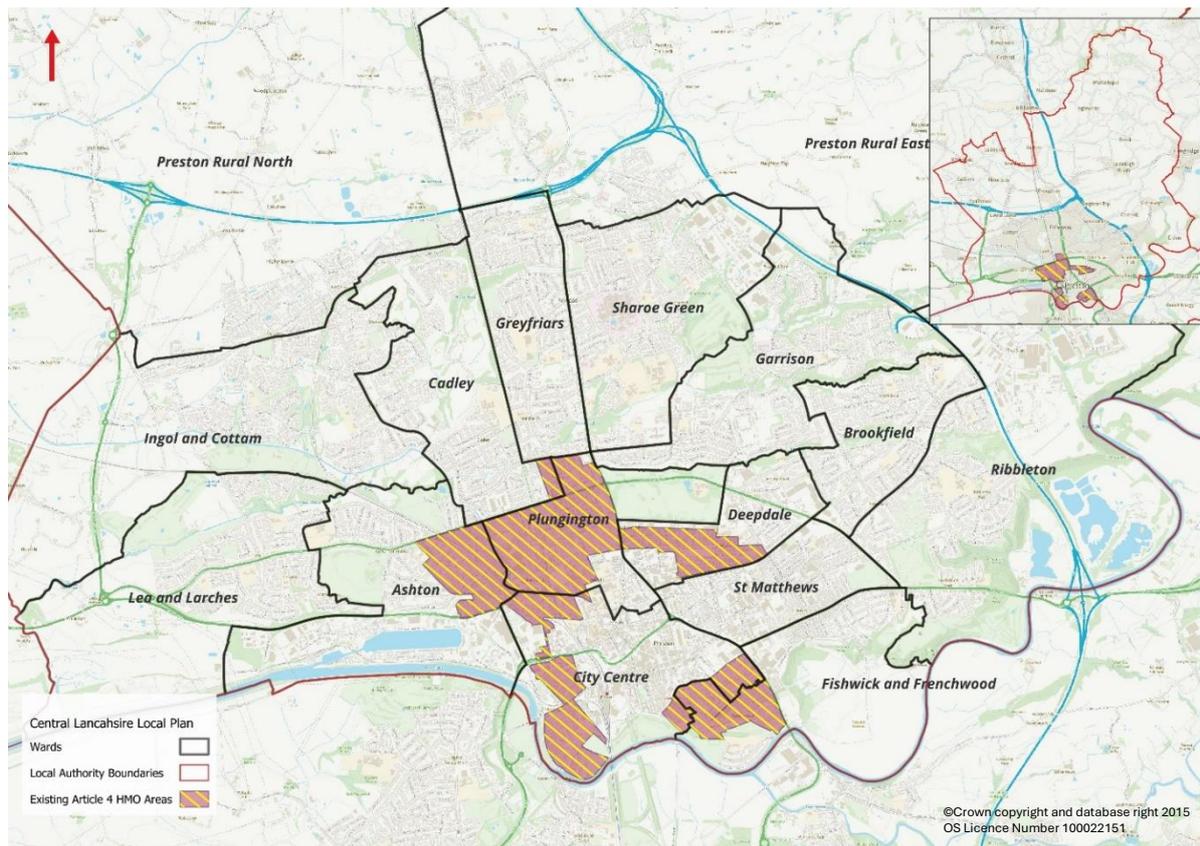


Figure 1 Existing Article 4 HMO Directions within Preston

5. DEFINING HOUSES OF MULTIPLE OCCUPATION (HMOs)

5.1. Definition

5.1.1. An HMO is a property rented out by at least three people who are not from one 'household' but share toilet, bathroom and kitchen facilities. It's sometimes called a 'house share'. A household could be a single person or family, which includes couples, relatives, half-relatives, step-parents or step-children.

5.1.2. To be classified as an HMO the accommodation must be used by persons as their only or main residence. This includes full-time students in further or higher education, those seeking refuge in temporary accommodation, provided accommodation for migrant or seasonal workers and accommodation provided by a private landlord for the occupation of asylum seekers and their dependents.

5.1.3. Night shelters or hostels providing accommodation to the homeless may qualify as an individuals' only residence even if the accommodation was overnight.

5.2. **Housing Act, Council Tax & Planning**

5.2.1. Section 254 of the Housing Act 2004 provides a definition of a House in Multiple Occupation (HMO):

(1) For the purposes of this Act a building or a part of a building is a “house in multiple occupation” if —

- (a) it meets the conditions in subsection (2) (“the standard test”);
- (b) it meets the conditions in subsection (3) (“the self-contained flat test”);
- (c) it meets the conditions in subsection (4) (“the converted building test”);
- (d) an HMO declaration is in force in respect of it under section 255; or
- (e) it is a converted block of flats to which section 257 applies.

5.2.2. Further detail regarding criteria for these tests is outlined throughout [Section 254](#). A HMO could be a house or an individual flat that is in multiple occupation. The criteria to meet the self-contained flat test are the same as the standard test.

5.2.3. [The Council Tax \(Chargeable Dwellings and Liability for Owners\) \(Amendment\) \(England\) Regulations 2023](#) defines HMO properties for Council tax purposes. The definition is mostly similar than that provided by the Housing Act, although does not include converted blocks of flats. Properties which are exempt from HMO regulations are not exempt from the definition of an HMO for council tax purposes.

5.2.4. On the other hand, for planning purposes, HMOs are defined based upon the number of individuals or individual households in the property as discussed in Section 2.

5.2.5. Numerous searches on Local Planning Authority websites have shown that the definition provided by the [Housing Act 2004](#) is used to determine if a property is defined as a HMO and [The Town and Country Planning \(Use Classes\) Order 1987](#) determines which class the property falls under for planning purposes.

5.2.6. It is also important to note that student accommodation (halls) often fall under the HMO definition. However, halls of residence (or other accommodation occupied by students) that are managed or controlled by one of the educational establishments listed in the regulations are exempt from licencing provisions.

5.3. **HMO Licences**

5.3.1. Whether a HMO requires a licence or is exempt from requiring a licence does not determine whether it can be used and occupied as an HMO. A licenced HMO refers to a house that meets the mandatory licencing criteria, these are required by properties that are occupied by five or more people. Under the [Housing Act 2004 Section 232](#), the Council are required to publish details of mandatory licenced HMOs in the Preston district ([Mandatory Licenced HMOs Register](#)).

5.3.2. If an HMO does not meet the criteria required for a licence, it is referred to as licenced exempt HMO. In addition, the following groups can provide and manage accommodation in the form of an HMO but do not require a licence to do so: the health service, private registered providers of social housing, a cooperative, a local authority, police or fire authority.

5.3.3. The [Housing Act 2004](#) also provides powers, in certain closely prescribed circumstances, to Local Authorities to licence HMOs which are not covered by mandatory licencing. This is known as Additional Licencing. Furthermore, if HMOs are located in a specific area defined within the [Housing Act 2004](#), a selective licence is required.

6. EVIDENCE BASE

6.1. **Number of HMOs within Preston**

6.1.1. Council Tax records show a total of 1,960 HMOs within the Preston City district (as of 10th September 2024). Of these 1,960 properties, approximately 950 are listed as student accommodation under Council Tax. It is important to note that these figures could include separate flats within properties or student halls, along with residential health care facilities.

6.2. **Distribution of HMOs across the City**

6.2.1. Figure 2 (below) shows that there is a high concentration of HMOs in the south of the district, notably within the City Centre, Plungington and

Deepdale wards. A large number of licenced HMOs are concentrated within the City Centre ward. Licence exempt HMOs are more scattered across the urban area, although there are large clusters in Deepdale and Plungington.

6.2.2. Table 1 (below) shows the number of HMOs within each of the 16 wards of Preston, these figures are broken down into licenced and licenced exempt HMOs. In total there are 918 recorded HMOs across the district, of which 306 are licenced and 611 are licence exempt as of November 2024.

6.2.3. The data shows the highest concentration of HMOs is in the City Centre (311) and Plungington (157) wards, which have the highest number of licenced HMOs. These are followed by Deepdale (87), Cadley (76) and Greyfriars (69), all of which have a high count of licenced exempt HMOs. Both Preston Rural North and Preston Rural East have no recorded HMOs.

6.2.4. Table 2 below shows that there has been a large increase in additions to the HMO licence register from 2019. Both 2021 and 2023 saw the largest number of additions, with 85.

Table 1 Distribution of Licenced and Licence Exempt HMOs by Ward

Ward (Licenced)	No.	Ward (Licenced Exempt)	No.	Sum Total
Ashton	21	Ashton	38	59
Brookfield	2	Brookfield	8	10
Cadley	3	Cadley	73	76
City Centre	157	City Centre	156	311
Deepdale	20	Deepdale	67	87
Fishwick and Frenchwood	3	Fishwick and Frenchwood	6	9
Garrison	5	Garrison	9	14
Greyfriars	1	Greyfriars	68	69
Ingol and Cottam	0	Ingol and Cottam	44	44
Lea and Larches	2	Lea and Larches	18	20
Plungington	79	Plungington	78	157
Preston Rural East	0	Preston Rural East	0	0
Preston Rural North	0	Preston Rural North	0	0
Ribbleton	2	Ribbleton	16	18
Sharoe Green	4	Sharoe Green	10	14
St Matthews	9	St Matthews	20	29
Total	306	Total	611	917

Figure 2 Distribution of Licenced and Licence Exempt HMOs within Preston

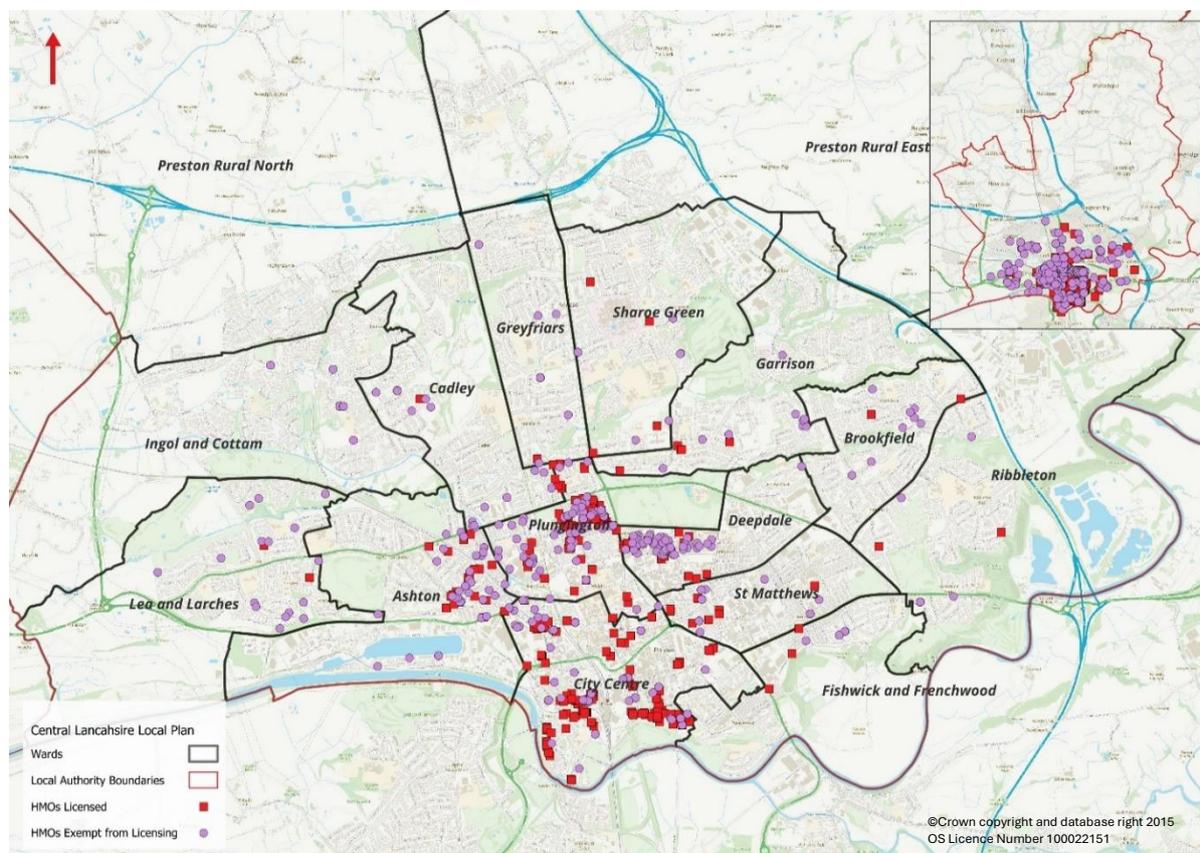


Table 2 Number of additions to the HMO licence register from 2017 to 2024.

Year	No. of additions to HMO licence register
2017	1
2018	1
2019	44
2020	25
2021	85
2022	44
2023	85
2024 (January to April)	11

6.2.1. Pre-October 2018, mandatory licencing only applied to properties occupied by 5 or more people and were 3 storeys and above. From 1 October 2018, 2 storey properties, flats and bungalows operated as HMOs with 5 or more occupants required a licence.

6.3. **Student Accommodation**

6.3.1. At the University of Central Lancashire there were 3,455 undergraduate students living in ‘other rented student accommodation’ according to the 2022/23 HESA statistics. This compares to 5,000 students living with parents/guardians and 3,855 living in their own residence.

6.3.2. Table 3 below, highlights that there is a large number of student HMOs in PR1 1 (177), PR1 2 (384), PR1 7 (235) and PR1 8 (109).

Table 3 Number of student HMOs by postcode, registered under Council Tax

Postcode	Number of HMOs
PR1 1	177
PR1 2	384
PR1 3	8
PR1 5	1
PR1 6	4
PR1 7	235
PR1 8	109
PR2 2	28
PR2 3	3
PR2 9	1

6.3.3. Cushman & Wakefield Student Accommodation Demand and Supply Study (November 2024) reported that from 2016/17 to 2021/22, the student body grew by 25%, mainly driven by a 248% increase in postgraduate students. At a postgraduate level, growth has been driven by older, international students, who are significantly less likely to demand a purpose-built student accommodation (PBSA) bed space.

6.3.4. This significantly impacts the overall demand for PBSA amongst the student body, as older students are traditionally less likely to demand PBSA therefore much of this cohort are choosing to reside in the private rented sector. The study reported that the private rented accommodation is largely HMOs.

6.4. **Impact of Short Term Lets**

6.4.1. A recent search on a short-term holiday let website “*Airbnb*”, indicates that a small number of individual rooms located in HMO properties are being advertised for short- and long-term homestays. This activity is particularly pertinent in the City Centre, attracting tourists and students.

6.5. Conservation Area Appraisals

6.5.1. The 2024 update of the [Conservation Area Appraisals](#) (CAAs) for the Fishergate Hill Conservation Area and Avenham Conservation Area (CA), produced on-behalf of the Council by Growth Lancashire Ltd (the Councils retained heritage consultants) found that the presence of HMOs to be a widespread threat to the urban fabric, character and appearance of the conservation areas.

6.5.2. The Avenham CAA (2024) found (pg.79) that the noticeable number of “To Let” signs, particularly along Ribblesdale Place, Camden Place, Starkie Street and Regent Street, suggest that properties are increasingly being converted for use as houses of multiple occupation within the CA.

6.5.3. Across both the Fishergate Hill and Avenham CAs, there is a widespread issue with the additional number of bins per property as to accommodate the multi occupancy of the buildings. This is an issue throughout both conservation areas, creating a visual and environmental health impact upon the conservation area.



Source: Avenham Conservation Area Appraisal (2024) - Bins along Starkie St. (left), fly tipping on Chaddock St. (centre), bin bags in front of 47-49 Great Avenham St. (right)



Figure 3 Images taken from the Fishergate Hill and Avenham CAAs, showing key impacts of HMOs within the Conservation Areas.

6.5.1. Based upon the findings of the Fishergate Hill CAA, a need was identified for a wider reaching HMO Article 4 Direction which would have afforded protection to the remaining area of the conservation area (with the exception of County Hall) that was not covered by extant HMO Article 4 Directions.

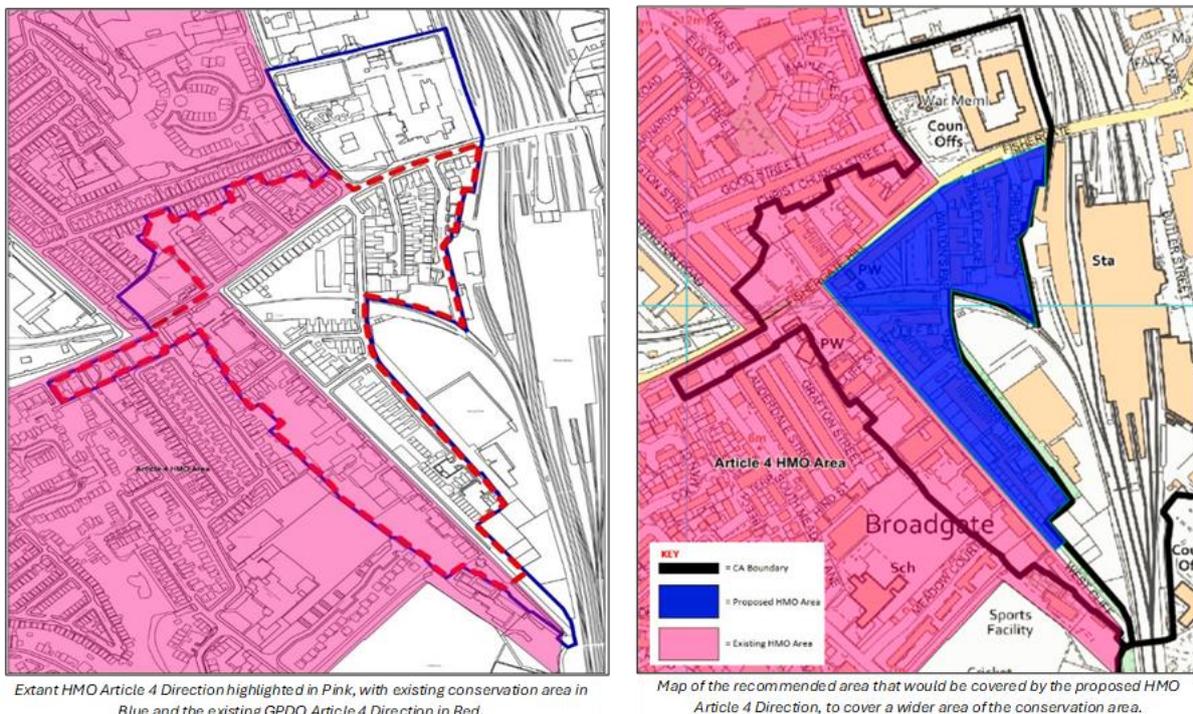


Figure 4 Map showing the extent of the Extant Article 4 Direction (HMO) within the Fishergate Hill CAA and the Recommended area for an additional Article 4 Direction (HMO) within the Conservation Area.

6.6. **Housing Needs and Demand Assessment 2022**

6.6.1. The most recent publication of the [Housing Needs and Demand Assessment](#) for Preston City Council noted that the local authority were proposing to review the exempt accommodation housing benefit provision. This was due to the large number of properties that are being taken on for HMO use by a range of providers, largely under the exemption. This has resulted in large numbers of vulnerable persons residing in HMOs and areas of the city, but very often lacking the specialist support required to sustain the tenancies .

6.6.2. Without the necessary support, anti-social behaviour, property damage and neighbourhood issues can occur.

6.7. Planning Applications

6.7.1. Applications relating to HMOs typically are submitted as a full application or a request for a lawful development certificate. All applications submitted and determined between 2010-2024 relating to HMOs are shown in Appendices 1-to-4.

6.7.2. The table below shows that there have been 91 approvals for HMO properties in the district between 2010 and 2024. A large proportion of approvals have been determined between 2016 and 2024 with 74 applications.

6.7.3. The two periods have been used (2010-2015 and 2016-2024) to add a comparative element. The 2016-2024 period differentiates the years where both the article 4 direction (2012) was in place and the current local plan had been adopted (2015) which contained the specific HMO policy, allowing time for implementation.

Table 4 Planning Approvals for HMO properties from 2010 to 2024 (up to 5th August 2024).

		Period		Total
		2010-2015	2016-2024	
Application Type	Full Application	16	64	80
	Lawful Use Certificate	1	10	11
Total		17	74	91

Full Applications

6.7.4. Of the 17 applications submitted to the LPA between 2010 and 2015 relating to using properties as HMOs, 16 were approved and one was withdrawn.

6.7.5. 76 applications were received relating to HMOs between 2016 and 2024, of which seven were withdrawn or finally disposed and one refused, with four applications remaining undetermined. The remaining 64 were approved.

Lawful Use Certificates

6.7.6. Only one submission for a certificate of lawfulness for an HMO was applied for between 2010 and 2015.

6.7.7. A total of ten certificates were granted for HMOs between 2016 and 2024 of the 13 applications submitted.

6.8. **Comparison of Planning Approvals vs Register Additions**

6.8.1. The summary table below shows that applications relating to HMOs have been approved continuously since 2013. Recent years (2021-2023) have shown a large increase in submissions and approvals, with the greatest number of approvals in 2023.

6.8.2. Likewise, there has been a large increase in additions to the licence register since 2019. As from 1 October 2018, mandatory licencing was no longer limited to HMOs that were 3 or more storeys high, but also included buildings with 1 or 2 storeys. So, some properties may well have been in use as HMOs for many years, and were brought under the scope for licencing, rather than being ‘new HMOs’ From April 2016, there were numerous Universal Credit changes. Universal Credit replaced Housing Benefits in many cases along with several other benefits with a single monthly payment. This has been linked with the increase in applications from landlords applying for an HMO or supported accommodation within the City.

6.8.3. The data indicates that there are far more HMOs in use than those properties approved for HMO use through the granting of planning permission.

Table 5 Summary table of HMO applications which have been approved/certificate granted and the number of additions to the mandatory HMO licence register.

Year	Planning Approvals (2024 Jan-Jun)	No. of additions to HMO licence register (2024 Jan- Apr)
2010	3	0
2011	1	0
2012	0	0
2013	5	0
2014	6	0
2015	2	0
2016	5	0
2017	7	1
2018	3	1

2019	2	44
2020	9	25
2021	17	85
2022	11	44
2023	19	85
2024 ¹	1	11

6.9. *Demography of Preston*

Population

6.9.1. Preston City Council district covers 142 square kilometres over 16 wards. At June 2023, Preston had a population of 156,410 with a population density of 1,099 per km² which is twice the England and Wales average ([LCC Profile](#)).

6.9.2. In the long-term, births have exceeded deaths in Preston, even though the Covid-19 pandemic. If the high growth rate continues, Preston is set to be the most populated authority in the Lancashire-14 area ([LCC Profile](#)).

Deprivation

6.9.3. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation in England. It is based on 39 separate indicators, organised across seven distinct domains which are combined and appropriately weighted. The indicators include income, employment, health deprivation and disability, education, skills training, crime, barriers to housing and services and living environment.

6.9.4. IMD is calculated for every Lower-layer Super Output Area (LSOA) in England. Areas are ranked from the most deprived area (rank 1) to the least deprived area.

6.9.5. Preston falls within the most deprived 20% within England on the IMD average rank measure (2019). Preston has remained within the most deprived 20% average rank since the year 2000. The district falls into the most deprived 20% specifically for living environment, health and disability, employment and local concentration ([LCC](#)).

6.9.6. Of the lower-tier local authorities, Preston sits alongside Pendle in the most deprived 20% on the IMD rank of average rank. The authority is recorded as less deprived than Burnley and Hyndburn who sit within the most deprived

¹ For 2024 only, the planning approval data up to June, whilst the licence register data is up to April 2024.

10%, whereas the neighbouring Ribble Valley is in the least deprived 20% in England ([LCC](#)).

6.9.7. The map (Figure 5) of the overall IMD ranking shows that St. Matthews ward has the most deprivation, whilst Ribbleton, Fishwick and Frenchwood, Deepdale, City Centre and Ingol and Cottam wards also have LSOA(s) which sit within the most 10% deprived. The distribution of HMO properties are commonly in LSOAs where the IMD rank is between 1 and 4.

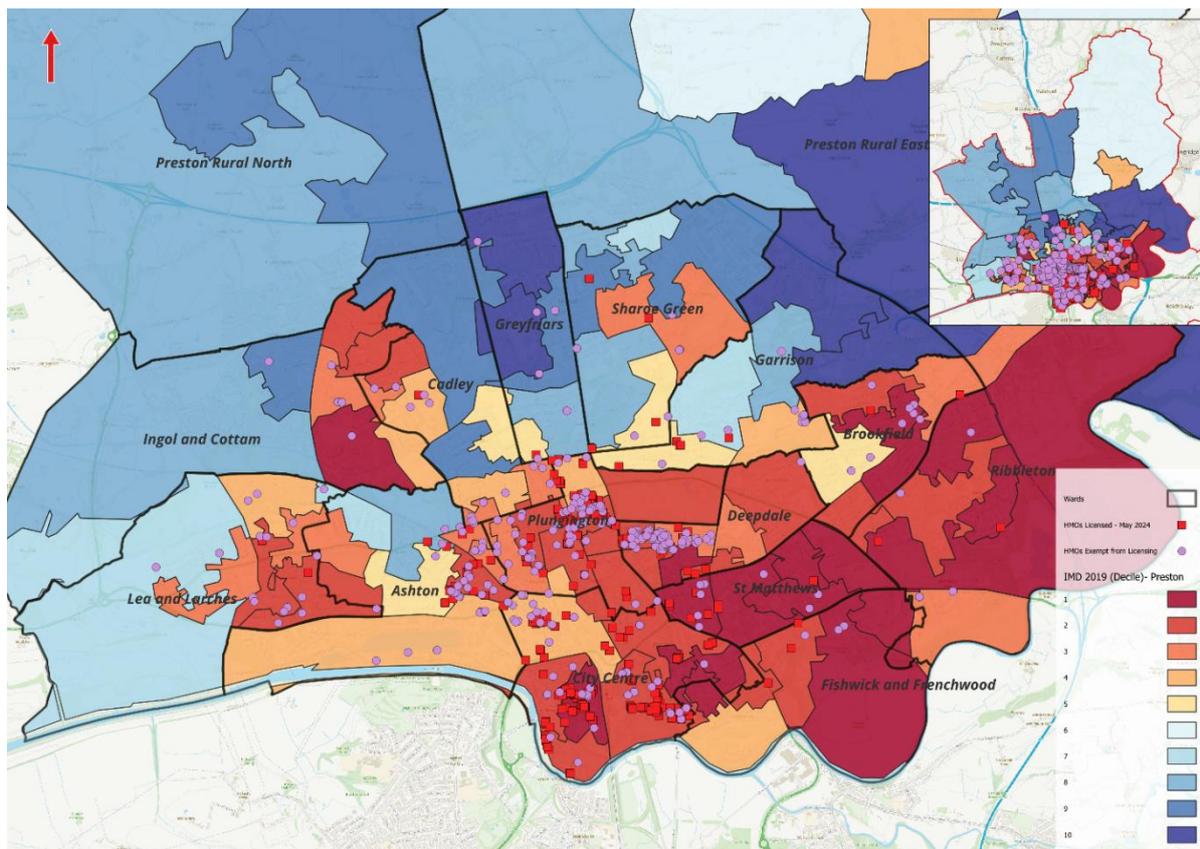


Figure 5 Map of IMD (2019) overlaid with Preston’s ward boundaries and HMO clusters

6.9.8. There are correlations between those wards which have high numbers of HMOs (Table 1) and deprivation indicators. Wards such as City Centre, Plungington and Deepdale have the highest count of HMOs across the district and are recorded as the three wards which have a high deprivation

score on the IMD. These wards also have a high percentage of households with overcrowding based on overall room occupancy levels.

Indicator	Period	England	Preston	Greyfriars	Preston Rural East	Preston Rural North	Sharee Green	Garrison	Cadley	Ashton	Ingol & Cottam	Lea & Larches	Plungington	Brookfield	City Centre	Deepdale	Fishwick & Frenchwood	Ribbleton	St Matthew's
Index of Multiple Deprivation (IMD) Score	2019	21.7	29.5	7.0	11.1	11.9	12.0	13.3	18.3	23.8	27.7	29.1	33.8	36.4	36.5	38.5	42.5	49.7	53.1
Income deprivation, English Indices of Deprivation	2019	12.9	16.2	4.8	5.2	4.5	7.2	7.4	9.2	12.1	16.4	16.0	15.9	21.1	17.6	23.6	26.3	27.5	29.0
Child Poverty, Income deprivation affecting children index (IDACI)	2019	17.1	20.4	4.9	4.1	4.0	6.2	5.3	11.7	17.6	19.8	18.5	26.7	26.3	26.6	24.3	28.7	33.5	32.0
Older people in poverty, income deprivation affecting older people Index (DAOPI)	2019	14.2	19.4	7.1	5.8	6.8	9.6	14.7	10.6	13.2	19.2	17.4	26.2	24.4	31.7	42.9	38.0	28.8	44.0
Modelled estimates of the proportion of households in fuel poverty (%)	2020	13.2	14.9	9.1	10.2	12.6	7.4	8.3	11.9	12.7	10.1	12.4	18.8	16.9	21.5	19.8	20.5	20.4	18.5
Households with overcrowding based on overall room occupancy levels	2011	8.7	7.5	2.7	1.1	1.0	4.5	3.5	3.5	4.8	5.5	5.2	10.1	5.8	17.6	10.1	12.3	7.5	13.0
Older people living alone, Percentage of people aged 65 and over who are living alone	2011	31.5	34.2	31.9	27.1	17.0	27.9	33.9	33.2	32.9	33.4	36.3	44.0	34.2	49.1	33.5	37.6	37.2	48.0

Figure 6 Indicators of deprivation, housing and living environment at ward, district and country level ([Source](#))

6.10. **Housing and Homelessness**

6.10.1. Preston had a total of 66,025 dwellings in 2023. It is estimated that there will be a 8% increase in the number of households in Preston between 2018 and 2043, compared to England’s average predicted increase of 16.2% ([LCC Profile](#)).

6.10.2. Within the City, the over-abundance of HMO accommodation is considered to be contributing towards the number of rough sleepers and cycle of rough sleeping and homelessness within the city as found by the Councils Housing Advice and Homelessness service.

6.10.3. The Councils Rough Sleeper Outreach Team have verified that a large proportion of Preston’s rough sleeping population, at any given time, do not have a connection to Preston and have come in via a supported placement in one of the HMO’s. In many instances, the lack of robust and sustained support by the providers means people have quickly lost the accommodation and ended up sleeping rough. This suggests that HMOs within the City as a housing option offer insecure short-term accommodation to vulnerable adult individuals with complex needs. As a result of these particular HMOs insecure nature, combined with complex needs, individuals are often evicted or leave the HMO accommodation and enter a rough sleeping cycle.

6.10.4. HMOs in Preston attract many individuals from outside the district. As these individuals become residents for six out of the last twelve months, they establish a local connection which can support the verification to join the

waiting list for the Housing Register. This increases the pressure and demand for homes, resources and services. Likewise, demand and pressures increase for the local authority if provider support is inadequate or even withdrawn in HMO properties. The Council encourages HMO providers of supported accommodation to complete information and contact forms to increase communication, however these are not mandatory and are often not completed.

Supported Housing Improvement Plan (SHIP)

6.10.5. Preston City Council is currently part of a Ministry of Housing, Communities and Local Government scheme called Supported Housing Improvement Programme (SHIP).

6.10.6. As part of the programme, Preston City Council are carrying out reviews of all Supported Housing within the City, working with Housing Standards, Housing Benefits, Housing Options, external agencies and providers of supported accommodation.

6.10.7. The reviews are focusing on ensuring that:

- the standard of accommodation is in line with Housing Health and Safety Rating System (HHSRS) guidance;
- Support provided to the resident is of a high standard, person centred and relevant;
- value for money exists; and that
- the level of support meets the requirements of 'Exempt Accommodation' under Housing Benefit Regulations, where the landlord claims to be providing care, support or supervision to its tenants.

6.10.8. During the reviews that we have carried out so far, improvements have been identified in relation to both property standards and quality of support.

6.10.9. The reviews have also identified that a high number of residents living in supported accommodation do not require support but are unable to move on due to the lack of affordable housing. This factor gives a misconception that there is a further need for supported accommodation in Preston.

6.10.10. It is also evident that certain areas of the city are overpopulated with Housing of Multiple Occupation (HMO's) occupied by vulnerable adults,

which in some cases are impacting local communities and external agencies. As part of the SHIP, we are working with external agencies and communities to look at ways of sustaining these communities.

6.11. **Housing Register**

6.11.1. Preston Housing Register holds information of active applications submitted by applicants seeking Housing Association accommodation and who have had their local connection to Preston verified (resident in Preston for 6 out of the last 12 months, or 3 out of the last 5 years through either employment, training or family connection). Housing register applications require applicants to provide a reason for seeking accommodation and a postcode of their current address.

6.11.2. The postcodes of housing register applications have been matched to the postcodes of known HMOs within Preston. These matches have been assessed against four categorises of ‘Reasons’ in which the applicant is seeking to move into housing association accommodation from their current HMO accommodation:

Self-Assessment:

- Condition of Property

Verified Need:

- Severe Overcrowding ;
- Severe Hardship; and
- Supported Tenant seeking to move one.

6.11.3. The data contained within Table 6 (below) has been retrieved from the Self-Assessment portion of the application process, taken from what an applicant has selected from the tick boxes as their reason for wanting to move. As such, the reason(s) given have not yet been verified by the Council.

Table 6 Housing Register - Self-Assessment Applications (Below)

Housing Register: Applicant Self- Assessment Moving Reasons	
Reason:	No. of Applications Linked to Known HMO Addresses
Condition of Property	43

6.11.4. The data contained within Table 7 (below) has been retrieved from applications where the Council have verified the reasons given and have determined the applicant falls within a priority need banding.

Table 7 Housing Register - Verified Need

Housing Register: Housing Need Verified and Banded	
Reason:	No. of Applications Linked to Known HMO Addresses
Severe Overcrowding (2+ beds)	11
Severe Hardship	17
Supported Tenants Moving On	27

6.12. **Housing Quality**

6.12.1. Figure 7 shows that Preston had an overcrowding percentage of 6.2 of all dwellings in 2021. Preston ranks 5th in overcrowded households amongst the Lancashire-14 authorities. Overcrowding is particularly high in wards such as Deepdale (13.6%), St. Matthews (12.5%), City Centre (11.5%), Fishwick and Frenchwood (10.8%) and Plungington (8.4%) ([LCC Dashboard](#)).

Area name	Occupancy rating of rooms: -1 (%)	Occupancy rating of rooms: -2 or less (%)	Total % overcrowding
▲ Blackburn with Darwen	6.3	2.3	8.6
Blackpool	3.3	0.3	3.6
Burnley	5.4	1.7	7.1
Chorley	2.3	0.3	2.6
Fylde	2.4	0.2	2.6
Hyndburn	5.6	1.6	7.2
Lancaster	3.3	0.4	3.7
Pendle	5.8	2.9	8.7
Preston	5.0	1.2	6.2
Ribble Valley	2.7	0.3	3.0
Rosendale	4.3	0.9	5.2
South Ribble	2.2	0.3	2.5
West Lancashire	2.6	0.3	2.9
Wyre	2.0	0.2	2.2

Figure 7 Percentage of overcrowding with the Lancashire-14 area, 2021 census ([Dashboard](#))

6.12.2. Overcrowding is linked with poor housing quality and is more common with social-rented households. The map below demonstrates that where there is a high percentage of overcrowding, there is a high number of HMOs (figure 8). This is of particular concern in Deepdale which has the highest percentage of overcrowding at 13.6% and has a large cluster of HMO properties. Likewise, City Centre and St. Matthews wards have high overcrowding percentages, notably City Centre ward has the highest count of HMOs.

6.12.3. In 2021, 14.7% of households within Preston were in fuel poverty. Preston ranks the 7th highest across the Lancashire-14 area. It is perceived that there are three key drivers of fuel poverty, these include fuel costs, energy efficiency and household income. 1.7% of households in Preston have no central heating, this is the fourth highest percentage across the Lancashire-14 area. These drivers are influenced by tenure type, age of the dwelling, insulation and household composition ([LCC Profile](#)).

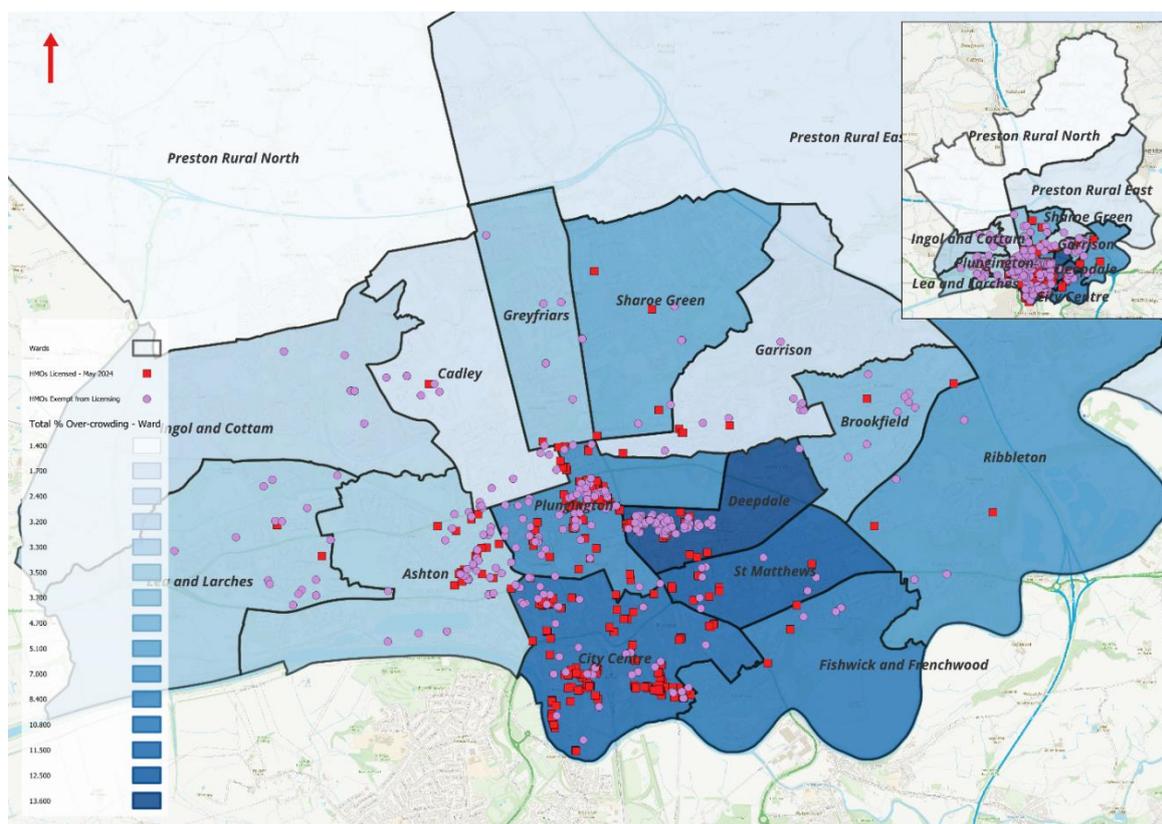


Figure 8 Map showing overcrowding vs HMO count

6.13. **House Prices**

6.13.1. In 2022, the house price to earnings ratio was 5.54 across the Preston authority. This indicates that the ratio is in excess of 5 times earnings.

6.13.2. An affordability ratio of 4.97 (lower quartile house prices to lower quartile earnings), indicates that it is easier to enter the housing market in this area. Preston ranks 22nd across the 308 authorities across England.

6.13.3. Figure 9 shows that those wards that have a high HMO count, typically have lower median house prices. Cadley and Greyfriars wards have 76 and 69 HMOs respectively, although have higher median house prices. Those wards with no HMOs have the highest median house prices.

6.13.4. Low house prices mean landlords are more likely to buy properties to split and maximise their rental income. In turn these properties make Preston an attractive choice for vulnerable and low-income households then the cycle continues, increasing the number of HMOs in these areas. Despite Preston’s affordability ratio and areas of relatively low median house prices, the number of HMOs indicate that a house or flat is not an affordable option in many circumstances. Consequently, more properties are social-rented, and it reduces the opportunities within the owner-occupied sector.

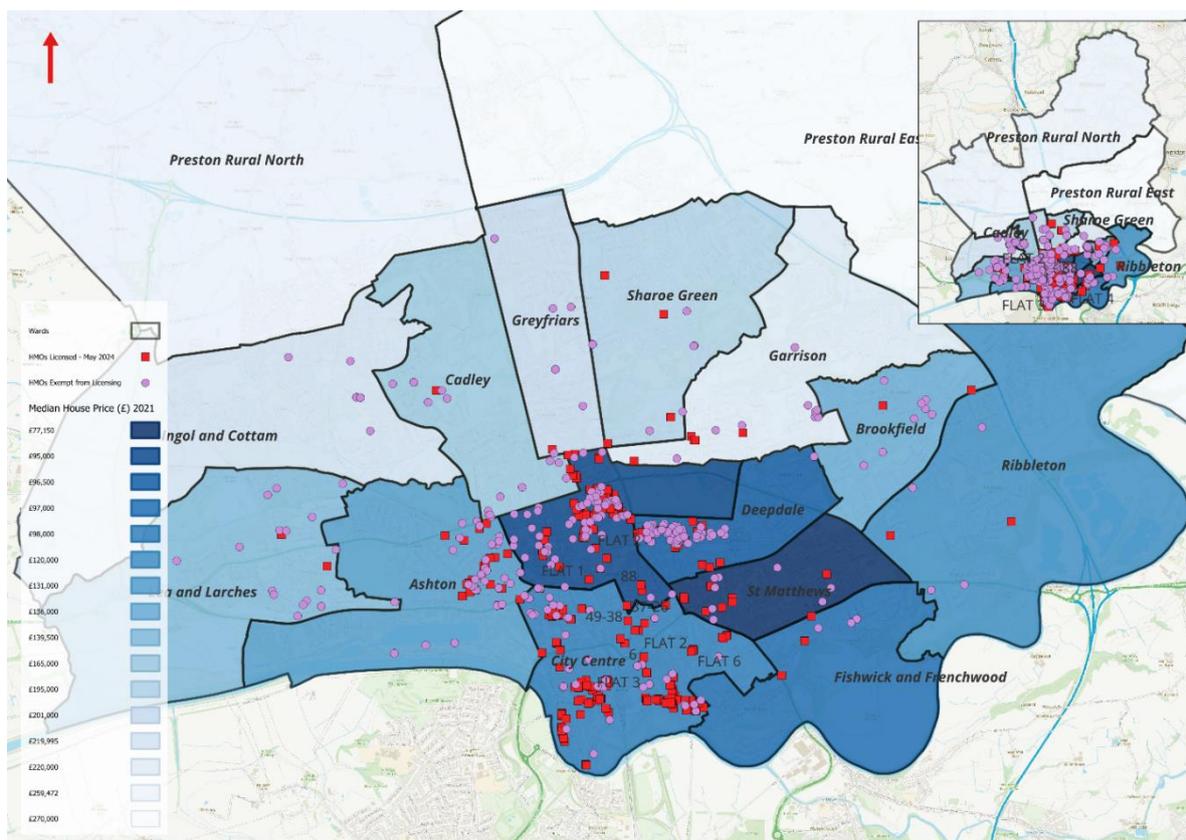


Figure 9 Median house price (£) (2021) and HMO distribution

6.14. **Preston's Housing Stock**

6.14.1. In 2023, Preston had a total of 66,025 dwellings of which 59% were owner occupied and 22 % privately rented. This is relevant as nationally only 20% of all stock is privately rented. Preston City Council is not a stock owning authority , which results in a higher proportion of owner occupied or privately rented properties ([LCC Profile](#)).

6.14.2. 18.6% of dwellings are let by registered social landlords, this percentage is the highest of this tenure in Lancashire-12 and joint highest in the Lancashire-14 area ([LCC Profile](#)). 44.8% of Preston's housing stock falls into 'band A' for council tax purposes, this is a high proportion and indicates that there are a high number of properties at the lower end of the housing market. Preston has 19,400 single person households, third highest behind Lancaster and Blackpool in Lancashire.

6.15. **Homelessness Statistics in the City**

6.15.1. Quarter 2 of 2021/22 saw the highest percentage of recorded homelessness in Preston. It was reported that 2.65 households per 1000 were found to be homeless. Blackpool was the only other authority which had a higher percentage of homelessness in this time period ([LCC Dashboard](#)).

6.16. **Employment and Income within Preston**

Economic Activity

6.16.1. Preston had the greatest provisional estimate of employee numbers in the Lancashire-14 area (2018). The district benefits from its strategic location within Lancashire and has a jobs density rate of 1.11 with 107,000 jobs (2022). This density is above the UK average (0.87) as well as the rate for the North West. An additional 23,000 people are in Preston on a workday, this is 14% higher than the usual resident population ([LCC Profile](#)).

6.16.2. In December 2023, Preston's employment rate stood at 80.4%, which is higher than the North West as a whole. Although, it's unemployment rate is higher than the North West's at 4%, but has fallen since 2022 ([ONS](#)). 21.3% of people in Preston were recorded as economically inactive between April 2023 and March 2024. People may be economically inactive due to health reasons, caring responsibilities or are retired or a student. 92.6% of those who are economically inactive do not want a job ([Nomis](#)).

6.16.3. Figure 10 (below) shows that City Centre and Plungington wards are the least economically active with 50% and 48.7% employed respectively. These are also the wards with the highest number of HMO properties.

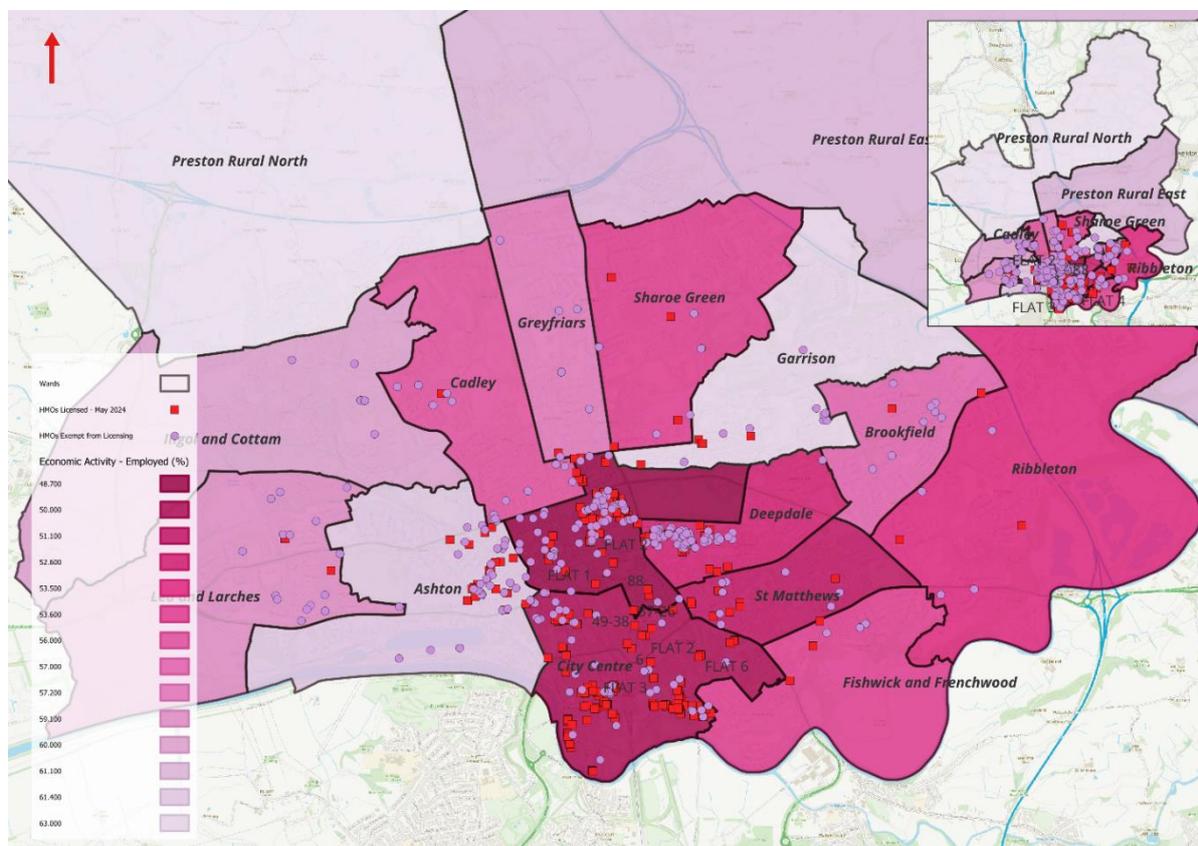


Figure 10 Map showing economic activity (Employed %) vs HMO distribution (Source)

Average Earnings

6.16.4. In Preston, median workplace-based weekly earnings are higher than their respective residence-based earnings. The weekly workplace-based estimate was £38.70 greater than the residence-based estimate (LCC Profile). Median gross annual earnings for all employees by place of residence stood at £21,688 in Preston in 2019 (LCC Profile).

Household Income

6.16.5. The estimate for the median total personal income 2014/15 was £20,200 in Preston. Alongside several other Lancashire authorities, this is statistically lower than the UK estimate of £22,400. Likewise, the median employment income estimate of £19,500 was lower than UK figure of £21,300 in 2014/15 (LCC Profile).

6.16.6. In 2021, the gross disposable household income was estimated at £17,097, below the national average of £20,425. Gross median weekly pay was also below average with an estimation of £508 for Preston ([ONS](#)).

Claimant Counts

6.16.7. The claimant count has risen again recently, with 5% of people aged 16-64 claiming unemployment related benefits. In March 2024, the claimant count in Preston was 4,815, which is an increase from March 2023 (4,315 claimants) ([ONS](#)).

Employment and Support Allowance

6.16.8. Preston had 6,500 claimants of Employment and Support Allowance (ESA) in August 2018, this is the highest across the Lancashire-12 area. There has been an overall increase in claimants since the 140 counted in November 2008 (LCC Dashboard). Preston received the greatest amount of ESA award payments per week in the Lancashire-12 area in August 2018. The payments equated to £0.815 million ([LCC Profile](#)).

6.17. **Crime**

Overall Crime Rate

6.17.1. In 2022/23 there were 16,968 crimes reported in Preston, this was equal to 111.9 crimes per 1000 people. This fell to 105.3 crimes per 1000 people from July 2023 to June 2024 with 15,968 reported crimes. This is the third highest 'all crime' rate across Lancashire and is well above the country's average ([MADE/Lancashire Constabulary Community Safety Statistics](#)).

Specific Crime Rates

6.17.2. There were 6,056 violent crimes reported between 2023 and 2024 in Preston, this was only 348 less than the year previous. These are similar figures to those reported for Hyndburn and Burnley ([MADE/Lancashire Constabulary Community Safety Statistics](#)).

6.17.3. 13,695 victim-based crime offences were recorded in Q1 2024 (12 months ending). 2,339 of these were violence offences against the person without injury and 1,954 were violence offences against the person with injury ([Local Government Association](#)).

6.17.4. Burglary rates were equal to that in Blackpool in 2022/23 with 7.2 crimes per 1000 people. Preston is particularly high in rates of anti-social behaviour, with 6,741 instances reported from July 2023 to June 2024. Whilst there were

211 reported robberies ([MADE/Lancashire Constabulary Community Safety Statistics](#)).

6.17.5. LCC ‘[Crime in Lancashire 2022/23](#)’ suggests that the crime rate and high number of theft offences in Preston may be linked to the City Centre shopping area, student population and night-time economy. This compared to neighbouring predominantly rural authorities such as Ribble Valley and West Lancashire who have significantly lower rates of crime.

6.17.6. Figure 11 below shows that the City Centre ward has the highest crime rate per 1000 at 336. The rate is more than double any other ward. This is followed by St Matthews, Plungington, Deepdale and Ribbleton wards. The statistics correlate to those areas with high concentrations of HMOs. Those wards with a lower crime rate either have no recorded HMOs or lower numbers of HMO properties.

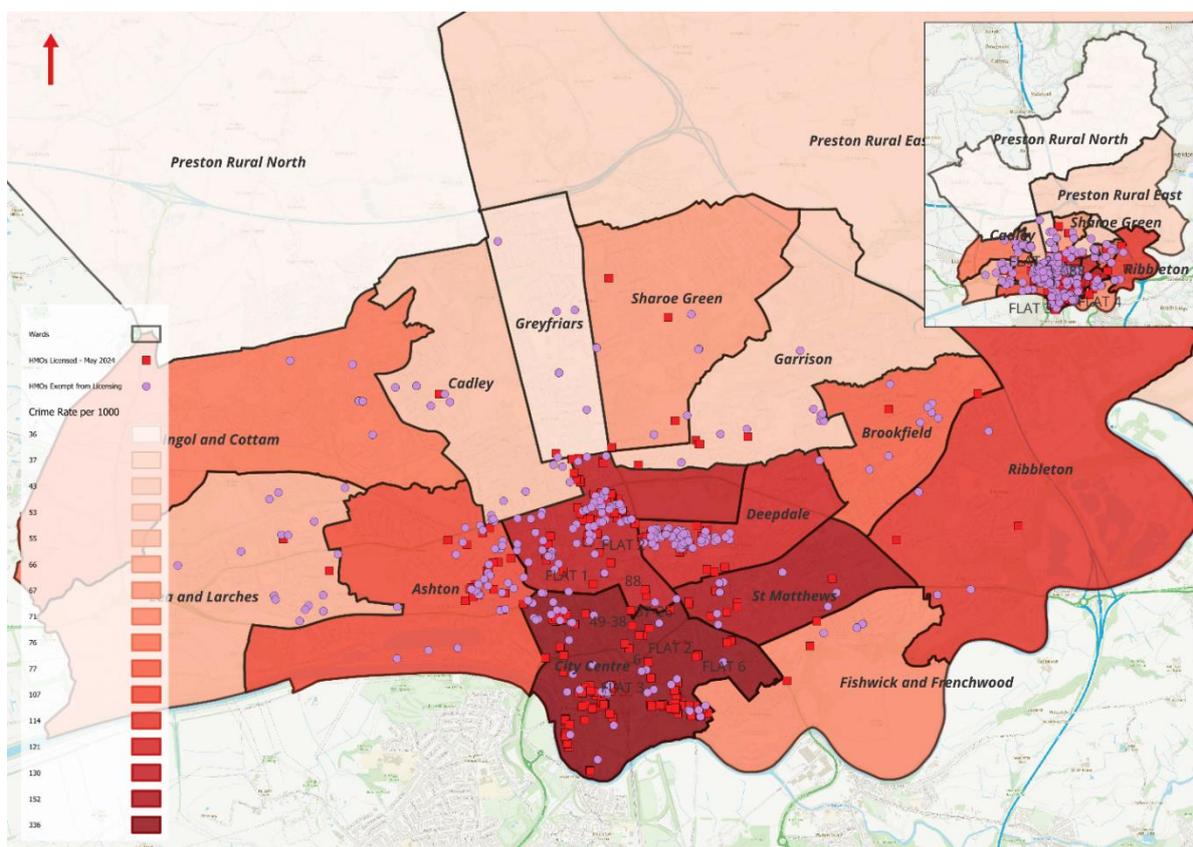


Figure 11 Crime rate per 1000 and HMO distribution across the City

Housing Register – Crime

6.17.7. The postcodes of housing register applications have been matched to the postcodes of known HMOs within Preston. These matches have been assessed against categorises of ‘Reasons’ in which the applicant is seeking

to move into housing association accommodation from their current HMO accommodation where the stated reason links to crime (or the threat of):

Self-Assessment:

- Anti-social behaviour

Verified Need

- Applicant at risk of violence (Including Domestic Abuse)

6.17.8. The data contained within Table 8 (below) has been retrieved from the Self-Assessment portion of the application process, taken from what an applicant has selected from the tick boxes as their reason for wanting to move. As such, the reason(s) given have not yet been verified by the Council.

Table 8 Housing Register Self-Assessment No. of Applications linked to HMOs for requests to move due to Anti-Social

Housing Register: Applicant Self- Assessment Moving Reasons	
Reason:	No. of Applications Linked to Known HMO Addresses
Anti-Social Behaviour	85

6.17.9. The data contained within Table 9 (below) has been retrieved from applications where the Council have verified the reasons given and have determined the applicant falls within a need priority need banding.

Table 9 Housing Register Verified Need - No. of Applications linked to HMOs for requests to move due to Risk of Violence

Housing Register: Housing Need Verified and Banded	
Reason:	No. of Applications Linked to Known HMO Addresses
At risk of violence (Including Domestic Abuse)	6

6.18. **Environment and Health**

6.18.1. HMOs increase the density of residents in an area which puts pressure on the streetscape and physical environment. Areas or clusters of HMOs can cause pressures on parking provision, waste facilities and community facilities. Due to the transient nature of some residents, communities become imbalanced and unsustainable.

Air Quality

6.18.2. In the highly urbanised central core of Preston, air quality is relatively poor. Wards such as Plungington and Ashton scored over 1 on the Air Quality indicator which contributes to the Index of Deprivation 2019 ([LCC Profile](#)).

Life Expectancy and Mortality Rate

6.18.3. Life expectancy at birth for males is significantly worse in Preston (75.7) compared to England (78.9) (2020-22). Life expectancy for females is higher (80.7), although still lower than the expectancy for the North West (81.3) and England (82.8). Life expectancy for those in Preston falls within the worst 95% quartile ([Public Health England](#)).

6.18.4. Life expectancy at 65 years for males is significantly lower in Preston (16.8) than England (18.4). Likewise, life expectancy at 65 years for females is significantly lower (19.5) than the Lancashire-12 area (20.3) and England (20.9) ([LCC Profile](#)).

6.18.5. Preston's mortality rate for under 75 from all causes is 433 per 100,000 which falls into the worst 95% quartile (2022) ([Public Health England](#)).

Alcohol Profile

6.18.6. Preston's alcohol profile below (figure 12) shows that the authorities' alcohol-related mortality is higher than the values of the North West and England. This data has not significantly changed overtime, indicating that this has been an ongoing challenge for the area ([Office for Health Improvement & Disparities](#)).

6.18.7. The potential years of life lost due to alcohol related conditions is higher for males than females. Again, both figures are above that of the North West and England. Preston falls into the worse 95% for mortality from chronic liver disease with 69 cases between 2017-2019 ([Office for Health Improvement & Disparities](#)).

6.18.8. In the period 2022/23, there were 1,194 admission episodes for alcohol specific conditions. The overall and 'broad' data shown in this category shows that Preston falls into the worst 95% ([Office for Health Improvement & Disparities](#)).

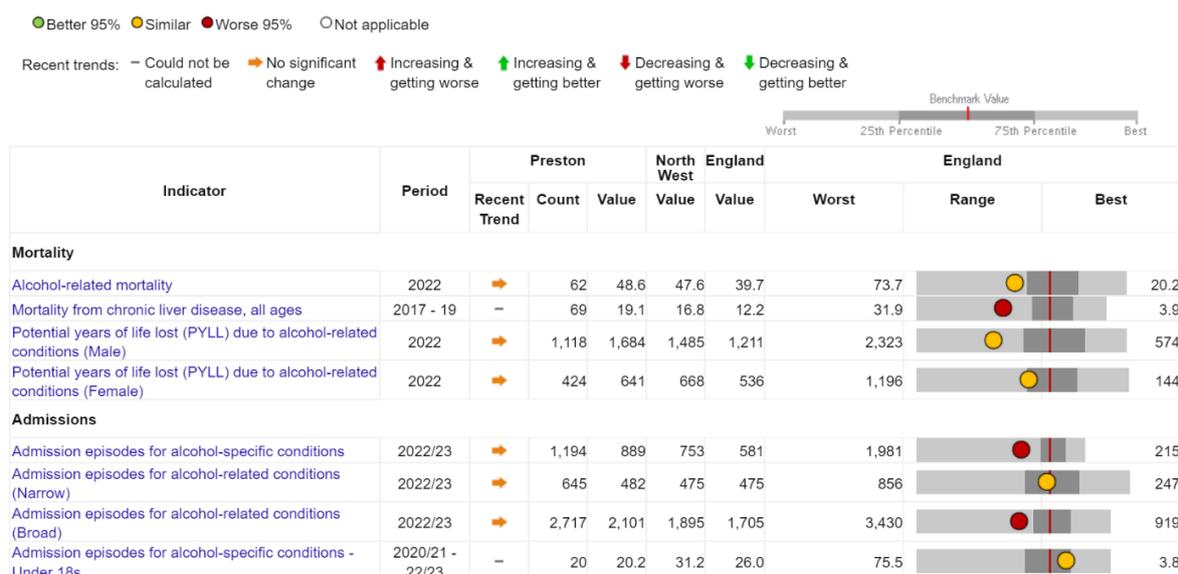


Figure 12 Alcohol Profile for Preston (Source: *Office for Health Improvement & Disparities*)

6.19. Comparison with other Local Authorities

6.19.1. ONS data analysis has concluded that Preston is in global cluster C. A comparison of indicators and analysis provided by ONS concluded that the district is similar to Blackburn with Darwen, Blackpool, Burnley, Hyndburn, Lancaster, several Greater Manchester and Merseyside local authorities. A full list can be found [here](#).

6.19.2. These areas are mostly urban local authorities and past industrial heartlands of the UK. Common indicators include a low rate of level 3+ qualifications, low healthy life expectancy, high proportion of children in relative poverty and low domestic electricity consumption (ONS). Blackpool, Blackburn with Darwen, Burnley, West Lancashire and Lancaster all have Article 4 Directions in place in relation to HMOs. These areas share characteristics with Preston, particularly relating to student accommodation and high deprivation levels in the inner urban areas.

6.19.3. HMOs occupied by students are the primary source of HMOs in the Lancaster district. Like Preston, a large concentration of HMOs is in and around residential areas, close to the university, services and amenities. Similarly, HMOs in West Lancashire are concentrated in the residential areas of Ormskirk. More affordable family homes have been taken from the market and have been converted into HMO properties for students. This is

detrimental to the character of the area, parking availability and a rise in anti-social behaviour.

6.19.4. Much like Preston, Blackburn with Darwen and Bolton have the largest concentration of HMOs within the most deprived areas, mainly located in the urban area or city centre. The growth of HMOs in Blackburn with Darwen, beyond the (now previous) Article 4 Direction, was an element of the justification to extend it to cover the whole urban area, which included those areas with the most deprivation. Alike Preston, those areas with no HMOs, have the highest median house prices and are unlikely to be an attractive opportunity for conversion to an HMO property.

7. JUSTIFICATION AND PROPOSED ARTICLE 4 DIRECTION AREA

7.1. *Rationale and Justification*

7.1.1. Government guidance is that Article 4 Directions should apply to the smallest geographical level possible. The 2012 Article 4 Direction HMO covered 8 wards (with the ward boundaries drawn as they applied at that time (Pre-May 2019)).

7.1.2. The evidence presented through this evidence documents has demonstrated that HMO numbers have grown considerably within those areas covered by the original Article 4 Direction, and we are also seeing growth of HMOs in wards beyond areas covered by the original Article 4 Direction.

7.1.3. Without Council intervention, there is a risk that the City will see:

- i) a continued intensification of HMO numbers within wards covered by the existing Article 4 Direction; and
- ii) growth of HMO numbers within adjacent wards when the new planning policy approach towards HMOs is applied.

7.1.4. The Council will continue to monitor the Article 4 Direction and review the area of its extent.

7.2. *Proposed Article 4 Direction Area*

7.2.1. To protect local amenity and the well-being of the area from further harm, the Council therefore proposes to extend the Article 4 Directions as to cover the main urban areas of the City.

7.2.2. The boundary of those urban areas is defined as the areas of the City: south of the M55 motorway, west of the M6, north of the River Ribble and east of the A582 (Edith Rigby Way) as well as including the areas of the approved ‘Bartle Garden Village’ in which the red-edge boundary extends to the West of the A582 (Application Reference Number: 06/2020/0888).

7.2.3. The new Article 4 Direction, once in effect, will replace the 2012 Article 4 Direction and its designated areas as shown in Figure 13 below.

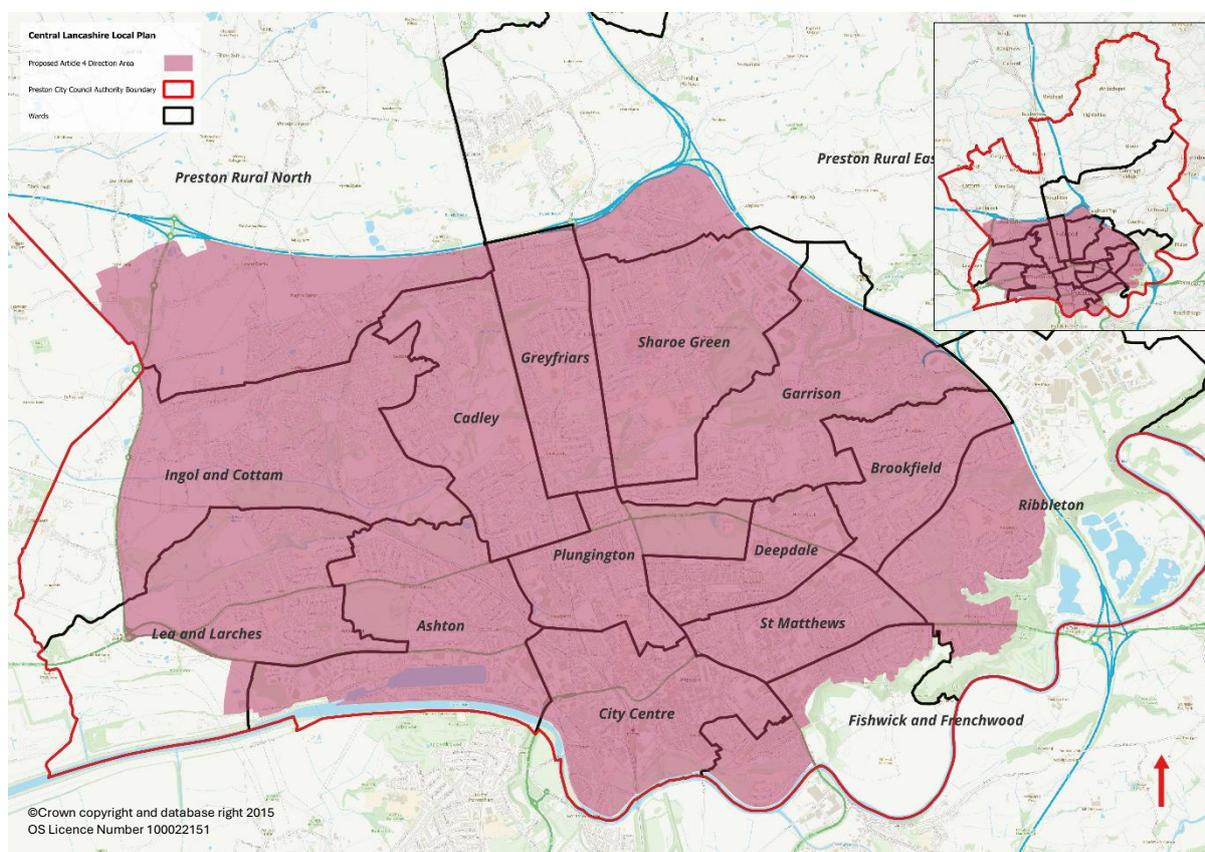


Figure 13 Proposed Article 4 Direction Area

7.2.4. As shown in Figure 13 (above) and Appendix 5, the proposed area is considered to be the smallest, most appropriate geographical level to apply for the reasons evidenced through this document.

7.2.5. The remaining non-urban areas of the City are considered to be self-regulating due to higher house prices and rural locations dissuading their conversion to HMOs by potential landlords. But, as before, the Article 4 Direction will be subject to future monitoring and review, and should issues

disperse into those areas to create negative impacts on local amenity, then the boundaries can again be considered.

7.2.6. The proposed Article 4 Direction HMO would not remove the permitted development right for an existing Class C4 small HMOs to revert its main use back into Class C3 dwellinghouse. Planning permission would need to be obtained to change use from a dwellinghouse back into an HMO. Under these proposals, that would likely result in a refusal of planning permission under Policy HS7. However, the number of cases of this example are expected to be few in number.

7.3. **Risks and Mitigation Measures**

7.3.1. The Council have set out identified risks associated with the approach of bringing the proposed Article 4(1) Direction into force within Preston, these are set out within Table 10 below.

Table 10 Table of Risk and Mitigation Measures associated with bringing the proposed Article 4(1) Direction into force.

Risk	Mitigation
The current situation will remain in place for a further 12 months whilst the non-immediate direction is introduced. In this time, there could be a ‘rush’ of conversions to avoid the future requirement for planning application.	Planning is just one part of the regulatory process available to the Council to manage the conversion of properties to HMOs.. The only alternative to a non-immediate direction would be to introduce an immediate direction, but this would leave the Council open to the risk of financial compensation for a 12-month period. The existing policy and extant Article 4 Direction will remain in the interim reducing the areas exposed to this risk.
Planning applications for the conversion to an HMO in an Article 4 Direction area are exempt from a planning fee.	Under the emerging draft Policy HS10 (Houses in Multiple Occupation (HMOs)), it is expected that all applications will result in a refusal, which may deter applicants. The cost of processing applications will be met through the existing budget for the Development Management department.

<p>The extended Article 4 Direction could result in a reduction in the supply of HMOs.</p>	<p><i>The Council's Housing and Economic Needs Assessment (2018) and Update (2021) identified no need for any type of this accommodation (HMOs).</i></p>
<p>Transfer of displacement of problems to other areas not covered by an Article 4 Direction.</p>	<p>The evidence shows a growth of HMOs dispersed into areas not covered by the existing Article 4 Direction, but this is understood to be because of the similar conditions across the wider urban area, including deprivation and low-cost housing, particularly for the slightly larger properties preferred as HMOs. Rural areas are considered to be self-regulating due to higher house prices and better-quality housing stock dissuading conversion to HMOs.</p>

8. PUBLIC CONSULTATION

8.1. **Stages**

8.1.1. Introducing an Article 4 Direction is a two-stage process.

Stage One:

8.1.2. At the first stage the Council will 'make' the direction and carry out a consultation within the areas where the proposed Direction will take effect. The consultation is carried out in accordance with [The Town and Country Planning \(General Permitted Development\) \(England\) Order 2015](#) and this provides the opportunity for interested parties to make representations.

Stage Two:

8.1.3. The second stage is confirmation of the direction by the Council after consideration of the comments received at public consultation.

8.2. **Public Consultation**

8.2.1. A consultation period will be carried out in accordance with Schedule 3 of The Town and Country Planning (General Permitted Development) (England) Order 2015 and the Councils Statement of Community Involvement (SCI).

8.2.2. A consultation report will be made available post-consultation summarising the consultation responses received and the Council's response.

8.2.3. If material changes are deemed necessary following the review of the consultation changes, then a further consultation may be required to consult on the significant amendments.

9. NON-IMMEDIATE ROUTE OPTION AND TIMETABLE OF INTRODUCTION

9.1. *Article 4 Direction Introduction Route Options*

9.1.1. An Article 4 Direction can either be introduced with or without immediate effect.

9.2. *Non-Immediate Route*

9.2.1. Due to the financial implications of the procedures required to introduce the direction with immediate effect, the decision was made to take the direction without immediate effect.

9.2.2. As the non-immediate route has been taken, there is a 12-month lead-in period from the date the Direction is 'made' to the date it takes effect. A Council has the power to 'confirm' an Article 4 Direction, although the Secretary of State will be notified in line with the legislative requirements and will intervene if deemed necessary.

APPENDIX 1: TABLE OF CHANGE OF USE PLANNING APPLICATIONS (2010-to-2015)

Application number	Location	Decision description
06/2010/0338	58 Brackenbury Road, Fulwood, Preston, Lancashire, PR1 7UQ	Approval with conditions
06/2010/0337	89 Brackenbury Road, Fulwood, Preston, Lancashire, PR1 7UR	Approval with conditions
06/2014/0265	91 Symonds Road, Fulwood, Preston, Lancashire, PR2 3DJ	Approval with conditions
06/2014/0267	88 Christ Church Street, Preston, Lancashire, PR1 8PJ	Approval with conditions
06/2011/0612	25 Bird Street, Preston, Lancashire, PR1 8DY	Approval with conditions
06/2013/0364	29A Ribblesdale Place, Preston, Lancashire, PR1 3NA	Approval with conditions
06/2015/0838	12 Cross Street, Preston, Lancashire, PR1 3LT	Approval with conditions
06/2014/0297	206 St Thomas Road, Preston, Lancashire, PR1 6LN	Approval with conditions
06/2014/0631	281 Fylde Road, Preston, Lancashire, PR2 2NH	Approval with conditions
06/2013/0503	8 Suffolk Road, Preston, Lancashire, PR1 6LA	Approval with conditions
06/2014/0198	172 Plungington Road, Preston, Lancashire, PR1 7UD	Approval with conditions
06/2015/0772	18 Spa Road, Preston, Lancashire, PR1 8SL	Approval with conditions
06/2012/0891	30 West Cliff, Preston, Lancashire, PR1 8HU	Withdrawn
06/2010/0479	5, 6 & 7 St Wilfrid Street, Preston, Lancashire, PR1 2US	Approval with conditions
06/2013/0529	24 Spa Road, Preston, Lancashire, PR1 8SL	Approval with conditions
06/2014/0250	42 Wellington Road, Ashton, Preston, Lancashire, PR2 1BU	Approval with conditions
06/2013/0541	18 Spring Bank, Preston, Lancashire, PR1 8PL	Approval with conditions

APPENDIX 2: TABLE OF CHANGE OF USE PLANNING APPLICATIONS (2016-to-2024)

Application number	Location	Decision description
06/2023/0648	85, Cambridge Street, Preston, PR1 7XA	Approval with conditions
06/2022/0854	36, Broadgate, Preston, PR1 8DU	Approval with conditions
06/2017/1321	7 Latham Street, Preston, PR1 3TE	Approval with conditions
06/2018/0833	43, Whinfield Lane, Preston, PR2 1NQ	Withdrawn
06/2021/0034	37 Ashton Street, Preston, PR2 2PP	Approval with conditions
06/2022/0099	58 Jemmett Street, Preston, PR1 7XJ	Approval with conditions
06/2021/1558	37, Broadgate, Preston, PR1 8DU	Approval with conditions
06/2019/0490	38 Frenchwood Street, Preston, PR1 3SU	Finally disposed
06/2021/1253	10 Moor Hall Street, Preston, PR1 7XL	Approval with conditions
06/2023/0127	31 Priory Street, Preston, PR2 2QB	Withdrawn
06/2020/0725	56 Eldon Street, Preston, PR1 7PJ	Pending consideration
06/2023/0307	43, Cardigan Street, Preston, PR2 2AS	Approval with conditions
06/2023/1325	3 Brixey Street, Preston, PR1 8EB	Approval with conditions
06/2017/0750	25 , Wellington Street, PRESTON, PR1 8TQ	Approval with conditions
06/2018/1121	1 North Cliff Street, Preston, PR1 8JA	Approval with conditions
06/2024/0586	1 Moor Hall Street, Preston, PR1 7XL	Pending consideration
06/2024/0587	23, Waterloo Terrace, Preston, PR2 1DA	Pending consideration
06/2021/1091	30 Broadgate, Preston, PR1 8DX	Approval with conditions

06/2021/1132	282 Plungington Road, Preston, PR2 3PR	Approval with conditions
06/2020/0676	33 Broadgate, Preston, PR1 8DU	Approval with conditions
06/2023/0929	63, Lytham Road, Preston, PR2 8JD	Approval with conditions
06/2024/0648	16, Portland Street, Preston, PR1 8PR	Pending consideration
06/2021/0988	195 Tulketh Brow, Preston, PR2 2JD	Approval with conditions
06/2023/0193	44 De Lacy Street, Preston, PR2 2DD	Approval with conditions
06/2024/0442	32, Christ Church Street, Preston, PR1 8PJ	Approval with conditions
06/2019/0188	16 Spa Road, Preston, PR1 8SL	Approval with conditions
06/2022/0733	8 Murray Street, Preston, PR1 7HY	Approval with conditions
06/2022/0350	145, De Lacy Street, Preston, PR2 2AP	Approval with conditions
06/2022/1255	43, Eldon Street, Preston, PR1 7PJ	Approval with conditions
06/2023/0305	59, Elmsley Street, Preston, PR1 7XE	Approval with conditions
06/2023/0609	30 Ecroyd Road, Preston, Lancashire, PR2 2LA	Approval with conditions
06/2023/0268	61, Wellfield Road, Preston, PR1 8SP	Approval with conditions
06/2023/0934	61, Wellfield Road, Preston, PR1 8SP	Approval with conditions
06/2022/0614	81 Eldon Street, Preston, Lancashire, PR1 7PL	Approval with conditions
06/2022/1352	19, Chaddock Street, Preston, PR1 3TL	Approval with conditions
06/2023/0796	31, Priory Street, Preston, PR2 2QB	Refusal
06/2022/0964	42 Great Avenham Street, Preston, PR1 3TD	Approval with conditions
06/2021/1449	42, Broadgate, Preston, PR1 8DU	Approval with conditions

06/2023/0225	59 Wellfield Road, Preston, PR1 8SP	Approval with conditions
06/2023/0890	59 Wellfield Road, Preston, PR1 8SP	Approval with conditions
06/2023/0439	154, Havelock Street, Preston, PR1 7NJ	Approval with conditions
06/2023/0610	89, Wellington Road, Preston, PR2 1BX	Approval with conditions
06/2023/1067	30, Chaddock Street, Preston, PR1 3TL	Approval with conditions
06/2020/0028	93, Watling Street Road, Preston, PR2 8BQ	Approval with conditions
06/2020/0077	3, Camden Place, Preston, PR1 3JL	Approval with conditions
06/2016/0587	2 Eldon Street, Preston, Lancashire, PR1 7YE	Approval with conditions
06/2017/1271	4, Camden Place, Preston, Lancashire, PR1 3JL	Approval with conditions
06/2017/1452	101 Plungington Road, PRESTON, PR1 7UE	Approval with conditions
06/2020/0712	56 Eldon Street, Preston, PR1 7PJ	Approval with conditions
06/2020/0720	13 Lorraine Avenue, Preston, PR2 3BL	Approval with conditions
06/2023/0183	35 Lowndes Street, Preston, Lancashire, PR1 7XS	Approval with conditions
06/2020/1279	28, Eldon Street, Preston, PR1 7YE	Approval with conditions
06/2021/1303	51, Wildman Street, Preston, PR1 7QJ	Approval with conditions
06/2016/0528	1 Broughton Street, Preston, Lancashire, PR1 7US	Withdrawn
06/2016/0266	107 Plungington Road, Preston, Lancashire, PR1 7UE	Approval with conditions
06/2017/0768	1 , Camden Place, PRESTON, PR1 3JL	Approval with conditions
06/2017/1273	38, Frenchwood Street, Preston, Lancashire, PR1 3SU	Withdrawn
06/2016/0191	77 Broughton Street, Preston, Lancashire, PR1 7UU	Approval with conditions

06/2017/0442	17, Spa Road, Preston, PR1 8SL	Approval with conditions
06/2017/0032	15 , Spa Road, PRESTON, PR1 8SL	Approval with conditions
06/2016/0811	1, Broughton Street, Preston, PR1 7US	Approval with conditions
06/2020/0426	55 Lark Hill Street, Preston, PR1 4JJ	Approval with conditions
06/2021/0066	7 St Marks Road, Preston, PR1 8TL	Approval with conditions
06/2021/0861	74 Emmanuel Street, Preston, PR1 7HU	Approval with conditions
06/2017/0765	33 , Bairstow Street, PRESTON, PR1 3TN	Withdrawn
06/2018/0205	28, Great Avenham Street, Preston, Lancashire, PR1 3TD	Approval with conditions
06/2021/1506	51 Lytham Road, Preston, PR2 8JD	Approval with conditions
06/2021/1227	27, Broadgate, Preston, PR1 8DX	Approval with conditions
06/2023/0298	6, Fishergate Hill, Preston, PR1 8JB	Approval with conditions
06/2023/1087	40, Hesketh Street, Preston, PR2 2RY	Approval with conditions
06/2023/0575	10, Moor Hall Street, Preston, PR1 7XL	Approval with conditions
06/2021/1374	22, Broadgate, Preston, PR1 8DX	Approval with conditions
06/2021/0391	24 Waterloo Road, Preston, PR2 1BQ	Approval with conditions
06/2021/0077	11 St Ignatius Square, Preston, PR1 1TT	Withdrawn
06/2021/1577	28-29, Broadgate, Preston, PR1 8DX	Approval with conditions
06/2022/0398	55A, Bridge Road, Preston, PR2 2JU	Approval with conditions

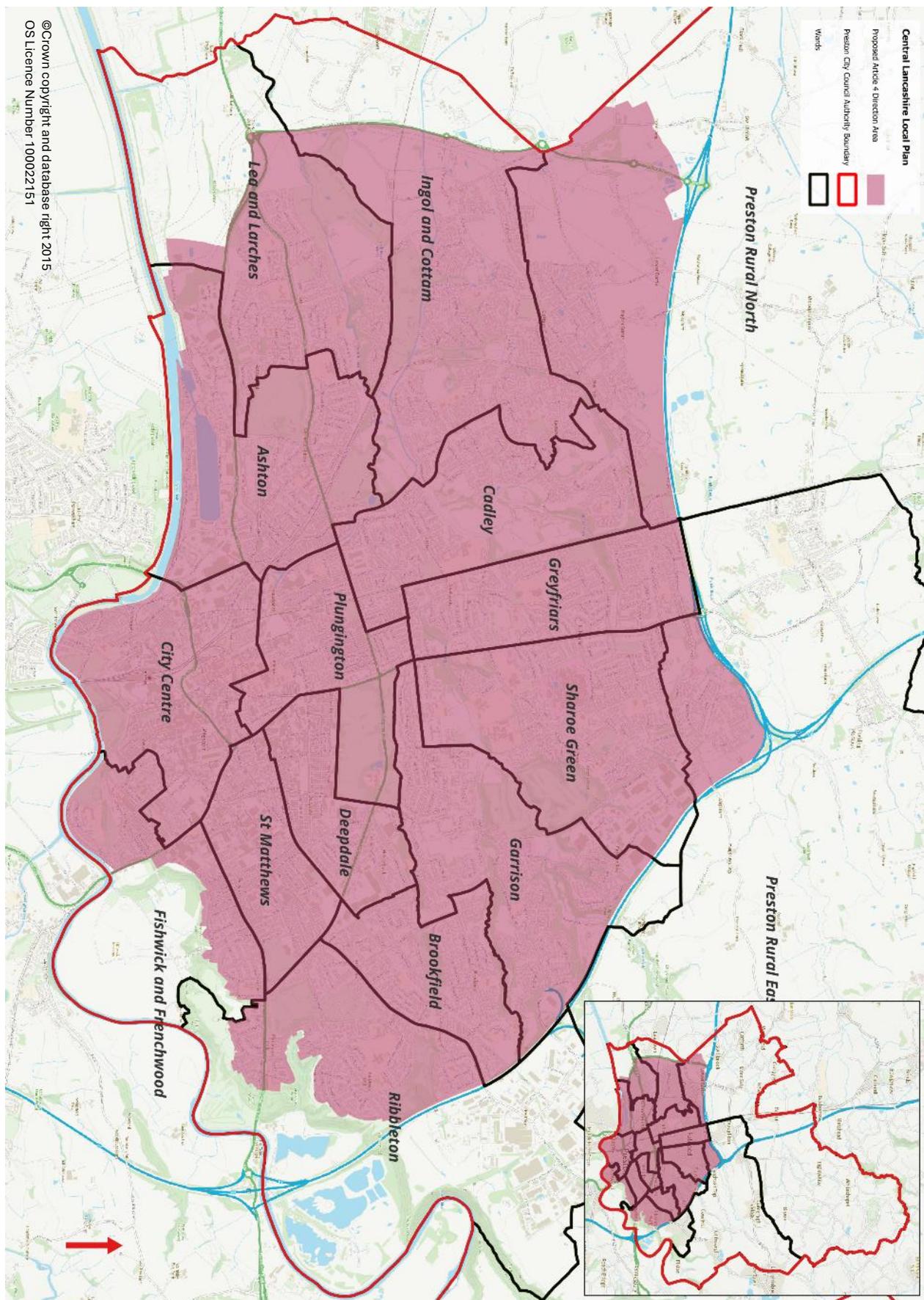
APPENDIX 3: TABLE OF CERTIFICATE OF LAWFULNESS FOR EXISTING CLASS C4 USE (2010-TO-2015)

<u>Application number</u>	<u>Address</u>	<u>Decision description</u>
06/2013/0687	3 Broughton Street	Grant certificate

APPENDIX 4: TABLE OF CERTIFICATE OF LAWFULNESS FOR EXISTING CLASS C4 USE (2016-TO-2024)

<u>Application number</u>	<u>Address</u>	<u>Decision description</u>
06/2016/1265	13 North Cliff Street	Grant certificate
06/2018/0934	3 Latham Street	Grant certificate
06/2019/0541	Flat 1, 43-45 Glovers Court	Refuse to grant certificate
06/2019/1274	43-45 Glovers Court	Grant certificate
06/2020/0448	5 Broadgate	Grant certificate
06/2020/0567	148 Tulketh Brow	Grant certificate
06/2021/0024	71 Waterloo Terrace	Grant certificate
06/2021/0277	27 Wellington Street	Grant certificate
06/2021/0325	56 Wellfield Road	Refuse to grant certificate
06/2022/0531	St Annes House, Waddington Road	Grant certificate
06/2022/1016	93 Waterloo Road	Grant certificate
06/2023/0948	64 Brackenbury Road	Grant certificate
06/2023/1134	226 Manchester Road	Refuse to grant certificate

APPENDIX 5: PROPOSED ARTICLE 4 DIRECTION AREA





Preston
City Council