Article 4 Direction Evidence Report

Removal of permitted development (PD) rights for the change of use from Use Class C3 (dwelling houses) to C4 (HMOs).

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Glossary

'HMO' means a house in multiple occupation as defined in Sections 254-259 of the Housing Act 2004

'GPDO' means the Town and Country Planning (General Permitted Development)(England) Order 2015 as amended

'**LCR'** means the Liverpool City Region that includes the Knowsley Metropolitan Borough area and encompasses the City of Liverpool, St. Helens, Sefton, Wirral and Halton borough areas.

'MHCLG' means the Ministry of Housing, Communities and Local Government. The Secretary of State for Housing, Communities and Local Government.

'**NPPF'** means the National Planning Policy Framework published by the MHCLG as amended from time to time. At the time of preparation the latest NPPF was published on 17 August 2026

'Permitted Development' means the various forms of development that by Article 3 of the GPDOcan be carried out without obtaining an express grant of planning permission

'UCO' means the Town and Country Planning (Use Classes) Order 1987 as amended

Introduction

This paper provides the evidence base and policy context for the prospective introduction of an Article 4 Direction relating to the material change of use of a dwellinghouse in Use Class C3 of the UCO to a House in Multiple of Occupation (HMO) in Use Class C4 of the UCO throughout the Metropolitan Borough of Knowsley.

Sections 254-259 of *the Housing Act 2004* define an HMO as a building, part of a building, or a flat occupied as the only or main residence of three or more persons forming two or more households, where the occupiers share one or more basic amenities (such as a kitchen, bathroom or toilet), or where the accommodation lacks one or more of those amenities. The term also includes certain converted buildings and converted blocks of flats as defined by Part 7 of the Housing Act 2004. This means that only properties with 3 or more residents can be classed as an HMO.

Use Class C4 in the UCO incorporates HMOs used by not more than six residents as a "house in multiple occupation" but does not include a converted block of flats to which section 257 of the Housing Act 2004 applies. These HMOs are referred to as 'small HMOs', larger HMOs of 6 or more people do not fall within a planning 'Use Class' and always require planning permission.

By establishing an Article 4 Direction, permitted development rights are withdrawn, preventing the conversion of dwellinghouses to HMOs under permitted development and requiring an express grant of planning permission for such change of use.

An Article 4 Direction would not prevent the change of use of buildings to HMOs to be used as a form of private sector housing, rather these measures allow Knowsley Council to have greater control of conversion of housing stock in the Borough into HMOs.

National Policy and Legislative Context

In England Permitted Development rights allow for the conversion of dwellinghouses to small HMOs without an express grant of planning permission. It is recognised that local circumstances may make certain permitted development rights inappropriate, so directions made under Article 4 of the GPDO can be used to restrict these Permitted Development rights. 'Article 4' restrictions can be either temporary or permanent, with the Secretary of State for Housing, Communities and Local Government or the local planning authority able to implement them in an identified geographical area. The Secretary of State does not need to explicitly agree to an Article 4 Direction established by a local council, but must be informed of them and has the capacity to modify or block them if they consider it necessary.

The *National Planning Policy Framework* (NPPF) in paragraph *DM10: Removal of national permitted development rights* advises that:

1. *The use of Article 4 directions to remove permitted development rights should:*

a. *Be limited to situations where it is necessary to protect local amenity or the wellbeing of the area (for example safeguarding against the demolition of local facilities preventing an over-concentration of uses which could affect the quality of life such as small Houses in Multiple Occupation, or supporting the vitality and viability of parts of town centres);*
b. *Be based on robust evidence; and*
c. *Apply to the smallest area required to mitigate the evidenced harm.*

The GPDO establishes 2 procedures for the making of Article 4 Directions that can be pursued by Knowsley Council:

1. An immediate Article 4 Direction which takes effect on the date of the direction, with a consultation period proceeding confirmation of the direction
2. A non-immediate Article 4 Direction which allows for a consultation period that precedes implementation. A non-immediate Article 4 Direction takes effect 12 months after a Councils decision to implement it.

In accordance with *Sections 107 and 108 of The Town and Country Planning Act 1990* and *The Town and Country Planning (Compensation) (England)Regulations 2015*, property owners whose permitted development rights have been restricted by the immediate implementation of an Article 4 Direction may be eligible to receive compensation following refusal of planning permission or a conditional planning permission with onerous conditions.

Regional Context

There are several planning authorities within and surrounding the Liverpool City Region that have already introduced Article 4 Directions restricting permitted development rights for HMO conversions. Liverpool, Halton and Sefton have confirmed Article 4 Directions in place, whilst St. Helens has recently commenced the implementation of a whole Borough Article 4 Direction.

Liverpool issued a non-immediate Article 4 Direction in 2020, covering large portions of the city including Anfield, Central, Greenbank, Kensington and Fairfield, Picton, Princes Park, Riverside, Tuebrook, Stoneycroft and Wavertree wards. A total of 850 representations were received during Liverpool's statutory public consultation process, with 81% of respondents supporting the proposal to implement an Article 4 Direction. Liverpool are currently consulting on an extension to the area covered by the Article 4 Direction. In 2022 the Liverpool Local Plan was adopted, with Policy H11 detailing how to protect residential character and amenity and how in designated areas where the quantity of HMOs exceeds a certain threshold, further planning applications will not be supported.

Sefton issued a non-immediate Article 4 Direction in 2017 which covered parts of Bootle, Litherland, Seaforth, Waterloo and Southport. Restricted areas were extended in July 2025 with the immediate Article 4 Direction in the Aintree area, and a further

immediate Article 4 Direction implemented in October 2025 to encompass the entire borough. Sefton received 211 responses representing 246 residents, all responses were in support of removal of permitted development rights. No responses were recorded for the non-immediate Article 4 Direction in 2017 or the final borough-wide Article 4 Direction. Policy HC4 of the Sefton Local Plan details that if significant harm to the character of the area/general amenity of residents the conversion of dwellings to HMOs will not be supported.

Halton introduced an immediate Article 4 Direction in September 2025 within defined parts of Widnes and Runcorn. The Council received no responses from members of the public as part of the statutory public consultation process. Halton Council has an adopted Houses in Multiple Occupation Supplementary Planning Document (SPD) which sets out restrictions to limit the concentration of HMOs in small areas and aims to manage the siting of HMOs relative to other HMOs.

St Helens approved the making of a borough-wide, non-immediate Article 4 Direction in July 2026. The Direction, currently subject to consultation and confirmation, seeks to remove permitted development rights for the conversion of dwellinghouses to small HMOs across the borough. The Council has cited concerns regarding increasing HMO numbers, parking pressures, waste management, community cohesion and residential amenity as justification for the measure. St Helens also has an HMO SPD adopted in January 2026 which sets out the Council's approach to HMO management.

Wirral does not currently have an Article 4 Direction relating specifically to the conversion of dwellinghouses into HMOs.

Council	Scale of Article 4 Direction	Type of Article 4 Direction
Liverpool	Neighbourhood-specific	Non-immediate
Sefton	Area-specific	Non-immediate / immediate
Halton	Area-specific	Immediate
St Helens	Borough-wide	Non-immediate
Wirral	n/a	n/a

Table 1: Liverpool City Region HMO Article 4 Directions

Local Policy Context

Saved Policy H7 of Knowsley's Replacement Unitary Development Plan is the relevant planning policy consideration when considering planning applications that propose an HMO and other forms of accommodation such as flats, hostels and nursing and residential homes, in the Borough. These types of residential accommodation are acknowledged as an important aspect of Knowsley's housing stock, with the policy outlining how these forms of housing will be supported providing that:

a) There will be no unacceptable increase in the level of noise or disturbance, or loss of privacy, for occupiers of neighbouring property;

b) Any necessary vehicle parking areas would be adequate to meet the needs of the development, safe and screened and/or landscaped so as to avoid causing loss of visual amenity in the area;

c) Bin stores, fire escapes and clothes drying areas would be adequately screened or designed so as to avoid causing loss of visual amenity;

d) In the case of proposals to convert existing property, the property would be suitable in terms of its size and character to accommodate the development proposed; and

e) In the case of proposals for nursing or residential homes, hostels or Houses in Multiple Occupation, the proposals would not result in:

- *An existing dwelling having a nursing home, residential home, hostel or HMO on both sides; or*
- *More than 2 adjoining properties being used as a nursing home, residential home, hostel or HMO*

Saved Policy H7 is the main consideration for assessing HMO applications with the protection of residential amenity a principal consideration. The Saved Policy is only a consideration if planning permission is required so the policy is not currently a consideration when properties are converted from dwellinghouses to small HMOs.

Evidence

Houses in multiple occupation

An HMO is a property in which 3 or more unrelated people live and share basic amenities which can include kitchens and bathrooms.

Houses in Multiple Occupation provide affordable and flexible accommodation for a range of people such as single people, students, unemployed people and seasonal workers. Issues can arise with the concentration of people in relatively small places in dwellings that don't have the necessary infrastructure. These issues can include noise, disturbance, loss of residential amenity and inadequate living conditions.

The Office for National Statistics estimate that on the 2021 census day, out of a total national dwelling stock of 26,394,778 that 182,552 dwellings were HMOs. This constitutes 0.07% of dwelling stock.

In September 2026 there were 72,058 dwellings in Knowsley, of these the Council is aware of 151 HMOs that are operating meaning that HMOs make up at least 0.21% of dwelling stock. As changes of use from dwellinghouses to small HMOs can occur without planning permission under permitted development rights, and small HMOs do not require a License it is possible that the actual number of HMOs within the borough may exceed the number recorded by the Council.

HMOs are distributed across the Borough, with the Townships of Huyton and Kirkby accounting for 68.2% of known HMOs. At a ward level, it should be noted that all 15 wards in Knowsley have HMOs, with Northwood (21) and Prescot North (18) accounting for more than a quarter of all identified HMOs.

Area	HMOs	% of Total
Huyton (including Stockbridge)	54	35.8%
Kirkby	49	32.4%
Prescot (including Whiston & Cronton)	34	22.5%
Halewood	14	9.3%

Table 2: HMO distribution by Township

Ward	HMOs	% of Total
Northwood	21	13.91%
Prescot North	18	11.92%
Swanside	13	8.61%
Halewood South	12	7.95%
Stockbridge	11	7.28%
Shevington	10	6.62%
Whitefield	10	6.62%
St Gabriels	10	6.62%
Cherryfield	10	6.62%
Prescot South	9	5.96%
Whiston & Cronton	7	4.64%
Page Moss	7	4.64%
St Michaels	7	4.64%
Roby	4	2.65%
Halewood North	2	1.32%

Table 3: HMO distribution by Ward

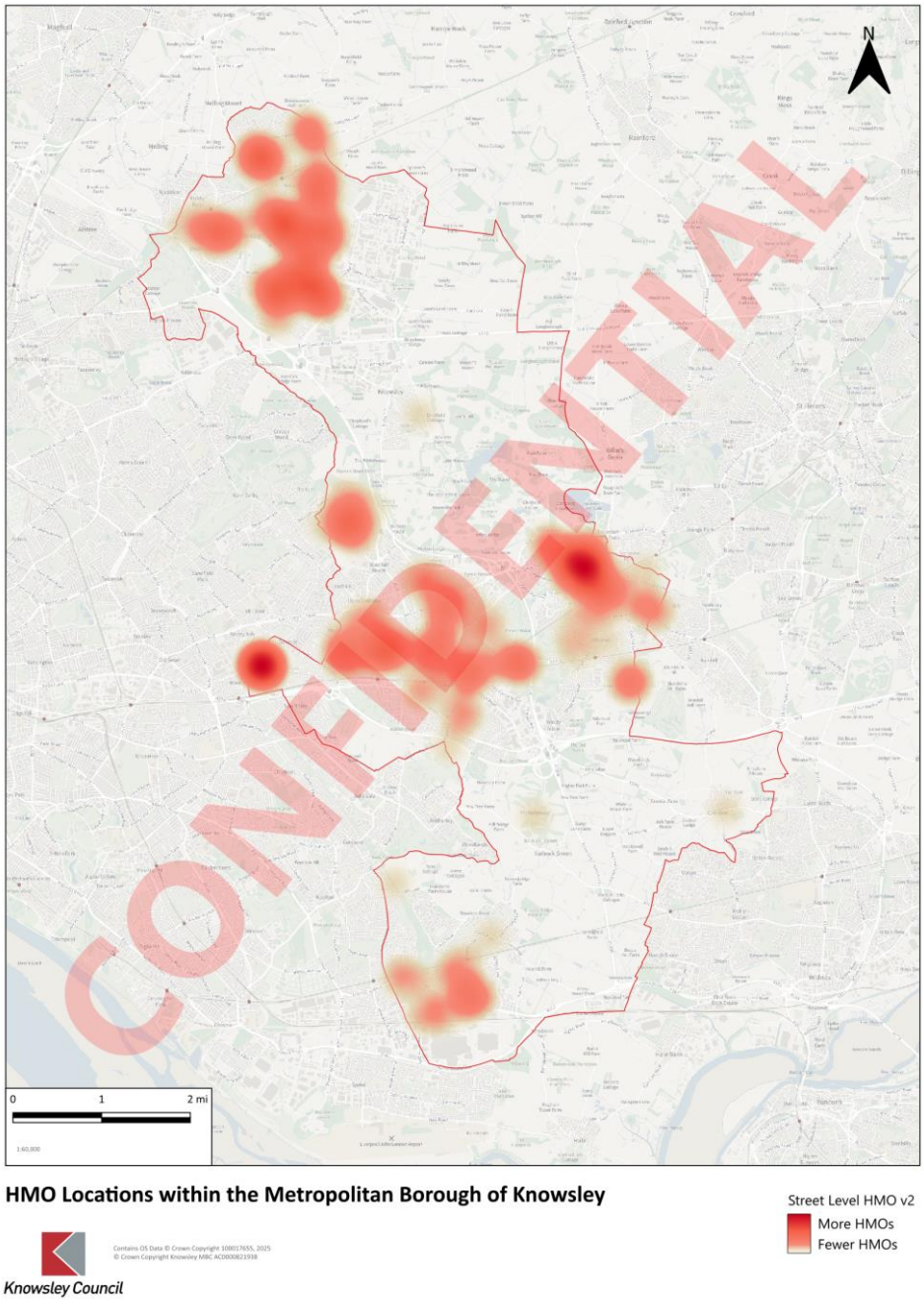


Figure 1: Heat Map of HMOs in Knowsley

Figure 1 above shows that the highest concentration of HMOs is in the east of the borough in the ward of Prescot North, specifically in the town centre of Prescot, there are also concentrations in the Cherryfield, Northwood, Shevington and Whitefield wards of Kirkby. It should be noted that all 15 wards in Knowsley contain an HMO presence.

Since 2020, the Council has received a total of 63 complaints relating to HMOs, highlighting a range of issues commonly associated with intensified residential occupation and the management of shared accommodation. These complaints related to the following matters: waste storage, collection and bin management issues, noise and disturbance, poorly maintained or overgrown gardens and reports of rat infestations.

The nature and frequency of these complaints demonstrate the potential for HMO accommodation to give rise to impacts on residential amenity where properties are not appropriately managed or inappropriate properties are converted to HMOs. The predominance of complaints relating to waste management is particularly notable, reflecting the increased pressures that higher occupancy levels can place on storage capacity and the public realm. Collectively, these issues have the potential to adversely affect the character and appearance of residential areas, neighbouring occupiers' quality of life, and perceptions of neighbourhood stability. The Council considers that these recorded complaints provide tangible evidence of the types of impacts on amenity that can arise from concentrations of HMOs and the use of unsuitable properties as HMO demonstrating the importance of controlling when dwellinghouses can be changed to small HMOs.

Year	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026 (to date)
Number of HMO complaints	0	0	0	4	10	5	10	17	17	17

Table 4: Number of Complaints Received by Environmental Health About an HMO

The above table of complaints received by Environmental Health shows that the negative impacts which can be caused by HMOs is continuing to increase. The potential for this trend of complaints to continue would conflict with the Council Plan's objective of creating strong community networks, based on principles of trust and respect for local diversity, and nurturing a sense of belonging and confidence in local people.

Character

Knowsley's character is distinctive within the Liverpool City Region, reflecting a combination of historic settlements, extensive post-war planned communities and a substantial rural hinterland. Unlike many authorities where urban development evolved more incrementally, much of Knowsley's present-day built form is the product of large-scale twentieth century expansion associated with Liverpool overspill housing, resulting in neighbourhoods with markedly different physical and social characteristics.

In Kirkby, Northwood ward has the highest percentage of its dwelling stock used as HMOs and there are signs of clustering of HMOs in both Northwood and Shevington wards. Each of these wards feature terrace housing with some semi-detached dwellings, in the post-war planned community vernacular common in the township; these dwellings were purpose-built to house families as part of the overspill from Liverpool. Instances of clustering enables the potential for applying NPPF Policy DM10.1a[1] in order to safeguard the quality of life for residents from an over-concentration of uses.

Knowsley Council operates localised residential permit schemes and trial parking management zones in specific areas affected by non-resident or commuter parking, but in residential areas not in immediate proximity to town centres and retail centres parking can be unrestricted. Dwellings where HMO concentrations have been identified tend to offer limited private parking, with a reliance on on-street parking. Limited off-street parking coupled with high-density neighbourhoods can mean limited parking provision. HMOs with several unrelated residents may generate a larger strain on parking infrastructure compared to the intended use of a single dwelling. There is a risk that the grouping of HMOs in respect to parking provision can impact the amenity of the local community, even if all residents of an HMO do not have access to a private vehicle.

In Prescot, there are early signs of HMO clustering surrounding the town centre boundary. These areas are, like in Kirkby, located in post-war neighbourhoods with lower-than-median house prices and do not feature off-street parking, therefore the same worries around parking provision and how they threaten local social amenity is still applicable.

There is also a documented HMO presence in the centre of Prescot, where housing has more of an historical legacy, with a range of Victorian and Georgian houses and flats.

As set out earlier in this report, parking is not the sole issue pertaining local character, with grouping of HMOs also placing pressure on waste storage and litter, negative

[1] See page 2

impacts on the physical environment and the provision of inadequate living accommodation for occupiers.

Housing

Average house prices (June 2026) in Knowsley (£189,116) are lower than average in the North West (£219,922) and the 3rd most affordable in the LCR, ahead of St. Helens (£186,435) and Liverpool (£185,307).

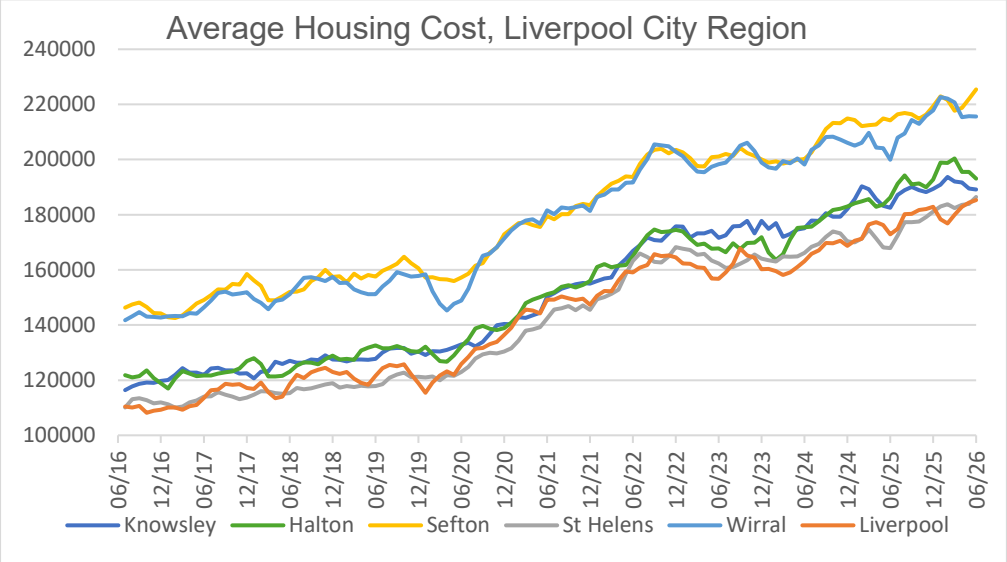


Figure 2: Average Liverpool City Region Housing Costs 2016-2026 (UK House Price Index, 2026)

Whilst average private rent prices reflect similar trends to average house prices in the LCR, the average yearly rate in which private rent prices have risen between January 2023-July 2026 is higher in Knowsley (7.8% average) than both the North West (7.7% average) and England (6.8% average). The percentage rise of private rent in Knowsley from January 2023 to July 2026, at 33.5%, is also the highest across the City Region (Liverpool: 30.6%, St. Helens: 30.2%, Sefton: 30%, Wirral: 26.8%, Halton: 24.2%).

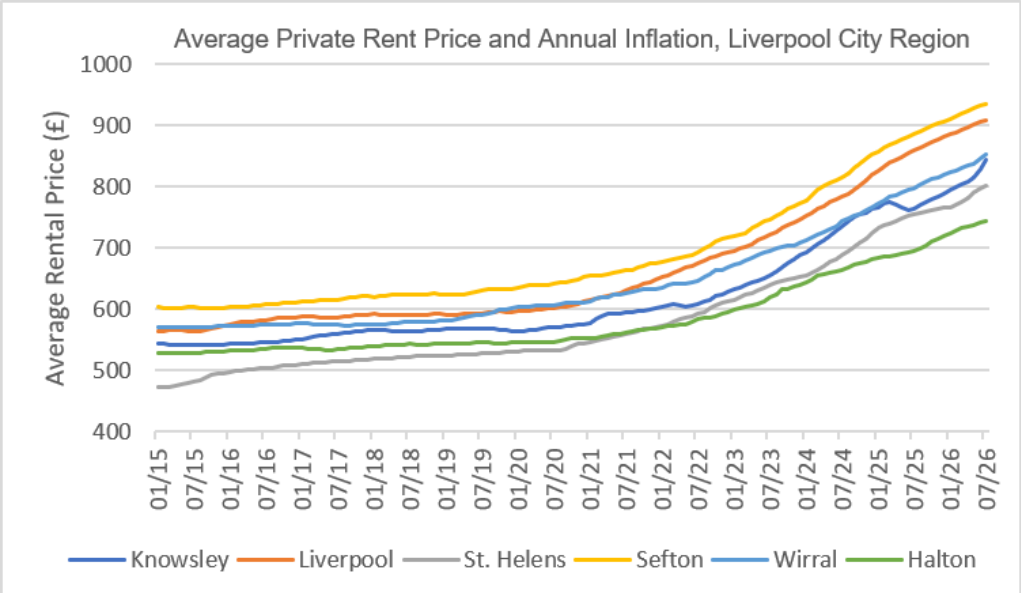


Figure 3: Average Liverpool City Region Private Rent Price and Annual Inflation 2015-2026 (ONS, 2026)

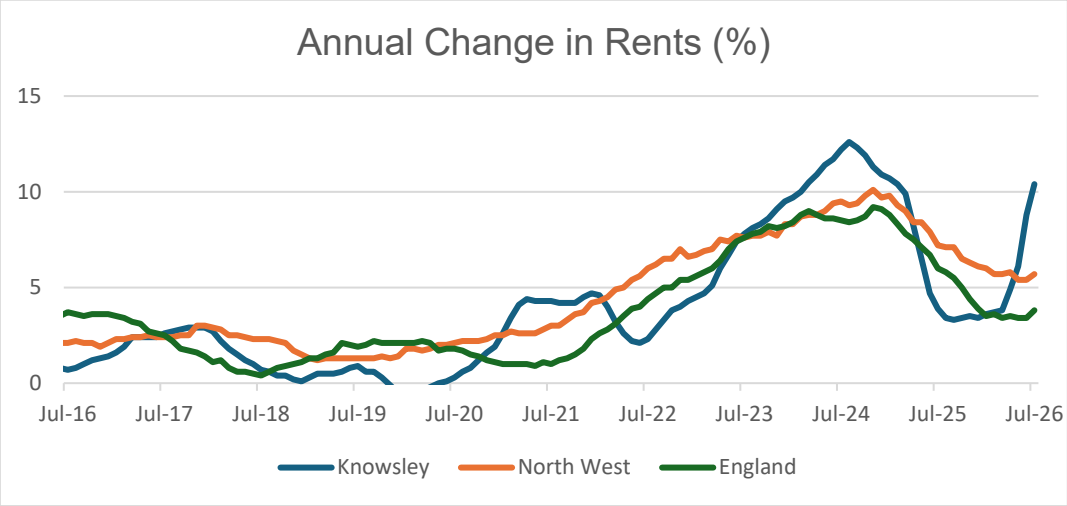


Figure 4: Comparison of Average Change in Rents for Knowsley, North West, England 2016-2026 (ONS, 2026)

Relatively low house prices make Knowsley an attractive place for landlords to purchase properties to convert to HMOs, especially in relation to rental prices which are increasing at a faster rate than neighbouring councils and the regional average.

In 2021 Knowsley Council published a Housing Needs Assessment (HNA), which included stakeholder participation surrounding the strengths and weaknesses of Knowsley's housing offering. Whilst a range of positives were noted such as affordability of ownership, high demand for properties and general quality of housing stock, consultation with stakeholders also revealed areas for improvement in the Borough.

This included the relative high price of private renting in the borough, a lack of provision of 1-bed and 2-bed dwellings, insufficient numbers of shared ownership and Rent to Buy properties and a shortage of social rented accommodation. These factors hint towards conditions that may promote the growth of HMOs across the borough as gaps in the market are identified.

Since the HNA in 2021 Knowsley's housing market has seen significant changes and challenges. Knowsley Council has overseen a successful new build affordable housing programme working with its Registered Provider partners which has delivered almost 1000 homes for rent between 2020/21 and 2025/26. However, more generally house prices and private rents have increased and the overall number of affordable homes for rent in the borough has remained static due to losses through the Right to Buy / Right to Acquire and the demolition of inadequate housing stock.

The Council has also seen the need for housing increase, in June 2026 the Council had 1311 applicants with a one-bedroom housing need on its Housing Register, which equates to 47% of all applicants. The need for more one-bedroom homes, insufficient

supply in the social and private rented sectors, low property prices and high rental values is likely to lead an increasing number of HMOs in Knowsley.

Population

At the time of the 2021 Census, Knowsley was recorded to have a population of 154,523, a rise of 5.9% from the 2011 recording of 145,893. Whilst other councils in the Liverpool City Region, saw slower population growth, such as Sefton and Halton with 2% growth each as shown in Table 5. Table 6 below shows the population change since 2011, Knowsley's population is aging, with an emphasis on the transition into the 25-44 age demographic which now accounts for 26.6% of the overall population of Knowsley.

Age	2011 Census	2021 Census	Percentage Change
0-15	28,668	30,220	5.4%
16-24	17,934	15,134	-15.6%
25-44	36,598	41,165	12.5%
45-64	39,679	41,761	5.2%
65-74	11,944	15,112	26.2%
75%	11,070	11,131	0.6%

Table 5: Knowsley Population Change 2011-2021(Census 2011, Census 2021)

Using 2021 census data, it is also possible to compare these same parameters against the authorities in the Liverpool City Region, with percentages used as a better comparative indicator, Knowsley has the highest proportion of residents in the youngest age band. As detailed in Table 8, the proportion of households relying on the private renting sector has increased and with purchasing power decreasing nationally, the likelihood of the next generation of Knowsley workers relying on the PRS may be stronger than ever. This younger demographic base in comparison to the LCR averages need to be encouraged to stay in the borough, with a strong, diverse family housing offering a reliable method to retention.

Area	Age 0-15	Age 16-24	Age 25-44	Age 45-64	Age 65-74	Age 75+
Knowsley	19.56%	9.79%	26.64%	27.03%	9.78%	7.20%
Halton	19.09%	9.52%	25.70%	27.04%	11.18%	7.47%
Liverpool	17.09%	16.14%	28.04%	23.44%	8.73%	6.56%
St. Helens	17.84%	9.12%	25.21%	27.30%	11.19%	9.35%
Sefton	16.78%	8.80%	23.19%	28.04%	11.96%	11.24%
Wirral	18.14%	8.85%	23.49%	27.53%	11.87%	10.11%

Table 6: Liverpool City Region Population Proportion by Age Band (Census 2021)

Levels of Deprivation

Knowsley has consistently been among the most deprived local authorities in England. On the Indices of Deprivation (IMD) 2025, which uses small neighbourhood level spatial data typically comprising 1,000-3,000 residents called Lower-layer Super

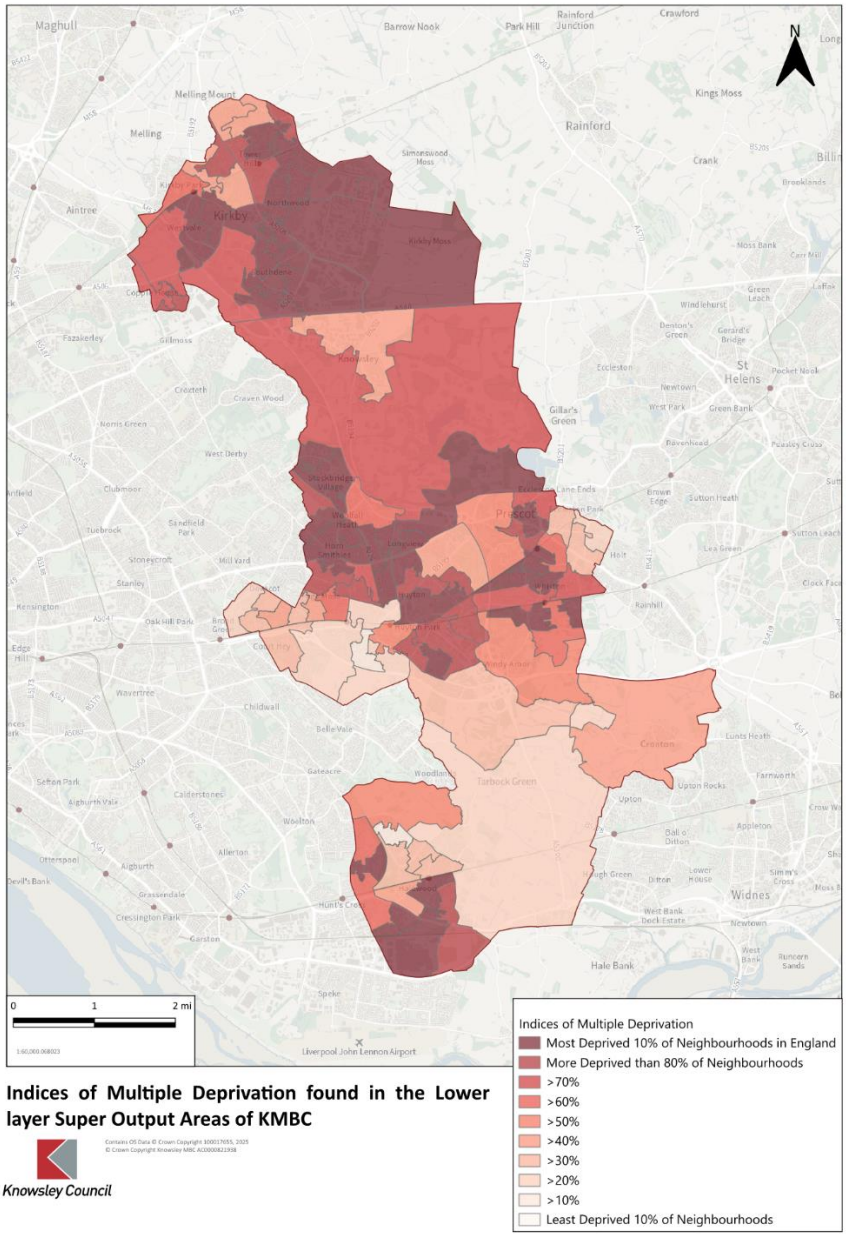
Output Areas (LSOAs), around 40% of Knowsley's neighbourhoods (40 of its 100 LSOAs) fall within the most deprived 10% nationally. The IMD identifies that the borough is affected by high levels of deprivation in relation to health, employment and education (Table 7). MHCLG's official (population-weighted) local-authority summary places Knowsley 13th of 296 English local authorities on average IMD score, 17th on average rank, and 7th on the proportion of neighbourhoods in the most-deprived national decile.

Deprivation domain	Knowsley rank in England (of 296; 1 = most deprived)
Health and disability	3
Employment	4
Education, skills and training	7
Income	25
Crime	72
Barriers to housing and services	222
Living environment	254
Overall (average score)	13 (rank of average score)

Table 7: Knowsley Deprivation by Domain (Indices of Multiple Deprivation, 2025)

It is important to recognise that within these borough-level statistics there are uneven levels of deprivation across the borough, with deprivation concentrated in particular neighbourhoods, with others considerably less deprived. This reality is acknowledged by the Knowsley Council Corporate Plan 2025-2030, which sets a priority of encouraging growth that benefits all, where nobody is left behind.

This means focussing efforts on some of the neighbourhoods with the highest indices of deprivation which is displayed below. This dataset is created by MHCLG and ranked neighbourhoods in England according to their relative level of deprivation. Comparing this with Figure 1, there is a correlation between the most deprived areas of the borough and where the greatest number of HMO properties are located. With one of the driving concerns about HMO proliferation being the potential to impact the amenity of local communities due to pressure on parking provision, waste storage, irregular working hours and general disturbance, there is a risk that allowing a greater spread of HMOs in these areas could have particularly adverse impacts in these areas.



Indices of Multiple Deprivation found in the Lower layer Super Output Areas of KMBC

Knowsley Council

Figure 5: Knowsley's Indices of Multiple Deprivation by LSOA

Tenure Profile

In 2011 it was estimated there were 61,323 dwellings in the Borough, rising to 66,073 at the time of the 2021 Census. Within this period, housing tenure has shifted, with the gap between Knowsley's historic strong offering of social housing and the private rented sector (PRS) becoming noticeably closer as more housing is now operating as part of the PRS. Increasing demand for private rented households also creates a more suitable environment for the growth of HMOs as a form of affordable housing within the PRS. Noticeably home ownership (a mix of outright ownership and ownership with a mortgage/loan) has also fallen.

Housing tenure	2011 Census		2021 Census		Percentage change (%)
	Households	Percentage (%)	Households	Percentage (%)	
Owned	37,896	61.80	39,286	59.46	-2.34
Shared ownership	314	0.51	543	0.82	0.31
Social rented	16,333	26.63	16687	25.26	-1.37
Private rented	5,980	9.75	9,461	14.32	4.57
Lives rent free	800	1.30	96	0.15	-1.15
Total	61,323		66,073		7.7

Table 8: Comparison of Knowsley's Housing Tenure (Census 2011, Census 2021)

To further contextualise these trends and what they represent, Knowsley's 2021 Census data can be compared with Liverpool City Region tenure profiles.

Housing tenure	Knowsley		Halton		Liverpool		Sefton		St. Helens		Wirral	
	Households	%	Households	%	Households	%	Households	%	Households	%	Households	%
Owned	39,286	59.5	33,840	60.5	97,041	46.8	81,991	66.6	52,049	64.3	93,114	65
Social rented	16687	25.3	13,619	24.6	54,758	26.4	17,735	14.4	15,993	19.7	22,065	15.4
Private rented	9,461	14.3	8,018	14.4	54,067	26.1	22,457	18.3	12,264	15.1	27,091	18.9
Lives rent free	96	0.2	45	0.1	247	0.1	45	0.1	80	0.1	95	0.1
Total	66,073		55,951		207,491		123,073		81,013		143,252	

Table 9: Housing Tenure Across the Liverpool City Region (Census 2021)

Looking across the LCR, Knowsley still has the lowest proportion of private rented dwellings, however this needs to be read alongside ownership rates, which are the lowest across the region, aside from within the City of Liverpool. With ownership rates nationally predicted to stagnate, it is logical that the trends of more private rented housing in Knowsley to continue rising as more housing is built. Although this claim should be balanced with the Renters Rights Act introduced in 2025 that has seen landlords leaving the sector. Whilst this may stem growth of the PRS, it is important to understand the potential fallout from this, with Knowsley's housing team noting a rise in homeless presentations as landlords look to sell properties. A growth in displaced residents may increase the demand for HMOs in Knowsley.

As explained earlier in relation to deprivation indicators, reviewing housing tenure at a more local level, the ward level, more insight can be gained into Knowsley's tenure profile. Areas with low home ownership rates also score highly on the IMD database

and this association can also be extended to HMO concentrations, with HMOs typically located in areas with low household ownership.

Knowsley Ward	Owned		Social Rented		Private Rented	
	Households	Percentage (%)	Households	Percentage (%)	Households	Percentage (%)
Cherryfield	2,626	56.8	1,195	25.9	780	16.9
Halewood North	3,109	70.5	718	16.3	519	11.8
Halewood South	2,775	62.0	1,172	26.2	463	10.3
Northwood	1,988	39.4	2,051	40.7	969	19.2
Page Moss	2,422	48.4	1,855	37.1	662	13.2
Prescot North	2,913	59.5	894	18.3	1,049	21.4
Prescot South	2,692	63.5	878	20.7	639	15.1
Roby	3,379	86.2	213	5.4	295	7.5
Shevington	2,769	60.9	920	20.2	816	18.0
St Gabriels	2,494	60.2	1,002	24.2	616	14.9
St Michaels	2,061	51.5	1,420	35.5	473	11.8
Stockbridge	1,844	39.3	2,188	46.6	602	12.8
Swanside	3,211	83.1	205	5.3	438	11.3
Whiston and Cronton	2,585	65.9	810	20.6	507	12.9
Whitefield	2,417	56.2	1,164	27.1	638	14.8

Table 10: Knowsley's Dwelling Tenure by Ward (Census, 2021)

Proposed Action

The evidence presented within this report demonstrates that the growth of Houses in Multiple Occupation (HMOs) has the potential to affect residential amenity, housing mix and the long-term sustainability of communities within Knowsley. The Borough contains a substantial stock of three and four-bedroom dwellings capable of conversion from Class C3 dwellinghouses to Class C4 HMOs under permitted development rights, and these opportunities are distributed throughout Knowsley's residential area rather than being concentrated within specific locations. The strong demand for one-bedroom housing noted in the Housing Register, with limited social and private supply and rising rent rates provide the conditions for HMO growth.

The evidence from Knowsley and comparable authorities suggests that a borough-wide approach would provide the most effective and consistent means of managing such development. Experience elsewhere, including Sefton Council, indicates that spatially limited Article 4 Directions can result in development pressures being displaced to areas outside the designated control zones, which led to Sefton subsequently expanding their directions to encompass the whole borough. Given the broad distribution of housing stock capable of HMO conversion within Knowsley, a borough-wide Direction would reduce the risk of displacement and ensure that proposals are subject to a consistent planning framework across the Borough.

It is important to recognise that an Article 4 Direction would not, in itself, prevent HMO development or introduce new planning policy. Rather, it would require planning permission for future C3 to C4 conversions, enabling the Council to assess proposals on their individual merits and consider factors such as residential amenity, parking provision, waste storage arrangements, local character and cumulative impacts.

An additional consideration is whether the circumstances warrant an *immediate* or *non-immediate* Article 4 Direction.

The case for an immediate Direction is based on the risk that further C3 to C4 conversions could occur during the twelve-month notice period associated with a non-immediate Direction, resulting in permanent changes to the Borough's housing stock before controls take effect. The report identifies a number of factors which may increase this risk, including rising rates of HMO-related complaints, growth within the private rented sector, rising rental values, the availability of housing stock suitable for HMO conversion, demographic changes within the Borough and the potential for displacement of investment activity from neighbouring authorities that have already introduced, or are seeking to introduce, HMO Article 4 Directions.

The possibility of a proliferation of changes from single family dwellings to small HMOs during a 12 month consultation period has to be balanced against the possibility that landowners will seek to be compensated for the loss of the automatic right to make that change.

Whilst the evidence presented identifies potential future pressures and risks, it is necessary to consider whether these factors justify immediate intervention or whether the making of a non-immediate Direction would represent a proportionate approach that still secures the long-term objective of bringing HMO conversions within planning control, whilst risking short-term unregulated HMO growth.

In the circumstances outlined in this report the evidence supports the introduction of an immediate borough-wide Article 4 Direction.

Appendix A- Draft Article 4 Direction

IMMEDIATE ARTICLE 4 DIRECTION

Knowsley Metropolitan Borough Council

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)(ENGLAND) ORDER 2015 (AS AMENDED)

WHEREAS Knowsley Metropolitan Borough Council (the "Council") being the appropriate local planning authority within the meaning of article 4 and schedule 3 of the Town and Country Planning (General Permitted Development) Order 2015, as amended (the "Order"), are satisfied that it is expedient that development of the description(s) set out in the Schedule below should not be carried out on the land shown edged red on the attached plans (the "Land"), unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990 as amended.

NOW THEREFORE the said Council in pursuance of the power conferred on them by article 4(1) of the Order hereby direct that the permission granted by article 3 of the said Order shall not apply to development on the said land of the description(s) set out in the Schedule below.

THIS DIRECTION is made under article 4(1) of the said Order and, in accordance with paragraph 2(6) of Schedule 3, shall remain in force until DD_MM_YYYY (being six months from the date of this direction) and shall then expire unless it has been confirmed by the appropriate local planning authority in accordance with paragraphs 1(9) and (10) of Schedule 3 of the Order before the end of the six month period.

SCHEDULE

Development consisting of a change of use of a building from a use falling within Class C3 (dwellinghouse) of the Schedule to Town and Country Planning (Use Classes) Order 1987 (as amended) to a use falling within Class C4 (Houses in Multiple Occupation) of that Schedule, being development comprised within Class L(b) of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015 and not being development comprised within any other Class.

The Article 4 Direction will come into force on the date below.

Made under the common seal of **KNOWSLEY METROPOLITAN BOROUGH COUNCIL this ……..day of ……202…**

The Common Seal of Knowsley Metropolitan Borough Council was affixed to this Direction in the presence of-

Authorised Signatory

Appendix B- Draft Article 4 Direction Notice

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 (AS AMENDED)

PUBLIC NOTICE

NOTICE OF MAKING AN IMMEDIATE DIRECTION UNDER ARTICLE 4 RELATING TO THE BOROUGH IN ITS ENTIRETY

NOTICE is hereby given that Knowsley Metropolitan Borough Council made an immediate Article 4(1) Direction on X October 2026 under Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

The Direction removes the permitted development rights for the change of use from a use falling within Class C3 (dwellinghouse) of the Schedule to Town and Country Planning (Use Classes) Order 1987 (as amended) to a use falling within Class C4 (Houses in Multiple Occupation) of the said Order and not being development comprised within any other Class.

The Direction applies to the entire borough of Knowsley as shown on the edged red on the Plan attached to the Direction.

This Article 4 Direction shall come into force immediately on the day it is made (X October 2026), and if subsequently confirmed by the Council shall come into force permanently on X March 2026 (unless a different date is specified by the Secretary of State) subject to the consideration of any representation received during the consultation period.

Representation may be made concerning the Article 4 Direction to the local planning authority from X October 2026 to X October/November 2026, by email to: localplan@knowsley.gov.uk or by post to ….

Date of notice …… October 2026

Appendix C- The Spatial Extent to Which the Article 4 Direction will Apply in a Borough-wide Removal of Permitted Development Rights

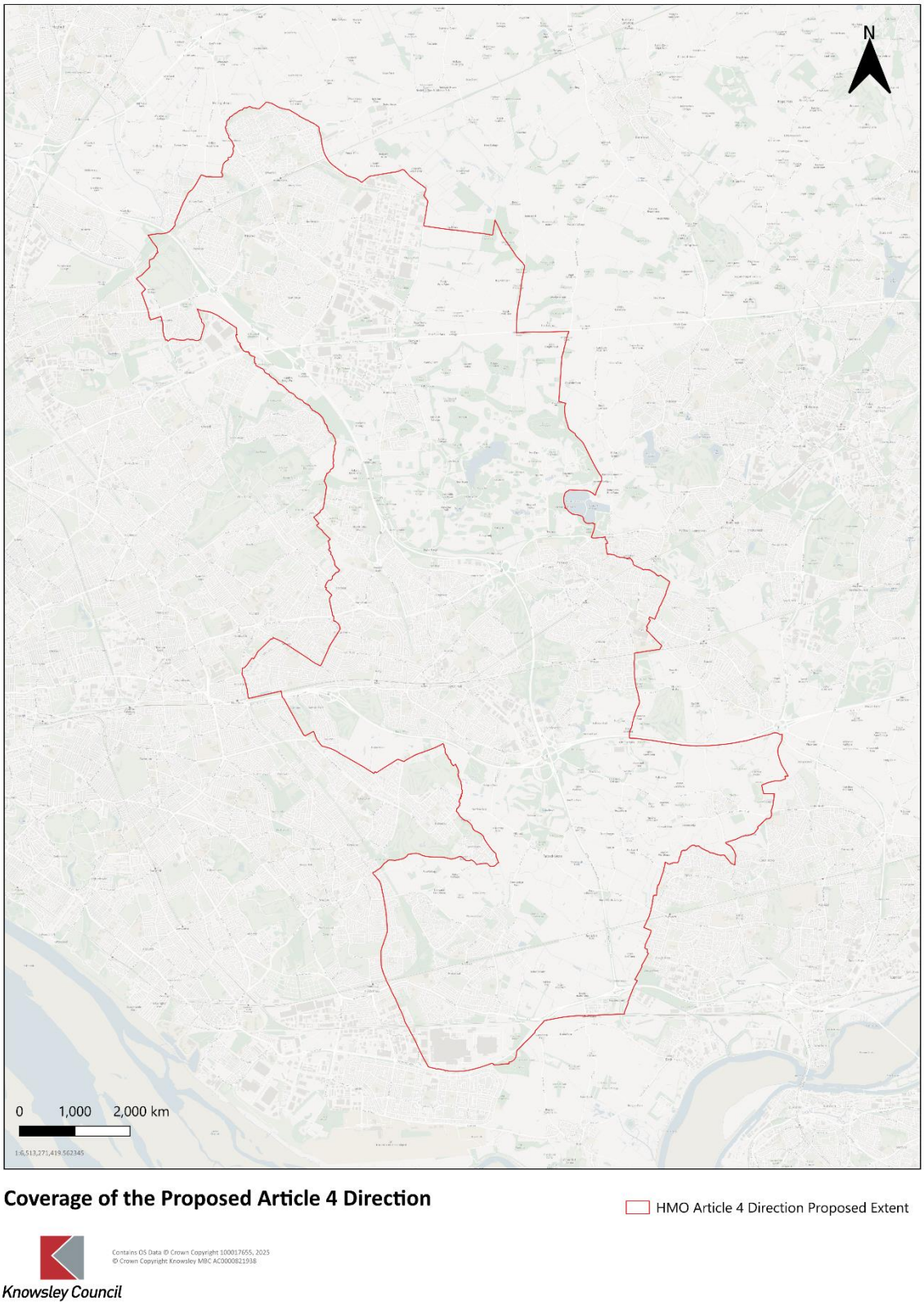


Figure 6: Coverage of the Proposed Article 4 Direction