



Appendix D

Small houses in multiple occupation: evidence to justify the purpose and extent of an Article 4 Direction for parts of Crewe

October 2019

Contents

1. Introduction	3
Background	3
Use of Article 4 Directions	3
2. Private rented sector and the number and distribution of HMOs within Cheshire East.	5
Introduction	5
Licensed HMOs.....	5
Planning application data	6
Other sources of data.....	7
Distribution of known HMO's	8
3. Evidence for Article 4 Directions	10
Fly tipping.....	11
Environmental health complaints	13
Anti-social behaviour & crime.....	15
Alley gates.....	20
House prices	22
Other observations.....	23
4. Conclusions	28
Appendix 1: Article 4 Direction: Nantwich Road	30
A1.1 Introduction.....	30
A1.2 Boundary review.....	30
A1.3 Boundary	35
Appendix 2: Article 4 Direction: West Street	36
A2.1 Introduction.....	36
A2.2 Boundary review.....	36
A2.3 Boundary	41
Appendix 3: Article 4 Direction: Hungerford Road	42
A1.1 Introduction.....	42
A1.2 Boundary review.....	42
A1.3 Boundary	45

1. Introduction

- 1.1 This paper provides the evidence to justify the purpose and extent of Article 4 Directions relating to small houses in multiple occupation for the Nantwich Road, West Street and Hungerford Road areas of Crewe (See Appendix 1-3 for boundaries).

Background

- 1.2 Houses in multiple occupation (HMOs) consist of dwellings that are occupied by unrelated individuals who share basic amenities such as a kitchen or bathroom. They are often referred to as 'house shares'.
- 1.3 Under the Town & Country Planning (Use Classes) Order 1987 (as amended), a small HMO (Class C4) can accommodate between 3 and 6 unrelated individuals and a large HMO (Sui Generis – outside of any use class) 7 or more unrelated individuals.
- 1.4 The Town and Country Planning (General Permitted Development) Order 2015 (GPDO) provides permitted development rights for the change of use of a dwelling (Class C3) to a small HMO (Class C4) without the need to apply to the council for planning permission. The change of use of a dwelling to a larger HMO (Sui Generis) always requires the submission of a planning application.

Use of Article 4 Directions

- 1.5 Article 4 of the GPDO enables local planning authorities to withdraw specified permitted development rights in defined areas. Once an Article 4 Direction comes into force, a planning application is then required for the specific permitted development withdrawn.
- 1.6 The withdrawal of permitted development rights does not infer that planning applications will automatically be refused if they are submitted. The submission of a planning application simply gives the local planning authority opportunity to consider a proposal against relevant planning policies, supplementary planning documents (where available) and any other material planning considerations.
- 1.7 The [National Planning Policy Framework](#) (NPPF) states that the use of Article 4 Directions to remove national permitted development rights should be limited to situations where they are necessary to protect local amenity or the well-being of the area. National [Planning Practice Guidance](#) also confirms that

Article 4 Directions covering wide areas (for example, the entire area of a local planning authority) are not encouraged unless there is a particularly strong justification for such a direction.

- 1.8 An Article 4 Direction can therefore be used to withdraw permitted development rights for the conversion of existing dwellings to small HMO's. This enables the introduction of new HMOs to be managed and monitored.
- 1.9 It is recognised that HMOs and the wider private rented sector play a key role in meeting the housing needs in the borough. HMOs provide an important source of low cost, private sector housing for those on lower incomes, students and those seeking temporary accommodation. However, a concentration of HMOs in a particular area can change its character, increase demand on services and infrastructure, leading to conflicts with the existing community.

2. Private rented sector and the number and distribution of HMOs within Cheshire East.

Introduction

- 2.1 Cheshire East has seen a rapid growth within the private rented sector over the last few years and it is now the second largest tenure behind home ownership. It offers a flexible form of tenure meeting a wide range of housing needs. It contributes to greater labour market mobility and is increasingly the tenure of choice for young people. The private rented sector is an essential part of a strong housing market.
- 2.2 There are currently over 21,000 private rented properties across Cheshire East and the sector consists of a number of forms of housing including family accommodation, self contained flats and houses in multiple occupation.
- 2.3 It is difficult to confirm the exact number of small private rented HMOs that currently operate within Cheshire East. This is because planning permission is not needed to convert dwellings to small HMOs. Dwellings can change quickly between C3 (dwellinghouses) and C4 (small HMO) Use Classes and vice versa without any requirement to inform the local planning authority. In order to provide an estimate of the number of HMOs within the Borough, various records and data sources have therefore been reviewed.

Licensed HMOs

- 2.4 Mandatory licensing of HMO's was first introduced under the 2004 Housing Act. Following changes introduced in October 2018, all HMOs that are occupied by more than 5 or more people that do not form 1 household (i.e. they are not a family), now require a HMO licence. Prior to October 2018, only those properties that had three or more storeys and occupied 5 or more unrelated individuals required a licence.
- 2.5 It is an offence for landlords not to license a HMO that is required to be licensed. As part of the licencing process, the local authority must also ensure that satisfactory management arrangements are in place for the property and it meets the required minimum standards for the number of tenants housed. Further guidance on licencing can be found on the council's [website](#).

- 2.6 Prior to the recent changes to licensing requirements, there were 51 licensed HMO's in the Borough (23 in Crewe). This has now increased to 174 licensed HMO properties¹ (118 in Crewe). However this increase cannot be attributed solely to an increase in new HMOs over the last 12 months. Figures are likely to include new HMOs plus historic HMOs of less than 3 storeys which are now required to have a licence.
- 2.7 In addition to mandatory licensing, the council has discretionary powers to introduce additional licensing. Additional licensing can be used to extend the requirement for licensing to certain descriptions of HMOs or to all HMOs (other than those that are subject to mandatory licensing) in a designated area. A local authority may not make an additional licensing scheme unless it has identified that a significant proportion of the HMOs that a scheme would capture are being managed sufficiently ineffectively that they are causing, or have the potential to cause, problems for the occupiers or members of the public. The council has not introduced additional licencing but is keeping these powers under review.
- 2.8 Further to mandatory and additional licensing, the council also has discretionary powers to introduce selective licensing. Selective licensing can be used to require the licensing of all private rented properties regardless of size over a defined area or areas. The council is currently considering options with regards to the introduction of a selective licensing scheme.

Planning application data

- 2.9 Since 2010², approximately 42 planning applications have been determined for large HMOs. 40 were subsequently approved. Of the 2 that were refused, 1 was allowed at appeal. The distribution of these applications across the Borough is shown in Table 1.
- 2.10 While planning application data provides limited evidence of HMO activity (the size of the housing stock limiting the number of planning applications made), it is evident that the majority of applications made are within the Crewe area.

¹ A 9 September 2019

² Between 2010 and September 2019.

Table 1: planning applications for large HMO's					
Area		No. of planning applications for large HMO's	As % of total applications	No of applications approved	No. of applications refused
CHESHIRE EAST		42	100%	40	2
CREWE					
Ward	Crewe South	15	36%	15	0
	Crewe Central	9	21%	8	1
	Crewe West	7	17%	7	0
	Crewe East	2	5%	2	0
	Willaston and Rope	1	2%	0	1
	Wistaston	1	2%	1	0
SUBTOTAL		35	83%	33	2
MACCLESFIELD					
Ward	Macclesfield Central	5	12%	5	0
	Macclesfield West and Ivy	1	2%	1	0
SUBTOTAL		6	14%	6	0
CONGLETON					
Ward	Congleton West	1	2%	1	0
SUBTOTAL		1	2%	1	0

Other sources of data

2.11 In addition to information obtained about licensed HMOs and planning applications, a number of additional data sources are used to gather evidence of existing HMOs. This includes:

- Council tax records;
- building control records;
- information received from the fire service;
- housing standards records;
- information from landlords and advertisements and other intelligence received.

2.12 Taking all available sources into account, there are 659 known HMOs that are occupied by 3 or more individuals, within the Borough. However, this could be an under-estimate of the actual number of HMOs given that planning permission is not currently needed for small HMOs.

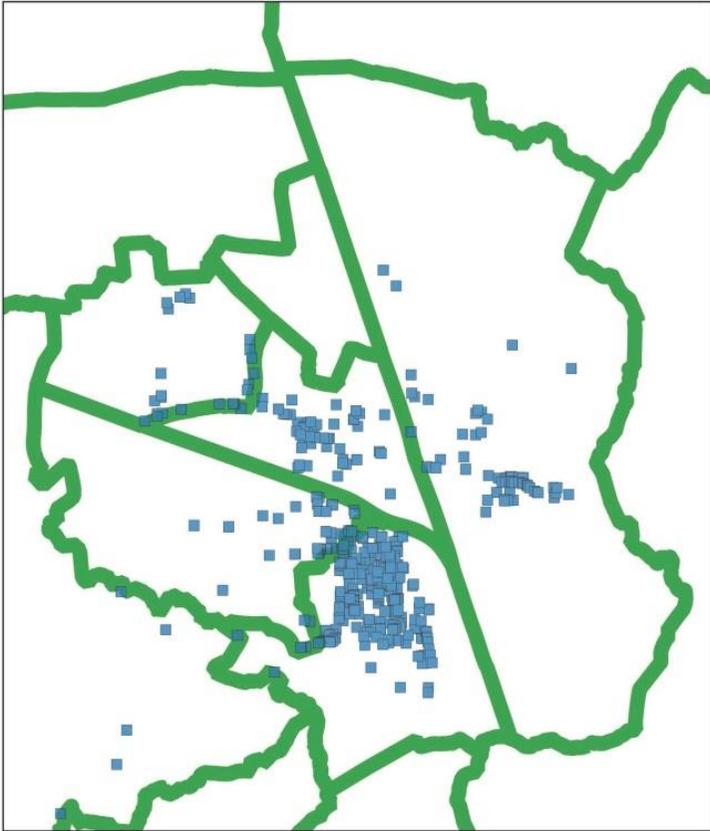
Distribution of known HMO's

2.13 Table 2 shows the distribution of HMOs across wards that have 5 or more known HMOs. The majority are located within the Crewe titled wards (454 HMOs or 72%)³.

Table 2: Distribution of HMO's		
Ward	Number	Percentage
Crewe South Ward	262	42%
Crewe East Ward	65	10%
Crewe Central Ward	57	9%
Crewe West Ward	47	7%
Macclesfield Central Ward	47	7%
Crewe St Barnabas Ward	23	4%
Macclesfield South Ward	16	3%
Macclesfield Tytherington Ward	15	2%
Congleton West Ward	12	2%
Alsager Ward	7	1%
Knutsford Ward	7	1%
Nantwich North and West Ward	6	1%
Middlewich Ward	6	1%
Nantwich South and Stapeley Ward	6	1%
Wistaston Ward	6	1%
Macclesfield West and Ivy Ward	6	1%
Areas		
Crewe titled wards (5)	454	72%
Macclesfield titled (6) + Broken Cross & Upton wards	97	15%

2.14 Map 1 shows that there are concentrations within parts of wards, including the Nantwich Road area (mainly Crewe South), the West Street area (mainly Crewe Central) and the Hungerford Road areas (Crewe East). Elsewhere HMOs are more scattered.

³ Focuses on urban area of Crewe. Figures exclude Wistaston which has 6 known HMO's.



**Map of Licensed and Known Un-licensed HMOs
September 2019**

■ HMOs Sept 2019 Wards - Current

1:83,064

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Map 1: Known HMOs

3. Evidence for Article 4 Directions

- 3.1 Planning Practice Guidance states that Article 4 Directions should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. Potential harm that the direction is intended to address should be clearly identified and there should be particularly strong justification for the withdrawal of permitted development rights relating to a wide area (for example the whole Borough or a whole Town). Immediate directions can only be made where the development presents an immediate threat to local amenity or prejudices the proper planning of an area.
- 3.2 The problems associated with high concentrations of HMOs has been recognised by the government. In 2008, the Department for Communities and Local Government (DCLG) published a report titled “Evidence Gathering – Housing in Multiple Occupation and possible planning responses”. The report summarised the impacts that can occur as a result of high concentrations of HMOs, including:
- Anti-social behaviour, noise and nuisance
 - Imbalanced and unsustainable communities
 - Negative impacts on the physical environment and streetscape
 - Pressures upon parking provision
 - Increased crime
 - Growth in the private rented sector at the expenses of owner-occupation
 - Pressure upon local community facilities
 - Restructuring of retail, commercial and recreational facilities to suit the lifestyle of the predominant population.
- 3.3 There is generally no single piece of evidence that can be used to establish whether an Article 4 Direction is necessary to protect local amenity or the wellbeing of the area. Information about the number and location of HMOs in a particular area is likely to be the most compelling piece of evidence to show whether a concentration exists.

3.4 Alongside evidence of concentrations, the council has considered environmental, social and economic indicators within areas with the highest HMOs together with observations about the areas. Relevant findings are presented below.

Fly tipping

3.5 As set out in the DCLG report, an increase of environmental impacts may be experienced in areas with high concentrations of HMOs. This could be due to more people living in HMOs than would generally live in the same size house occupied by a family or higher levels of transience meaning that people have less motivation to look after the area if they are staying there for a short time.

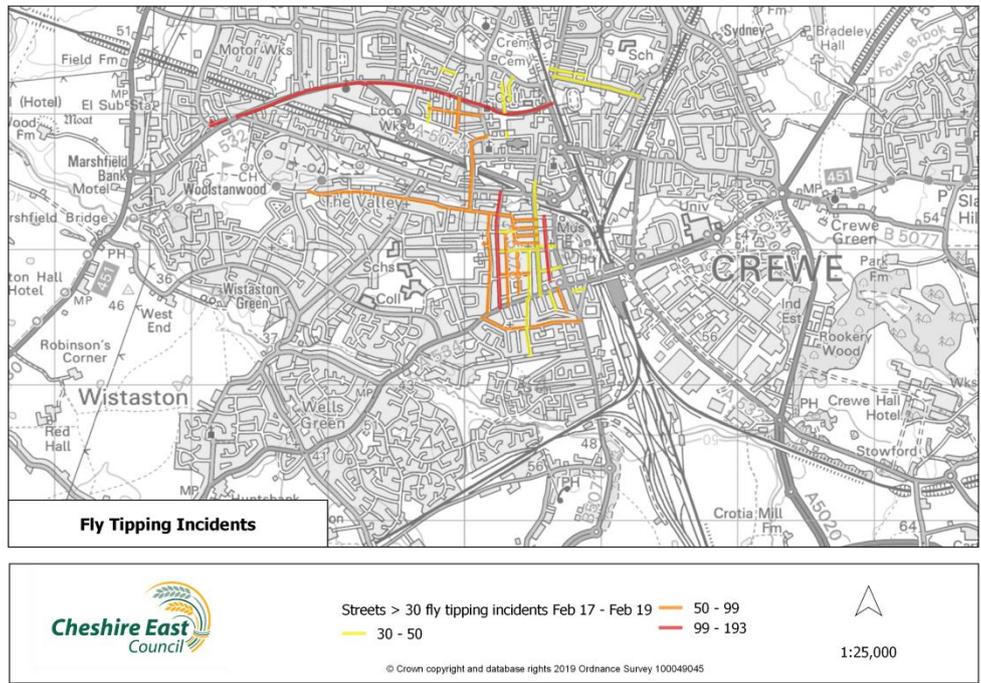
3.6 Environmental indicators include increased litter or fly tipping reports. The council's fly tipping records for two year period of February 2017-2019 have been reviewed and there have been 5,770 reports across the borough over this period. 65% of all recorded incidents were located within Crewe.

3.7 Table 3 shows all streets within Crewe that have experienced 10 or more fly tipping reports over this period. Streets that lie within areas of the proposed Article 4 Directions are shaded.

Approx. location - street	Reports						
West Street	193	Camm Street	44	Richard Street	24	Casson Street	16
Walthall Street	190	Newdigate Street	37	Oxford Street	24	Chetwode Street	16
Lord Street	108	Ernest Street	36	Moss Lane	23	Bright Street	15
Lawton Street	92	Ludford Street	35	Broad Street	23	Alban Street	15
Derrington Avenue	86	Union Street	35	Nantwich Road	22	Lewis Street	14
Westminster Street	81	Hammond Street	34	Elizabeth Street	22	Bridle Road	14
West Avenue	81	Wood Street	32	Minshull New Road	21	Derrington Avenue	14
Alton Street	72	Edleston Road	31	Gresty Road	21	Edward Street	14
Maxwell Street	71	Ramsbottom Street	30	Ford Lane	20	Badger Avenue	14
Myrtle Street	71	Audley Street	30	Davenport Avenue	19	Frank Webb Avenue	13
Ruskin Road	66	Hewitt Street	30	Underwood Lane	18	Stafford Street	12
Chambers Street	60	Fletcher Street	30	Richard Moon Street	18	Wistaston Road	12
Bedford Street	58	Electricity Street	28	Hope Street	18	High Street	12
Samuel Street	57	Vincent Street	26	Collins Street	18	Gresty Terrace	12
Nelson Street	54	Hungerford Road	26	Waldrons Lane	17	Derrington Ave	12
Nile Street	52	Catherine Street	26	Meredith Street	17	Lockitt Street	11
Flag Lane	51	Furnival Street	26	Gainsborough Road	17	Queens Park Drive	11
Brooklyn Street	46	Rigg Street	25	Adelaide Street	17	Delamere Street	11
Stalbridge Road	45	Barker Street	25	Leighton Street	16		

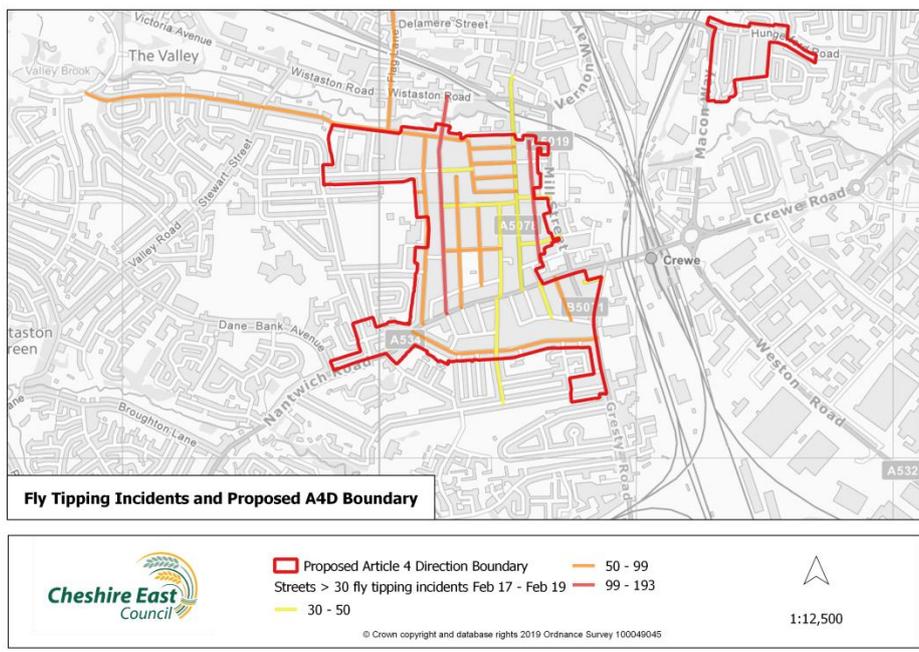
3.8 All streets that have experienced 30 or more reports have been mapped. The mapping shows that the areas with the highest number of reported incidents are in the streets to the north and south of Nantwich Road and the West Street area. These areas are characterised by higher density terraced streets.

3.9 While the mapping does not reveal high levels of fly tipping reports in the Hungerford Road area, it is noted that this road experienced 26 reports, just under the mapping threshold.

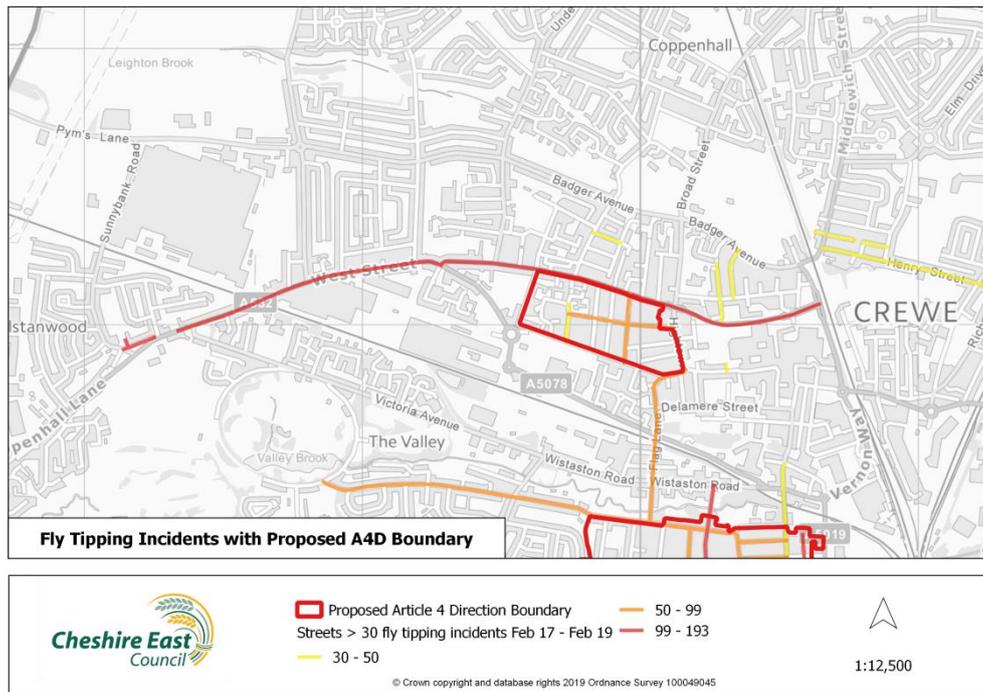


Map 2: Fly tipping reports

3.10 Maps 3 & 4 show fly tipping data in relation to the areas of the proposed Nantwich Road, Hungerford Road and West Street Article 4 Directions.



Map 3: Fly tipping Nantwich Road and Hungerford Road areas

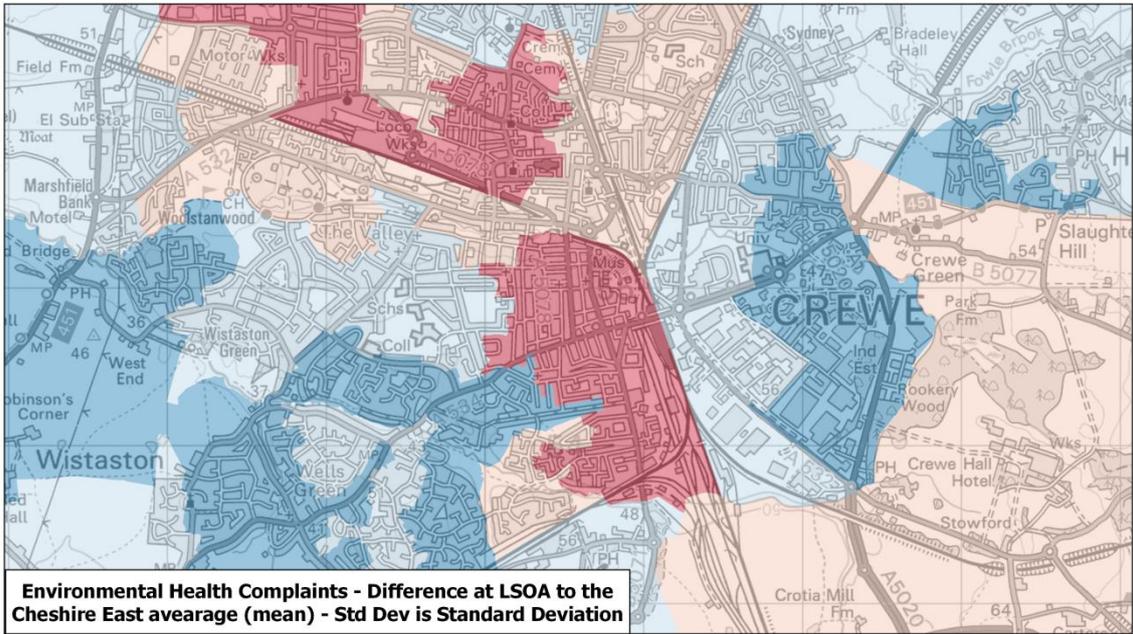


Map 4: Fly tipping and West Street area

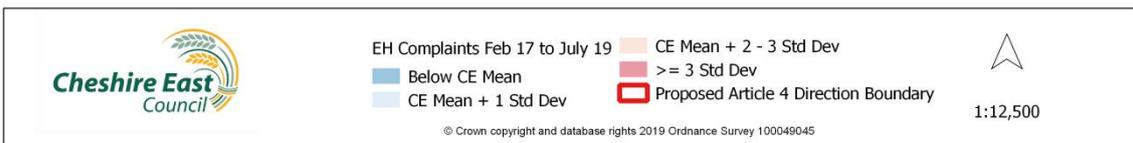
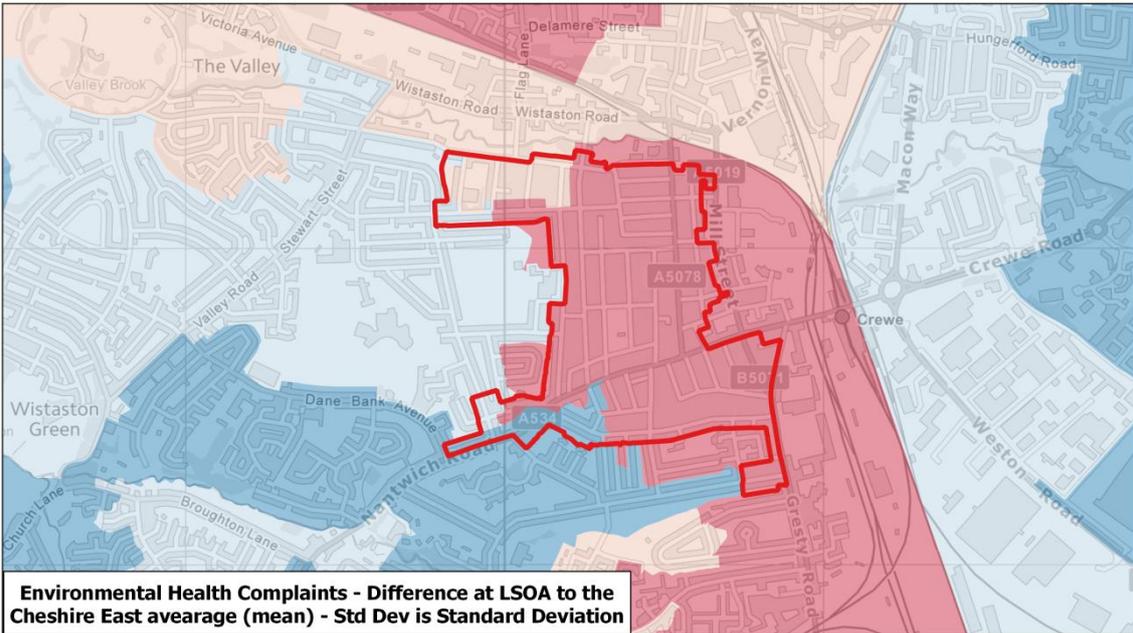
Environmental health complaints

- 3.11 A further indicator of environmental issues is the number of environmental health complaints received in areas, including noise and other nuisances⁴.
- 3.12 During the period February 2017 – July 2019 there were 3,397 environmental health complaints of which 3,179 could be mapped (Map 5). The mapping shows those areas which experienced a level of complaints below the Cheshire East average (mean) and those areas that experienced higher levels than the average (expressed as + standard deviation). The higher the levels of complaint, the higher the deviation from the mean.
- 3.13 Mapping of environmental health complaints shows that the areas with the highest levels of complaints include the town centre, the Nantwich Road area, West Street and surrounds. Lower levels of environmental health complaints were experienced in the Hungerford Road area, although levels are slightly higher in this area than the borough average.
- 3.14 Maps 6, & 7 show this data in relation to the areas of the proposed Article 4 Directions.

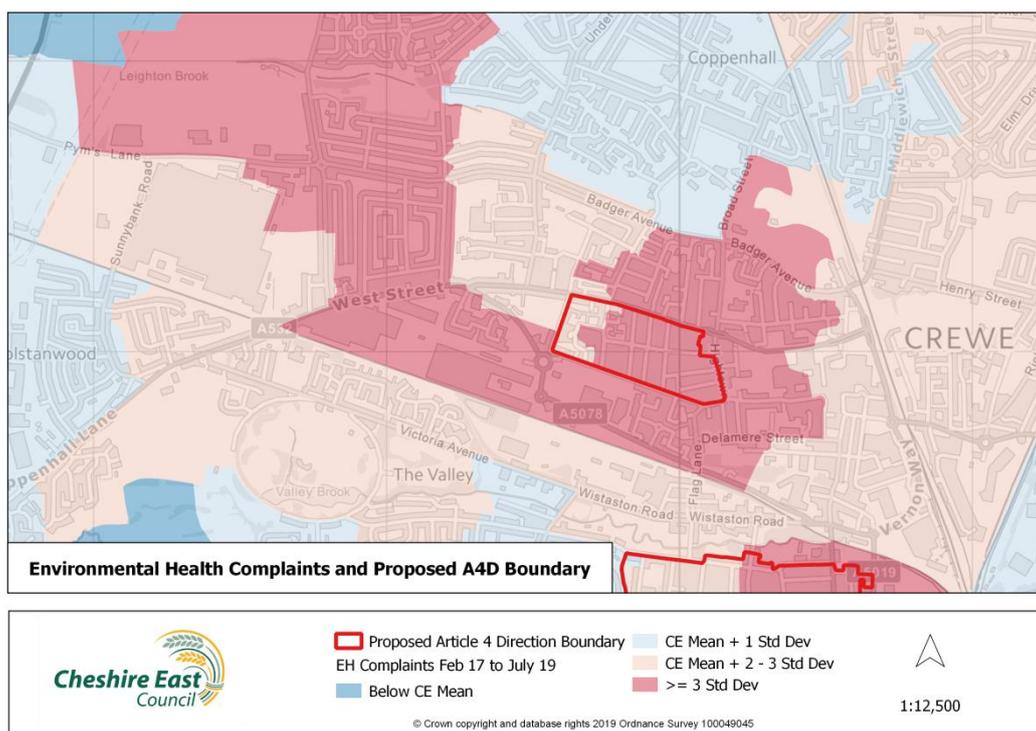
⁴ Includes complaints concerning noise, animals, fires, deposits on land, filthy and verminous properties and air pollution



Map 5: Environmental Health Complaints



Map 6: Environmental health Complaints and proposed Nantwich Road and Hungerford Road Article 4 Direction areas.

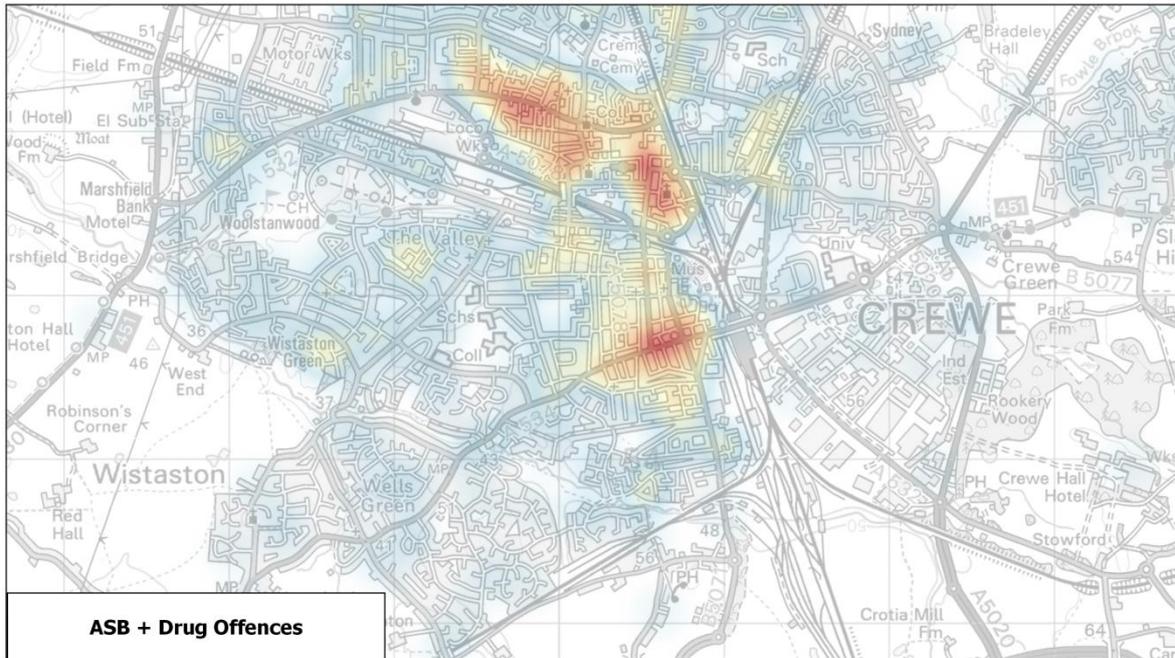


Map 7: Environmental Health complaints and West Street areas

Anti-social behaviour & crime

- 3.15 As set out in the DCLG report, increases in crime can be experienced in areas with high concentrations of HMOs.
- 3.16 During the year ending the 31 March 2019, there were 7,945 recorded anti-social behaviour and drugs related offences across the Borough⁵. Those occurring within Crewe have been heat mapped (Map 8).
- 3.17 The heat mapping shows that the areas with the highest levels of recorded anti social behaviour and drugs incidents are the Town Centre, the Nantwich Road area and the West Street area. There is a small pocket of anti-social behaviour recorded close to the junction of Macon Way with Hungerford Road. Maps 9, 10 & 11 show this data in relation to the areas of the proposed Article 4 Directions.

⁵ Source: Year end March 2019 - Police.uk



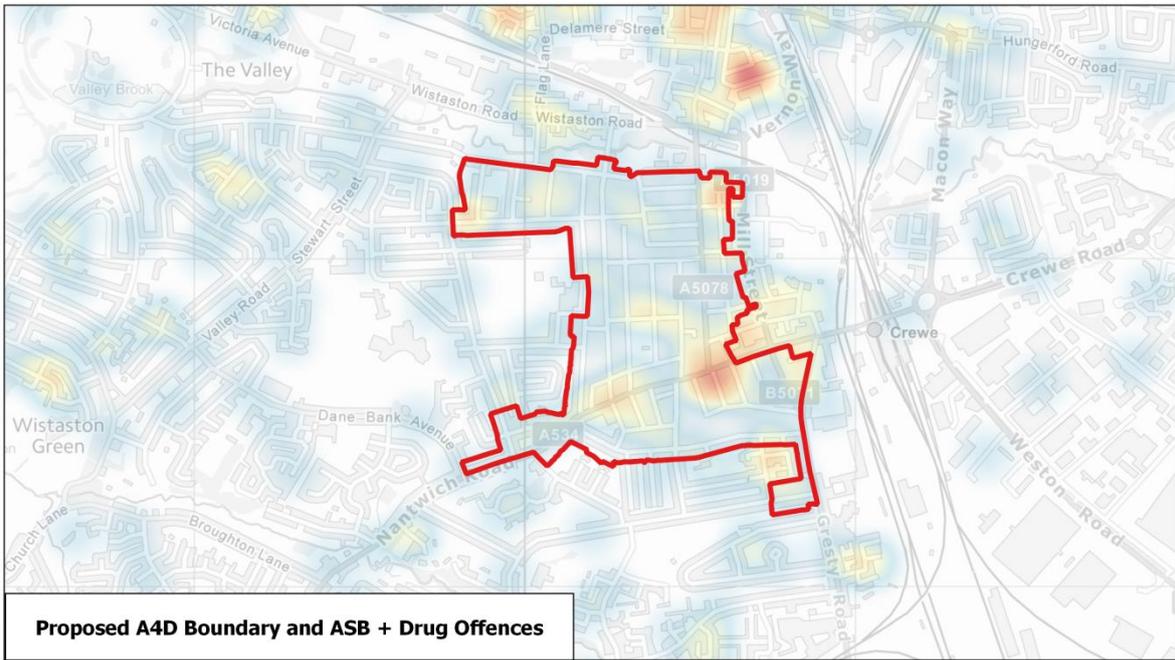
ASB + Drug Offences


ASB & Drugs Mar18 Mar19 - Heat Map


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Map 8: Anti-social behaviour and drugs



Proposed A4D Boundary and ASB + Drug Offences

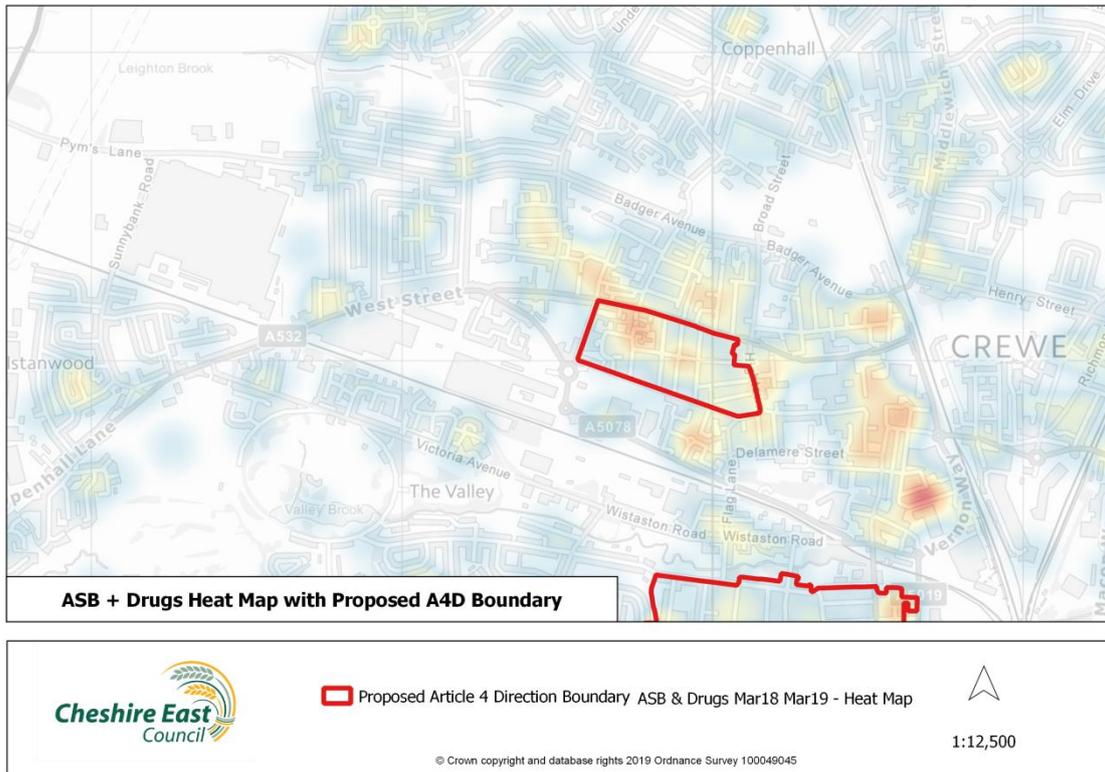


 Proposed Article 4 Direction Boundary ASB & Drugs Mar18 Mar19 - Heat Map

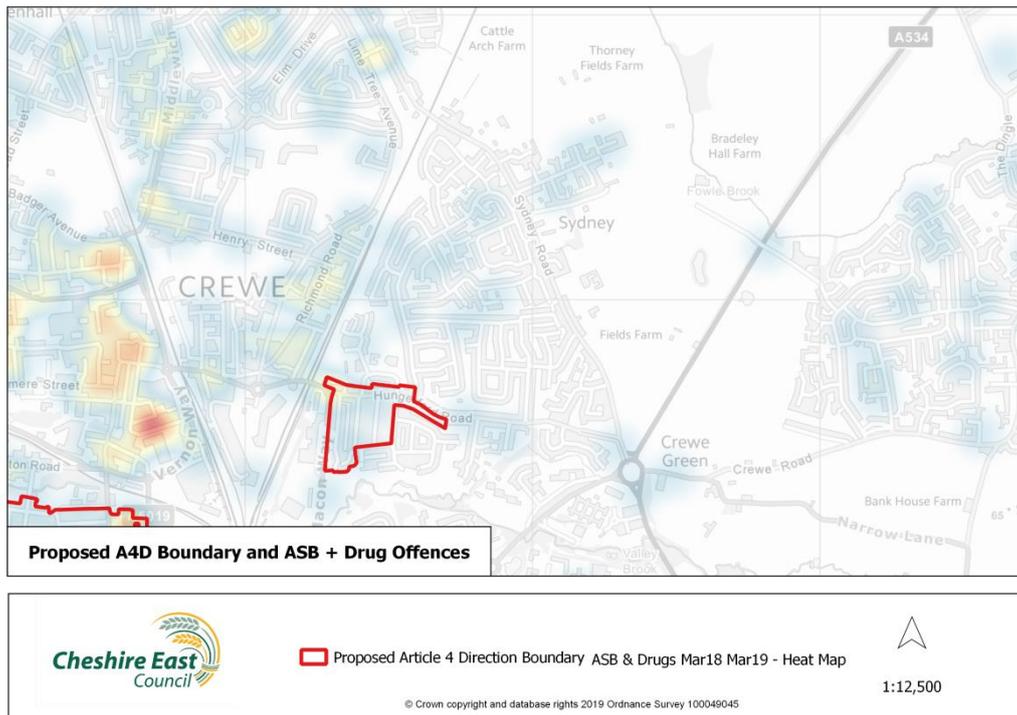

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Map 9: Anti-social behaviour & drugs – Nantwich Road area

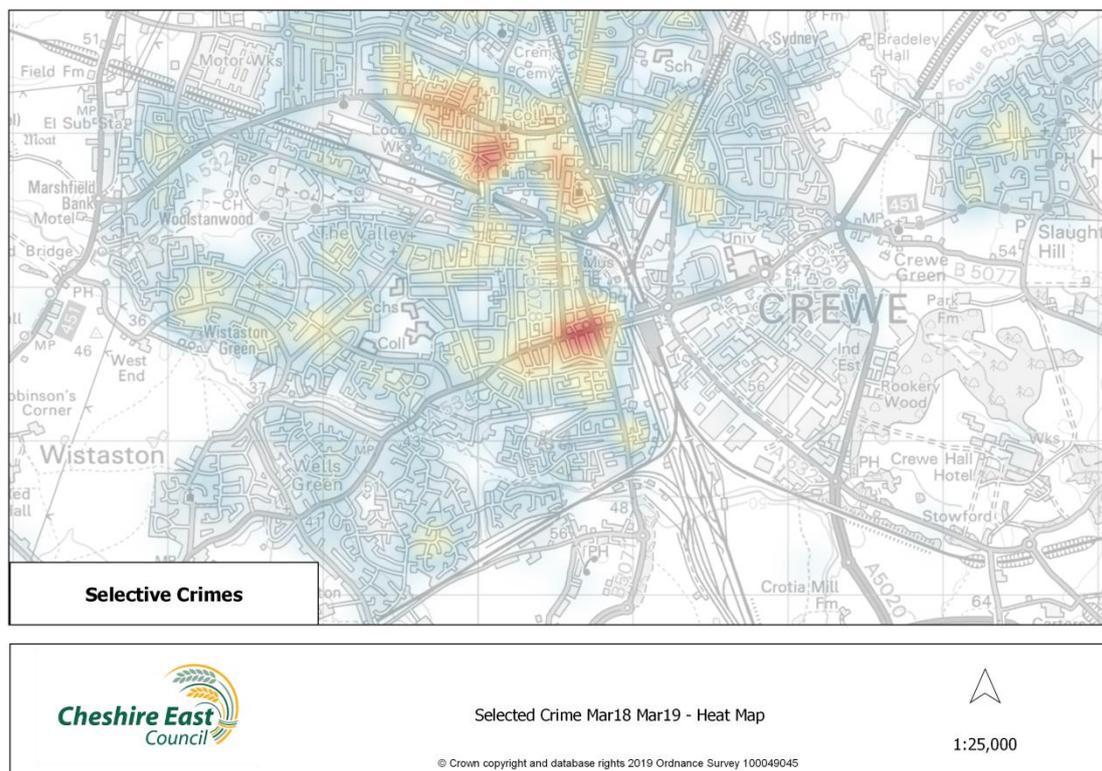


Map 10: Anti-social behaviour & drugs – West Street area



Map 11: Anti-social behaviour & drugs – Hungerford Road Area

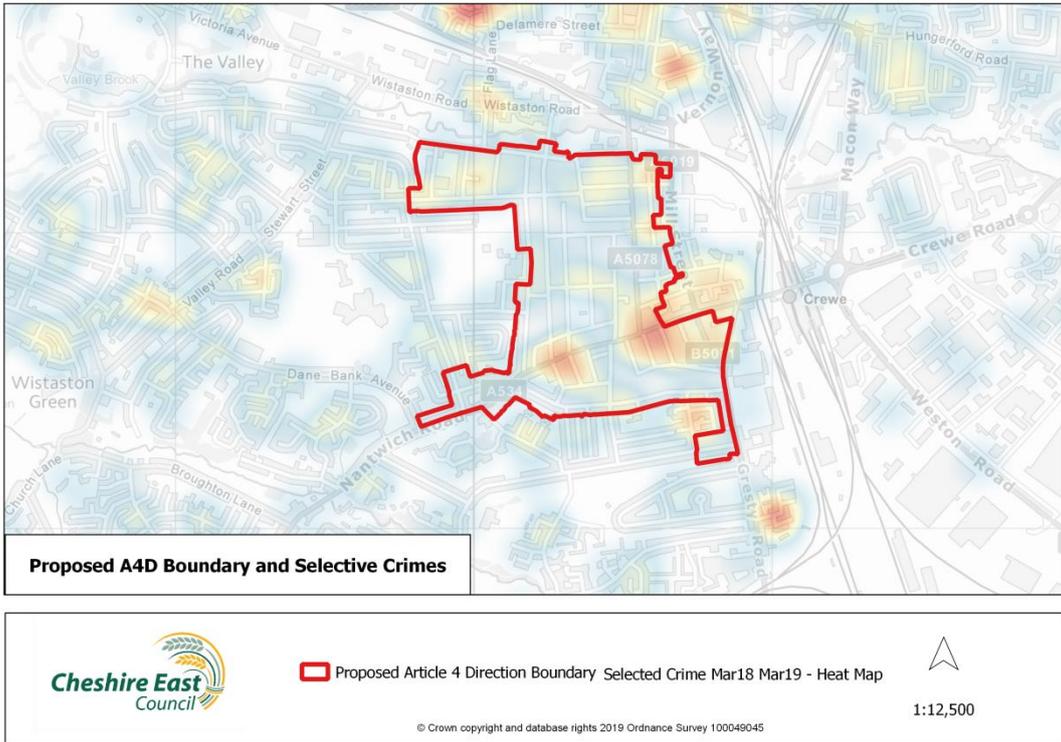
- 3.18 It is a similar picture with regards to selected crime data⁶. The number of crimes recorded in the Borough were highest within the town centres of Crewe and Macclesfield as might be expected.
- 3.19 Crewe Central had the highest number of recorded crimes (2,650 crimes or 8.6%) followed by Macclesfield Central (1,917 or 6.2%). Third was Crewe South (1,884 crimes or 6%) followed by Crewe East (1,645 or 5.3%).
- 3.20 Heat maps have been produced to show the location of crimes (excluding shop lifting). Excluding town centres, the mapping indicates higher levels of crime around the Nantwich Road and West Street areas and to a lesser extent around the Hungerford Road areas (Map 12).



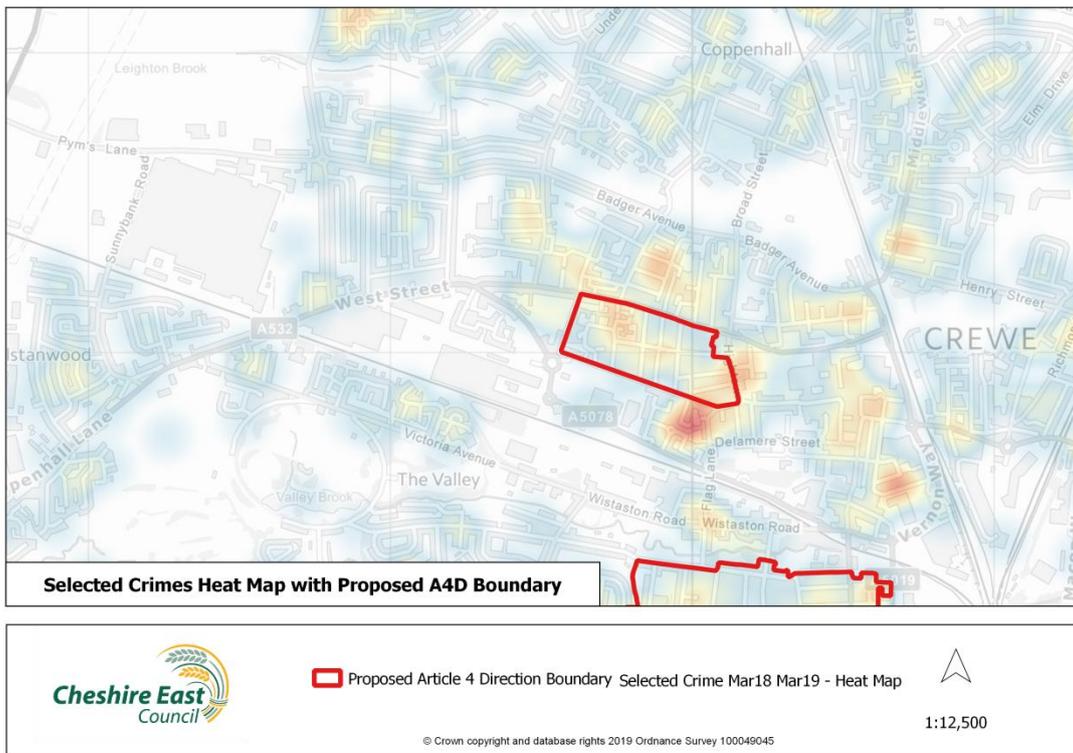
Map 12: Selected crime data

- 3.21 Maps 13, 14 & 15 show this data in relation to the areas of the proposed Article 4 Directions. Crime and anti-social behaviour within these areas could impact on the demand for owner occupation properties. This could encourage property owners to look at alternative means of letting properties such as sub-division, perpetuating the potential for harm in these areas.

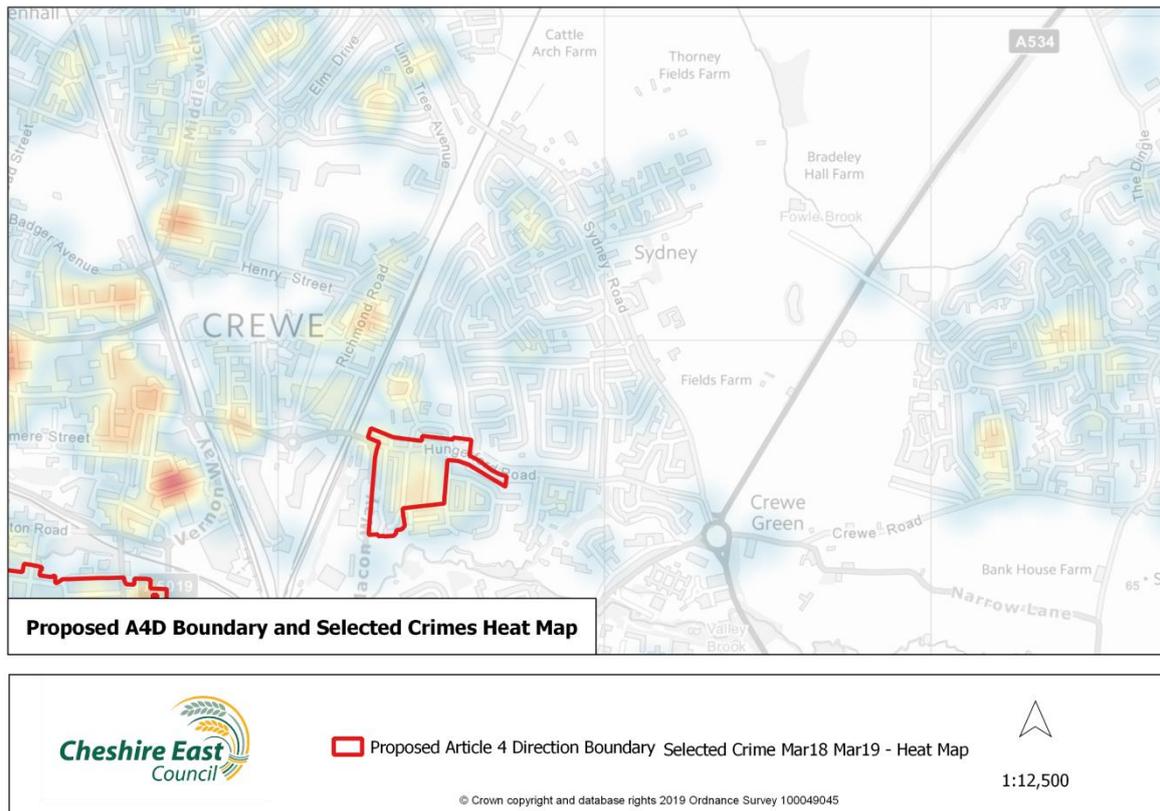
⁶ Source: 2017 & 2018 data - Police.uk. Selective crimes excludes ASB+drugs (see separate indicator) and shoplifting.



Map 13: Selective Crimes and Nantwich Road area



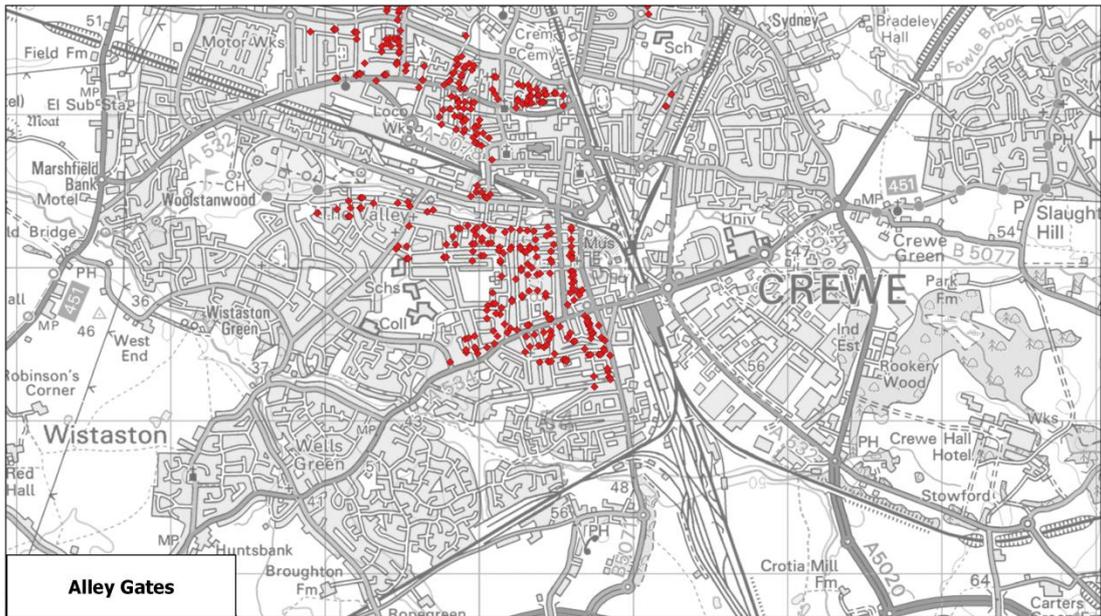
Map 14: Selective Crimes and West Street area



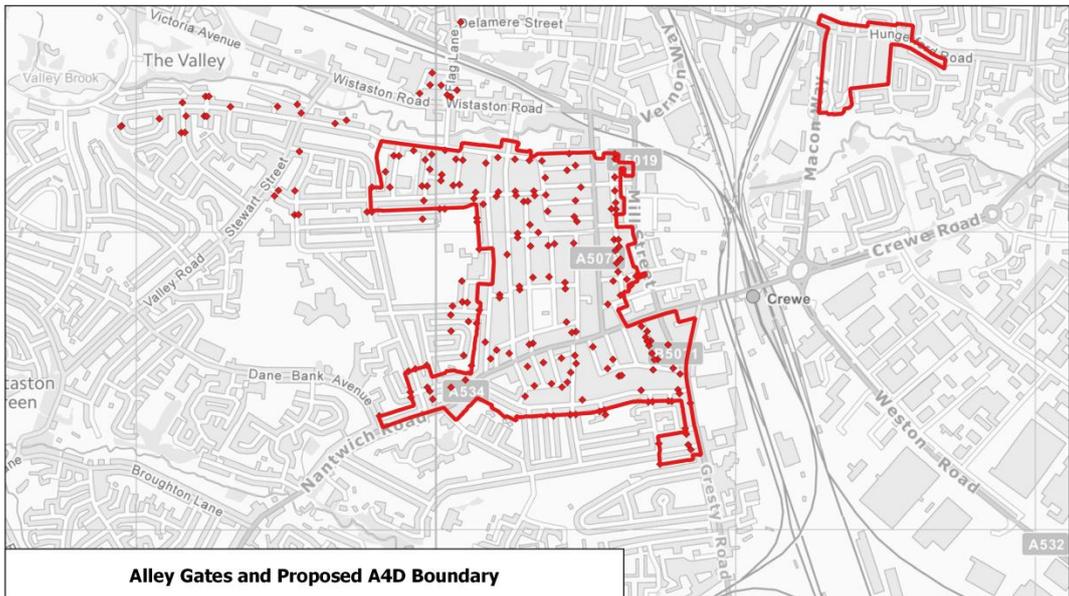
Map 15: Selective Crimes and Hungerford Road area

Alley gates

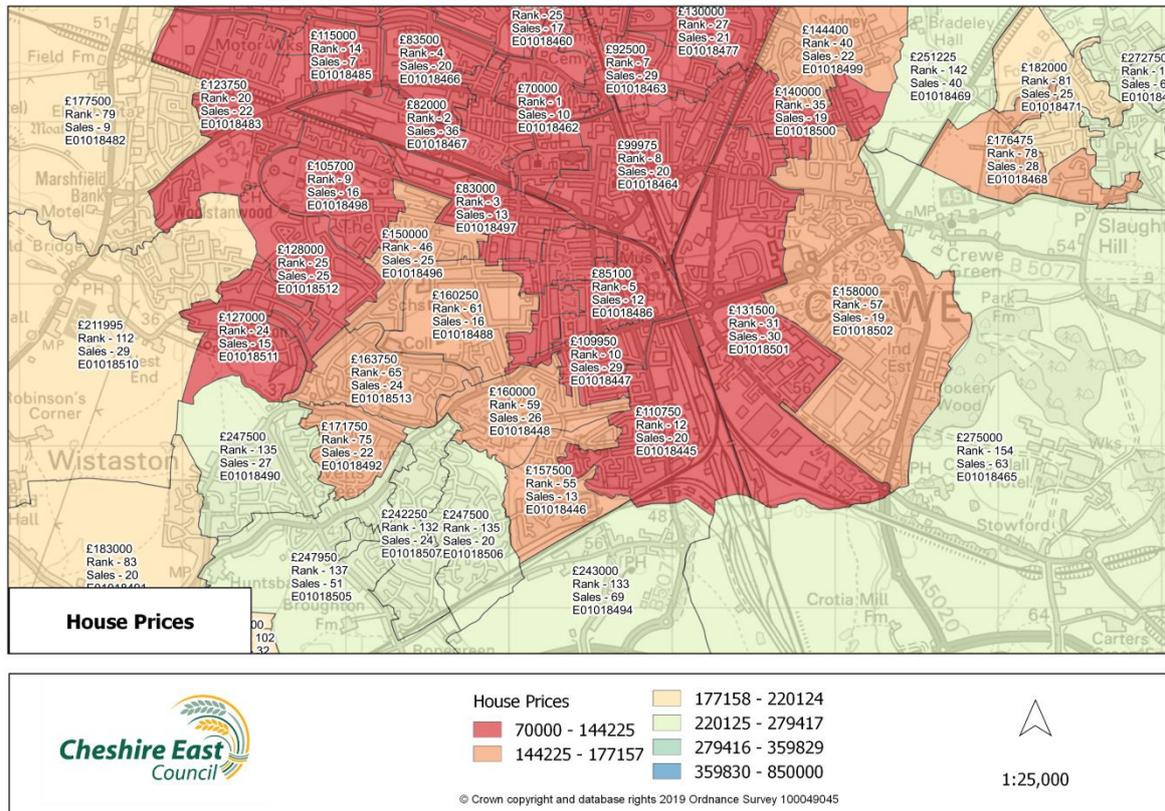
- 3.22 The council has installed a number of alley gates within Crewe as a response to crime and disorder issues. The location of installed alley gates therefore potentially highlights those areas that have experienced amenity issues in the past and are potentially vulnerable to further issues.
- 3.23 Mapping of alley gates (Map 16) highlights high numbers of gates to the north and south of Nantwich Road and the West Street area.



Map 16: Alley Gates



Map 17: Alley gates and Nantwich/ Hungerford Road areas



Map 15: House prices

3.27 The mapping shows a coincidence of lower house prices with the Nantwich Road and West Street areas.

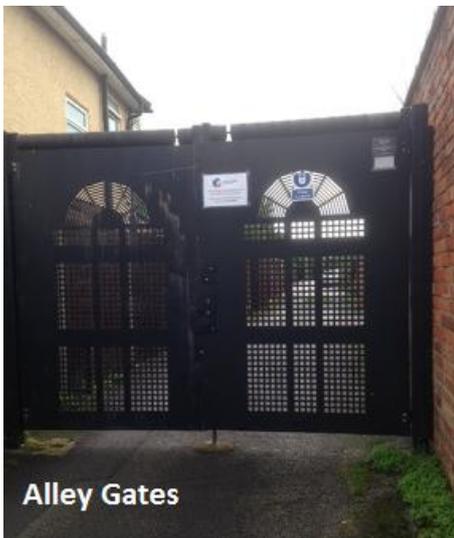
Other observations

3.28 All areas of HMOs concentrations were visited during September/October 2019. Observations made included:

- Property types and sizes
- Litter and street conditions
- Property conditions
- Presence of marketing boards advertising rooms to let
- Availability of car parking
- Presence and condition of alley gates

Nantwich Road area

- 3.29 The majority of HMOs in this area are contained within the streets to the north and south of Nantwich Road. The streets within this area are very dense, predominantly comprising of traditional brick terraces. Many of the dwellings have small, walled front gardens.
- 3.30 Some litter was observed on the streets, front gardens and alleyways. No anti-social behavior was noted. There are high levels of on-street parking due to the terraced nature of the streets.
- 3.31 The condition of properties within the area is mixed. High numbers of 'To let' and 'rooms to let' signs were observed within this area. The following photographs show examples of house types and the streets within this area.





West Street area

- 3.32 The housing in this area is more mixed to that seen in the Nantwich Road area. There is a prevalence of older traditional terraced houses but generally properties appear smaller in the streets to the south of West Street than those in the Nantwich Road area. Many houses have no front garden areas. There are pockets of modern social housing within the area.
- 3.33 Some litter was observed on the streets, front gardens and alleyways. No anti-social behavior was noted. There are high levels of on-street parking due to the terraced nature of the streets.
- 3.34 The condition of properties within the area is mixed. Evidence of 'to let' signs were observed within this area. The following photographs show examples of house types and the streets within this area.



Hungerford Road area

- 3.35 The majority of HMOs in the Hungerford Road area are located on the main road itself and tend to comprise of older, terraced dwellings. While there are lower levels of HMOs in the quieter, surrounding residential streets, there are pockets of older terraced dwellings to the south of Hungerford Road, which could lend themselves to conversion to HMOs.
- 3.36 Low levels of litter levels were observed on the streets. No anti-social behaviour was noted. There high levels of on street parking observed in the streets to the south of Hungerford Road with little on street parking apparent on the main road itself. Several to let boards were observed.
- 3.37 The following photographs show examples of house types and the streets within this area.



Hungerford Road - looking towards Manchester Bridge



Buxton Avenue



Rear alleys - un gated in this area



Hungerford Road - view from junction of Coleridge Way



Bulkeley Street - looking in an easterly direction. Terraced dwellings on left but clear change to property type on opposite side of the road.

4. Conclusions

- 4.1 Mapping of all known HMOs within the Crewe area highlights that they tend to be concentrated within specific parts of the town. While HMOs do occur in other areas, they are at lower levels and more dispersed.
- 4.2 From observations of areas of mapped concentrations, HMOs tend to be located in densely populated areas characterised by older, smaller sized housing which is close to main routes and retail centres.
- 4.3 Mapping of HMOs has highlighted concentrations in the following areas:
- The areas to the north and south of Nantwich Road;
 - West Street; and
 - Hungerford Road.
- 4.4 A coincidence of social, environmental and economic issues can occur within areas with concentrations of HMOs. This has been recognised by the government⁸. Available evidence of environmental, social and economic issues within the areas of the highest HMO concentrations has been reviewed. The evidence shows that:
- Fly tipping levels are particularly high in the Nantwich Road and West Street areas;
 - Environmental health complaints are high in the Nantwich Road and West Street areas. There are lower levels in the Hungerford Road area;
 - Outside of the town centre, there are pockets of anti-social behaviour and crime incidents in the Nantwich Road and West Street areas. There are also recorded incidents of crime in the Hungerford Road area;
 - Alley Gates have been used in the past to address anti-social behaviour in the Nantwich Road and West Street areas. There are no alley gates in the Hungerford Road area;
 - House prices are lower in the West Street and Nantwich Road area and higher in the Hungerford Road area by comparison.

⁸ See DCLG Report 'Evidence Gathering – Housing in Multiple Occupation and possible planning responses'.

- 4.5 The evidence suggests that there is a coincidence of environmental, social and economic issues in the areas around the Nantwich Road and West Street areas of Crewe. While there is less evidence of issues in the Hungerford Road area, there is a clear concentration of HMOs plus an availability of house types that could lend themselves to conversion.
- 4.6 It is not being claimed that all HMOs cause or exacerbate social, economic or environmental problems. However, they can provide for a far more intensive use of residential areas and result in a much larger population living in areas already of high density. This often leads to conflict and tension due to lack of space, pollution, poor environment and services being stretched. Residents of HMOs are often short term tenants and transitory and the perception is that they have less stake in the local neighbourhood when compared to the longer term residents.
- 4.7 On the basis of the evidence, there is potential for harm should permitted development rights for HMOs continue to be utilised in the Nantwich Road and West Street areas. The Hungerford Road area may also be vulnerable to further harm should permitted development rights continue to be utilised.
- 4.8 The removal of permitted development rights will mean that proposal to convert a dwelling to a small HMO will require planning permission. This will allow the council to fully assess the impact of the proposal on future residents, neighbouring residents and the neighbourhood as a whole.
- 4.9 The introduction of the Article 4 Directions is therefore justified on the basis of the amenity and well-being of these areas. These issues cannot be addressed through environmental management measures alone.

Appendix 1: Article 4 Direction: Nantwich Road

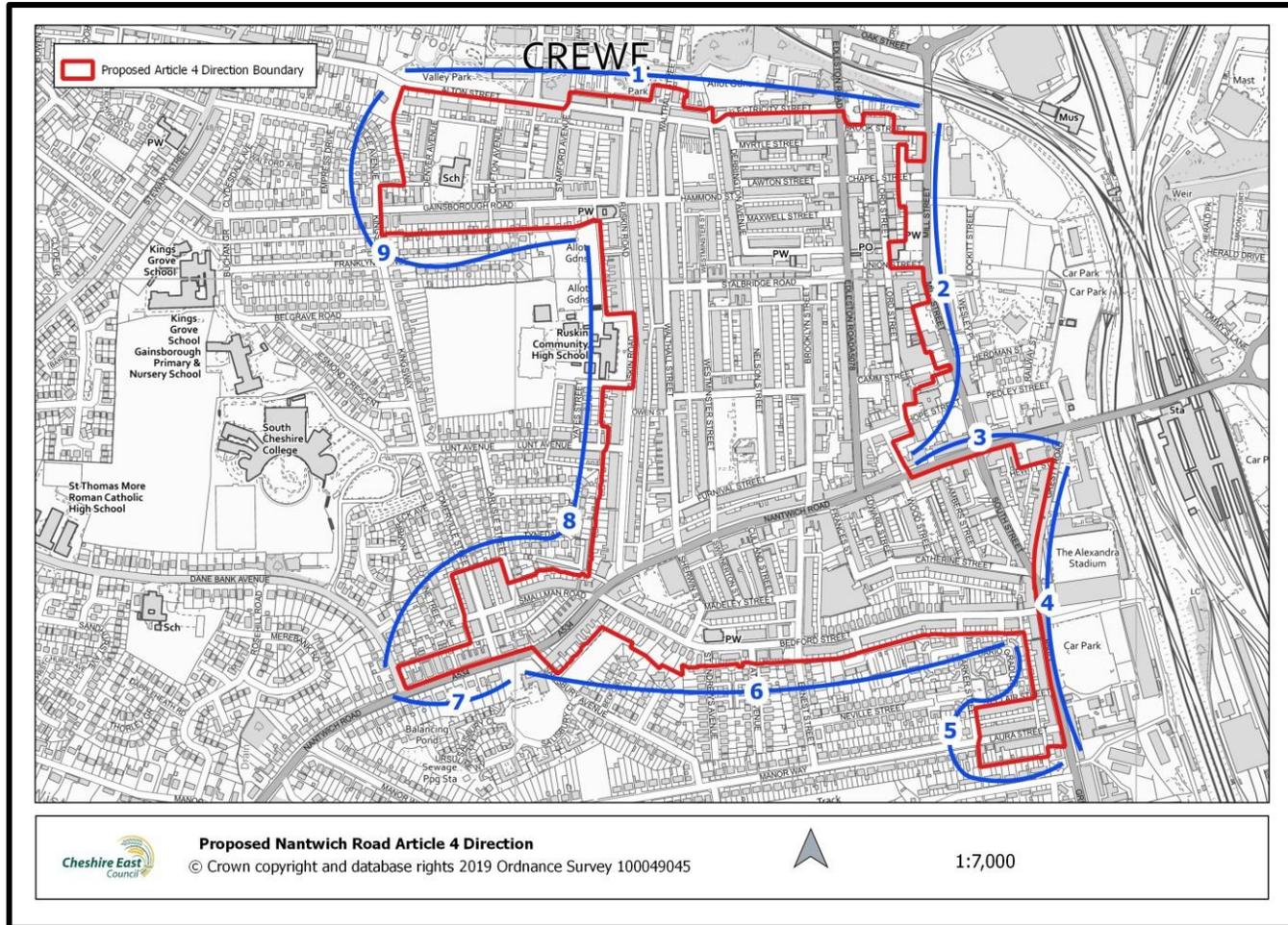
A1.1 Introduction

A1.1.1 In defining the boundary for the Nantwich Road Article 4 Direction, consideration has been given to the following factors:

- Evidence of concentrations of HMOs in particular streets;
- The nature of the housing stock in the area. HMOs tend to be concentrated in densely built areas and predominantly streets with high numbers of older terraced dwellings. Much lower concentrations are observed outside of these areas, for example in surrounding semi-detached dwellings or more modern housing – house prices also often sharply increase in the lower density areas;
- Walking tours of the areas and observations about street conditions, including litter, presence of advertising boards for house shares;
- Location of any areas of non-residential buildings. These have been excluded where it makes logical sense to do so;
- The coincidence of environmental, social and economic factors within the areas of the proposed Direction.

A1.2 Boundary review

A1.2.1 For the purposes of review, the boundary has been divided into a number of sections (Map Nantwich Road 1: Boundary Review) with justification provided in Table Nantwich Road 1.



Map Nantwich Road 1: Boundary Review

Table Nantwich Road 1: Boundary Justification

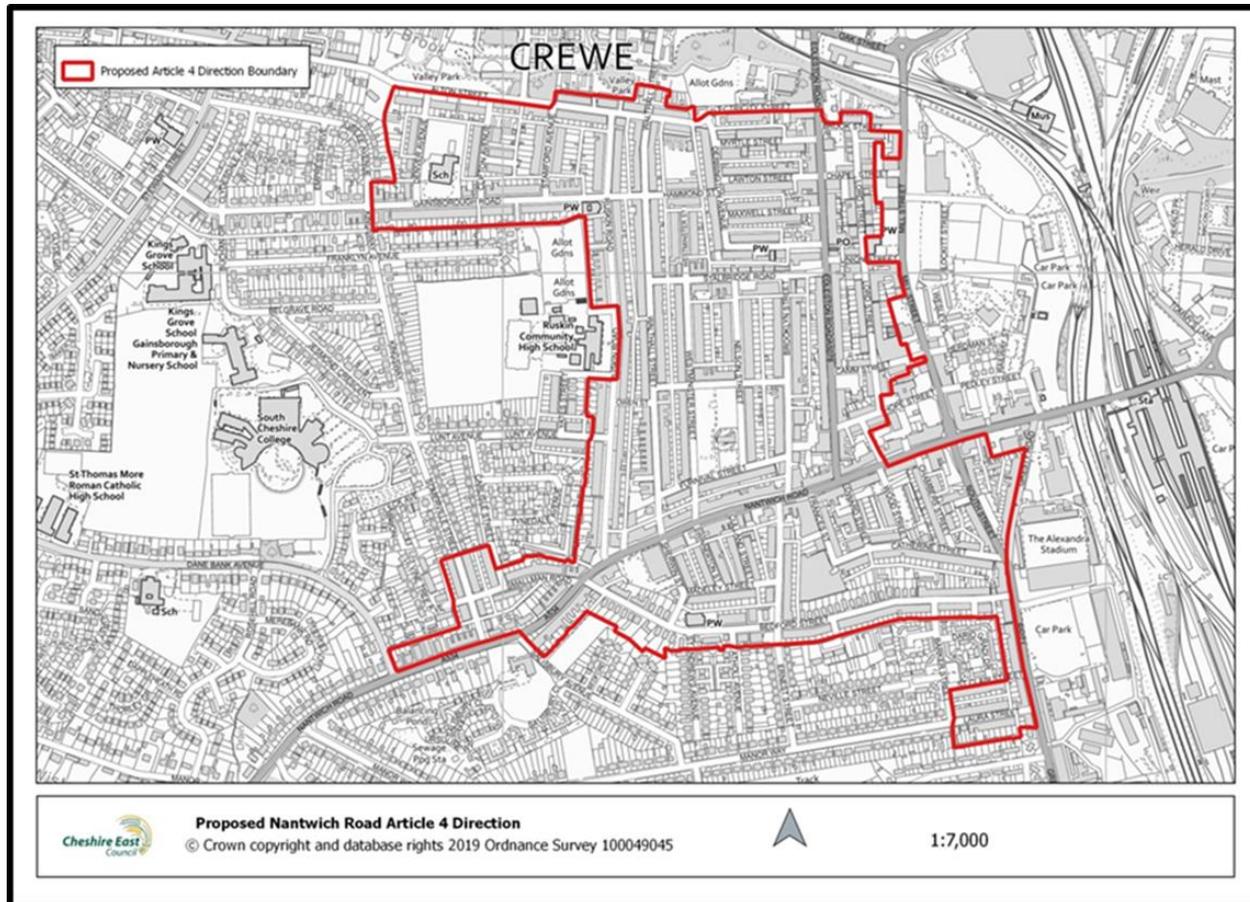
Boundary Section	Proposed boundary	Justification
1. Alton Street – Mill Street	This section follows the row of terraced dwellings on Alton Street opposite Valley Park and proceeds along Alton Street to the east to its junction with Walthall Street. The boundary takes in a small group of dwellings located to the north of the Alton Street/ Walthall Street junction. The boundary then proceeds along Electricity Street, excluding a garage block on the northern corner. The boundary continues along Electricity Street to the junction with Edleston Road, excluding the substation site to the north. The proposed boundary then crosses over Edleston Road and down to Brook Street to the south. The boundary includes the terraced dwellings along Brook Street but excluding the commercial building located at the Mill Street junction.	Land to the north of the proposed boundary is excluded from the proposed boundary as it predominantly comprises of commercial buildings, allotment gardens and public open space. To the west of the proposed boundary on Alton Street, the character of dwellings changes from the denser terraces within the proposed boundary to a higher proportion of semi-detached dwellings. There are few recorded HMOs with the area to the west of the proposed boundary.
2. Mill Street	The proposed eastern boundary follows the western side of Mill Street but excluding commercial buildings and land where it is logical to do so.	There are a number of dense terraced residential streets located to the west of Mill Street with evidence of concentrations of HMOs. The boundary therefore follows boundaries of residential properties close to the Mill Street junctions and those residential dwellings located on Mill Street itself. Land to the east of Mill Street is predominantly commercial - including the site of the consented Lidl store. There is limited evidence of HMO activity to the east of Mill Street.
3. Nantwich Road – Gresty Road	This section includes a number of properties on the southern side of Nantwich Road up to the junction with Gresty Road but excluding a group of commercial buildings on the corner of Nantwich Road/ Gresty Road.	There is evidence of HMO activity in the 'triangle' area bounded by South Street, Gresty Road and Nantwich Road. Commercial properties are excluded where it is logical to do so. Beyond the proposed boundary there is

		limited evidence of HMO activity.
4. Gresty Road – Laura Street	This section starts at the junction of Hewitt Street with Gresty Road, excluding the commercial properties on the corner of Gresty Road and Nantwich Road. The boundary proceeds to the south, along the western side of Gresty Road down to the junction with Laura Street.	The boundary excludes land on the eastern side of Gresty Road as this comprises of the Crewe Alexandra Football Stadium, associated car parking, commercial land and buildings. The boundary also excludes the group of commercial properties close to the junction of Gresty Road and Nantwich Road. Beyond Laura Street to the south, dwellings are predominantly semi-detached and there are few recorded HMOs within this area.
5. Laura Street – Bedford Street	The boundary includes a terrace to the south of the Laura Street/ Gresty Road junction but excludes the brick semi-detached dwellings beyond. The boundary then includes a group of terraced dwellings to the north and south of Laura Street but excludes the semi-detached dwellings along Manor Way. The boundary then returns north to the rear of the properties on Gresty Road, excluding the modern housing development at Dario Gradi Drive.	Properties to the south and west of the proposed boundary along Laura Street are predominantly semi-detached dwellings and the number of HMO's in this area is significantly lower. The boundary excludes the modern housing development in Dario Gradi Drive as there is no evidence of HMOs within this area.
6. Bedford Street – Nantwich Road	The boundary includes all dwellings either side of Bedford Street from its junction with Gresty Road to the east down to the junction with Nantwich Road to the south.	There is evidence of concentrations of HMOs within the Bedford Street area. While there are a number of semi-detached dwellings on the southern side of the road towards the Nantwich Road junction, the proposed boundary is considered to follow a logical route.
7. Nantwich Road West	The boundary continues in a south-westerly direction from the junction with Bedford Street to take in a group of terraced dwellings on the southern side of Nantwich Road up to the junction with Salisbury Avenue. On the northern side of Nantwich Road, the proposed boundary extends as far as Dane Bank Avenue.	The boundary includes terraced dwellings on the southern and northern side of Nantwich Road as there is evidence of HMOs within this area. The boundary excludes the former Police College at the junction of Salisbury Avenue. Dwellings to the south of the proposed boundary (south side of Nantwich Road) are generally

		semi-detached and there is no evidence of HMO concentrations within this area. The same applies on the opposite side of Nantwich Road (northern side) there is little evidence of HMOs along Dane Bank Avenue itself or in the Vine Tree Avenue area.
8. Dane Bank Avenue - Smallman Road – Ruskin Road	This section of the boundary follows the dwellings fronting Nantwich Road but also takes in the terraces at the southern end of Somerville Street and along Smallman Road back to its junction with Nantwich Road. The boundary then continues down the length of Ruskin Road following the rear gardens of the dwellings on the western side of the road.	Land to the north and west of this section is excluded primarily due to low levels of HMO's and clear changes in property type with excluded areas comprising predominantly of semi-detached dwellings. There is clear evidence of high HMO concentrations within the Ruskin Road area.
9. Gainsborough Road – Denver Avenue	This section extends to the west from the junction of Ruskin Road along Gainsborough Road down to the junctions with Kingsway/ Jubilee Avenue. The boundary then continues to the north to include the rear boundaries of dwellings in Denver Avenue, up to the junction with Gainsborough Road.	The proposed boundary along Gainsborough Road takes in a number of terraced properties to the north and south side of the road. Beyond the boundary to the west, there is a clear change in property type with a higher number of detached or semi-detached dwellings. There is also little evidence of HMO activity beyond the proposed western boundary.

A1.3 Boundary

A1.3.1 The boundary for the Nantwich Road Article 4 Direction is shown on the map below.



Appendix 2: Article 4 Direction: West Street

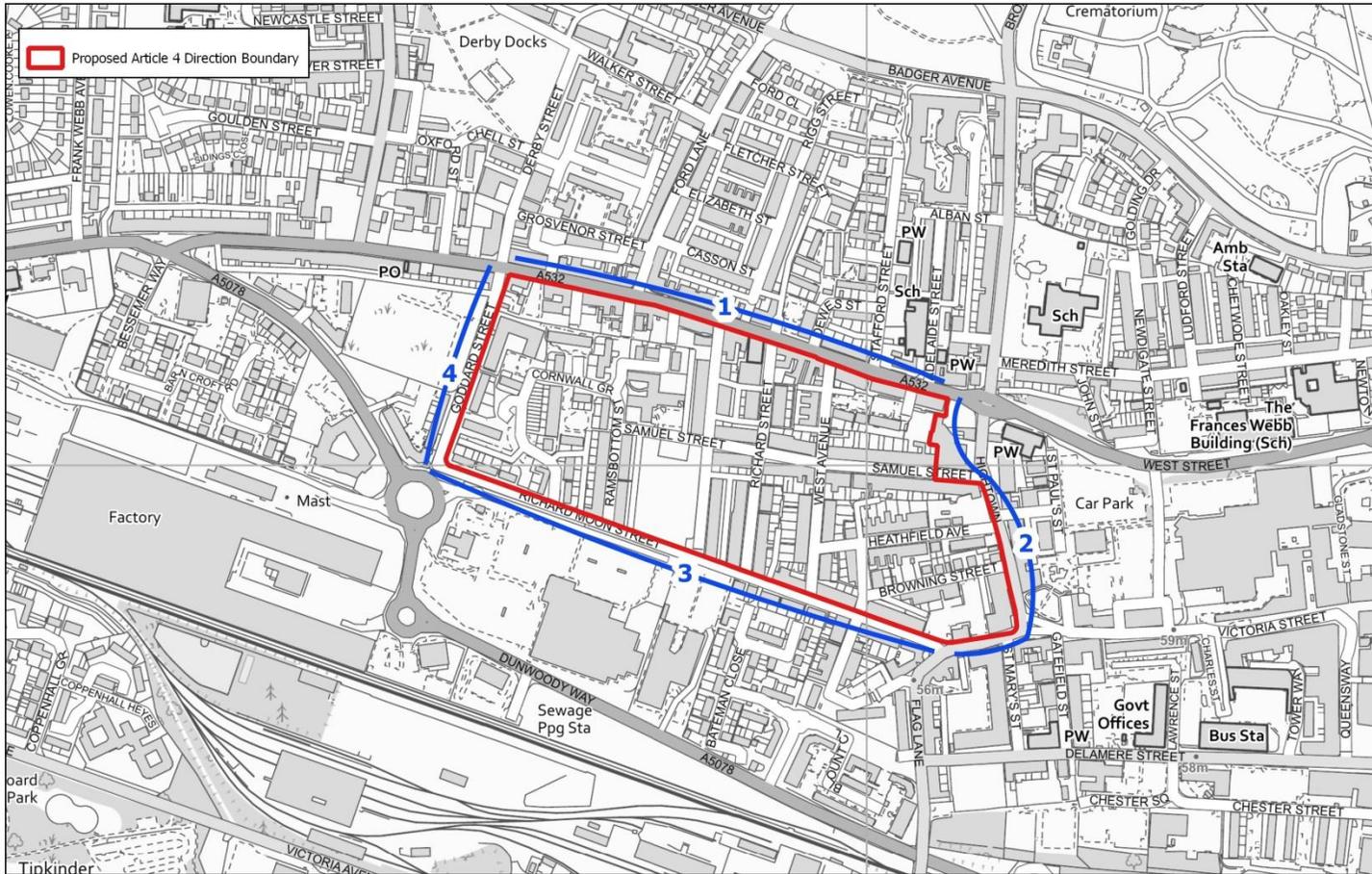
A2.1 Introduction

A.2.1.1 In defining the boundary for the West Street Article 4 Direction, consideration has been given to the following factors:

- Evidence of concentrations of HMOs in particular streets;
- The nature of the housing stock in the area. HMOs tend to be concentrated in densely built areas and predominantly streets with high numbers of older terraced dwellings;
- Walking tours of the areas and observations about street conditions, including litter, presence of advertising boards for house shares;
- Location of any areas of non-residential buildings. These have been excluded where it makes logical sense to do so;
- The coincidence of environmental, social and economic factors within the areas of the proposed Direction.

A2.2 Boundary review

A.2.2.1 For the purposes of review, the boundary has been divided into a number of sections (Map West Street 1: Boundary Review) with justification provided in Table West Street 1.




Proposed West Street, Crewe Article 4 Direction
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 1:5,000

Map West Street 1: Boundary Review

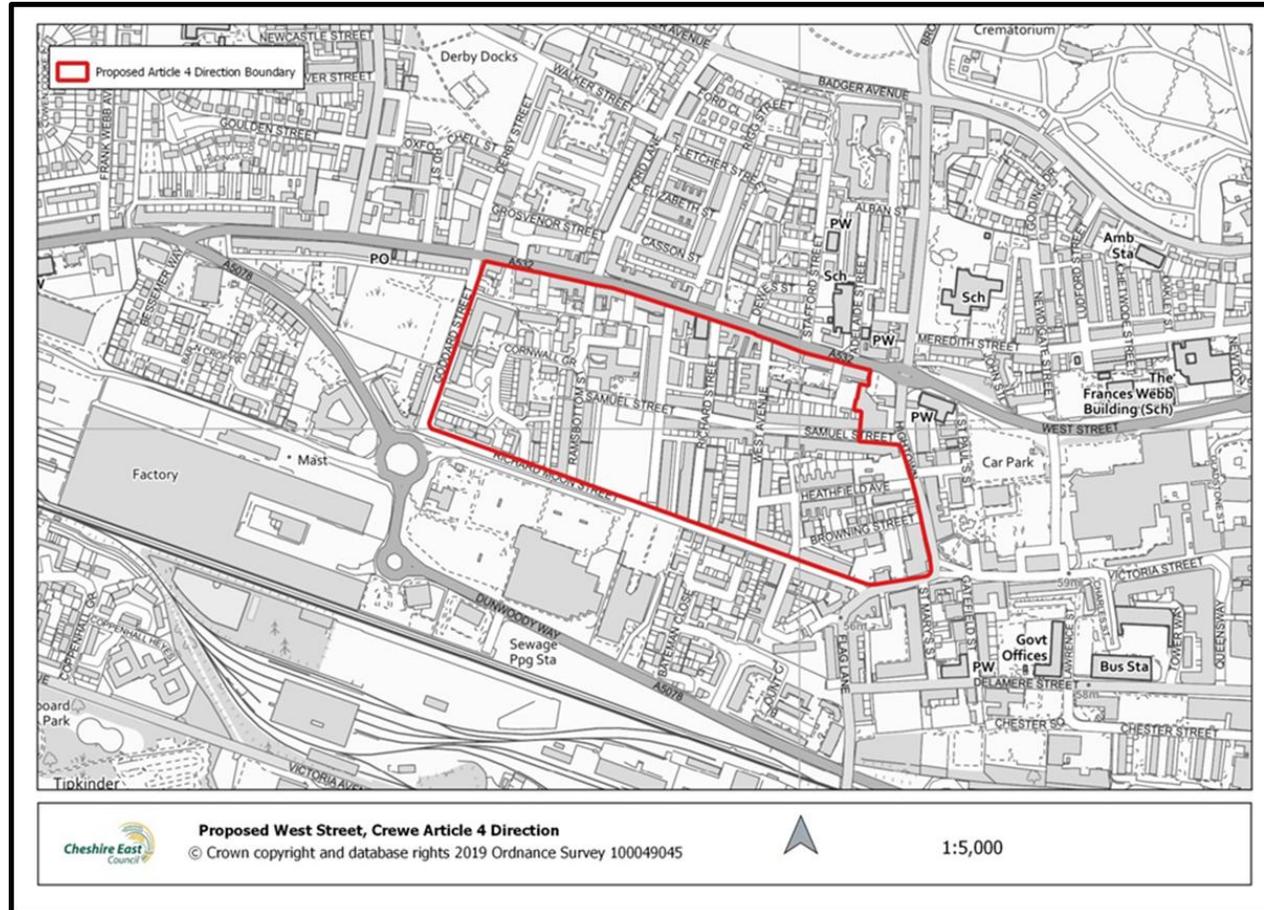
Table West Street 1: Boundary Justification

Boundary Section	Proposed boundary	Justification
1. West Street	This section follows the southern side of West Street from its junction with Goddard Street to the west to the junction with Hightown to the east.	<p>West Street is a busy main road with a mix of commercial and residential properties along its length. The proposed boundary includes dwellings located to the south of West Street between the junctions of Goddard Street to Hightown because it is the area with the highest concentrations of HMOs.</p> <p>To the north and west of the proposed boundary, HMOs are generally more dispersed along the bustling main road where there is a greater mix of uses. While there are some streets with older terraced properties to the north of West Street, HMOs are more scattered.</p>
2. Hightown	The proposed eastern boundary follows the western side of High Town but excludes commercial buildings and land where it is logical to do so.	There are a number of dense terraced residential streets located to the west of High Town with evidence of concentrations of HMOs. Land to the east of High town is excluded from the boundary as this is predominantly commercial (Kwik Fit/ Halfords) with some retail uses plus there is limited evidence of HMO concentrations to the east of the boundary.
3. Richard Moon Street	The boundary proceeds from the junction of High Town in a westerly direction down Richard Moon Street. The boundary follows the northern side of Richard Moon Street to its junction with Goddard Street.	<p>There is evidence of HMO concentrations between Richard Moon Street and West Street in the denser terraced residential streets.</p> <p>To the south of Richard Moon Street, there is a Morrison's supermarket and associated car park, a pharmacy and the rear gardens of a number of modern dwellings that are accessed from Dunwoody Way. While there are HMO's to the south of Richard Moon Street,</p>

		they are more dispersed than seen in the streets to the north.
4. Goddard Street	The boundary follows the eastern side of Goddard Street from the junction with Richard Moon Street to the south and West Street to the north.	There is currently limited evidence of HMO activity in the area to the immediate east of Goddard Street and to the west of Ramsbottom Street. Here there appears to be a number of social rented dwellings and/or sheltered accommodation that could be subject to tenancy agreements that limit sub-division. However there are pockets of older, terraced housing mixed into this area such as the terrace on the southern side of Cornwall Grove. The proposed boundary therefore follows Goddard Street as it forms a clearly identifiable and logical boundary.

A2.3 Boundary

A2.3.1 The boundary for the West Street Article 4 Direction is shown on the map below.



Appendix 3: Article 4 Direction: Hungerford Road

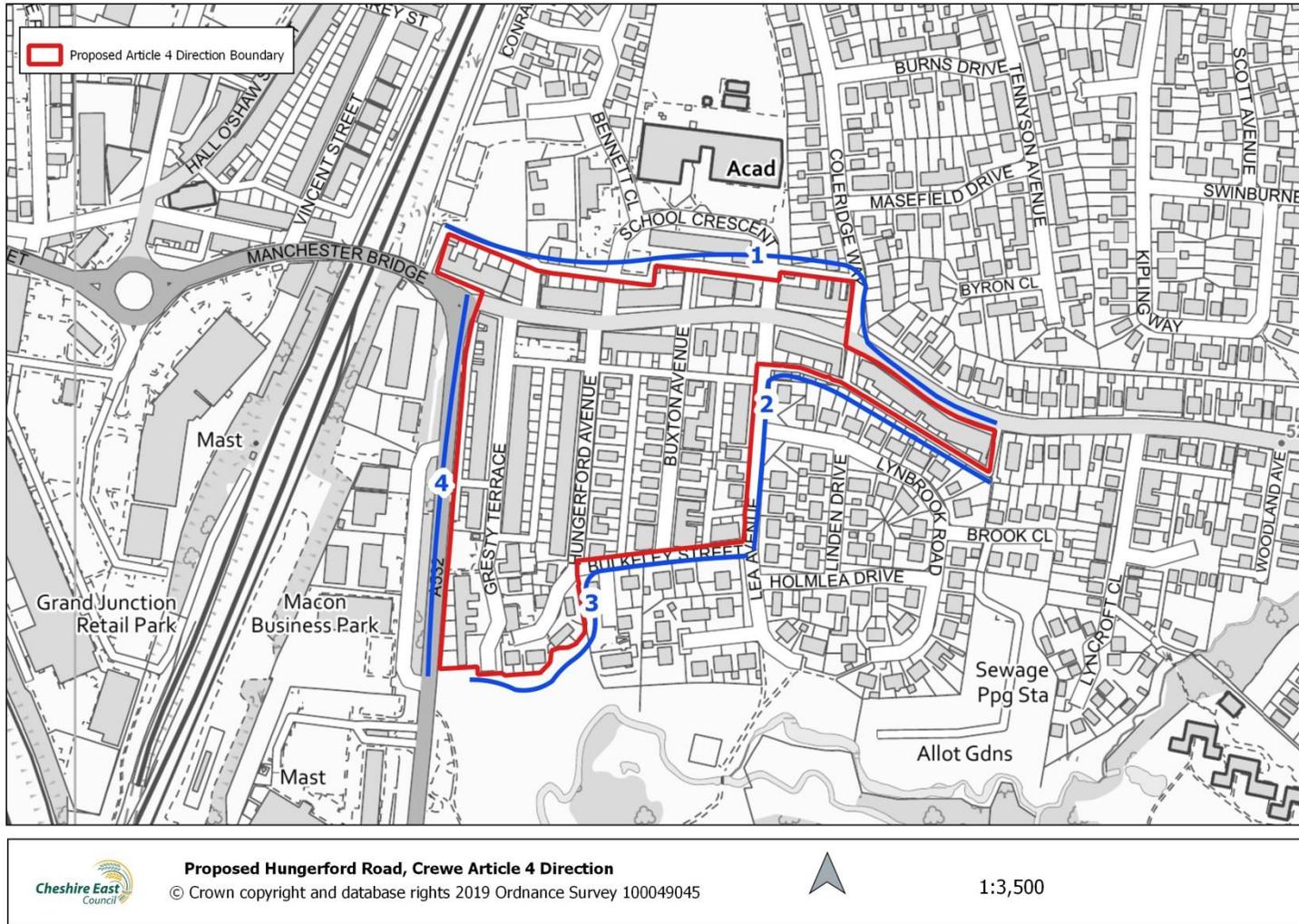
A1.1 Introduction

A1.1.1 In defining the boundary for the Hungerford Road Article 4 Direction, consideration has been given to the following factors:

- Evidence of concentrations of HMOs in particular streets;
- The nature of the housing stock in the area. HMOs tend to be concentrated in densely built areas and predominantly streets with high numbers of older terraced dwellings. Much lower concentrations are observed outside of these areas, for example in surrounding semi-detached dwellings or more modern housing – house prices also often sharply increase in the lower density areas;
- Walking tours of the areas and observations about street conditions, including litter, presence of advertising boards for house shares;
- Location of any areas of non-residential buildings. These have been excluded where it makes logical sense to do so;
- The coincidence of environmental, social and economic factors within the areas of the proposed Direction.

A1.2 Boundary review

A1.2.1 For the purposes of review, the boundary has been divided into a number of sections (Map Hungerford Road 1: Boundary Review) with justification provided in Table Hungerford Road 1.



Map Hungerford Road 1 Boundary Review

Table Hungerford Road 1: Boundary Justification

Boundary Section	Proposed boundary	Justification
1. Hungerford Road	This section follows the row of terraced dwellings on the northern side of Hungerford Road from the end of Manchester Bridge to Coleridge Way and then crosses to the other side of the road to include a group of terraced dwellings to the east. The boundary follows the rear of the dwellings on the southern side of Hungerford Road until it reaches Lea Avenue.	Land to the north of the proposed boundary on the northern side of Hungerford Road is excluded from the boundary as it predominantly comprises of a school, sheltered housing and an area of bungalows on Coleridge Way. To the east of the boundary (northern side of Hungerford Road, there is change of housing type beyond the boundary with increased presence of detached and semi-detached housing and there are fewer recorded HMO's in this area. To the west of this section, uses are predominantly commercial.
2. Lea Avenue	The proposed boundary continues around the back of the terraced dwellings on Hungerford Road to take in the terraced housing on the western side of Lea Avenue before proceeding along Bulkeley Street.	There are some older terraced dwellings located on Lea Street and to the west of this area which may be suitable for HMO uses. Land to the east of the boundary is primarily bungalows and semi-detached dwellings and there is less evidence of HMO activity within this area.
3. Bulkeley Street	This section follows the southern boundaries of a number of terraced streets including Buxton and Hungerford Avenue.	The boundary includes older terraced housing. To the south there is less evidence of HMO activity and consists primarily of bungalows. The boundary proceeds to join the southern end of Gresty Terrace and takes in an area of modern housing to the western end of Bulkeley Street. While there is no evidence of HMO activity within this area of modern housing, it forms a logical boundary.
4. Gresty Terrace	This section follows the junction with Bulkeley Street and rejoins Hungerford Road to the north.	The boundary excludes land to the west as this is predominantly commercial. To the south there is an area of open space. Gresty Terrace includes a number of older, terraced dwellings that are potentially attractive for conversion to HMOs.

A1.3 Boundary

A1.3.1 The boundary for the Hungerford Road Article 4 Direction is shown on the map below.

