



PROOF OF EVIDENCE FOR LONDON BOROUGH OF BROMLEY

PROOF OF EVIDENCE OF BEN JOHNSON

Appeal by Ringers Road Properties Ltd

2-4 Ringers Road and 5 Ethelbert Road, Bromley, BR1 1HT

PINS Ref: APP/G5180/W/24/3340223

LBB Ref: 21/05585/FULL1

I am Ben Johnson. My current position is Head of Planning Policy and Strategy at the London Borough of Bromley. I have worked as a town planner for 15 years, entirely in planning policy/spatial planning, both at a regional and local authority level, in London and North East England.

I hold a Bachelor of Arts Honours Degree in Town Planning and a Postgraduate Diploma in Town Planning from Newcastle University. I am a Full Chartered Member of the Royal Town Planning Institute.

The evidence which I have prepared and provide for this appeal (in this proof of evidence) is true to the best of my knowledge and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed in this proof of evidence are my true and professional opinions.

1. Summary

- 1.1. My proof of evidence first provides detail of the planning policy context relating to refusal reason 2 (RfR2):

The proposed development, by reason of not providing any larger family sized units (3 bedroom +), would fail to address the identified need in the Borough, contrary to London Plan Policy H10 and Local Plan Policy 1 and policy 2.

- 1.2. My proof of evidence sets out the adopted planning policy and guidance that is relevant to RfR2, particularly policy H10 of the London Plan (2021), policies 1 and 2 of the Bromley Local Plan, and evidence base documents that are relevant to the issue of housing size mix.
- 1.3. My evidence includes commentary on how the appeal scheme has or has not addressed criteria in London Plan policy H10, concluding that the Appellant seems to have made little effort to engage with this policy requirement.
- 1.4. I conclude that the appeal scheme is not compliant with London Plan policy H10 and Local Plan policies 1 and 2. However, I recognise that the appeal scheme's proposed housing size mix does meet some defined local need, and I consider that this should be given moderate weight.
- 1.5. My proof of evidence then turns to the matter of affordable housing in Bromley. In order to fully understand the weight that should be given to affordable housing provision, I set out how affordable housing need interacts with planning policies and targets; and set out the wider context, in terms of affordable housing delivery in Bromley over recent years.
- 1.6. I acknowledge the importance of affordable housing delivery and note it is a priority in the Local Plan and London Plan, and that such delivery will help to contribute towards tackling the national housing crisis. Taking into account this context, I consider that the proposed affordable housing provision of 12% (by habitable room) should be given substantial weight.
- 1.7. Finally, my proof of evidence sets out the Council's five year housing land supply figure of 2.96 years. I consider that very substantial weight should be given to the proposed provision of 88 net additional units, taking into account the Council's housing land supply position.
- 1.8. While several issues relating to the housing land supply position have been agreed as part of the Statement of Common Ground, there remains matters of disagreement. My proof focuses on these matters, setting out the justification for the Council's approach to small sites projections and the use of the London Plan small sites target as a windfall allowance; and information to support the Council's proposed phasing of a disputed large site.