

# Summary Affordable Housing Proof of Evidence of Annie Gingell BSc (Hons) MSc MRTPI

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2-4 Ringers Road and 5 Ethelbert Road, Bromley, BR1  
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Demolition of existing buildings and construction of a mixed use development comprising residential units, ancillary residents' facilities (including co-working space) and commercial floor space (Use Class E) across two blocks, along with associated hard and soft landscaping, amenity spaces, cycle and refuse storage (Revised scheme incorporating a second stair into Block A and Block B, internal layout and elevational changes, and changes to the on street parking bays and footpath along Ringers Road and Ethelbert Road).

2 - 4 Ringers Road, Bromley, BR1 1HT

Ringers Road Properties Ltd

June 2024

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

LPA REF: 21/05585/FULL1

OUR REF: M24/0305-03.RPT

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# Introduction

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## Section 1

- 1.1 My name is **Annie Gingell** and my credentials as an expert witness are summarised as follows: I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development from Cardiff University (2020).
- 1.2 I am a member of the Royal Town Planning Institute. I have over 9 years' professional experience in the field of town planning and housing. I have previously been employed by a Local Authority in the South West and have been in private practice since 2017. I have been employed at Tetlow King Planning Ltd for the past 7 years.
- 1.3 During my career, I have presented evidence at numerous Section 78 appeals in the West Midlands, North West, South West, South East of England, and London.
- 1.4 Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging Development Plan Documents and Supplementary Planning Documents on affordable housing throughout the UK.
- 1.5 My Proof of Evidence examines the affordable housing need in the London Borough of Bromley and considers the weight to be attributed to affordable housing in the overall planning balance.
- 1.6 As part of my evidence, I have sought data, from the Council through a Freedom of Information ("FOI") request which can be viewed at **Appendix AG1**. The request was submitted to the Council on 19 March 2024, with the 20-working day statutory response time elapsing on 17 April 2024. Unfortunately, at the time of writing the Council were still yet to provide any of the data requested. As such I reserve the right to provide a Supplemental Statement upon receipt.
- 1.7 There is an acute need for more affordable homes to be delivered in Bromley which the appeal proposals would make a substantial contribution towards addressing.

# Affordable Housing Evidence

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## Section 2

### Introduction

- 2.1 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 2.2 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.
- 2.3 Market signals indicate a worsening trend in affordability across LBB and, by any measure of affordability, this is an Authority amid an affordable housing emergency, and urgent action must be taken to deliver more affordable homes.

### Affordable Housing Offer

- 2.4 The proposed development is for 94 dwellings, of which 11% (ten dwellings) are to be provided on-site as affordable housing (12% by habitable room).
- 2.5 The 12% is based on the viability evidence of Turner Morum which has been independently verified by the Council and agreed in the Main Statement of Common Ground ("SoCG) (**CD11.1, p.12, [7.12]**) as the maximum level of affordable housing provision capable of being provided by the development proposals.
- 2.6 Policy 2 of the Bromley Local Plan (2019) allows for viability considerations in respect of affordable housing provision, as does Policy H5 of the London Plan (2021). Consequently, any justified reduction from the policy expectations is permissible and means the resultant offer, by definition, is policy compliant even at a reduced percentage.
- 2.7 The proposed tenure split will be six social rented units and four shared ownership units which reflects the viability review of the proposed scheme.
- 2.8 The proposed affordable housing will be secured by way of a Section 106 Planning Obligation.

### **Local Policy Position**

- 2.9 The relevant Development Plan in respect of affordable housing for the Appeal site currently comprises the London Borough of Bromley Local Plan (2019) and the London Plan (2021).
- 2.10 Policy H5 of the London Plan is the primary policy for affordable housing and required qualifying developments (i.e. 11 or more gross dwellings) to provide 35% on site affordable housing across London including LBB.
- 2.11 Policy 2 of the Bromley Local Plan (2019) echoes the above the in terms of requiring residential developments of 11 or more to deliver 35% or more affordable housing units on site and also considers financial viability when determining the appropriate level of affordable housing provision to be provided onsite.

### **Affordable Housing Needs**

- 2.12 The 2014 SHMA which underpins the LBB Local Plan (2019), indicates a net need for 1,404 new affordable homes annually, totalling 28,080 homes over the 20-year period between 2011 and 2031.
- 2.13 Data from DLUHC shows that on 31 March 2023, there were 2,772 households on the Housing Register in 2023. This represents a 6% increase from the previous year, when the figure stood at 2,618 households.
- 2.14 Of the households on the Housing Register on 31 March 2023, 100% (2,772) were considered to fall within the 'Reasonable Preference' category.
- 2.15 According to DLUHC data, on the 31 March 2023, LBB have placed a total of 1,539 households in temporary accommodation, with 24% of these households having been in temporary housing for five years or longer.
- 2.16 DLUHC data indicates that LBB spent £23,120,000 on temporary accommodation between 1 April 2022 and 31 March 2023, 77% was spent on nightly paid, privately managed accommodation and 22% was spent on private sector accommodation.
- 2.17 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 575 households in need of homelessness prevention duty, and a further 779 households in need of relief duty from the Council.

- 2.18 In LBB in 2022/23, the termination of a private sector tenancy accounted for 248 households owed a prevention duty, or 43% of all households owed a prevention duty; it is the most common reason for the prevention duty.

### **Affordable Housing Delivery**

- 2.19 In the 12-year period between 2011/12 and 2022/23, a total of 7,566 net dwellings were delivered in LBB, equivalent to 631 per annum. Of these, 1,748 gross dwellings were affordable tenures, equivalent to 146 per annum. This equates to 23% gross affordable housing delivery.
- 2.20 GLA data shows that in 2023/24, there were just 29 affordable housing completions.
- 2.21 Once the RP Right to Buy losses to stock are accounted for over the nine-year period, the Council's gross affordable housing completions figure of 1,748 affordable dwellings over the period falls to 1,652 additions to affordable housing stock (net of Right to Buy sales), equivalent to just 22% of net housing completions.
- 2.22 When comparison is drawn between affordable housing delivery and the needs identified in the 2014 SHMA since its 2011/12 base date, it can be seen that there has been an accumulated shortfall in the delivery of affordable housing of some -16,571 affordable homes against an identified need for 18,252 affordable homes over the 13-year period (including gross completions for the 2023/24 monitoring year).

### **Affordability**

- 2.23 In addition to the persistent shortfall in affordable housing delivery when compared to affordable housing needs, other indicators further point to an affordability crisis in LBB. Set out below are the key findings in respect of affordability across the Borough:

#### Private Rental Market

- Median private rents in LBB stood at £1,325 per calendar month ("pcm") in 2022/23. This represents a 33% increase from 2013/14 where median private rents stood at £1,000 pcm.
- A median private rent of £1,325 pcm in 2022/23 is slightly lower than the London figure of £1,500 pcm however it is 61% higher than the national figure of £825 pcm.
- A lower quartile rent of £1,100 pcm in 2022/23 is slightly lower than the London figure of £1,250 pcm however LBB is 76% higher than the national figure of £625 pcm.

### Median House Prices

- The ratio of median house prices to median incomes in LBB now stands at 13.04, a 34% increase since the start of the 2014 SHMA period in 2011/12 where it stood at 9.76. A ratio of 13.04 in LBB stands substantially above the national median of 8.26 (+58%) and above the London median of 11.95 (+9%).
- The median house price across LBB has risen by 91% from £275,000 in 2011 to £525,000 in 2023. This figure is some 81% higher than the national figure of £290,000, which has seen an increase of 58% over the same period and 2% lower than the London figure of £535,000 which has seen an increase of 84% over the same period.

### Lower Quartile House Prices

- The lower quartile house price across LBB has risen by 79% from £209,000 in 2011 to £375,000 in 2023. This compares to an 83% increase across London and a national increase of 52% over the same period.
- In 2023, lower quartile house prices in LBB (£375,000) were 6% lower than across London (£399,017) and 97% higher than the national figure (£190,000).

2.24 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in LBB.

2.25 This demonstrates an acute need for affordable housing in LBB and one which the Council and decision takers need to do as much as possible to address as required to do so, proactively, by the NPPF (2023).

### **Summary and Conclusions**

2.26 There are serious and persistent affordability challenges across LBB. This is exemplified by the affordability indicators which show a poor and worsening affordability across the Borough.

2.27 It is my opinion that there is an acute housing crisis in LBB, with a lower quartile house price to income ratio of 13.92 in 2022. Mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 209% higher than that.

2.28 Boosting the supply of affordable homes will mean that households needing affordable housing will spend less time in unsuitable accommodation. This will improve the lives



of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.

- 2.29 Considering the Authority's past poor record of affordable housing delivery and worsening affordability indicators at both the Borough and local level, it is my view that the provision of ten affordable dwellings on this site should be afforded **substantial weight** in the determination of this appeal.