

Summary Proof of Evidence of Ben Pycroft re: Housing Land Supply

For Ringers Road Properties Ltd | 24-054

Mixed use development – 2-4 Ringers Road and 5 Ethelbert Road, Bromley, BR1 1HT



Project: 24-054
Site Address: Bromley 5YHLS
Client: Ringers Road Properties Ltd
Date: 17 June 2024
Author: Ben Pycroft

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1. Introduction

- 1.1 This summary proof of evidence is submitted on behalf of Ringers Road Properties Ltd (i.e. the Appellant) in support of its appeal against the decision of the London Borough of Bromley (LBB) to refuse to grant planning permission for the 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) at 2-4 Ringers Road and 5 Ethelbert Road, Bromley (LPA ref: 21/05585/FULL1, PINS ref: APP/G5180/W/24/3340223).
- 1.2 This summary and my main proof of evidence address matters relating to LBB's five year housing land supply (5YHLS). They should be read alongside the proofs of evidence of Annie Gingell, which addresses affordable housing and Mark Batchelor, which addresses all other planning matters in relation to this case.

Qualifications

- 1.3 I am Benjamin Michael Pycroft. I have a B.A. (Hons) and postgraduate diploma in Town Planning from the University of Newcastle-upon-Tyne and am a member of the Royal Town Planning Institute. I am a Director of Emery Planning, based in Macclesfield, Cheshire.
- 1.4 I have extensive experience in dealing with housing supply matters and have prepared and presented evidence relating to 5YHLS calculations at several Local Plan examinations and over 60 public inquiries across the country.
- 1.5 In June 2023, I presented evidence in relation to 5YHLS at a public inquiry into an appeal made by Caerus Developments Ltd against the decision of LBB to refuse to grant planning permission for the demolition of all existing buildings on site and redevelopment to provide residential development comprising a mix of dwellinghouses and apartment blocks (part 3 and part 5 storeys in height), including provision of affordable housing, alongside the provision of public open space fronting Worsley Bridge Road, onsite play space and areas for public sports facilities, associated landscaping, car parking and ancillary works at former Sports Ground, Worsley Bridge Road, Beckenham¹. In that case, the Inspector concluded that the Council could demonstrate a deliverable housing land supply of 3.38 years at 1st April 2021 (paragraph 86). LBB has since

¹ PINS ref: 3315293 – **CD7.13**



revised its position and now claims that it can demonstrate a 2.96 year supply at 1st April 2021 as I discuss below.

- 1.6 I understand my duty to the inquiry and have complied, and will continue to comply, with that duty. I confirm that this evidence identifies all facts which I regard as being relevant to the opinion that I have expressed, and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion. I believe that the facts stated within this proof are true and that the opinions expressed are correct and comprise my true professional opinions which are expressed irrespective of by whom I am instructed.
- 1.7 I provide this summary, my main proof of evidence and a set of appendices. I also refer to several core documents and the Statement of Common Ground (SoCG) in relation to housing land supply.



2. Summary

2.1 LBB is required to demonstrate a 5YHLS in accordance with the Framework.

2.2 The base date of LBB's latest 5YHLS position remains 1st April 2021 (3.25 years ago). LBB accepts that it cannot demonstrate a 5YHLS at the agreed base date of 1st April 2021. It also accepted that it could not demonstrate a 5YHLS in the previous position at 1st April 2020. Whilst LBB claimed it could demonstrate a 5YHLS at 1st April 2015, 1st April 2017 and 1st April 2019, appeal Inspectors have concluded that those claims were unfounded and a 5YHLS could not be demonstrated. LBB has therefore been unable to demonstrate a 5YHLS for several years.

2.3 The following matters are agreed in relation to 5YHLS as set out in the SoCG on HLS:

- The base date for the 5YHLS calculation is 1st April 2021 and the five year period is to 31st March 2026 (paragraph 2.1, page 4);
- The 5YHLS should be measured against the housing requirement set out in the London Plan (adopted March 2021) of 774 dwellings per annum (paragraphs 2.2-2.4, page 4);
- The past shortfall at 1st April 2021 is 687 dwellings (paragraph 2.5, page 4);
- The shortfall should be addressed in full in the 5YHLS period (i.e. the Sedgefield method – paragraph 2.6, page 4);
- A 20% buffer applies (paragraph 2.10, page 5); and
- LBB cannot demonstrate a deliverable 5YHLS.

2.4 The extent of the deliverable supply is not agreed. LBB considers that the supply equates to 2.96 years. I conclude that it is 2.4 years. There are two reasons for the difference in supply:

- Firstly, I dispute LBB's inclusion of 1,974 dwellings on small sites in the 5YHLS period. The evidence demonstrates that actual completions on small sites in Bromley in 2021/22 and 2022/23 were 63 and 112 respectively. This is significantly less than the 418/419 dwellings per annum claimed in LBB's trajectory for these two years and the 379 dwellings per annum windfall allowance set out in the London Plan. I apply the historic completion rate of 302 dwellings per annum on small sites over the 5YHLS period and this means that **464 dwellings** should be removed from LBB's 5YHLS; and
- Secondly, I do not consider there is a realistic prospect that **143 dwellings** will be delivered at South Eden Park Road by 31st March 2026 (i.e. in 1.75 years from now). Whilst a start on site has been made, the site is only at the ground works stage. The below ground works are extensive, applications to discharge conditions relating to above ground works have not been



made and my analysis of other large sites demonstrates that it takes over 3 years for such sites to deliver housing.

2.5 As a result of these deductions, I conclude that LBB's 5YHLS at 1st April 2021 is 2,628 dwellings. This results in a 2.4 year supply as shown in the following table.

Table 2.1 – LBB's 5YHLS at 1st April 2021

	Requirement	Council	Appellant
A	Annual housing requirement	774	774
B	Five year requirement (A X 5 years)	3,870	3,870
C	Shortfall from 1 st April 2019	687	687
D	Total five year housing requirement (B+C)	4,557	4,557
E	Five year housing land supply to be demonstrated (D + 20%)	5,468	5,468
F	Annual average requirement plus buffer (F / 5 years)	1,094	1,094
	Supply		
G	5YHLS at 1st April 2021	3,235	2,628
H	Supply in years (G / F)	2.96	2.4
U	Undersupply against 5 year housing requirement and buffer	-2,233	-2,840

2.6 The implication of this is addressed by Mark Batchelor.



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