

Summary Proof of Evidence of Ben Pycroft in relation to Five Year Housing Land Supply

For Aurora Properties (UK) Ltd | 22-679

Mixed use development - Land to the North of Bradmore Way, Bradmore Way, The Brookmans Estate, Brookmans Park, Hertfordshire

Project: 22-679
Site Address: Land to the North of Bradmore Way, The Brookmans Estate,
Brookmans Park, Hertfordshire
Client: Aurora Properties (UK) Ltd
Date: 09 January 2023
Author: Ben Pycroft

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence. No part of this document may be reproduced without the prior written approval of Emery Planning. Emery Planning Partnership Limited trading as Emery Planning.

Contents

1.	Introduction _____	1
2.	Welwyn Hatfield's 5 Year Housing Land Supply _____	2



1. Introduction

- 1.1 This summary proof of evidence is submitted on behalf of Aurora Properties (UK) Ltd (i.e. the Appellant) in support of its appeal against the decision of Welwyn Hatfield Borough Council to refuse to grant outline planning permission for up to 125 dwellings, a C2 care facility for up to 60 bedrooms with associated facilities, a scout hut and all ancillary works on Land to North of Bradmore Way, The Brookmans Park Estate (LPA ref: 6/2022/1097/OUTLINE, PINS ref: APP/C1950/W/22/3307844).
- 1.2 This summary and my main proof of evidence specifically address matters relating to housing land supply. They should be read alongside the proofs of evidence prepared by Mr Stacey in relation to affordable housing and Mr Gray in relation to all other planning matters.

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 five year housing land supply calculations at several Local Plan examinations and over 40 public inquiries across the country. In 2021, I prepared and submitted evidence in relation to the Council's housing land supply at the appeal against the Council's decision to refuse to grant planning permission for up to 100 dwellings at land off Bullens Green Lane, Colney Heath¹.
- 1.5 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.
- 1.6 I provide this summary, my main proof of evidence and a set of appendices. I also refer to several core documents. I will work with the Council on a Statement of Common Ground in relation to housing land supply.

¹ PINS ref: 3265926 – Core document 9.28



2. Welwyn Hatfield's 5 Year Housing Land Supply

Background

- 2.1 In August 2022, the Council published its Housing Delivery Test Action Plan². Appendix 1 of this document states that at 1st April 2022 the Council has a deliverable 5 year housing land supply (5YHLS) of 2,545 dwellings. Against the local housing need calculated using the standard method set out in the PPG of 888 dwellings per annum and a 20% buffer, this equates to 2.63 years.
- 2.2 However, the Council claims that upon adoption of the emerging Local Plan the deliverable supply at 1st April 2023 will be 5,481 dwellings, which against the proposed (stepped) housing requirement, a proportion of the shortfall to date and a 20% buffer would equate to 5.2 years.
- 2.3 It is of note that the Council's proposed approach for addressing the shortfall, a stepped housing requirement and its housing trajectory (including proposed allocations) have not been endorsed by the Local Plan Inspector and are the subject of further consultation between 4th January and 15th February 2023. The Appellant will be responding to this consultation before it closes.

Summary

- 2.4 As above, it is common ground that the Council cannot currently demonstrate a deliverable 5YHLS by a significant margin. Whilst the Council considers that the deliverable supply at 1st April 2022 is 2,545 dwellings, I have assessed the supply and consider that it is 1,762 dwellings, which against the local housing need and a 20% buffer equates to 1.65 years.
- 2.5 The housing completions between 1st April 2022 and 31st March 2023 will not be known until the start of the next monitoring year. Therefore, the shortfall at 1st April 2023 is not known at the time of writing. It is also not known whether the Council's proposed approach for addressing the shortfall, a stepped housing requirement and its housing trajectory will remain unchanged after the current consultation on them closes.
- 2.6 Nevertheless, my proof of evidence demonstrates that even were the development plan to be adopted, the Council would not be able to demonstrate a 5YHLS. This is because the Council has not provided the clear evidence required for the inclusion of sites in the 5YHLS within the context of the definition of deliverable set out in the 2021 Framework. Whilst the emerging Local Plan is being examined under the

² Core document 7.01



2012 Framework and its definition of “deliverable”, the 5YHLS will be measured against the current (2021) Framework.

- 2.7 I conclude that the deliverable supply at 1st April 2023 with reference to the definition in the current Framework is 2,056 dwellings. This equates to 1.88 years or 1.95 years depending on whether the emerging housing requirement is to be stepped or not.
- 2.8 Regardless of the position in terms of the 5YHLS, I also explain in my proof of evidence that the presumption in favour of sustainable development will apply because the Council has failed the 2021 Housing Delivery Test (HDT) and will fail the 2022 HDT even if the Council is successful in adopting a stepped housing requirement.
- 2.9 The implications of this are addressed by Mr Gray.



emery

PLANNING

2-4 South Park Court, Hobson Street
Macclesfield, Cheshire, SK11 8BS

+44 (0)1625 433 881

Regus House, Herons Way
Chester Business Park, CH4 9QR

+44 (0)1244 732 447



[emeryplanning.com](https://www.emeryplanning.com)