

Summary Proof of Evidence of Ben Pycroft BA(Hons), Dip TP, MRTPI in relation  
to Five Year Housing Land Supply  
For Boningale Developments Ltd | 25-288

Residential development of 70 dwellings including access, open space, landscaping and  
associated works - Land to the east of Tilstock Road, Tilstock, Whitchurch, Shropshire

PINS ref: 3362414, LPA ref: 24/04176/FUL

Project: 25-288  
Site Address: Land to the east of Tilstock Road, Tilstock, Whitchurch, Shropshire  
Client: Boningale Developments Ltd  
Date: 20<sup>th</sup> September 2025  
Author: Ben Pycroft

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# 1. Introduction

- 1.1 This summary proof of evidence is submitted on behalf of the Appellant (Boningale Developments Ltd) in support of its appeal against the failure of Shropshire Council to determine within the relevant timescales a full planning application for:

“Residential development of 70 dwellings including access, open space, landscaping and associated works”

at land to the east of Tilstock Road, Tilstock, Whitchurch, Shropshire (LPA ref: 24/04176/FUL, PINS ref: 3362414).

- 1.2 This summary and my main proof of evidence address the Council’s Five Year Housing Land Supply (5YHLS). They should be read alongside the proof of evidence of Megan Wilson, which addresses all other planning matters in relation to the appeal.
- 1.3 For the avoidance of doubt, my proof of evidence supersedes the Appellant’s statement of case in relation to 5YHLS dated 19<sup>th</sup> May 2025.

## Qualifications

- 1.4 I am Benjamin Michael Pycroft. I have a B.A. (Hons) and a 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.
- 1.5 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 80 public inquiries across the country.
- 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 and my main proof of evidence and a set of appendices. I also refer to several core documents. I am working with the Council on a Statement of Common Ground (SoCG) in relation to housing land supply, which is to be submitted by 7<sup>th</sup> October 2025.



## 2. Summary

- 2.1 From the outset, the Council accepts that it cannot demonstrate a 5YHLS. The Council's published position considers that it has a deliverable supply on 1<sup>st</sup> April 2024 of 9,902 dwellings, which against a local housing need figure of 1,994 dwellings per annum and a 5% buffer equates to 4.73 years (a shortfall against the 5YHLS requirement of 567 dwellings).
- 2.2 In its Statement of Case (SoC) when this appeal was due to be considered by a hearing, the Council's position was that it has a deliverable supply of 9,802 dwellings (i.e. rather than 9,902 dwellings), which against a local housing need figure of 1,994 dwellings per annum equates to **4.68 years (a shortfall against the 5YHLS requirement of 667 dwellings)**.
- 2.3 The following matters in relation to 5YHLS are agreed:
- The base date for assessing the 5YHLS is 1<sup>st</sup> April 2024 and the 5YHLS period is to 31<sup>st</sup> March 2029;
  - In accordance with paragraph 78 and footnote 39 of the Framework, the 5YHLS should be measured against the local housing need calculated using the standard method set out in the PPG. Whether the latest available data should be used in calculating the local housing need is not agreed;
  - A 5% buffer should be applied; and
  - The Council cannot demonstrate a 5YHLS.
- 2.4 There are two matters of disagreement in relation to 5YHLS.
- 2.5 The first is what the local housing need is. As above, the Council's position statement states that the local housing need is 1,994 dwellings per annum. Whilst the Council's 5YHLS position has a base date of 1<sup>st</sup> April 2024, the Council's calculation of local housing need uses the housing stock in Shropshire at 2023 and the 2023 affordability ratio. Paragraph 2a-004 of the PPG states that the latest available data should be used when calculating the local housing need. This is the 2024 housing stock data (published in May 2025) and the 2024 affordability ratios (published in March 2025). Using the latest available (i.e. 2024-based) data, the local housing need at 1<sup>st</sup> April 2024 is 2,025 dwellings per annum.
- 2.6 Secondly, the extent of the deliverable supply is not agreed. As above, in its position statement, the Council considers that it has a deliverable supply at 1<sup>st</sup> April 2024 of 9,902 dwellings. In its SoC, the Council considers that the deliverable supply at 1<sup>st</sup> April 2024 is 9,802 dwellings.



2.7 I have assessed the Council's claimed supply and for the reasons set out in section 6 of this proof of evidence conclude that the following should not be included in the 5YHLS:

- 1,573 dwellings on 21 sites which were proposed to be allocated in the withdrawn Local Plan;
- 412 dwellings on 6 sites, which are allocated in the current Local Plan;
- 165 dwellings on 3 sites with planning permission;
- 34 dwellings on 1 site identified in the SLAA; and
- 32 dwellings on 2 affordable housing sites.

2.8 I therefore conclude that the deliverable supply at 1<sup>st</sup> April 2024 is 7,586 dwellings (i.e.  $9,802 - 1,573 - 412 - 165 - 34 - 32 = 7,586$  dwellings). Against the local housing need and a 5% buffer, this equates to **3.56 years (a shortfall in the 5YHLS of 3,045 dwellings)** as shown in the following table.

Table 2.1 – Shropshire's 5YHLS at 1<sup>st</sup> April 2024

|   | Requirement                                                | Council     | Appellant     |
|---|------------------------------------------------------------|-------------|---------------|
| A | Annual local housing need figure                           | 1,994       | 2,025         |
| B | Five year housing requirement without buffer (A X 5 years) | 9,970       | 10,125        |
| C | 5% buffer (5% of B)                                        | 499         | 506           |
| D | Five-year supply to be demonstrated (B + C)                | 10,469      | 10,631        |
| E | Annual requirement plus 5% buffer (D / 5 years)            | 2,094       | 2,126         |
|   | <b>Supply</b>                                              |             |               |
| F | Five-year supply at 1 <sup>st</sup> April 2024             | 9,802       | 7,586         |
| G | Supply in years (F / E)                                    | <b>4.68</b> | <b>3.56</b>   |
| H | Undersupply against the five-year requirement plus buffer  | <b>-667</b> | <b>-3,045</b> |

2.9 The implication of this is addressed by Megan Wilson.



