

APPENDIX 3



25<sup>th</sup> September 2020

Mr G Thomas  
Area Planning Officer  
Swale Borough Council  
Swale House  
Sittingbourne  
Kent  
ME10 3HT

Dear Mr Thomas,

**Frogna Lane, Teynham - 16/507689/OUT**

I understand the only issue of substance which has not been resolved in respect of the above application is the provision of on-site affordable housing and Trenport, the applicant, have therefore instructed me to submit notice to you of a formal revision to the application.

In that regard the application was submitted in October 2016 and Pioneer, on behalf of Trenport, submitted a detailed viability appraisal in September 2018 which concluded that the site could not viably support more than 8% affordable housing; subsequently, in April 2019, the consultant appointed by the Council to undertake a review of that report (Martin Aust at Pathfinder) concluded the development could only support 22% affordable housing.

It has therefore been mutually accepted for some 18 months that the scheme cannot viably support the 40% target level of provision and during that time we have, at your request, both examined the potential to utilise the employment land for residential purposes (even a development of broadly 550 dwellings could not support 40% affordable housing provision) and negotiated with several Registered Providers to investigate the potential to invest Homes England grant moneys to increase the proportion of affordable housing.

Consequently, we met with your colleagues on 6<sup>th</sup> March 2020 and, to try and break the deadlock, it was agreed that the Council would brief Martin Aust at Pathfinder that Hyde HA were interested in the scheme and would be contacting him regarding the viability appraisal. Since then matters have been somewhat delayed by the pandemic however in your email of 4<sup>th</sup> June you confirmed that Martin Aust at Pathfinder had informed you his most recent assessment had concluded that *"...the application scheme for 300 dwellings is viable with 15.7% affordable housing (48 units) based on the Council seeking a 90% Affordable Rent, 10% Intermediate tenure mix"* and you further clarified, on 1<sup>st</sup> July, that the figure should be increased to 18.33% as a consequence of Martin Aust not being aware that this tenure split did not reflect the 40% Affordable Rent and 60% Intermediate Housing tenure split agreed in the engrossed S106 of August 2018.

## APPENDIX 3



It is therefore common ground that this scheme cannot viably support 40% affordable housing and you have accepted that whilst the relevant policy in respect of affordable housing is Policy DM8 it should be considered in the context of the conclusion reached by the Local Plan Inspector with specific regard to Teynham, in paragraph 83 of her report, that the policy allowed "sufficient flexibility for site specific evidence to be considered as part of the planning process".

To enable Trenport to move forwards in their negotiations with Hyde HA, it is essential that planning consent be granted so please regard this letter as formal confirmation of Trenport's wish to revise the application to provide 18.33% on-site affordable housing in accordance with the independent conclusion reached by Pathfinder - the consultant appointed by the Council. Furthermore, please note that Trenport also agree that the S106 off-site developer contributions as set out in the August 2018 engrossment shall be indexed from the date at which they were agreed with Kent CC in 2017 and that the planning conditions are to incorporate (as set out in your email of 4<sup>th</sup> June) additional condition 2 regarding a water consumption rate of no more than 110 litres per person per day and condition 9 regarding energy efficiency.

I trust that this is acceptable and would therefore be grateful if you could acknowledge receipt of this formal notification of the revision to the application and confirm that this matter can be placed before the relevant Committee by the end of October.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "David Parker". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

**David Parker MSc BA(Hons) DMS FCIH**  
**Chairman**  
T: 01225 899591  
M: 07788 140240  
E: dparker@pioneerps.co.uk

cc Mr R Hall, Trenport  
Mr M Friend, Vincent Goring