



The countryside charity

Kent

**Application: OL/TH/20/0847.- – Land On The North West And South East Sides Of Shottendane Road MARGATE Kent**

**Proposal: application for the residential development of up to 450 dwellings and alterations to the highway network, including details of access with all other matters reserve.**

We write further to, and in addition to, previous objections raised by CPRE Kent specifically with regards to the updated committee report to be considered by members 21<sup>st</sup> July 2021.

It remains CPRE Kent's overriding position that this proposal is contrary to the adopted plan and quite clearly should be refused outright We would therefore urge members to refuse this application as per option 4.1 of the updated committee report.

In support of this, we make the following additional observations:

1. We take exception to paragraph 2.8 of the committee report which provides a very brief outline of an unrelated appeal decision at Newark and Sherwood District Council. No context has been provided as to the circumstance of that decision nor any factual or technical differences that may lead Thanet Planning committee members to distinguish on the facts, or indeed any guidance as to weight to be given to that appeal. Without such context, reference to this case seems solely intended to intimidate members into approving the current application. Therefore, and as an absolute minimum, we would expect officers to provide a verbal update to members clearly explaining the circumstances with which weight may be given to this appeal in making their decision upon the current application.
2. Paragraph 2.3 states that whilst a lower developer profit figure (at 15%) could be adopted, this would not result in a sufficient increase to allow for 30% affordable. This may be the case, though reducing developer profit from 17.5% to 15% would still result in nearly £500,000 extra being available towards affordable housing provision. By hiding this behind seemingly small percentages, the real-world consequences are not being made clear to members. In the circumstance that members are minded to approve, this absolutely should be upon the proviso of a 15% developer profit for the following reasons:
  - This is an allocated site and therefore deemed to be of the lowest risk to a developer (The reason policy allows for a range of developer profit of 15%-20% is to provide for an appropriate buffer depending on how uncertain developer costs may be. An allocated greenfield site is widely accepted to have the least uncertain costs)
  - A significantly higher number of houses are being proposed than allowed for within the allocation.
  - The 17.5% has in part been justified upon past uncertainties arising from the COVID pandemic and Brexit (note the report was drafted June 2020). Overall, sold prices in Thanet over the last year were 13% up on the previous year and 19% up on the 2018 peak of £258,896<sup>1</sup>.

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<sup>1</sup> <https://www.rightmove.co.uk/house-prices/thanet.html>

3. In a similar context, within this report and within the previous committee report, very little non-technical explanation has been provided with respect to the review mechanism clauses proposed within the Section 106 agreement. As it stands, the proposal appears to be for Gladmans and the Council to split any surplus profit 50/50 with the reviews only happening at 200 units being built and 400 units being built. The report however is not clear as to whether this additional surplus profit is being awarded to the developer ahead of the 30% equivalent of site affordable housing being met? Clearly it is our view that any surplus profit should only be provided to the developer after the 30% affordable house requirement has been met. We are also of the view two points of review so late on are quite clearly insufficient at a time of rapidly rising houses prices coupled with an ever increasing urgent requirement for affordable housing. As a minimum, we would expect the clauses to provide:
- A clear requirement that no surplus profit is provided to the developer ahead of the affordable housing requirement of 30% having been met.
  - A clear assumption that any additional affordable housing provision beyond the 15% currently being offered will be provided on site before off-site financial payments are accepted.
  - That annual financial monitoring be agreed in a suitably robust and transparent manner with the ability for the Council to require a formal review ahead of the agreed trigger points if better than expect profits are reported.
  - The ability for the Council to require a formal review ahead upon notification of an intended sale of the site.

As a final point, if ever there is a site whereby the costs of providing a policy compliant scheme are accurately accounted for within a purchase price, it is one where the Council had a landholding interest. Further, it would have clearly been within the Councils ability to have retained an interest within the site and ensured a policy compliant development is delivered via way of appropriate Developer Agreements. In a similar vain, the viability report here has assumed a Bench-Mark Land Value of £250,000 per hectare. As the difference between the actual price paid and this nominal £250,000 figure will be direct additional profit to the developer, and the Council will know what price was paid, this would quite clearly require onward scrutiny should the Council now look to approve this non-policy compliant scheme.

Yours sincerely

David Morrish

**Chairman Thanet committee – CPRE Kent**



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