



cornerstone barristers

Steve Reed OBE
Secretary of State for Housing, Communities and Local Government
Ministry of Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

14th April 2026

BY EMAIL ONLY: correspondence@communities.gov.uk
& Ministerial.Correspondence@communities.gov.uk

Dear Secretary of State

**APPLICATIONS RELATING TO LAND TO THE SOUTH AND EAST OF SITTINGBOURNE, KENT AND
LAND TO THE WEST OF TEYNHAM, KENT**

**PINS REFERENCES: APP/V2255/V/24/3355313 AND APP/V2255/V/24/3355314 (“Highsted
Park”)**

1. I write on behalf of the Five Parishes Group and the Teynham and Highsted Community Action Group and in respect of the above applications, which were called in under s.77 TCPA 1990 by your predecessor on 7th November 2024. My clients acted as Rule 6 Parties during the Inquiry, which ran for 16 weeks last year, and following which the appointed Inspector now has the unenviable task of writing her report for you to consider in due course.
2. The purpose of this letter is to raise concerns with you about the appearance of predetermination that arose at the point at which the applications were called in, and has remained to this day. Indeed, recent local reporting has reignited these concerns.
3. As you are no doubt aware, the task of determining a called-in application has to be undertaken in accordance with well-established public law principles. In particular:
 - a. the decision-maker must approach the matter with an open mind, genuinely considering the material considerations (*Franklin v. Minister of Town and Country Planning [1948] A.C. 87*, per Lord Thankerton at p.104)



- b. the relevant question is whether the fair-minded and informed observer would conclude that there is a real possibility of bias (*Porter v Magill* [2002] 2 A.C. 357 per Lord Hope at §104);
- c. while political predisposition is lawful, predetermination—actual or apparent—is not (*R (Lewis) v Redcar and Cleveland Borough Council* [2009] 1 W.L.R. 83); and
- d. a closed mind, or the real risk of one, may properly be inferred from the surrounding circumstances and evidence, including informal or private engagement.

Against those principles, a number of matters now within the public domain give rise to legitimate concerns as to the issue of predetermination of these applications.

- 4. Recent reporting indicates that you attended as the keynote speaker at a fundraising event (“the Curry Night”) involving senior representatives of the housebuilding and development sector, at which attendance was secured on a paid basis¹, with developers paying up to £2,000 for seats at “exclusive corporate tables”. This was held on 28th October 2025 at Mumbai Square, in London.
- 5. It is understood that the Curry Night was arranged by a “Labour YIMBY” organiser named Adam Allnut, and was in support of two Labour MPs, Kevin McKenna and Naushabah Khan. You will be aware that Mr McKenna led the calls locally for Highsted Park to be called in, and it is understood that his request to your predecessor was instrumental in the decision to call the matters in. It is also understood that Mr. McKenna co-ordinated the request for Highsted Park to be called in with other companies, some of whom attended the Curry Night.
- 6. An extremely detailed local report has also now been published on a blog, and you are invited to read it, in full, and to consider what it describes as the “optics” of your attendance at such an event, as well as the links between those organising and attending it. A copy has been enclosed with this letter, but can also be accessed here: ["Did Housing Lobbyists Curry Favour with Fundraiser for Kevin McKenna MP?"](#)
- 7. As you read the report, you will be aware (as if you were not before) that the applicant in Highsted Park is Quinn Estates, a firm identified in the enclosed report as being a client of one of Mr Allnut’s lobbying companies.

¹ [Housing Secretary had ‘curry night’ with developers who could benefit from planning rules](#)



8. My clients agree with the concluding comments in the report namely that: “...these relationships—linking politicians, donors, lobbyists, and developers—paint a picture of an increasingly interconnected ecosystem shaping housing policy. It is a landscape that raises persistent questions about transparency, accountability, and where the line is drawn between legitimate advocacy and undue influence.”
9. As you attended the Curry Night, my clients are seeking the following information from you:
 - a. Whether any person or organisation with a direct or indirect commercial or other interest² in Highsted Park³ was present at the event referred to above? If you were provided with a copy of a list of attendees at the Curry Night, that should be disclosed.
 - b. Whether Highsted Park (or comparable strategic developments) was discussed at that event;
 - c. Whether you, your officials within MCHLG, or special advisors have received communications from attendees of the Curry Night or associated parties relating to Highsted Park? You are requested to disclose any such communications.
 - d. Whether you, your officials within MCHLG, or special advisors have received any further representations since the close of the inquiry? You are requested to disclose any such communications
10. Given that you are to determine Highsted Park personally, you are requested to perform a search of both your personal and official text messages (or other messaging services) and email accounts. The same is requested of your SPADs and officials.
11. However, the Curry Night was not an isolated instance. Other material now in the public domain indicates that, over a period of months, there have been multiple occasions on which you have been present at events attended by individuals and organisations connected with development interests, including those linked (directly or indirectly) to Highsted Park, including:
 - a. events at the Labour Party Conference (September 2025);

² “other interest” can include political interest – such as furthering the “build baby build” approach this Government has adopted.

³ A list of companies and individuals is set out at §14 of this letter which may assist you in identifying correspondence/communications with those who have a direct or indirect commercial interest in Highsted Park.



- b. industry-facing events, including the “Brickies” awards (November 2025); and
- c. further panel and reception events extending into early 2026.

12. Given this, my clients request confirmation:

- a. as to whether you, members of your private office or your SPADs attended any conference, fringe or industry events at which persons connected with Highsted Park were present.
- b. the dates and details of those events
- c. whether Highsted Park was raised with you, members of your private office or SPADs at those events and by whom
- d. Notes of those discussions or any follow up correspondence concerning Highsted Park

13. As with the earlier request, you are requested to perform a search of both your personal and official text messages (or other messaging service) and email accounts. The same is requested of your SPADs and officials

14. To assist you in identifying such events, my clients have provided this list of individuals/companies connected to Highsted Park:

- a. Mark Quinn
- b. Quinn Estates
- c. Kevin McKenna MP
- d. Adam Allnutt
- e. The YIMBY Initiative Ltd
- f. Labour YIMBY
- g. Homes for Britain Ltd
- h. Labour Housing Group
- i. Stuart King
- j. Terrapin Group
- k. Quoin Partners
- l. Oliver Doubleday
- m. GH Dean & Co Ltd
- n. Kevin Attwood
- o. Attwood Farms Ltd



- p. AG Kent Holdings BV
- q. Kent Housing and Development Group
- r. Pioneer Group
- s. Brett Aggregates Group
- t. TPG Angelo Gordon
- u. Kent Science Park
- v. Pioneer Group

15. This letter has been sent in order to help you to ensure that the decision is taken solely on the basis of the evidence presented at the inquiry and properly disclosed (and consulted on) representations.
16. You will be aware that, should any decision to grant permission to Highsted Park be the subject of a challenge in the High Court, you, as the Defendant, will be subject to the Duty of Candour. The Duty of Candour was explained by Lord Donaldson MR in R v Lancashire County Council ex p. Huddleston [1986] 2 All ER as follows:

“This development [the remedy of judicial review and the evolution of a specialist administrative or public law court] has created a new relationship between the courts and those who derive their authority from public law, one of partnership based on a common aim, namely the maintenance of the highest standards of public administration ... The analogy is not exact, but just as the judges of the inferior courts when challenged on the exercise of their jurisdiction traditionally explain fully what they have done and why they have done it, but are not partisan in their own defence, so should be the public authorities. It is not discreditable to get it wrong. What is discreditable is a reluctance to explain fully what has occurred and why... Certainly it is for the applicant to satisfy the court of his entitlement to judicial review and it is for the respondent to resist his application, if it considers it to be unjustified. But it is a process which falls to be conducted with all the cards face upwards on the table and the vast majority of the cards will start in the authority’s hands” (emphasis added). This is the approach that should be applied in response to all applications for judicial review, and is required in order to satisfy the requirement of the duty of candour, the obligation upon all public authorities who are parties to applications for judicial review. The duty of candour in judicial review applies from the outset and applies to all information relevant to the issues in the case, not just documents” (emphasis added).

17. My clients’ view is that if a challenge to a decision to grant permission to Highsted Park is brought (by them or others) and that challenge includes a predetermination ground, material such as that requested in this letter will be clearly disclosable under the Duty of Candour. As such, it is hoped that you will engage with this letter, and the requests



made within it in the spirit in which it has been drafted and sent and disclose any material that falls into the categories set out above.

18. My clients look forward to hearing further from you.

Yours sincerely



Simon Bell
Counsel