



Homes
England

The Housing and Regeneration Agency

Date: 27 July 2023

Our Ref: RFI4340

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

██████████
By Email Only

Information Governance Team
Homes England
Windsor House
6th Floor
42-50 Victoria Street
London
SW1H 0TL
United Kingdom

Dear ██████████

RE: Request for Information – RFI4340

Thank you for your recent email, which was processed under the Environmental Information Regulations 2004 (EIR).

You requested the following information:

You have recently submitted an outline planning application to Huntingdonshire District Council to build 120 homes on a site called the Houghton Grange Field site - planning application no. 23/00627/OUT. Under an Environmental Information Request, please can you provide me with the date that it was decided that 120 homes would be the number Homes England/AECOM would use in their design scheme for this site in order to apply for outline planning permission. Please can you also supply me with copies of the documents that relate to this chosen number (120 homes) being the number ultimately decided upon.

Response

We can confirm that we do hold the requested information.

We can confirm that the figure of 120 homes was determined on 28 August 2019.

You have also requested copies of the documents that relate to the 120 homes being the number ultimately decided on. Please find enclosed with this response Annex A, an extract from three documents

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that relate to the decision making regarding the number of homes. These documents consist of a paper that were presented to the Land Projects Executive on 28 August 2019, an annex to that paper and a further paper that was presented to the Local Development Management Team on 11 February 2021.

Some information has been withheld from disclosure as it is out of scope of your request. We have also withheld some information from disclosure under the following exceptions:

Regulation 13 – Personal Data

We have redacted/withheld information on the grounds that it constitutes third party personal data and therefore engages Regulation 13 of the EIR.

To disclose personal data, such as names, contact details, addresses, email addresses and personal opinions could lead to the identification of third parties and would breach one or more of the data protection principles.

Regulation 13 is an absolute exception which means that we do not need to consider the public interest in disclosure. Once it is established that the information is personal data of a third party and release would breach one or more of the data protection principles, then the exception is engaged.

The full text in the legislation can be found on the following link:

<http://www.legislation.gov.uk/ukxi/2004/3391/regulation/13/made>

Regulation 12(4)(e) – Internal Communications

Under regulation 12(4)(e) of the EIR, Homes England may refuse to disclose information to the extent the request involves the disclosure of internal communications.

In engaging this exception, it is only necessary that the information fall into the defined category, not that disclosure would have an adverse effect. However, under regulation 12(1)(b), the public authority can only withhold the information if, in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information. Furthermore, under regulation 12(2), it must apply a presumption in favour of disclosure.





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Public Interest Test

Regulation 12(4)(e) is subject to the public interest test. Once the exception has been engaged it is then necessary to consider the balance of the public interest in maintaining the exception or disclosing the information.

Factors in favour of disclosure

- Homes England acknowledge that there is a presumption in disclosure regarding environmental information as well as a public interest in promoting transparency in how we undertake our work and allocate public money; and
- Homes England acknowledge that there is an interest from the public in how Homes England makes decisions and that there is a level of transparency required from public servants making these decisions.

Factors in favour of withholding

- It is vital that Homes England have a 'safe space' to assess and deliberate decisions in relation to ongoing matters concerning the development of land. Homes England is responsible for ensuring that a significant amount of public money is allocated effectively and in a way that best ensures value for money and deliverability. The deliberations undertaken by Homes England in the withheld information detail internal decision making processes in relation to ongoing developmental milestones in the development of housing. Disclosure may prejudice the ability of decision makers to make impartial judgements about ongoing development negotiations without fear of external scrutiny and undue pressure. This would not be in the public interest as it would be likely to prejudice our position in the market as the government's housing accelerator and effectively manage the public funds entrusted to us;
- The Information Tribunal has confirmed that the need for a safe space will be the strongest when the information relates to a 'live' matter. In this case, the information reveals internal appraisals of options of how to develop the land and create opportunities to maximise the number of houses developed in line with the Local Plan and with regard to the views of the local community. If the information were public it would be like that public pressure and external factors would detrimentally affect Homes England's ability to deliver housing. This would be detrimental to the public interest as it could negate a substantial amount of public money already invested; and
- Disclosure of internal approval decisions would have a 'chilling effect' on Homes England's ability to progress with both current and future decisions and discussions regarding the development of homes on this scheme. As previously stated, these discussions are currently ongoing and relate to a live





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process. To disclose the information would result in a loss of frankness and candour in relation to continuing discussions about a large amount of public money and would damage the quality of those discussions. This would lead to poorer decision making which would directly affect spending of public money and decision making in relation to the development of homes. It is vital that the quality of these decisions in as robust as possible to ensure that these decisions are made effectively and in the public interest.

Having considered the arguments for and against disclosure of the information, we have concluded that at this time, the balance of the public interest favours non-disclosure and there is not a wider public interest in disclosing the information requested.

The full text of Regulation 12(4)(e) in the legislation can be found via the following link:

<https://www.legislation.gov.uk/uksi/2004/3391/regulation/12/made>.

Advice and Assistance

We have a duty to provide advice and assistance in accordance with Regulation 9(1) of the EIR. In accordance with this duty we can advise that within Annex A, we have included some background information relating to the development, although not strictly within scope of your request we felt this may be useful contextual information for the decision made regarding the number of houses to be developed on the site. Pages 13-15 of Annex A provides information relating to the decision not to exceed 120 homes on the site.

Right to make Representations

If you are not happy with the information that has been provided or the way in which your request has been handled, you may request a reconsideration of our response (Internal Review). You can make this representation by writing to Homes England via the details below, quoting the reference number at the top of this letter.

Email: infogov@homesengland.gov.uk

The Information Governance Team

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Your request for reconsideration must be made in writing, explain why you wish to appeal, and be received within 40 working days of the date of this response (Reg 11(2)). Failure to meet this criteria may lead to your request being refused.

Upon receipt, your request for reconsideration will be passed to an independent party not involved in your original request. We aim to issue a response within 20 working days.

You may also complain to the Information Commissioner's Office (ICO) however, the Information Commissioner does usually expect the internal review procedure to be exhausted in the first instance.

The Information Commissioner's details can be found via the following link <https://ico.org.uk/>

Please note that the contents of your request and this response are also subject to the Freedom of Information Act 2000. Homes England may be required to disclose your request and our response accordingly.

Yours sincerely,

The Information Governance Team

For Homes England

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G2 APPROVAL OF INVESTMENT AND DISPOSAL STRATEGY: REVISION			
PCS No.	28869	PROJECT NAME	Houghton Grange, Houghton Road, St. Ives, Cambridgeshire, PE28 2BZ.
PROGRAMME	Single Land	APPROVAL LEVEL	Land Projects Executive
RESPONSIBLE OFFICER	Reg. 13(1)	OPERATING AREA	East and South East

Out of Scope

Out of Scope

DECISION REQUIRED

1. Approval is sought to pursue the recommended disposal strategy in relation to Phase 2 at Houghton Grange, which is to submit an outline planning application for the phase during 2019/20 in order to dispose of the phase in 2021/22.

Out of Scope

¹ All approvals associated with this project and any revised costs agreed at G3/G4

Template Version	Revised and Issued
2.7	21 March 2017

Is this proposal considered novel, contentious or repercussive?	No
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*Phases 1&2
 ** Phase 1 only

1. PROJECT SUMMARY

1.1. Project Description

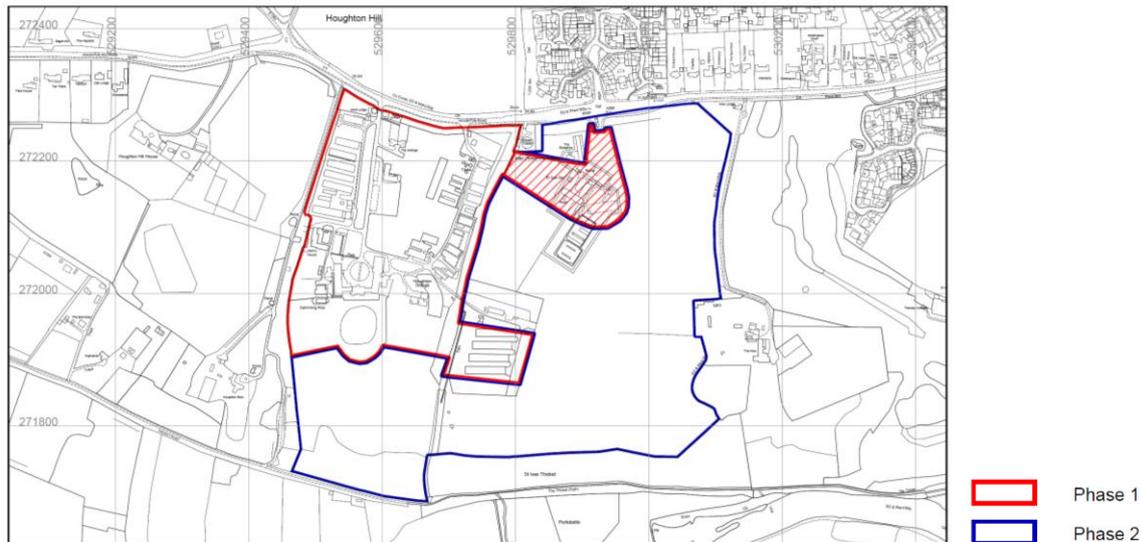
1.1.1.Houghton Grange is the former Biotechnology and Biological Sciences Research Council’s (BBSRC) poultry research station, located on the western edge of St Ives in Cambridgeshire. The site was previously used as a research and development facility for poultry diseases until its closure in 1992. Since then the site has been abandoned and left to deteriorate. The transfer of the site to Homes England completed in November 2016 under the Other Government Department (OGD) Transfer programme.



1.1.2.The property extends to 32.33 hectares (79.89 acres) and comprises three elements, the former Houghton Grange poultry research facility (The Grange site), an area of agricultural grazing land known as the Field Site, and an area of open grassland (The Grasslands) to the south of The Grange site.

1.1.3.Since taking ownership and following the approval of the original G2 paper for this site, Homes England has split the site into 2 phases.

1.2. Background and Context



1.2.1. Phase 1 comprises The Grange site (circa 10 ha), and includes the original Grade II Listed mansion house, gate houses and Dormy House as well as research labs, poultry huts, offices and outbuildings. Outline planning consent for Phase 1 was granted in June 2016 for residential use, including the demolition of all buildings except the original section of The Grange, the two gatehouses and Dormy House, and the development of up to 90 new build residential units. The buildings to be retained are to be renovated back in to residential use. 40% of the new build units are to be affordable (i.e. 36 units) in accordance with the Local Planning Authority's (LPA) policy.

1.2.2. Phase 1 was marketed during 2018/19 and conditional contracts were exchanged with Morris Homes Ltd in March 2019. Morris Homes have recently submitted the Reserved Matters planning application for Phase 1, including Listed Building consent. These applications are due to be determined in September 2019, followed by the contract going unconditional in September 2020 with a start on site also in September 2020.

1.2.3. Phase 2 comprises the remaining land (circa 22.33 ha). This includes the Field site and the Grasslands, which are currently leased out as grazing land on a Farm Business Tenancy.

- KEY**
- Site boundary
 - Existing roads
 - Existing local cycle path
 - Public right of way
 - Site access
 - Listed buildings
 - Conservation area
 - Views
 - St Ives Thicket
 - Woodland
 - A category trees
 - B category trees
 - C category trees
 - U category trees
 - Houghton Meadow
 - Tree Preservation Order
 - Badger sett
 - Bat roost
 - Bat foraging corridor
 - Water main and 5m easement
 - Water courses
 - Dry ditches
 - Flood zone 3
 - Flood zone 2



Phase 2 – Site Information Plan



View of Phase 2 looking east from Phase 1



Vehicular access to the site from Houghton Road

1.2.4. At the time of transfer, Huntingdonshire District Council (HDC) were undertaking a review of their Local Plan; Phase 2 was part-allocated in earlier consultation drafts of the Local Plan as part of a wider allocation known as St Ives West (approximately 400 homes). On transfer, meetings between Homes England and HDC confirmed that HDC's view, as Local Planning Authority, was that the position of Phase 2 would be confirmed by the conclusion of the Local Plan review process. They also confirmed their preference for taking Phase 2 forward; that a submission of a new outline planning application by Homes England should only take place once this position had been confirmed.

1.2.5. Also extant is an outline planning application submitted by the previous landowner in July 2013 for the development of 224 residential units and one retail unit on Phase 2. This application remains undetermined and has been held in abeyance by HDC, pending the outcome of the Local Plan review. Following the outcome of the Local Plan review, it is likely that this application will now be refused.

1.2.6. Since transfer, Homes England have been actively promoting Phase 2 through the Local Plan review in order to secure an allocation of at least 224 homes. Homes England submitted representations during the consultation process and appeared at the Examination Hearings in July and September 2018 to seek an increase in the 400 homes already allocated within the St Ives West allocation. However,

the emerging versions of the Local Plan would only allow 119 homes to come forward on Phase 2 within the wider St Ives West allocation, as much of the current 400 homes have already either been built out or received planning consent. The Planning Inspector's Report and list of Main Modifications were received by HDC in April 2019 and the Plan was found to be sound, meaning that no increase in the allocation had been secured. The Local Plan was adopted in May 2019.

1.2.7. Following the outcome of the Local Plan review, Homes England now needs to put a strategy in place to bring forward delivery on Phase 2 as soon as possible. However, it is important to note that the planning context for Phase 2 is also influenced by an adopted Neighbourhood Plan; the Houghton and Wyton Neighbourhood Development Plan, prepared by Houghton and Wyton Parish Council, was 'made' in March 2018. This followed an Examination of the Plan, with the Examiner recommending that the Plan include an Anti-Coalescence and Built Up Area definition policies. **reg. 12(4)(e)**

[REDACTED]

1.2.8. Given the outcome of the Local Plan review and the Neighbourhood Plan, the disposal strategy most likely to succeed is to prepare a masterplan and submit an outline planning application based on the residual 119 homes from Allocation SI 1 (updated reference in the new Local Plan for St Ives West) on Phase 2. This would result in a policy-compliant level of development, which is likely to receive Officer support from HDC. **reg. 12(4)(e)**

[REDACTED]

[REDACTED] This would still result in a sub-optimal level of development for the site in terms of capacity and receipt. However, there is the potential to treat the application for 119 homes as an initial phase and with careful masterplanning some of the retained land could be brought forward at a later date as a potential future phase of development. This could be as a result of further promotion of the site through the next Local Plan review or if HDC experience difficulties with the Housing Delivery Test and or achieving a five-year housing land supply.

Out of Scope

ANNEX: OPTIONS ASSESSMENT

PCS No.

28869

PROJECT NAME

Houghton Grange

Assessment Criteria	Do Nothing (mandatory)	Option 1: Promote Phase 2 in the next Local Plan	Option 2: Seek outline planning consent for 119 units Preferred Option	Option 3: Seek outline planning consent for 224-300 homes
Summary	Homes England disposes of this phase to the market as soon as possible at no cost or least cost (if there are legal, statutory or contractual obligations Homes England has to meet), and making commercial assumptions about what the market would deliver. There exists the possibility that this phase could be disposed of with only an allocation, rather than an allocation and an outline planning permission, however, this would be counter to the Agency's objective of unlocking and de-risking land. This option would also not allow Homes England to dictate the pace of delivery and include MMC.	Continue to hold the site and promote through the next iteration of the Local Plan, which may take up to 5 years. Local Plans must be reviewed every five years; the NPPF adds that reviews should be completed no later than five years from the adoption date of a plan. The new Huntingdonshire Local Plan was adopted in May 2019; this means HDC must have a new Local Plan adopted by May 2024. It is anticipated that HDC will need to start preparing a new Local Plan within 12-18 months from now.	Preparation of masterplan and outline planning application based on the residual 119 units from allocation SI 1. This option would result in a policy compliant level of development which is likely to be supported by HDC. Consultation with the local community would still be difficult given their objections to the principle of developing the site and this would be a sub-optimal level of development for the site in terms of capacity and receipt. However, it should be possible to treat the application for 119 homes as an initial phase and through masterplanning future proof the scheme, so that an initial 119 could be taken forward, with a reserve element to the south and or east retained by the Agency to take forward as Phase 3 of Houghton Grange, either through promotion in the review of the Huntingdonshire Local Plan, or sooner, if HDC experience difficulties with the Housing Delivery Test and or achieving a five year housing land supply.	Preparation of masterplan and outline planning application based on increasing the density in order to maximise capacity on the site of between 224 to 300 homes, including less open space. In accordance with policy SI 1 of the new Local Plan, this would be a policy non-compliant level of development, which would be unlikely to receive officer support. Wider engagement would be extremely difficult due to the local opposition to the principle of development on this phase and objection is likely to be substantial.

Template Version	Revised and Issued
1.0	23 November 2016



Homes
England

Making homes happen

Gateway 2 - Approval of investment and disposal strategy (revision)

Houghton Grange

LDMT South:11/02/2021

Headline Information

Please review the [Development PE Lessons Learnt](#)

Project details			
PCS Number	2886g	Project name	Houghton Grange
Programme	SLP	Approval level	LDMT
Project Manager	Reg. 13 (1)	Region	South East

Out of Scope

Out of Scope

Decisions required

1. Approval is sought from LDMT for a revision to the approved strategy for Houghton Grange Phase 2 to now include all of the agency's land in the red line boundary of the Phase 2 outline planning application, including the previously excluded area of land not currently proposed for development.
2. Approval is also sought to amend the Anticipated Disposal Date from January 2023 to September 2023, due to delays with progressing the public consultation for the outline planning application during the COVID-19 pandemic.

Is this proposal considered novel, contentious or repercussive?

No

¹ All approvals associated with this project and any revised costs agreed at G3/G4

Project summary

1. Houghton Grange is the former Biotechnology and Biological Sciences Research Council's (BBSRC) poultry research station, located on the western edge of St Ives in Cambridgeshire. The site was previously used as a research facility for poultry diseases until its closure in 1992. Since then the site has been abandoned and left to deteriorate. The transfer of the site to Homes England completed in November 2016 under the Other Government Department (OGD) Transfer programme.



2. The property extends to 32.33 hectares (79.89 acres) and comprises three elements, the former Houghton Grange poultry research facility (The Grange site), an area of agricultural grazing land known as the Field Site, and an area of open grassland (The Grasslands) to the south of The Grange site.
3. Since taking ownership and following the approval of the original G2 paper for this site, Homes England has split the site into 2 phases shown in Figure 2 below.

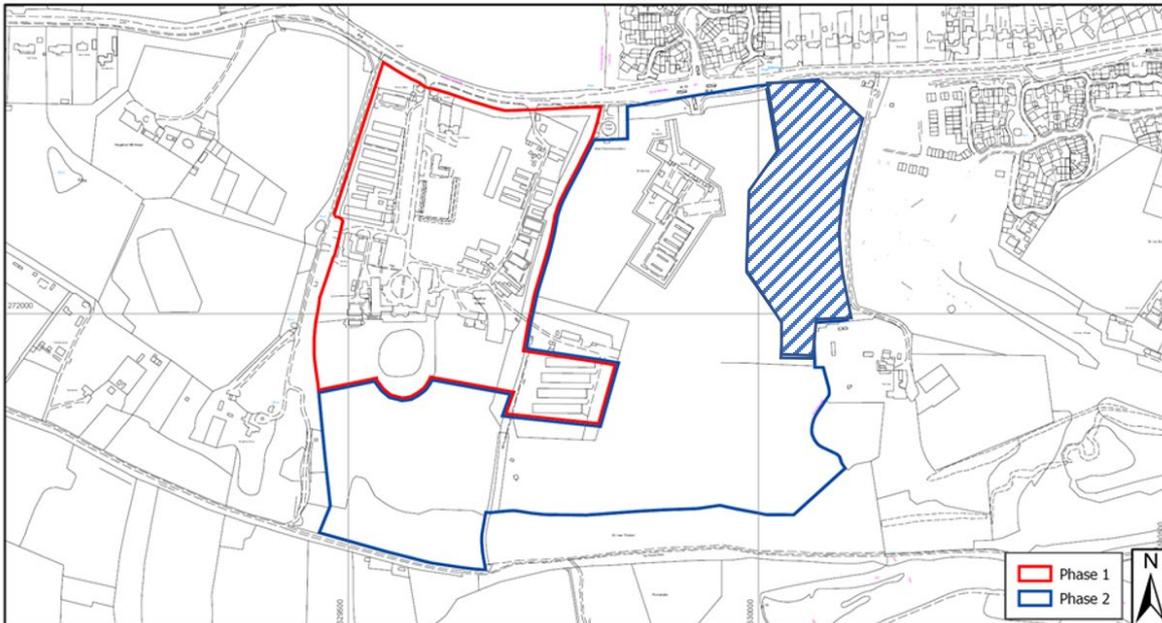


Figure 2

4. Phase 1 comprises The Grange site (circa 10 ha), and includes the original Grade II Listed mansion house, gate houses and Dormy House as well as research labs, poultry huts, offices and outbuildings. Outline planning consent for Phase 1 was granted in June 2016 for residential use, including the demolition of all buildings except the original section of The Grange, the two gatehouses and Dormy House, and the development of up to 90 new build homes. The buildings to be retained are to be renovated back into residential use. 40% of the new build homes are to be affordable (i.e. 36 homes) in accordance with the Local Planning Authority's (LPA) policy.
5. Phase 1 was marketed during 2018/19 and conditional contracts were exchanged with Morris Homes Ltd in March 2019. Morris Homes submitted the Reserved Matters planning application for Phase 1, including Listed Building consent in Summer 2019. The Outline Planning Application was approved at the end of July 2020 and the Listed Building Consent application is due to be determined shortly with the contract going unconditional and a start on site forecast by March 2021.
6. Phase 2 comprises the remaining land (circa 22.33 ha). This includes the Field site and the Grasslands, which until recently have been leased out as grazing land on a Farm Business Tenancy and is shown below in Figure 3. A requirement of the Phase 1 contract with Morris Homes was to provide vacant possession of the Phase 2 land prior to completing the Building Lease.

HOMES ENGLAND



Figure 3



View of Phase 2 looking east from Phase 1



Vehicular access to the site from Houghton Road

7. At the time of transfer, Huntingdonshire District Council (HDC) were undertaking a review of their Local Plan; Phase 2 was part-allocated in earlier consultation drafts of the Local Plan as part of a wider allocation known as St Ives West (approximately 400 homes). On transfer, meetings between Homes England and HDC confirmed that HDC's view, as Local Planning Authority, was that the position of Phase 2 would be confirmed by the conclusion of the Local Plan review process. They also confirmed their preference for taking Phase 2 forward; that a submission of a new outline planning application by Homes England should only take place once this position had been confirmed.
8. A Revised G2 was approved by Land PE on 28th August 2019 to the proposed disposal strategy, which was to prepare a masterplan and submit an outline planning application for 120 homes on Phase 2 in the north-western corner. This results in a sub-optimal level of development on Phase 2 but accorded with the outcome of the new Local Plan adopted in May 2019. The intention was to treat this as an initial phase of development, with the remainder of the land, shown hatched blue on Figure 2 above, potentially brought forward at a later date either through further promotion of the site through the next Local Plan

review (due around 2024) or if HDC experience difficulties with the Housing Delivery Test or achieving a five-year housing land supply.

9. The intention was to retain the remainder of Phase 2 (circa 4 ha), shown hatched blue on Figure 2 above, for agricultural use until such time as the planning policy position potentially changed in favour of development. reg. 12(4)(e)

[REDACTED]

Out of Scope

11. However, this paper seeks approval from LDMT for a minor change to this strategy for the remainder of the Phase 2 land.

Background and Context for the Revision

12. reg. 12(4)(e)

[REDACTED]

[REDACTED] an agreed programme of engagement workshops with local stakeholders and community members was drawn up by our Consultant advisers and was due to commence shortly before the Covid-19 lockdown in March 2020. This programme had to be revised in line with Government restrictions as the traditional 'in person' meetings and workshops are currently no longer possible. Each of the parish and town councils have had an individual online session with Homes England staff and our appointed consultants during September and October 2020 and an online workshop with a wider range of stakeholders took place in November 2020. An additional meeting took place with Houghton and Wyton Parish Council at their request in December 2020.

13. As expected, it has not been possible for a full consultation to be concluded within the same timescales as initially envisaged and may result in further delays to the submission of the outline planning application currently programmed for the end of June 2021.
14. It is currently envisaged, that subject to agreeing the amended strategy that is the subject of this paper, that the wider public consultation will begin in February 2021 and run through into April 2021. This will include leaflets, virtual on line exhibitions and a number of online 'chats'. Member of Homes England's new Community Engagement Team have been involved in the development of the Engagement Strategy for Phase 2 since their team's inception last year.
15. It has become clear from the public engagement that has taken place so far that the long term future of the Homes England land not currently allocated for development is a major issue given its role in forming part of a green 'gap' between St Ives and the villages to the west that prevents coalescence of these settlements.
16. It is by no means certain, and felt to be unlikely, that the remaining land would be allocated for development in future iterations of the Huntingdonshire Local Plan; particularly given that the agency

was unsuccessful in securing this larger allocation at the examination into the current, adopted Local Plan.

17. Given that the strategy currently proposed for the outline planning application for Phase 2 does not include this remaining land it is clear to stakeholders that the land although open and proposed to be undeveloped in the short term, still has the potential to be promoted for development in the future.
18. This increases the level of planning risk to the current proposed outline planning application for Phase 2, which although likely to generate a significant level of objection, will be a policy compliant scheme on an allocated site with consequent support from the local planning authority.
19. As such, retaining the possibility of future development, albeit limited, to achieve additional development on the site in the long term, has the potential to put at risk, or delay what is a policy compliant scheme with good prospects for delivery in the timeframe and numbers proposed in the earlier version of this paper.

20. **Out of Scope**



21. Therefore, this paper seeks to include all of the agency's remaining land within the red line boundary of the Phase 2 outline planning application, and, in accordance with adopted local and neighbourhood planning policy, use the land as publicly accessible green infrastructure shown in Figures 4 -5 below showing the original master plan and the revised master plan including all of the agency's remaining land.

Figure 4



Figure 5



22. This will form part of the extensive strategic green space available within the development, which falls within a wider network in the surrounding area. This will also allow pedestrian and cycle connections from the development to existing settlements and new developments to the east and west. These are shown in the conceptual masterplan in Figure 6 below. This is a key benefit arising from the development both for existing and new residents; particularly as the existing pedestrian and cycle connections along the main Houghton Road are of low quality.



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Annex 1.3 - Options assessment

PCS no.	2886g	Project name	Houghton Grange
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Assessment Criteria	Do Nothing (Mandatory. For G2 Revisions this means continue with existing strategy)	Option 1: Include all land within Phase 2 outline planning application boundary Preferred Option
Summary	Homes England continues with the current disposal strategy to exclude the agricultural land (designated as public open space within the allocation) from the Phase 2 outline planning application and retain it for potential future residential development should the planning policy context change.	Homes England includes the agricultural land (designated as public open space within the allocation) within the Phase 2 outline planning application boundary to safeguard its current designation in perpetuity

Out of Scope

Template Version	Revised and Issued
1.0	23 November 2016