



Homes
England

Date: 13 February 2025

Our Ref: RFI5016

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

[REDACTED]

By Email Only

Dear [REDACTED]

RE: Request for Information – RFI5016

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

You requested the following information:

I therefore would like to raise an FOI request for any documents, emails or discussion that has taken place on this matter. In particular has this significant concern reached the Risk and Audit committee for them to consider the case against Homes England.

Your request was made in relation to a complaint you have raised with Homes England, but have not yet received a response.

Response

We can confirm that we do hold some of the requested information. Please find enclosed with Annex A the correspondence exchanged relating to your request for information. We can confirm that your matter has not been shared with the Audit Assurance and Enterprise Risk Committee.

Regulation 13 – Personal Data

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

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

2nd Floor
The Lumen
St James Boulevard, Newcastle Helix
Newcastle upon Tyne, NE4 5BZ

0300 1234 500
@HomesEngland
www.gov.uk/homes-england





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The Housing and Regeneration Agency

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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>

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 we have issued correspondence to you separately on your complaint which outlines our position.

You can view Homes England's complaints procedure via the following link:

<https://www.gov.uk/government/organisations/homes-england/about/complaints-procedure>

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

Homes England

2nd Floor

The Lumen

St James Boulevard

Newcastle Helix

Newcastle upon Tyne

NE4 5BZ

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.

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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

2nd Floor
The Lumen
St James Boulevard, Newcastle Helix
Newcastle upon Tyne, NE4 5BZ

0300 1234 500
@HomesEngland
www.gov.uk/homes-england

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Out of Scope

From: Info Gov
Sent: 22 October 2024 13:03
To: Homes England Enquiries; Info Gov
Cc: reg. 13
Subject: RE: FW: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review CRM:0264909

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: reg. 13

Hi reg. 13

Thanks for sending this holding email out. Sorry for delay in getting back to you. We're just wondering what to do with this one. But yes, in any case you can leave it with us - that's fine.

Thank you so much reg. 13.

Kind regards,
reg. 13

reg. 13
reg. 13



2 Rivergate, Temple Quay, Bristol, BS1 6EH

The Housing and Regeneration Agency

We believe that affordable, quality homes in well-designed places are key to improving people's lives. We make this happen by using our powers, expertise, land, capital, and influence to bring both investment to communities and to get more quality homes built.

Please forward any Freedom of Information Requests to: infogov@homesengland.gov.uk



OFFICIAL

OFFICIAL

From: Homes England Enquiries

Sent: 22 October 2024 11:24

To: Info Gov

Cc: reg. 13

Subject: RE: FW: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review CRM:0264909

Dear Team

I hope all is well. I didn't receive a response from you, to the below email. Therefore, due to the conversation I had on Friday with reg. 13, I have sent him the below email yesterday afternoon:

'Dear reg. 13

Thank you for your recent emails of 17th September and 7th October.

Please accept our sincere apologies for the delay in responding to you. Your enquiry is with a specialist Homes England team and a response will be provided in due course.

Thank you for your patience.'

I trust you will be responding to reg. 13 in due course, but if there is anything you would like the Enquiries team to further respond with in the meantime, please let us know.

Kind regards

reg. 13



[@HomesEngland](#)

2nd Floor
7 and 8 Wellington Place
Wellington Street
Leeds
LS1 4AP

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Please forward any Freedom of Information Requests to: infogov@homesengland.gov.uk



----- Original Message -----

From: Enquiries Queue <Enquiries@homesengland.gov.uk>;

Received: Fri Oct 18 2024 12:09:50 GMT+0100 (British Summer Time)

To: Infogov <infogov@homesengland.gov.uk>;

Subject: RE: FW: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review CRM:0264909

Dear Team

I have received a phone call this morning from the enquirer **reg. 13** regarding his email sent on 17/9 and his further email sent on 8/10.

He is very unhappy that he has still not received any acknowledgement of receipt of both his emails. I have assured him it has been passed to the relevant team to look into but he would still like a response to at least confirm this.

Therefore, would it be acceptable if I send the following email?:

"Our sincere apologies for the delay in responding to you. Your enquiry is with a specialist Homes England team and a response will be provided in due course.
Thank you for your patience."

Kind regards

reg. 13



[@HomesEngland](#)

2nd Floor
7 and 8 Wellington Place
Wellington Street
Leeds
LS1 4AP

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----- Original Message -----

From: Homes England Enquiries <enquiries@homesengland.gov.uk>;

Received: Tue Oct 08 2024 10:12:44 GMT+0100 (British Summer Time)

To: Infogov <infogov@homesengland.gov.uk>;

Cc: Homes England Enquiries <enquiries@homesengland.gov.uk>; Enquiries Queue <enquiries@homesengland.gov.uk>;

Subject: FW: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review CRM:0264909

Hi team

reg. 13 [REDACTED] has contacted us again, I can see from the below emails his enquiry ended up with you. I haven't replied to him, but if there is anything you would like me to respond with then please let me know.

Kind regards

reg. 13 [REDACTED]

reg. 13 [REDACTED]

[@HomesEngland](#)

Northstowe House
Rampton Road
Longstanton
Cambridge
CB24 3EN

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Please forward any Freedom of Information Requests to: infogov@homesengland.gov.uk

OFFICIAL

From: Homes England Enquiries <enquiries@homesengland.gov.uk>
Sent: 23 September 2024 16:10
To: Info Gov <infogov@homesengland.gov.uk>
Cc: Info Gov <infogov@homesengland.gov.uk>; Government Relations <governmentrelations@homesengland.gov.uk>; Government Relations <governmentrelations@homesengland.gov.uk>; reg. 13 [REDACTED] <[\[REDACTED\]@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>
Subject: RE: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review CRM:0264909

Here you go reg. 13

Kind Regards

reg. 13

[REDACTED]

@HomesEngland

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Please forward any Freedom of Information Requests to: infogov@homesengland.gov.uk

----- Original Message -----

From: Infogov <infogov@homesengland.gov.uk>;
Received: Mon Sep 23 2024 16:01:50 GMT+0100 (British Summer Time)
To: Homes England Enquiries <enquiries@homesengland.gov.uk>; Enquiries Queue <enquiries@homesengland.gov.uk>;
Cc: Infogov <infogov@homesengland.gov.uk>; Government Relations <governmentrelations@homesengland.gov.uk>; Gov Relations <governmentrelations@homesengland.gov.uk>; reg. 13 [REDACTED] <[\[REDACTED\]@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>;
Subject: RE: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review CRM:0264909

Hi Enquiries team,

The original email discusses a PDF attachment, but this wasn't included in the email the Info Gov team received. Please can you share?

Thanks

reg. 13

[REDACTED]

[REDACTED]

[REDACTED]

[@HomesEngland](#)

3 New Bailey
New Bailey Street
Salford
M3 5AX

The Housing and Regeneration Agency

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Please forward any Freedom of Information Requests to: infogov@homesengland.gov.uk

OFFICIAL

From: Government Relations <governmentrelations@homesengland.gov.uk>

Sent: 23 September 2024 10:47

To: reg. 13 [REDACTED] <reg.13@homesengland.gov.uk>; Info Gov <infogov@homesengland.gov.uk>

Subject: RE: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review CRM:0264909

Hi reg. 13

We have looked into this enquiry and we don't believe we are the right people to discuss. It should follow the complaints procedure rather than come to us. I've copied in [@Info Gov](#)

Thanks,

reg. 13

[REDACTED]

Homes England | The Lumen | St James Boulevard | Newcastle upon Tyne | NE4 5BZ
reg. 13 [REDACTED] [@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)

#MakingHomesHappen

We're the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. [Find out more and help make this happen.](#)

OFFICIAL

From: reg. 13 [REDACTED] [@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)>

Sent: 23 September 2024 10:06

To: Government Relations <governmentrelations@homesengland.gov.uk>

Subject: FW: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review CRM:0264909

Good morning,

We have received the attached, having reviewed I do not believe the enquiry to be project specific but to relate to our governance. I have been asked by my Project Director to send to you for advice on next steps.

Thanks

reg. 13 [REDACTED]

reg. 13 [REDACTED]

7th Floor
10 South Colonnade,
Canary Wharf,
E14 4PU

[@HomesEngland](#)

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From: Homes England Enquiries <enquiries@homesengland.gov.uk>

Sent: Wednesday, September 18, 2024 9:56 AM

To: reg. 13 <reg.13@homesengland.gov.uk>

Subject: FW: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review CRM:0264909

Hi reg. 13

We have received the email below, I think from Spatial / LMT he's referring to your Ailsworth Site so hopefully I'm correct to send it your way, but if not please will you kindly redirect it or let me know, many thanks.

I haven't responded to reg. 13 but if there's any reply you would like me to send then please let me know.

Kind regards

reg. 13

[@HomesEngland](#)

Northstowe House
Rampton Road
Longstanton
Cambridge
CB24 3EN

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Please forward any Freedom of Information Requests to: infogov@homesengland.gov.uk

----- Original Message -----

From: reg. 13

Received: Tue Sep 17 2024 22:12:21 GMT+0100 (British Summer Time)

To: Homes England Enquiries <enquiries@homesengland.gov.uk>; Enquiries Queue <Enquiries@homesengland.gov.uk>;

Subject: Concerns Regarding Homes England's Strategic Alignment and Governance: Please forward to the Homes England Audit & Risk Committee for review

Dear Enquiries

I am writing to express my growing concern regarding recent decisions made by Homes England that appear to diverge from the organization's published Strategic Plan. There is a growing perception that pressure from both politicians and developers is influencing decision-making in a manner reminiscent of past governance scandals.

To facilitate a thorough investigation into these potential discrepancies and to identify any underlying governance issues, I have compiled a comprehensive document outlining the "Case Against Homes England." Please find the attached PDF for your review.

I respectfully request that the Audit & Risk Committee acknowledge receipt of this email and confirm their understanding of the issues raised.

Ideally, I would propose an independent review by the Audit & Risk Committee to assess the alignment of Homes England's current operations with its stated strategy and to ensure that decision-making processes are transparent, accountable, and in the best interests of the public. Thank you for your prompt attention to this matter.

Sincerely,

reg. 13

The Castor Common, greenfield site proposal for 5000+ houses runs against the stated Homes England strategy



Peterborough is top of the list of the UK's 20 Least Healthy Areas and large isolated housing developments will increase the stress on both healthcare and social services.

Topping the list as the least healthy area of the United Kingdom, Peterborough finds itself lackluster due to poor air quality with high levels of PM2.5. Its mean is 7, which could contribute to other findings, such as the high cancer rate (28.7% of the population in the city).

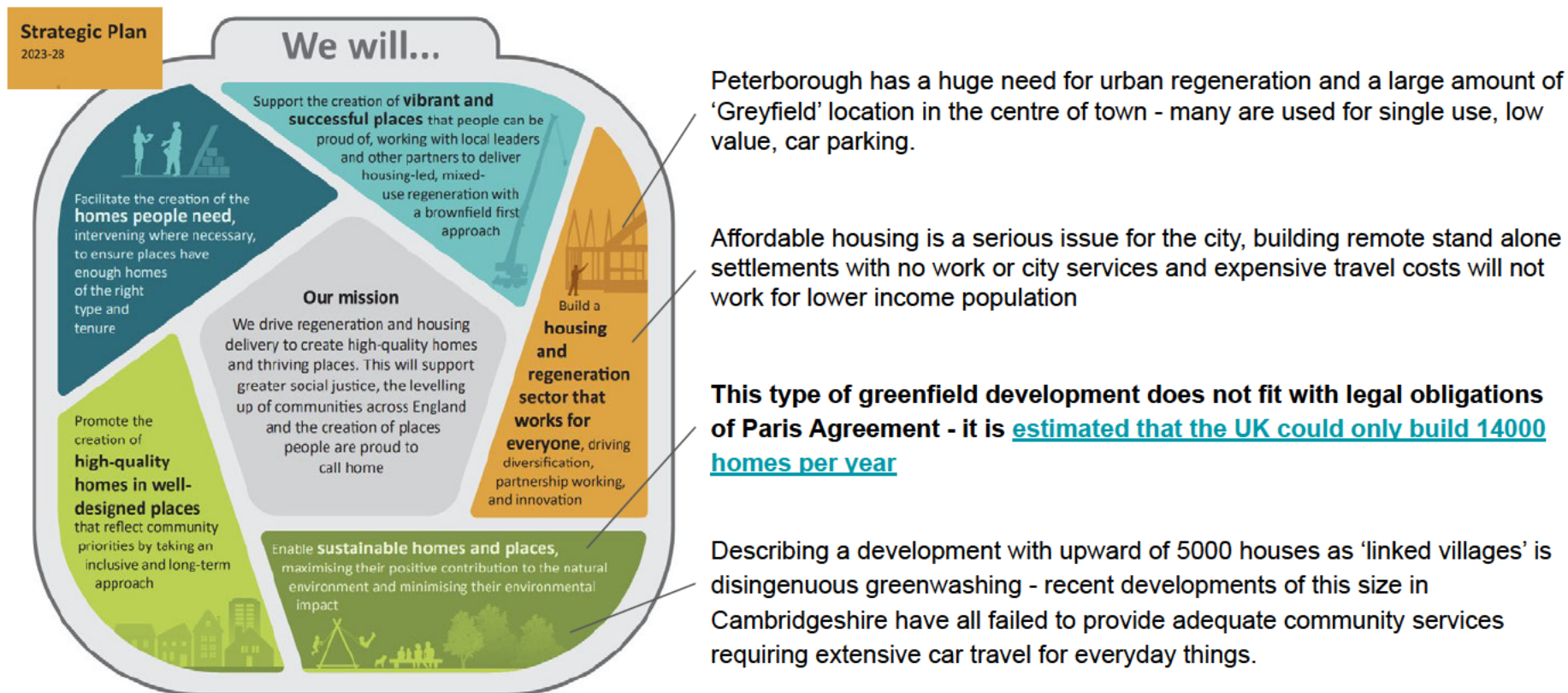
Why is the air quality poor? Traffic, livestock manure, industrial emissions, and wood burners all play a role in the poorer-than-average air quality that sits above the level set by the World Health Organisation (WHO). Perhaps in part due to the poor air quality, only a little over half of all adults in the city are physically active, 57.4% of the population, and 60.7% of adults are overweight or obese based on the BMI index.

<https://bluehorizonbloodtests.co.uk/blogs/news/healthiest-areas-index-of-the-uk-2023#table-of-contents-25>

Peterborough's brownfield register has almost 9000 houses and yet the 'one size fits all' Site Viability model deployed by City planners, shows that proposed brownfield locations are "unviable"

Growth options presented in recent growth consultation did not include brownfield as an option, despite Homes England Brownfield Strategy

The Castor Common, greenfield site proposal for 5000+ houses runs against the stated Homes England strategy



The Castor Common, greenfield site proposal for 5000+ houses runs against the stated Homes England strategy

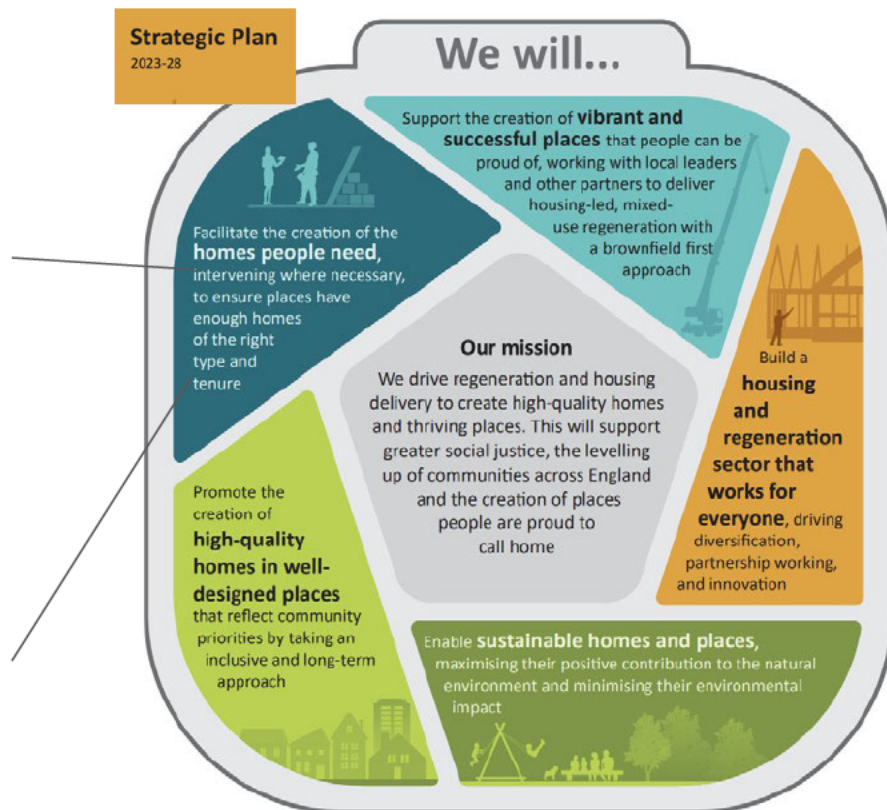
The priority for homes in the UK is not for stranded housing estates in rural locations, rather it is for affordable homes in cities where work is available and the cost of living is low (e.g. walkable, cycleable, easy to heat/cool) with good access to healthcare, social care and education services.

This Homes England site does none of these things, yet is being actively pushed forward

In addition the city council needs to lower the cost of providing quality public services. Urban sprawl increases the cost of providing every type of city service - infrastructure, cost of transport and inefficient use of time.

When the UK is struggling with food security and affordable food, building on good agricultural land is folly.

The recent 'Viability Assessment' for the site is not fit for purpose since it only considers developer profitability and omits both the significant infrastructure costs to develop the site, omits the increased flood risk and sewer overflows it would create for both local villages and the city of Peterborough from surface water flooding and does not account for the future financial liability a site like this would create for the city council.

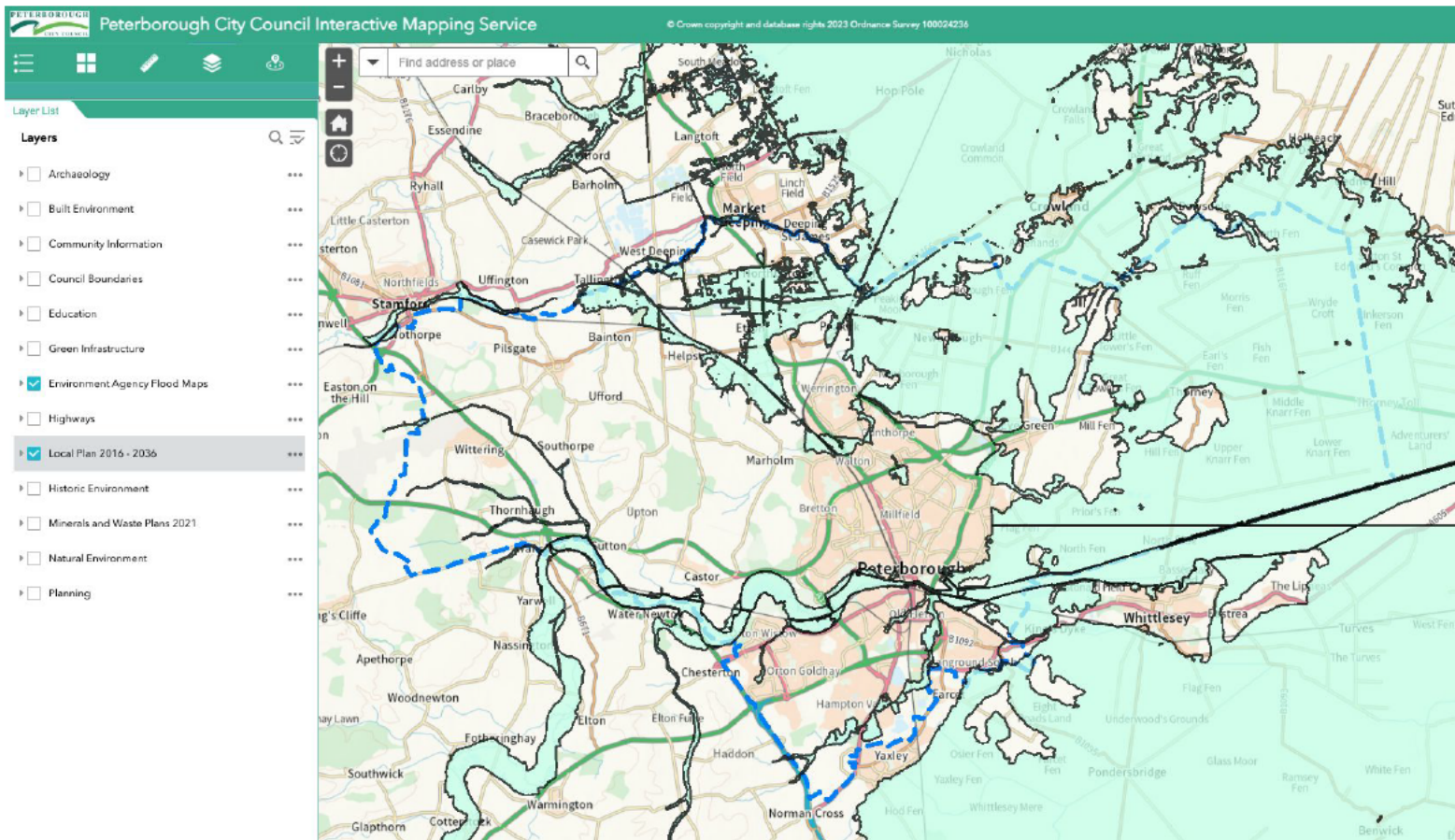


The Castor Common, greenfield site proposal for 5000+ houses runs against the stated Homes England strategy

The Homes England does not reflect community priorities

The proposed Homes England site was specifically rejected in the current local plan, it was overwhelmingly rejected in the 2024 consultation about growth options and this area already has a landscape-scale plan supported by major land owners, local parish councils, many local organisation and most residents.





A vital priority for Peterborough in the next 5 to 10 years is to work on coastal resilience, we have been lucky (so far) with surface water flooding and storm water surges in the North Sea

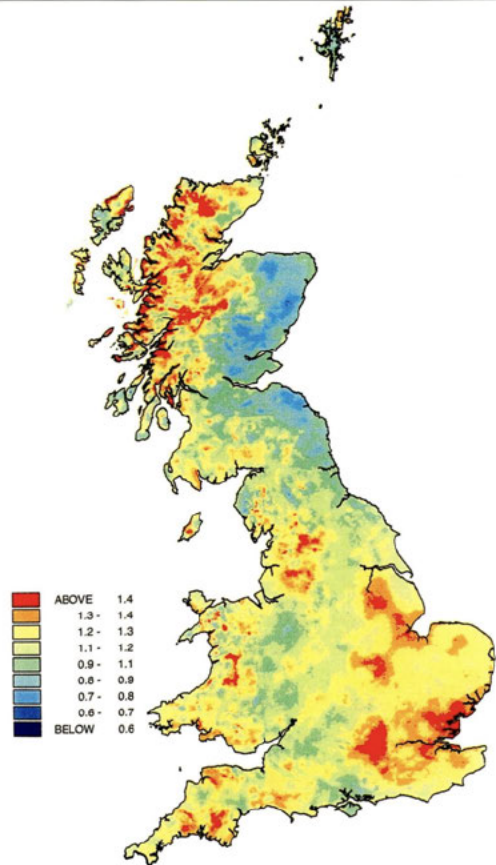
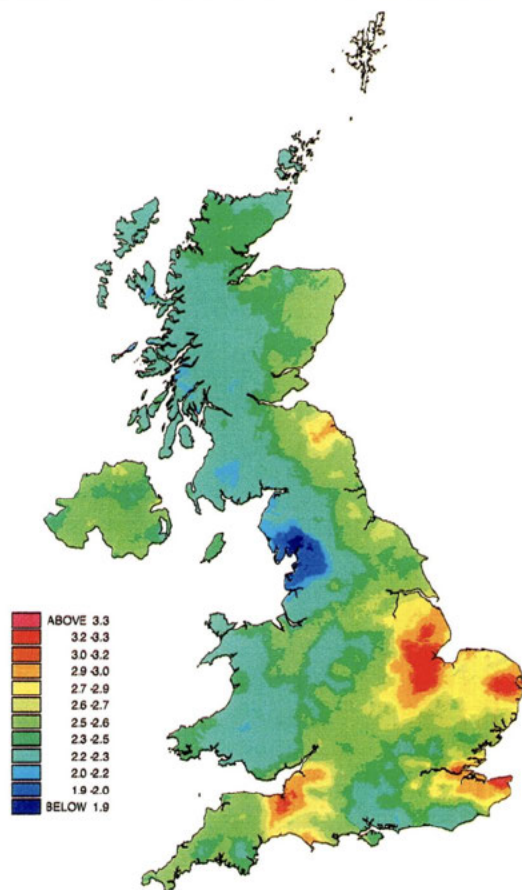
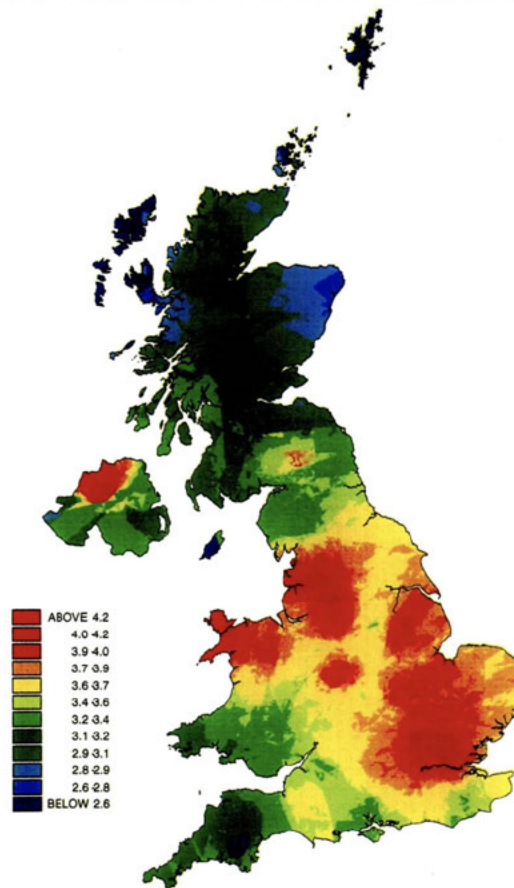


Figure 11.8 Ratio of FEH to FSR 1-hour rainfall for $T = 100$ years

The future rainfall frequency estimates for the Homes England site all show the highest rate of increase.

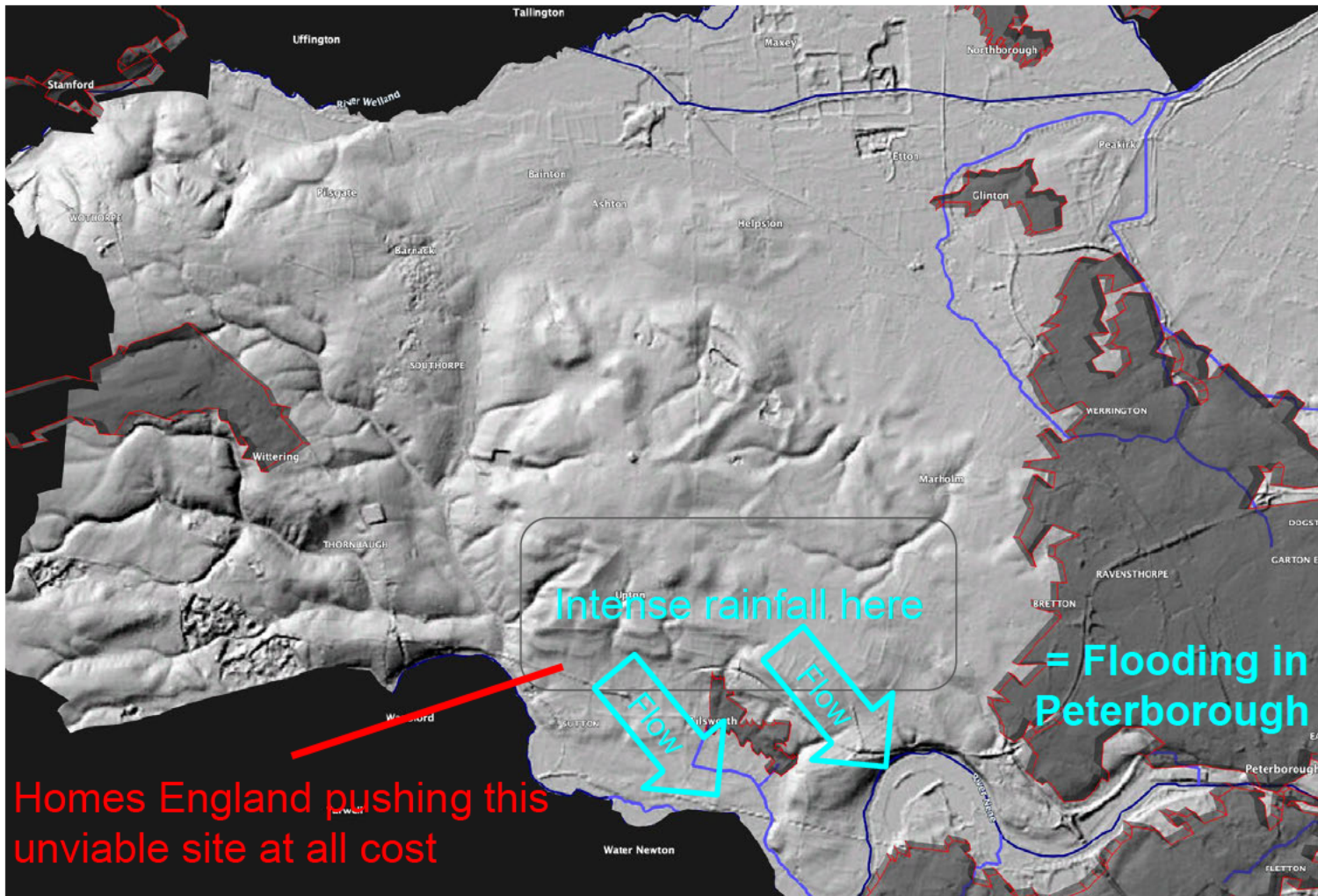
This has not been factored into the site viability

<https://www.ceh.ac.uk/sites/default/files/2021-11/Flood-Estimation-Handbook-2-Rainfall-Frequency-Estimation-Duncan%20Faulkner-2-9-21.pdf>

Figure 11.1 1-day growth rate for $T = 100$ yearsFigure 11.2 1-hour growth rate for $T = 100$ years

Source

https://www.ceh.ac.uk/sites/default/files/2021-11/Flood-Estimation-Handbook-2-Rainfall-Frequency-Estimation-Duncan%20Faulkner_2-9-21.pdf



With significant increase in surface water flooding, building on Castor Common will increase flooding in Peterborough

Lidar data showing terrain that enables large areas of surface water runoff to flow to Peterborough

Homes England pushing this unviable site at all cost

Puzzling...

- In the recent tender document there is a clear presumption that the site will be developed at all costs, it just needs to be pushed through.
- There is significant doubt even about the Homes England title over the site.
- Homes England is spending hundreds of thousands of pounds on pushing an unviable site that has been rejected 4 times when the city of Peterborough that is in need of regeneration growth in its existing urban areas, in particular in the city centre.
- The true cost of ownership for remote greenfield developments is unaffordable for Peterborough city council - the site creates a huge future liability for city services at a time when it has no funds. The very reason cities emerge is because they are designed to be efficient and productive places to live - this runs counter to how cities develop. Past Peterborough developments of this kind have not brought prosperity.
- **The manor of the Homes England aggressive, repeated push for the site has the hallmarks of the Grenfell Scandal and the Post Office Scandal:**
 - A high level of arrogance while pushing a solution that has not worked in the past
 - Lack of involvement from local people with significant knowledge
 - Pushing harder when evidence is inconvenient and the game is all about meeting numbers