

Date: 29 May 2025

Our Ref: RFI5059

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

By Email Only

Dear [REDACTED]

RE: Request for Information – RFI5059

Thank you for your request for information which was processed in accordance with the Freedom of Information Act 2000 (FOIA). Please accept our apologies for the delay in issuing this response to you.

You requested the following information:

- 1: According to Cambridgeshire and Peterborough Combined Authority on October 3, 2019, a grant application was made to Homes England for a total of £342,630 for pre-development costs across two projects in Cambridgeshire. May I have a copy of that application, and all documents associated with that application?**
- 2: Can you confirm who submitted the application (ie the senior executive/chief executive/Mayor)?**
- 3: I understand the money was subsequently paid to the Cambridgeshire and Peterborough Combined and, presumably, handed over to the Stretham and Wilburton Community Trust on whose behalf I understand the application was made.**
- 4: However I also understand that a private developer, Laragh Homes (now in voluntary creditors' liquidation), subsequently invoiced the Community Land Trust and received, in 2 payments, a total of £316,203 to develop a site in Wilburton, Cambridgeshire. Were Homes England aware of this transaction and content with how their grant to the Combined Authority was dispersed? (The development never materialised)**
- 5: There was no formal agreement in place between the Combined Authority and the Stretham and Wilburton Community Land Trust for this to happen.**
- 6: Can you confirm if at any time any employee of Homes England declared a beneficial interest in any of the land that was to be developed at Wilburton?**
- 7: Were Homes England aware that a supposed statement made by the Combined Authority at the time of a 'statement of community benefit' used by the Combined Authority in the planning application for this scheme was shown to be erroneous as the proposal did not have community support in any way shape or form. Indeed, the statement had to be withdrawn from the planning portal of East Cambridgeshire District Council**



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Response

We can confirm that we do hold some of the requested information. We will address each of your questions in turn below.

- 1. According to Cambridgeshire and Peterborough Combined Authority on October 3, 2019, a grant application was made to Homes England for a total of £342,630 for pre-development costs across two projects in Cambridgeshire. May I have a copy of that application, and all documents associated with that application?**

We can confirm that Homes England did receive an application from Stretham and Wilburton Community Land (CLT) trust for two projects on this date. Please see enclosed Annex A which contains a copy of both applications. However, we rely on the following exemptions of the FOIA to withhold some of the information contained within Annex A from disclosure.

Section 40 – Personal information

We are withholding information on the grounds that it constitutes third party personal data and therefore engages section 40(2) of the FOIA.

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.

Section 40 is an absolute exemption 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 exemption is engaged.

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

<https://www.legislation.gov.uk/ukpga/2000/36/section/40>

Section 43 - Commercial interests

Under section 43(2) Homes England is not obliged to disclose information that would, or would be likely to, prejudice the commercial interests of any party.

The information requested relating to the financial information in the applications engages section 43(2) of the FOIA as it is commercial in nature and its release would be likely to prejudice the commercial interests of Homes England and other interested parties to the information.





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Homes England has identified that the information requested, if released, would be likely to prejudice the effective operation of the Community Housing Fund.

Section 43 is a qualified exemption. This means that once we have decided that the exemption is engaged, Homes England must carry out a public interest test to assess whether or not it is in the wider public interest for the information to be disclosed.

Arguments in favour of disclosure:

- Homes England acknowledges there is a general public interest in promoting accountability, transparency, public understanding and involvement in how Homes England undertakes its work and how it spends public money.

Arguments in favour of withholding:

- Disclosing details of a third party's business proposals, processes and information not in the public domain may affect their relationship with other parties, including Homes England, and affect a party's reputation in the market. This would be likely to have a negative impact on the third party's ability to procure works or funding for ongoing development;
- If this information were to be released it would be likely to disadvantage Homes England's and the third party's commercial position and have a negative impact on ongoing discussions. This would also be likely to have the same negative effect on future commercial activity and other Homes England funding. This would not be in the public interest as it would put future developments at risk, inflate prices and damage Homes England's reputation as a partner;
- If information regarding funding amounts per individual scheme were in the public domain there could be expectations from the public and potential future partners about the value of funding applications and the value of potential works. This would mean that prices could be inflated and negotiating positions put at risk. This would not be in the public interest as it would be likely to result in poorer value for public money;
- Disclosure would be likely to be prejudicial to the commercial interests of both Homes England and Stretham & Wilburton CLT as there is a reasonable expectation that such information provided to Homes England in this capacity would not be disclosed. This may deter future partners from sharing commercial information with Homes England which would be likely to harm our ability to negotiate effectively and achieve value for public money;
- The requested information relates to current and ongoing projects where all opportunities have not yet been determined or concluded. The disclosure of this information into the public domain could therefore disrupt the progress and put the projects at risk; and
- Homes England has been unable to identify a wider public interest in disclosing the information requested.



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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.

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

<https://www.legislation.gov.uk/ukpga/2000/36/section/43>

2. Can you confirm who submitted the application (ie the senior executive/chief executive/Mayor)?

We can inform you that we do hold the information that you have requested. However, we rely on Section 40(2) of the FOIA to withhold the information from disclosure.

Section 40 – Personal information

We are withholding information on the grounds that it constitutes third party personal data and therefore engages section 40(2) of the FOIA.

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.

Section 40 is an absolute exemption 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 exemption is engaged.

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

<https://www.legislation.gov.uk/ukpga/2000/36/section/40>

Advice and Assistance

We have a duty to provide advice and assistance in accordance with Section 16 of the FOIA. To comply with this duty, we are able to confirm that the bids were submitted by East Cambridgeshire Community Homes on behalf of the CLT. We therefore advise that you contact East Cambridgeshire Community Land Trusts via the below link:

<https://www.eastcambsc.lt.org/contact>



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3. I understand the money was subsequently paid to the Cambridgeshire and Peterborough Combined and, presumably, handed over to the Stretham and Wilburton Community Trust on whose behalf I understand the application was made.

We can confirm that Homes England entered into a Funding Agreement with Stretham and Wilburton CLT. Funding was paid out to Stretham and Wilburton CLT against the four Community Homes Fund programme milestones, based on evidence and confirmation of progress achieved.

For reference the four CHF pre-development revenue funding milestones were:

1. Body corporate, or equivalent legal entity, established.
 2. Initial community housing proposals developed - outline business / finance plan, viability / feasibility assessment, site identified.
 3. Progress on developing community-led housing proposals - Results of feasibility study / site identified.
 4. Detailed housing proposals developed.
- 4. However I also understand that a private developer, Laragh Homes (now in voluntary creditors' liquidation), subsequently invoiced the Community Land Trust and received, in 2 payments, a total of £316,203 to develop a site in Wilburton, Cambridgeshire. Were Homes England aware of this transaction and content with how their grant to the Combined Authority was dispersed? (The development never materialised)**

We can confirm that Laragh Homes was identified as the CLT's development partner in the bid however we do not hold any information in relation to their liquidation or the transaction you reference.

We can advise that CHF funding was allocated to Stretham and Wilburton CLT for pre-development costs to support them to develop their affordable housing proposals. In particular, funding was to support project enabling costs, professional fees including architects, surveys, valuation and feasibility studies, and community engagement. Funding was not intended for building of the homes themselves.

Homes England received a statement of grant usage, completed by a qualified reporting accountant, to verify that the funding drawn down by Stretham and Wilburton CLT for these projects had been spent appropriately and in line with the CHF funding requirements.



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- 5. There was no formal agreement in place between the Combined Authority and the Stretham and Wilburton Community Land Trust for this to happen.**
- 7. Were Homes England aware that a supposed statement made by the Combined Authority at the time of a 'statement of community benefit' used by the Combined Authority in the planning application for this scheme was shown to be erroneous as the proposal did not have community support in any way shape or form. Indeed, the statement had to be withdrawn from the planning portal of East Cambridgeshire District Council**

We can confirm that Homes England does not hold the information detailed in your request. This is because there is no legal or business reason for Homes England to do so.

To conclude that the information is not held, we have searched with our Housing Delivery team who would have the requested information if held.

The FOIA does not oblige a public authority to create information to answer a request if the requested information is not held. The duty under section 1(1) is only to provide the recorded information held.

The full text of section 1 in the legislation can be found here:

<https://www.legislation.gov.uk/ukpga/2000/36/section/1>

Advice and Assistance

We have a duty to provide advice and assistance in accordance with Section 16 of the FOIA. To comply with this duty, we are able to confirm that we do not hold any recorded information in relation to the specific arrangements between the Combined Authority and the Stretham and Wilburton CLT nor are we aware of the statement made.

- 6. Can you confirm if at any time any employee of Homes England declared a beneficial interest in any of the land that was to be developed at Wilburton?**

We can confirm that there was a member of staff who at one point had declared a beneficial interest in land in Wilburton, Cambridgeshire.

Right to Appeal

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 an internal review. You can request an internal review by writing to Homes England via the details below, quoting the reference number at the top of this letter.



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Tel: 0300 1234 500

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Information Governance Team

Homes England

The Lumen

2nd Floor

St James Boulevard

Newcastle Helix

Newcastle upon Tyne

NE4 5BZ

United Kingdom

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

Upon receipt, your request for review 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



Community Housing Fund - enquiry CHF/REV/001055

Contact details	Name	s. 40(2)
	Email address	s. 40(2) @ecdccomhousing.org
	Telephone number	s. 40(2)
	Correspondence address	5, FORDHAM HOUSE COURT, 46 NEWMARKET ROAD FORDHAM ELY CB7 5LL
	Job title	Community Housing Programme Manager
	On behalf of?	Yes
	Relationship to applicant	Enabling organisation
Organisation details	Organisation type	Community benefit society
	Organisation name	Stretham & Wilburton CLT
	Not for profit organisation?	Yes
	Registered body corporate?	Yes
	Company registration number	31823R
	Date of registration	12/10/2012
	Registered office address	ORCHARD HOUSE, HIGH STREET Great Shelford CAMBRIDGE CB6 3JQ
	Website address	www.strethamwilburtonclt.co.uk
Funding	Type of funding	Revenue
	Revenue grant?	No
Capacity building	Proposal name	Land at Camps' Field part 1
	Total cost of preparing	£142,500
	Amount of funding	s. 43
	Spend the funding on	Architect, Professional/Legal Fees, Consultants Fees, Project Management, Public Engagement, Community-led Housing Enabler
	Body corporate forecast achievement date	
	Body corporate actual achievement date	14/10/2012
	Initial community housing proposals developed - forecast achievement date	15/04/2019
	Initial community housing proposals developed - actual achievement date	15/04/2019
	Progress on developing proposals - forecast achievement date	
	Progress on developing proposals - actual achievement date	15/05/2019
	>Detailed proposals developed - forecast achievement date	15/10/2019

Detailed proposals developed - actual achievement date		
Applicant organisation's own resources	£0	
Fundraising	£0	
Borrowing	£0	
Other	£5,433 (Secured)	
Other - please specify	Developer contribution	
State aid	No	

Community-led housing proposal	What do you propose to build?	Stretham & Wilburton CLT are seeking to develop 36 affordable homes in Wilburton, to secure for local people in perpetuity. In addition to this we will be providing a large amount of open green space and amenity space for local people, and open market housing to help to cross-subsidise the development.
	Number of homes	120
	Bedsit	0
	Flat	0
	House	100
	Maisonette	0
	Bungalow	20
	Affordable rent	29
	Social rent	0
	Shared ownership	7
	Rent to buy	0
	Discounted market sale	0
	Discounted market rent	0
	Mutual home ownership	0
	Shared equity	0
	Other	0
	General needs	120
	Older people	0
	Vulnerable and disabled people	0
	How will meet needs of community?	The proposed development will meet the needs of the community in many ways. Firstly, housing in the villages is extremely expensive, both in terms of purchase and rent. This means many local people and families, particularly those who work locally on local wages such as agricultural workers or key workers, are increasingly being priced out of the market. This often results in families having to move away from the areas they grew up in and where they have family and friends, in search of housing that they can afford. Stretham & Wilburton CLT secures its genuinely affordable housing for those with strong local connections to the area, particularly where there is an employment link to one of the villages. This benefits the individuals allocated housing, but also the community as a whole by ensuring the community thrives and remains sustainable. This is important to keep village services and schools open and successful, as well as small local businesses. Both Stretham and Wilburton are well served in these respects but, like many small villages, need development in order to keep their amenities thriving. Another way the proposed development meets the needs of the community is via the significant contribution to recreational facilities, public open

space and green amenity space. Wilburton suffers from a real lack of public open space. Despite being a rural community, there is next to no open green space available to the community to walk, take dogs, or for children to play. Community owned public space would present a real benefit and improvement in quality of life for the local residents. The recreational facilities could include sports pitches, a pavilion/ changing room, parking, and a large area devoted to wildlife, wildflower meadows and/or orchards areas with footpaths and cycle paths. Finally, the community will benefit from a long-term asset and income stream that the affordable housing will generate, ensuring a continually sustainable and thriving community.

Site details	Local Authority	
	Has a site for the project been identified?	Yes
		Camp's Field, Stretham Road Wilburton Ely CB6 3SQ
	Site/Property owned by applicant organisation?	
	Current Planning Status	NPYPA
	Current use class	Agri
	Are there restrictions on the site?	No
Project details	Delivery and management	
		Stretham & Wilburton CLT is working in partnership with a small local developer, Laragh Homes, in order to deliver the project. Upon delivery the CLT will manage the affordable properties.
	How financed?	Long term loan finance
	Applying for capital funding?	Unknown
	Innovation	Working with small and medium sized (SME) house builders, Other
	Small/Medium Enterprises - please specify	The CLT are working with an SME local developer Laragh Homes.
	Other - please specify	Stretham & Wilburton CLT have formed an innovative partnership with Laragh Homes. Laragh Homes is a local developer with a special interest in supporting community-led housing initiatives, engaging widely with the community on their developments, and ensuring community benefits are protected in perpetuity. This is the second development that Stretham & Wilburton CLT and Laragh Homes have worked together on.
	LA discussions?	Yes
	Discussions details	The Local Authority are very supportive of Community Land Trusts in general and are supportive of our scheme in principle. There is a strong need for affordable housing locally and the Council are pleased to see affordable housing being delivered via the CLT model.

Community support

Stretham & Wilburton CLT have undertaken extensive community engagement. This includes: leaflets, newsletters, several public open meetings and events, feedback forms, engaging with the membership base and meetings with various local organisations/ groups such as the school. Please see supporting documents for more information.

Supporting information

File	Description
S. 43	

History

Submitted date

03/10/2019

Community Housing Fund - enquiry CHF/REV/002079

Contact details	Name	s. 40(2)
	Email address	s. 40(2) @ecdccomhousing.org
	Telephone number	s. 40(2)
	Correspondence address	5, FORDHAM HOUSE COURT, 46 NEWMARKET ROAD FORDHAM ELY CB7 5LL
	Job title	Community Housing Programme Manager
	On behalf of?	Yes
	Relationship to applicant	Enabling organisation
Organisation details	Organisation type	Community benefit society
	Organisation name	Stretham & Wilburton CLT
	Not for profit organisation?	Yes
	Registered body corporate?	Yes
	Company registration number	31823R
	Date of registration	12/10/2012
	Registered office address	ORCHARD HOUSE, HIGH STREET Great Shelford CAMBRIDGE CB6 3JQ
	Website address	www.strethamwilburtonclt.co.uk
Funding	Type of funding	Revenue
	Revenue grant?	No
Capacity building	Proposal name	Land at Camps' Field part 2
	Total cost of preparing	£238,200
	Amount of funding	£s. 43
	Spend the funding on	Architect, Professional/Legal Fees, Consultants Fees, Planning Fees, Planning Consultant, Project Management, Public Engagement, Community-led Housing Enabler
	Body corporate forecast achievement date	15/11/2019
	Body corporate actual achievement date	
	Initial community housing proposals developed - forecast achievement date	
	Initial community housing proposals developed - actual achievement date	
	Progress on developing proposals - forecast achievement date	15/01/2020
	Progress on developing proposals - actual achievement date	
	>Detailed proposals developed - forecast achievement date	15/03/2020

Detailed proposals developed - actual achievement date		
Applicant organisation's own resources	£0	
Fundraising	£0	
Borrowing	£0	
Other	£5,433	(Secured)
Other - please specify	Developer contribution	
State aid	No	

Community-led housing proposal	What do you propose to build?	Stretham & Wilburton CLT are seeking to develop 36 affordable homes in Wilburton, to secure for local people in perpetuity. In addition to this we will be providing a large amount of open green space and amenity space for local people, and open market housing to help to cross-subsidise the development.
	Number of homes	120
	Bedsit	0
	Flat	0
	House	100
	Maisonette	0
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	Discounted market sale	0
	Discounted market rent	0
	Mutual home ownership	0
	Shared equity	0
	Other	0
	General needs	120
	Older people	0
	Vulnerable and disabled people	0
	How will meet needs of community?	The proposed development will meet the needs of the community in many ways. Firstly, housing in the villages is extremely expensive, both in terms of purchase and rent. This means many local people and families, particularly those who work locally on local wages such as agricultural workers or key workers, are increasingly being priced out of the market. This often results in families having to move away from the areas they grew up in and where they have family and friends, in search of housing that they can afford. Stretham & Wilburton CLT secures its genuinely affordable housing for those with strong local connections to the area, particularly where there is an employment link to one of the villages. This benefits the individuals allocated housing, but also the community as a whole by ensuring the community thrives and remains sustainable. This is important to keep village services and schools open and successful, as well as small local businesses. Both Stretham and Wilburton are well served in these respects but, like many small villages, need development in order to keep their amenities thriving. Another way the proposed development meets the needs of the community is via the significant contribution to recreational facilities, public open

space and green amenity space. Wilburton suffers from a real lack of public open space. Despite being a rural community, there is next to no open green space available to the community to walk, take dogs, or for children to play. Community owned public space would present a real benefit and improvement in quality of life for the local residents. The recreational facilities could include sports pitches, a pavilion/ changing room, parking, and a large area devoted to wildlife, wildflower meadows and/or orchards areas with footpaths and cycle paths.
Finally, the community will benefit from a long-term asset and income stream that the affordable housing will generate, ensuring a continually sustainable and thriving community.

Site details	Local Authority	
	Has a site for the project been identified?	Yes
	Site/Property owned by applicant organisation?	
	Current Planning Status	PDUPO
	Current use class	Agri
	Are there restrictions on the site?	No
Project details	Delivery and management	
	Stretham & Wilburton CLT is working in partnership with a small local developer, Laragh Homes, in order to deliver the project. Upon delivery the CLT will manage the affordable properties.	
	How financed?	Long term loan finance
	Applying for capital funding?	Unknown
	Innovation	Working with small and medium sized (SME) house builders, Other
	Small/Medium Enterprises - please specify	The CLT are working with an SME local developer Laragh Homes.
	Other - please specify	Stretham & Wilburton CLT have formed an innovative partnership with Laragh Homes. Laragh Homes is a local developer with a special interest in supporting community-led housing initiatives, engaging widely with the community on their developments, and ensuring community benefits are protected in perpetuity. This is the second development that Stretham & Wilburton CLT and Laragh Homes have worked together on.
	LA discussions?	Yes
Discussions details		The Local Authority are very supportive of Community Land Trusts in general and are supportive of our scheme in principle. There is a strong need for affordable housing locally and the Council are pleased to see affordable housing being delivered via the CLT model.
Community support		Stretham & Wilburton CLT have undertaken extensive community engagement. This includes: leaflets, newsletters, several public open meetings and events, feedback forms,

engaging with the membership base and meetings with various local organisations/ groups such as the school. Please see supporting documents for more information.

Supporting information

No supporting documents have been provided.

History	Submitted date	03/10/2019
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