

## RESPONSE PROVIDED

East Midlands Combined County Authority  
Northern Gateway Enterprise Centre  
Saltergate  
Chesterfield  
S40 1UT

13/06/2025

Freedom of Information Request – Ref: FOI 50

- **A copy of the funding application submitted (or supported) by Erewash Borough Council or the site's owners concerning the former Argos store on Bath Street, Ilkeston.**  
**Please find attached the initial application submitted for the site referred to. Please note some individual names have been removed in accordance with the Section 40(2) exemption of the FOI Act which permits the withholding of personal data relating to individuals. As this is an absolute exemption, a public interest test is not required.**
- **Any communications, reports or evaluations regarding the application that have been reviewed or issued by the Mayor's Office or EMCCA.**  
**Not Held - EMCCA utilises a third-party to review initial applications, conduct compliance checks and due diligence, and perform evaluations in order to progress with to a full application. Once this process has been conducted, and a full application is ready for consideration, it will then be sent on to EMCCA to review, consider, and comment on. However, this has not yet taken place, therefore there are no communications, reports or evaluations issued by the Mayor's Office or EMCCA to disclose at this time.**
- **Details of any funding allocated, conditionally approved, or earmarked for the redevelopment of this site under relevant government or regional schemes.**  
**£215,523 of Brownfield Housing Fund will be allocated to the approved applicant to support the delivery of 11 units on this site, once due diligence and compliance approval has gone through.**
- **Information on decision-making timelines or processes for considering such applications.**  
**The process for considering applications is as follows: The third party contracted by EMCCA receive expressions of interest relating to the site, they then conduct compliance checks as mentioned above, and continue in dialogue with the applicants to satisfy the conditions of the full business case and develop a complete application. Following this, the application is forwarded to EMCCA to review and evaluate and will then either be supported for recommendation and submitted for approval, or set aside in mutual agreement with the applicant. It isn't possible to give an exact timeline for how long this process can take, however if an expression of interest was made with a credible applicant, and all due diligence and required evidence was adequately prepared, the process *could* be conducted within 3 months.**



I hope this satisfies your request.

If you are dissatisfied with this decision, you may write to request an internal review. The internal review will be carried out by someone who did not make the original decision, and they will re-assess how the Department handled the original request.

If you wish to request an internal review, please write or send an email to the Information Governance Team within two months of the date of this letter, at the following address:

Information Governance Team  
East Midlands Combined County Authority  
North Enterprise Gateway  
Saltergate  
Chesterfield  
S40 1UT  
e-mail: [FOI@eastmidsdevo.org.uk](mailto:FOI@eastmidsdevo.org.uk)

Please remember to quote the reference number above in any future communications.

If you remain dissatisfied after an internal review decision, you have the right to appeal to the Information Commissioner's Office. You can find further details on how to do this via Information Commissioner's Office website: [FOI and EIR complaints | ICO](#).

Regards

Information Governance Team

**East Midlands Combined County Authority**

**East Midlands Combined Authority  
Brownfield Housing Fund Pipeline Expression of Interest (EOI)  
Application**

***Please return by 10<sup>th</sup> May at 12 noon***

**Local Authority Area**

Erewash

**Is the site cross-boundary? (yes/no)**

No

**Contact Person**

**Contact details (phone number and email)**

**Role in project**

Council Regeneration Manager / Liaison with developer

**Site name**

Former Argos

**Site address including postcode**

14 Bath St, Ilkeston, Derbyshire, DE7 8FB

**Gross Site area (hectares/areas)**

235 sqm (ground floor footprint)

**Net Housing site area (if different from above)**

428 sqm (across 3 floors).

**Net Commercial site area (if applicable)**

101 sqm

**Please confirm the site is Brownfield and provide details/evidence to confirm this**

Brownfield land within this context aligns with Government's National Planning Policy Framework, where this type of land is classified as 'previously developed land', which means: *"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."*

This town centre vacant unit fits within the NPPF definition of brownfield land.

**Land Ownership position**

Please outline whether all of the site is in your ownership, or the % of land which is. Where possible, please provide the title, covenant and any third party interests which may affect the delivery timetable

Privately owned by one company

**Total number of housing units to be delivered**

Please provide a breakdown of the tenure and affordable provision on site. Please state whether this meets the Local Authority Affordable Housing requirement, and if not, whether the lower quantum of affordable housing provision has been approved by the relevant LPA.

11 units

**Total sqm (NIA) of commercial/other space (please specify) (where relevant)**

101 sqm NIA Class E commercial floorspace

## Is there a developer in place, and if so who is this?

Where a Developer has not yet been identified, please state the process and timescales which will be required to identify a suitable Developer.

Yes, the owner -Huntingdon Property One Ltd, will act as developer and work with an appointed Building Contractor to implement the permitted scheme. The market failure of the site is currently preventing works from commencing.

## Is the site allocated for housing? Yes/No – please provide local plan site reference number if so

The site benefits from planning permission to deliver 11 residential apartments and ground floor commercial floorspace.

## Planning status

No consent/outline consent/full consent/consent lapsed – Where Consent has been approved, please provide the planning reference number and approval date.

Planning permission ([ERE/0122/0051](#)) granted in March 2022 for 11 no. residential apartments and 2 no. commercial units (101 sqm NIA).

## Brief project/scheme description and rationale for public sector intervention (300 words max)

The Former Ilkeston Argos, which has been vacant since 2015, is a long-standing regeneration and housing priority for the local authority. This project will convert this four storey property into 11 apartments and 2 ground floor commercial units. Planning permission was granted in 2022 for this scheme however viability issues have prevented it from coming forward. As was the case under the previous ownership, the current owners have identified that the cost of implementing the scheme is prohibitive when considering local land values and likely rental income.

The current owners have set out the scheme of works required to deliver the scheme:

- Asbestos removal
- Timber inspection and structural reinforcement / new steel installation
- Floor reinforcement
- Chimney removal/ repairs
- Removal of service lift
- Dry lining
- Electrical installations/ re wiring
- Plumbing and Plastering
- Timber, joinery and new doors

### Alignment to local housing need (max 300 words)

Erewash Borough has not met its local plan housing target for several years and has failed the government's Housing Delivery Test (HDT) since its introduction. Ilkeston has long been a focus for Housing growth and regeneration, however the market has failed to deliver sufficient number of homes due to viability of redeveloping/ converting brownfield sites.

The latest available HDT results for Erewash show that despite delivery improvements across the several years in which the test has been in place, there has been persistent under delivery of new housing.

This confirms the need for the Council to apply a 20% buffer to its calculated five-year housing land requirement.

### Housing Delivery Test results

| Set of HDT results | Target     | Period    | Number of homes required | Number of homes built | % result |
|--------------------|------------|-----------|--------------------------|-----------------------|----------|
| February 2019      | 363 to 368 | 2015-2018 | 1,098                    | 721                   | 66%      |
| February 2020      | 363 to 369 | 2016-2019 | 1,100                    | 685                   | 62%      |
| February 2021      | 360 to 369 | 2017-2020 | 1,092                    | 752                   | 69%      |
| February 2022      | 261 to 369 | 2018-2021 | 990                      | 782                   | 79%      |

### Alignment to EMCCA strategic objectives (see Prospectus) (max 300 words)

Growth in the economy, through targeted long-term investment, so that it is resilient enough to withstand future challenges – by providing 2 ready to let retail units in the heart of the town centre.

Build new and coherent transport links for better and more sustainable access to our economic hubs – by providing 11 town centre living units.

Reduce inequality and promote social mobility to allow people to achieve their potential – by providing social housing units.

Furthermore, the delivery of affordable units closely aligns with one the Strategic Framework's five themes:

"We will work with local authorities, landowners, developers and the full range of housing providers to create affordable, good quality housing options and to retrofit existing homes to be more environmentally sustainable".

**Infrastructure requirements**

What level of on and off site infrastructure is required to deliver the scheme?

None applicable. The viability appraisal exempted the scheme from infrastructure requirements

**Are any Modern Methods of Construction (MMC) being used to deliver the site?**

Not applicable

**Does the scheme have any specific design accreditations/aspirations?**

Existing structure. The permitted scheme is in keeping with the Conversation Area

**Have you started on site and if so what works have you undertaken to date?**

Not started due to funding constraints.

**If no to the above, when are you intending to commence works on site?**

As soon as possible, subject to securing funding. Start predicted December 2024-January 2025. Time is a motivating factor as a material start must be made prior to the expiry of planning permission in March 2025.

**Type and scale of public sector intervention required – please quantify this**

£215,523.44 to bridge funding gap. A viability appraisal was carried out in March 2021 to support the previous planning permission (amended by the 2022 permitted scheme). This calculated the funding gap to be £168,252. When applying indexation from the ONS Construction Output Price Indices up to a predicted December 2024 start date, this comes to £215,523.44

**Please identify the delivery structure for the scheme including the role of the applicant and other key delivery partners, proposed contractual arrangements**

The Developer would appoint a Design and Build Contractor. In order to minimise risk, the developer would claim grant funding from the local authority in arrears via staged payments, subject to meeting schedule of phased completions. The



Developer's preferred model with regard to the residential component is to secure a long lease with a registered housing provider. The developer would act as a landlord for the commercial units, which would be offered to tenants on easy in/out terms.

## Delivery Programme

| Milestone                                                        | Date completed/forecast (please complete)                                  |
|------------------------------------------------------------------|----------------------------------------------------------------------------|
| Site acquisition                                                 | July 2023                                                                  |
| Outline planning consent                                         | n/a Full consent                                                           |
| RIBA Stage 3 design                                              | n/a                                                                        |
| RIBA Stage 4 design                                              | n/a                                                                        |
| Full planning consent / Reserved Matters                         | Full Planning consent granted March 2022 ( <a href="#">ERE/0122/0051</a> ) |
| Construction contract tender issued                              | n/a                                                                        |
| Construction contract tender awarded                             | Subject to funding October 2024                                            |
| Start on site – Infrastructure/ enabling works commencement date | n/a refurbishment of existing buildings                                    |
| Start on site - housebuilding                                    | Subject to funding Dec 2024                                                |
| Practical Completion of housing units                            | October 2025                                                               |
| First legal completions                                          | November 2025                                                              |
| Last legal completions                                           | December 2025                                                              |

**Please describe any key delivery risks to the successful delivery of your scheme (e.g. planning, infrastructure, market demand, ownership, legal, cost, funding etc (guide 200 words)**

This is a low risk project because planning consent is in place, no additional infrastructure requirements are required, there is demonstrable demand for town centre living and low retail vacancy rates in the heart of the town centre. Site is in single ownership with no known legal issues.

The risk which has held up development to date is bridging the finance gap, something which this funding would resolve.

**Housing unit delivery profile – please provide your projected forecast**

**Housing Delivery Profile by Financial Year (please present dwellings per annum)**

| 2024-25 | 2025-26 | 2026-27 | 2027-28 | 2028-29 | Post 28 | Total |
|---------|---------|---------|---------|---------|---------|-------|
|         | 11      |         |         |         |         | 11    |

**Please append an indicative development appraisal/ **viability appraisal** to support your viability case for BHF support if this is available**

Viability Appraisal attached.

**Signature:**

**Name:**

**Position: Planning Policy and Regeneration Manager**

**Organisation: Erewash Borough Council**

**Date: 10 May 2024**