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Jill Shingler  
Epping Forest District Council  
Civic Offices  
High Street  
Epping  
Essex CM16 4BZ

1st August 2013

Dear Mrs Shingler

**Application No.EPF/2343/12 Mixed Use Redevelopment at Stonehall Business Park**

Further to your email to Andrew Tate dated 28<sup>th</sup> June 2013 we set out below what we suggest could be further justification to support your recommendation for approval:-

**1. Planning Policy – National Planning Policy Framework (NPPF)**

We strongly believe that the need for us to prove that the residential element of our scheme requires ‘special circumstances’ to justify its inclusion in the scheme is not necessary.

Paragraph 89, (the last bullet point) states that....An LPA should regard the construction of new buildings as inappropriate in a Green Belt except for limited infilling or the partial or complete redevelopment of previously developed sites (Brownfield land) whether redundant or in continuing use (excluding temporary buildings) which would not have a greater impact on the openness of the Green Belt than the existing development.

Paragraph 14 states says that housing is sustainable development to be approved without delay unless specific policies in the framework indicate development should be restricted.

We believe that these Paragraphs of the NPPF confirm that Green Belt policy specifically allows and encourages the residential development, particularly now that we have incorporated 3 affordable houses in full compliance with current affordable housing policy.

Paragraph 51 confirms that LPA’s should normally approve any change of use or associated development of commercial buildings (B uses) where there is an identified need for housing, and given the conclusion reached on Paragraph 89, above, we suggest that the LPA should approve development for housing as this is not inappropriate in the Green Belt. Part J of the GPDO, Amendment 2013 provides Permitted Development rights for the conversion of Existing offices, for housing.

It would therefore be lawful to change the use of the office buildings at Stonehall, to residential without planning permission, subject to prior approval.

## **2. Financial Statements**

Please find attached 2 simple financial statements, set out and incorporating the majority of the appraisal variables as previously supported by your external viability consultants, KIFT:-

1. Proposed mixed use scheme.
2. An alternative entirely B1 Business use scheme that replaces the proposed residential footage of approx 6,000 sq.ft, with additional B1 commercial footage.

These 2 comparables clearly demonstrate that the entirely B1 scheme is not viable and as such would not be brought forward as redevelopment on this site, where as the proposed scheme with a compliant 50% affordable housing provision afford an acceptable level of developers return, as confirmed by KIFT.

## **3. Special Circumstances Justifying Proposed Mixed Development.**

Whilst the financial analysis provides one robust ground for approving this scheme we also set out below additional reasons why the proposed mixed use scheme should be approved in accordance with your Officers recommendation:-

1. We believe existing Planning Policy supports the mixed use development of the site.
2. The existing buildings are no longer fit for purpose with poor loading and circulation low eaves height, with diminishing appeal to local businesses.
3. The refurbishment of the units is not viable due to their very rudimentary construction with no insulation, being former chicken sheds, making them difficult to repair and maintain, and expensive to heat.
4. The units do not comply with current DDA requirements and share limited communal WC facilities creating a poor working environment.
5. We are slowly losing tenants, finding it extremely difficult to replace them, and existing tenants are getting concerned for security as the site is occupied less.

**In considering our proposals we seek the Council also looks at the benefits that the scheme will bring and the responses to public consultation:**

6. From the Officers report we understand that no-one has objected to our proposals, and in fact those nearest to the scheme have actively supported the scheme and its benefits which include:
7. The approved setting of the adjoined listed Stonehall Barn with greater special amenity and the removal of the adjoining commercial uses.
8. The creation of a new green/openness at the front of the site will conceal the business use behind a naturally banded and planted area to the rear of the site that also sits at a lower level minimising its impact on the countryside around the site.

9. The proposed conditions control hours of working and removal of any open storage on the site and enhances the residential amenity of the location.
10. The modern adaptable buildings will not only allow us to retain the existing local businesses on site but also attract new business and jobs into the Borough creating longevity for local businesses and securing rural jobs.
11. The new access road will be moved away from existing building and adjoining residential again offering improved access and egress to the site with minimal intrusion to the residential neighbours.
12. The residential element, including 3 No. "Affordable Rented" units is part of a terrace of 6 "farm workers styled" cottages that improve and enhance the setting of the Listed Building.
13. The scheme provides a much improved environment for the residential and commercial occupiers. Whole estate will be in private ownership and actively managed by a Management Company to ensure the quality of the development is maintained.

**Without a mixed use scheme we have clearly shown that Stonehall Business Park would/could not be redeveloped but would slowly decline and be sold.**

Yours sincerely

Phil Roberts