

Possible Brownfield Sites within the Urban Area of Cambridge

1. Purpose:

- 1.1 The purpose of this paper is to demonstrate that there are brownfield sites within the urban area that might have development potential and thus contribute to the Cambridge City Council's housing target without the need to release further land from the Green Belt.
- 1.2 It is recognised that the Council has undertaken a thorough survey of all available locations within the urban area through the SHLAA process, and this paper does not imply any criticism of that process. What we do question is the rigour of the appraisal of the rejected sites, and whether with more innovation and determination, some of the discarded sites could actually be developed even if they are difficult. So long as the possibility remains that such sites have not been examined with adequate rigour, then the 'exceptional circumstances' required by the NPPF for the release of more Green Belt cannot apply.
- 1.3 The sites identified in this paper are a representation of the potential for additional brownfield development if a more rigorous and flexible approach is taken to their feasibility assessment. Obviously within the time restriction imposed by the Local Plan consultation, it has not been possible to undertake a detailed analysis of these sites, including their economic viability, so they should be regarded as potential sites that justify a more thorough examination.

2. Background:

- 2.1 The draft Cambridge Local Plan 2014 calls for the release of land in three new locations in the Green Belt around the city fringe. However, the 'exceptional circumstances' required by the NPPF (Paragraph 83) for the re-drawing of the boundary of the Green Belt can be met only if there are no realistic sites available elsewhere. The argument is presented that such sites are available within the urban area – and may also be available outside the Green Belt in South Cambs although these are not considered in this paper.
- 2.2 The principle of 'brownfield first' before greenfield sites on the city fringe is recognised by the City Council in the draft plan (Paragraph 2.26). It has also been confirmed by the Secretary of State at DCLG in the explanation of his decision in June 2013 to overturn the recommendation of the Planning Inspector by refusing planning approval for 165 new homes in the Green Belt at Thundersley, Essex. Despite the 'exceptionally low' supply of housing land facing the local authority, which the Minister described as 'unacceptable', he concluded that this development 'did not outweigh the presumption against inappropriate in the Green Belt when alternative sites outside the Green Belt had not been adequately explored'. This same principle should apply to the proposed new developments in the Cambridge Green Belt.
- 2.3 It is also argued that locating new housing within the city rather than on its edge is more environmentally sustainable in that residents are more likely to walk, or cycle or use public transport.
- 2.4 It is also recognised that there are parts of the city that are currently underused with a very low density of occupation or which offer a poor quality of life where local residents could benefit from

re-development. The issue of economic and social regeneration is contentious but it will become increasingly pressing as vacant areas for development within the city are exhausted. This paper does not fully consider the opportunities for regeneration and its potential contribution to housing targets but we believe the issue of whether the urban area is full, and that development must be sited at the fringes, still needs public debate.

3. Possible Sites within the Urban Area:

3.1 Sites less than 0.5ha are assumed by the Council to contribute towards the windfall allocation, so this review looks only at the larger areas. It also excludes land categorised as Protected Open Space or playing fields unless they are replaced by equal or larger areas in the immediate vicinity with enhanced public benefit. Protected Industrial Sites as well as sites identified in the Employment Land Review¹ to be retained for employment use have also been excluded.

3.2 In our view the following sites from the SHLAA are considered to warrant a more rigorous assessment. There could be other similar sites:

- Site 481 Newmarket Road Retail Parks West of the railway
- Site 541 The Beehive Retail Park
- Site 676 Warehouses at Church End, Cherry Hinton
- Site 854 Railway Sidings West of Rustat Road
- Site 912 Owlstone Croft, Newnham
- Site 22 Bishops Court, Trumpington
- New sites - Chesterton Bowls Club, Logan's Way
- Area north of Rosemary Lane/ Church End

3.3 Two main reasons have been put forward by the Council to explain why these sites are not deliverable:

i.) Ownership Issues:

Many of these sites are in multiple-ownership, or the ownership is not clear, or the owners have expressed no interest in developing their site. This is where the Council needs to show genuine leadership by creating the sorts of public/private partnership arrangements that can drive these sites forward. The Council should act as the catalyst by engaging with the owners, demonstrating the potential of these sites, and urging their development. The Council should also not be apprehensive about serving Compulsory Purchase Orders if necessary development is being frustrated by recalcitrant landowners. We understand there is a financial cost implication in pursuing the latter as an option.

ii.) Site Contamination:

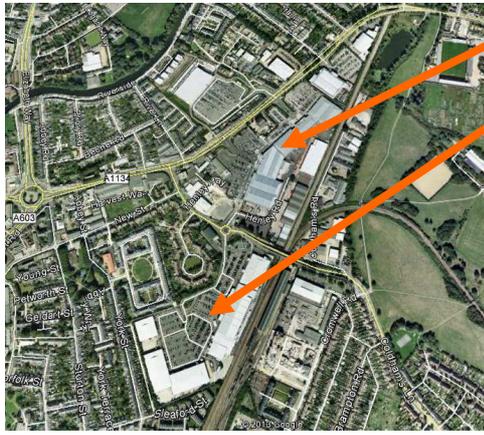
It is inevitable that most brownfield sites will have problems of contamination, which sometimes can be severe. Using the latest remedial technologies, however, this should not be an irredeemable problem – other planning authorities have demonstrated how even the most contaminated sites can be brought back into residential use. In severe cases, the problem can be overcome by raising the residential units above ground level combined with direct soil decontamination measures. In the most extreme cases, it may be that contamination does preclude residential use but such sites may be decontaminated sufficiently to allow for employment purposes leading to the release of other employment sites for residential use.

3.4 We understand that, compared with greenfield sites, inner city brownfield sites are more difficult and therefore potentially unattractive to developers, but this is where the Council should show leadership. Difficulty, or doubts about deliverability, is arguably inadequate justification, without a sound financial appraisal to underpin the argument, and when the alternative is to take more Green Belt land.

4. Consideration of Individual Sites:

¹ <https://www.cambridge.gov.uk/sites/www.cambridge.gov.uk/files/documents/employment-land-review-update-2012.pdf>

4.1

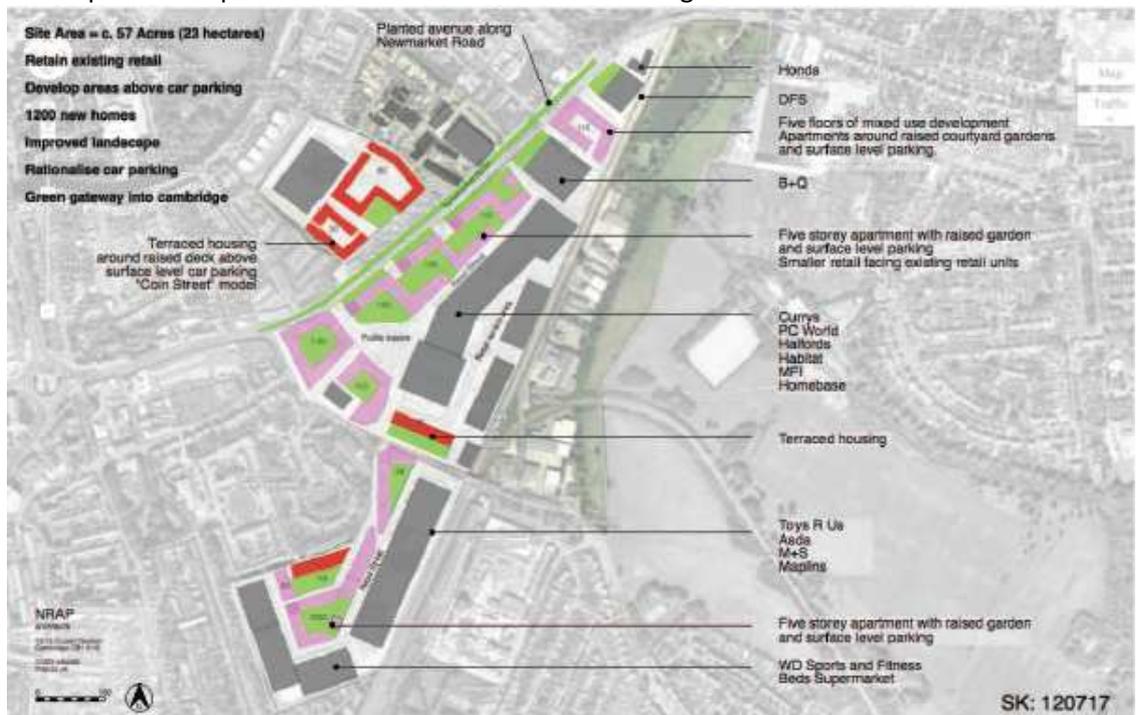


Site 481: The Newmarket Road Retail Parks, and

Site 541: The Beehive Centre.

The reason given in the SHLAA assessment for rejection of both these sites is that they are 'not considered to be suitable for residential development as it would result in the loss of the Cambridge Retail Park, which makes a major contribution to the retail economy, and employment situation in Cambridge. Residential development of these sites would mean the loss of the retail units and the jobs therein, and would diminish Cambridge's status as a regional shopping centre'.

This assumes replacement of the retail by residential which clearly is unacceptable. With a little imagination, however, it would be perfectly feasible to develop the sites for both. The outline prepared by the architects NRAP on behalf of the Cambridge Association of Architects that shows how the existing retail and the car parking provision can be retained together with the development of up to 1200 new homes with communal gardens:



This would be achieved by raising the housing and gardens, allowing car parking below. This would also help mitigate the contamination problem by raising the residential units above ground level.

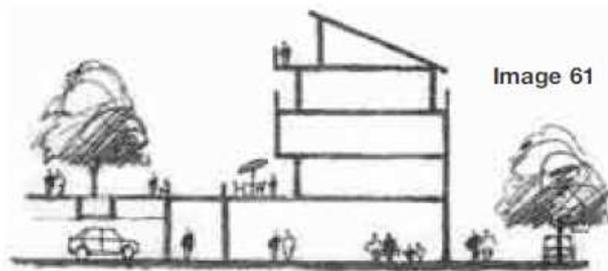


Figure 1: Hypothetical example of ground-level parking under proposed residential accommodation and decked greenspace.

Taken from Essex County Council (Urban Place Supplement, 2005.

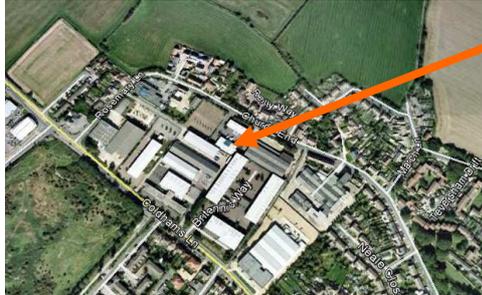
It must be stressed that this outline is not a tested plan: it is however a visual representation of what might be possible for the site. What it does show is that the site has sufficient potential to warrant further examination.

Other grounds for rejection that have been raised include complex ownership and soil contamination. The former could be resolved if the City Council was sufficiently determined and showed real leadership, including the possible use of Compulsory Purchase Orders (CPOs). The

contamination could be contained by sealing the surface which could then provide for surface level car parking, and by raising both the residential units and the communal gardens above ground level. The problem of public transport and traffic congestion along Newmarket Road is appreciated but this will have to be resolved if the Wings development, and eventually Cambridge East, are to proceed irrespective of further development at the retail parks.

CambridgePPF argues that these sites have sufficient potential to warrant a more comprehensive assessment. They could more than meet the housing supply that is currently proposed within the new sites in the Green Belt.

4.2



Site 676: Warehouses at Church End, Cherry Hinton: part of 5.32 ha

The eastern part of the site already has planning permission although this does not seem to have been included in the housing supply figures. The site includes the College Business Park, a Protected Industrial Site, but new housing could be positioned in the northern half of the site without compromising the Business Park.

The SHLAA states that *'on balance, the majority of the site is considered inappropriate for residential development'* without stating why. It is urged that the area outside the Protected Industrial Site that does not currently have planning permission is subject to a more rigorous re-assessment.

4.3



Site 854 Railway Sidings West of Rustat Road: 2.11 ha

The site was rejected as unsuitable for residential use because of the close proximity of the railway. In fact, it appears as though the homes would be no nearer than Site R9, the Travis Perkins yard between Devonshire Road and the railway, or Site R10, the Council's depot off the Mill Road. With good planning and design, this problem can be overcome. The site should be re-considered.

4.4



Site 912: Owlstone Croft, Newnham: 0.96 ha

We appreciate that this is a sensitive area. It was rejected because of the impact on the Conservation Area, the effect on the adjacent Nature Reserve with pedestrian use, and the problems with the multiple-ownership of the access. At the moment, the site comprises a rather unattractive 4-storey block of student housing and associated buildings, which if re-developed with sensitivity, could significantly enhance the Conservation Area.

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CambridgePPF has argued that this site could be re-developed to provide high quality sheltered accommodation that might be attractive to some of the elderly residents of Newnham, whose interest in downsizing is frustrated by the lack of suitable accommodation within walking distance of the facilities offered by Newnham village. This site should be re-considered.

4.5



Site 22: Bishops Court, Trumpington: 1.56 ha

This site was rejected because of the multiplicity of ownership and parking issues. These justifications seem weak. The parking issues could simply be resolved by linking the access to this area with the Glebe Farm development and its access through Addenbrooke’s Road. The Council should show its leadership on the ownership issue and re-investigate this site.

4.6



New Site: Chesterton Bowls Club, Logan’s Way: 0.96 ha

The Chesterton Bowls Club on Logan’s Way includes both an indoor and outdoor bowling green. The Club is keen to move to new premises and has, we understand, been in discussion with the City Council about this. The outdoor green is a Protected Open Space but with no public access, and both East and West Chesterton Wards have a deficiency of designated open space. In addition, the site lies in

the High Risk Flood Zone defined by the Environment Agency. Although these factors at first sight make this site seem unacceptable, there are numerous precedents as to how it could be developed. By raising the residential units above ground level the flood risk can be avoided. By raising the development, cars can be parked beneath. . This hypothetical scenario is illustrated at [Site 481: The Newmarket Road Retail Parks](#), with a figure taken from the Essex County Council, *Urban Place Supplement* (2005). A generic scenario for land use planning response to flood risk is also shown overleaf. The rest of the site could then be landscaped as a Protected Open Space with public access. It is estimated that the site could provide some 250 new homes with no loss of area of POS which would be open to the public rather than restricted access.

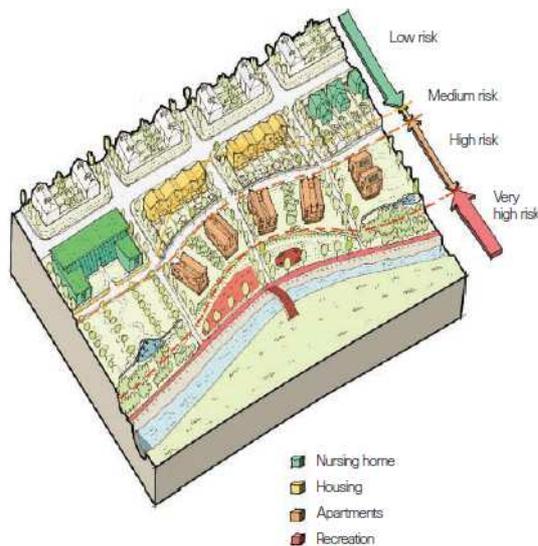
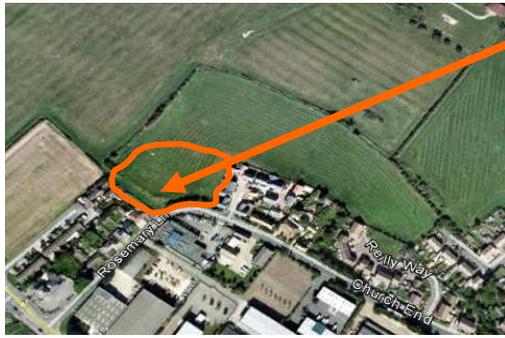


Figure 2: Land Use planning response to flood risk.

Taken from RIBA (2009) Climate Change Toolkit No7 Designing for Flood Risk.

4.7



New Site - to north of bend of Rosemary Lane / Church End: approx 0.75ha

We could not see any previous consideration of this site located outside the Cambridge East's Area Action Plan area and not within retained designated Green Belt to the north. Certainly some allowance should be made to long-term facilitate sustainable access to the proposed airport redevelopment

(and its proposed open space) but sufficient space should remain for sympathetic housing development. Clearly the neighbouring development of Braybrook Place built in the recent decade indicates easy developable land does exist.

5. Conclusion:

It is the contention of this brief analysis that there are possible brownfield sites within the urban area that do warrant further consideration, and that these sites should be thoroughly assessed before any further Green Built land is excised. A more rigorous application of the selection criteria with some real leadership by the Council could mitigate the need for greenfield sites to be developed. If 'easy options' are available on Green Belt land, they will reduce the likelihood of more appropriate but 'difficult' sites in the City being tackled. The outline from the Cambridge Association of Architects shows what might be possible with a little imagination. Until these sites have been thoroughly examined, the 'exceptional circumstances' required by the NPPF cannot be met.

The City Council is urged to re-consider these sites and that plans for the excision of more Green Belt land should be suspended until this exercise has been conducted. Until such time as it can be shown categorically that all brownfield sites have been rigorously examined and excluded for genuine reasons, the 'exceptional circumstances' required for the release of Green Belt will be open to challenge.

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