BIDWELLS

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Greater Cambridge Shared Planning
Greater Cambridge Local Plan
Regulation 19 Consultation

Via Consultation Portal Only

Dear Sir/ Madam

REPRESENTATIONS TO THE GREATER CAMBRIDGE LOCAL PLAN (REG 19)
ON BEHALF OF BYWATER GROUP

Bidwells LLP is instructed by Bywater Group to submit representations to the Draft Greater Cambridge Local Plan (Regulation 19) Consultation.

About Bywater

Founded in London in 2006, Bywater is a formidable partner in residential and commercial property development, with an exemplary team boasting extensive experience, expertise and commitment to a clear sense of purpose. Central to Bywater's mission is addressing the climate emergency with urgency and intensity, investing in innovation and design to deliver exceptional residential and commercial buildings with lasting industry-wide impact. Indeed, the business is shaped by four key drivers: Prosperity, Place, People and Planet. Through this, Bywater is recognised for its purpose-led projects and a commitment to a more sustainable living environment.

In February 2023, Bywater joined the Sumitomo Forestry family of companies across the UK, Europe, Asia, North America, and Oceania. Together, Bywater and Sumitomo Forestry are committed to prioritising the use of timber and achieving the goal of lowering the carbon impact of real estate.

Resultantly, Bywater takes a holistic, long-term view of creating social and environmental as well as financial value. Seeking to drive wider social prosperity, the business aims to make a positive difference to our planet by acting as a catalyst for industry-wide action that helps transform real estate investment into the valued places of the future.

The Greater Cambridge Local Plan

Reflecting the clear alignment with Bywater's interests with the Vision for Greater Cambridge, we support the recognition throughout the draft Plan that Cambridge will see a decrease in climate and environmental impact whilst creating the thriving neighbourhoods with a variety of jobs, homes and supporting infrastructure that the city and its surroundings need. The strategic priorities are clear and should be supported.

Nevertheless, we are concerned that the cumulative and multiplicity of policy requirements, in addition to the aspiration to adopt a Community Infrastructure Levy (CIL) tariff, are likely to create significant viability issues and therefore risk under-delivery in the plan period. In doing so, it puts this Vision at risk and creates a significant and pressing question as to the overall soundness of the Plan.

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Policy H/CO: Co-living

Further, we wish to raise a specific and focussed **objection** with respect to draft Policy H/CO in respect of Co-living.

Limb 1(d) of the draft policy states:

> *Developments will consider and respond to the need for Co-living units, and proposals must be supported by evidence of the need for this form of development in Greater Cambridge. It is expected that developments will be of a moderate scale of between 50 and 200 units, but a higher number of units will be considered where it is clearly demonstrated that:*
>
> *i. There is a need for the proposed number of Co-living units in the proposed location; and*
> *ii. The proposed number of units will not result in a harmful concentration of Co-living units within an area or place undue pressure on local infrastructure.*

Whilst we agree it is appropriate to consider the need, in our opinion, seeking to establish a quantum/ scale of development within the policy itself is unjustified, and fails to respond to market needs.

The emerging Plan itself directs that Co-living should be located in *"sustainable, highly accessible areas"* (Policy H/CO Part 1), and the National Planning Policy Framework 2026 (NPPF) provides that *"Development proposals should make efficient use of land, taking into account the identified need for different types of housing"* (NPPF L1,1) and *"Within settlements, development proposals for residential and mixed-use development should contribute to an increase in the density of the area in which they are situated"* unless there is a clear justification that this would be inappropriate (NPPF L1, 2a).

As such, an unjustified cap should not be placed on the appropriate scale of co-living developments and should be considered on a case-by-case basis. Accordingly, continuing to pursue the cap it risks soundness.

To ensure the most effective use of land, scale of development should be considered on a site-by-site basis in accordance with wider development plan policy and the NPPF. It is therefore submitted that Limb 1(d) should be revised through main modifications as follows:

> *Developments will consider and respond to the need for Co-living units, and proposals must be supported by evidence of the need for this form of development in Greater Cambridge. ~~It is expected that developments will be of a moderate scale of between 50 and 200 units, but a higher number of units will be considered where it is clearly demonstrated that:~~*
>
> *~~i. There is a need for the proposed number of Co-living units in the proposed location; and~~*
> *~~ii. The proposed number of units will not result in a harmful concentration of Co-living units within an area or place undue pressure on local infrastructure.~~*

Examination of the Local Plan

On behalf of Bywater Group, Bidwells wishes to reserve the right to attend the Examination in Public to explain Bywater's rationale on this matter should it be considered helpful in any assessment as to the soundness of the Plan.

Yours faithfully,

Jonathan Bainbridge
Partner, Planning

For and on behalf of Bidwells