Co-Living/Shared Accommodation

Report to Minister Darragh O’Brien

Planning Division
Department of Housing, Local Government and Heritage

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1.0 Introduction

1.1 A new format of rental accommodation has emerged in the private residential development sector in recent years, described under various titles including ‘Co-living’ and ‘Shared-Living’. This residential format comprises professionally managed rental accommodation, where individual rooms are rented within a centrally managed development that includes access to shared or communal facilities and amenities. Unlike most other forms of residential accommodation, co-living is generally intended for occupation for short lease periods of up to a year in duration.

1.2 Planning Standards did not address the co-living format prior to 2018. Sections 5.13-5.24 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018 (the ‘2018 Guidelines’) introduced a policy context for the consideration of ‘Shared Accommodation’ proposals by planning authorities, including An Bord Pleanála. The 2018 Guidelines identify Shared Accommodation as a distinct segment within the overall residential sector but which, due to its specific nature, has a limited, ‘niche’ role to play in the provision of the new residential accommodation needed within Ireland’s cities.

1.3 It continues to be important that the Irish planning system is equipped to appropriately address, new development formats such as co-living. Now more is known about the nature of co-living development proposals that have emerged in an Irish development context, there is scope to review the nature of the proposals and in turn, the 2018 Guidelines.

1.4 At the outset, it is important to clarify that other, more established and long-standing forms of accommodation with a shared or communal element, including hotels, apart-hotels, hostels, student accommodation and house or flat share arrangements, are entirely separate and not generally subject to Sections 5.13-5.24 of the 2018 Guidelines.

1.5 This Report firstly sets the intended purpose of making policy provision for co-living development. It then examines recent planning and development activity related to Shared Accommodation, analysing certain aspects of such development proposals, and the locations where they are emerging since publication of the 2018 Guidelines.

1.6 Finally, in light of the stated intention of the 2018 Guidelines to monitor and update policy guidance in relation to Shared Accommodation, this Report identifies options to give effect to review and makes a number of technical proposals that further clarify the appropriate policy context for the regulation of co-living/shared accommodation development.
2.0 Purpose of Policy Provision

2.1 Reference to the co-living or shared housing format in apartment planning guidance was introduced in response to the recent emergence of this accommodation type. Co-living is understood to be similar to, but a ‘step-up’ from student accommodation, with more and better quality communal facilities and amenities available to residents. Co-living accommodation is also operated by on-site management, which includes events co-ordination, maintenance and other services.

2.2 The cohort of people at whom co-living is targeted, are typically those at a stage of life where they have yet to accumulate significant possessions and a have shorter-term outlook with regard to choice of tenure i.e. they are not seeking to settle-down on a long-term basis. It also suits them not to have to engage with a variety of service providers and utility companies, as co-living occupants make a single monthly payment that covers the cost of accommodation and utilities.

2.3 The intended occupants of co-living developments are more likely to be mobile, in that they are willing to relocate nationally or internationally for personal and/or professional development, but may not have established family, friend or colleague networks in the city or place to which they relocate. Co-living developments therefore include ongoing opportunities for social interaction and meeting other people who are at a similar stage of life. The provision of communal/shared amenities and readily accessible on-site activities are designed to facilitate this.

2.4 This means that in addition to provision of private accommodation in co-living developments, the extent of additional communal facilities and amenities provided, together with the range of associated events and related organisation on an ongoing basis, are critical to the quality of the development. These factors also differentiate co-living from other more traditional forms of living accommodation.

2.5 Examples of purpose-built co-living accommodation that have been developed elsewhere, tend to be centrally or near-centrally located in large cities that are centres of business and creativity. There are established models in existence in the UK, Europe and North America. One of the first co-living development in Ireland or the UK, is a 550 room development at Old Oak, near Willesden Junction in north-west London in 2016, which adapted an un-implemented planning permission for student accommodation.

2.6 The company behind the Old Oak development in London recently opened a second, larger 705 room co-living development, located more centrally in London’s Docklands business district, and applied many of the lessons learned from Old Oak, with regard to how occupants interact with each other and use shared facilities. It is understand that all-in monthly rents range from £1,100 to £1,400 for a basic 16 square metre private room together with access to a wide range of shared facilities. The average age of occupants is reported to be 29-30 years old.
2.7 In order to reflect all of the above, the 2018 Guidelines were explicit in identifying the purpose of ‘Shared Accommodation’ for:-

“a specific renter cohort with specific needs or requirements from their housing provision. In particular, the usefulness of such an accommodation type to the dynamics in the urban employment market”.  

The specified example given was the potential needs of:-

“new employees arriving in urban areas and seeking short term accommodation during an establishment or local acclimatisation period that may be longer than a few weeks.”

Significantly, the 2018 Guidelines also state (pg.32) that:-

“Due to the distinct nature and features of Shared Accommodation type development, it is only appropriate where responding to an identified urban housing need at particular locations. It is not envisaged as an alternative or replacement to the more conventional apartment developments which are provided for elsewhere in these Guidelines”.

Figure 1: Example of Weekly Schedule of Activities for Residents in a Co-Living Development, London
3.0 Planning and Development Activity

Number and Location of Planning Applications

3.1 To date, there have been a total of 14 planning applications for shared accommodation schemes, all located in Dublin, comprising more than 2,100 proposed bedspaces. Of these:

- 5 applications have been granted planning permission (comprising c.740 bedspaces)
- 2 applications have been refused permission/quashed (comprising c.430 bedspaces), and
- 7 applications are presently under consideration (comprising c.930 bedspaces).

3.2 There has been one application to Fingal County Council, one to Dun Laoghaire-Rathdown County Council, one to South Dublin County Council and the remaining eleven were made to Dublin City Council. Five applications were made via the Strategic Housing Development (SHD) process directly to An Bord Pleanála by the developer and nine via the local authority planning process.

Map 1: Co-Living Proposals by Location and Number of Bedspaces
Appendix 1 to this Report provides a spreadsheet with a breakdown of the floor areas proposed as part of each of the above applications, with data provided on:

- the floor area of overall bedspaces;
- the floor area of ‘semi-private amenity’ space (for example kitchen space shared by a limited number of residents);
- the floor area of ‘communal amenity’ space (for example, large lounge areas or cinema rooms shared by all residents of the building) and
- information on the number of bedspaces per residential unit.

The overall level of planning activity, where a total of approximately 1,670 Shared Accommodation bedspaces have either been granted planning permission or are current development proposals, is relatively small-scale in the context of more than 40,000 residential units granted planning permission in 2019 alone, each with many multiple bedspaces (i.e. c.160,000 in total). There have also been 9,750 student bedspace granted planning permission through the Strategic Housing Development (SHD) process since mid-2017.

On the basis of an assumption of an average of four bedspaces per ‘traditional’ dwelling (i.e. 3-4 in a two-bedroom apartment and 5 in a three-bedroom house), the total number of Shared Accommodation bedspaces granted permission to date equates to less than 0.05% of all non-Shared Accommodation bedspaces granted planning permission in Ireland in 2019.

To date, this planning activity has not led to the commencement of construction of any approved Shared Accommodation scheme.

Format and Layout of Planning Applications

The 2018 Apartment Design Guidelines are not narrowly prescriptive on the overall layout of Shared Accommodation developments and allow for various formats of typology. The ‘cluster format’ of 6-8 bedrooms (each without individual cooking/dining facilities) served by a shared kitchen/dining/lounge area (similar to a conventional student accommodation format) is the format explicitly referenced in the 2018 Guidelines (Section 5.15). Minimum floor areas of bedrooms are also specified in the 2018 Guidelines along with the requirement that they are all en-suite in nature.

The 2018 Guidelines state that “shared accommodation formats may be proposed other than the format outlined”, in consideration that the Shared Accommodation format was only emerging at that time of publication. However, from an examination of the schemes that have sought planning permission in the interim, almost all of the Shared Accommodation applications have proposed an alternative to the 6-8 bedspace cluster format referenced in the 2018 Guidelines.

In terms of the layout of the Shared Accommodation schemes proposed to date, two main design themes are apparent:-
• Bedroom layouts, which are self-contained with kitchenette (hob and oven) and small dining space. These are generally proposed as a large number of units (often c.20 but a number of proposals have 40-50), around a separate large communal kitchen/lounge area;

or,

• Larger clusters of rooms (up to 20, but without self-contained cooking facilities), sharing a communal kitchen/dining area.

3.10 Of the schemes that have proposed smaller ‘clusters’, there are different approaches:

• Small cluster - 3-4 bedspaces per unit, each cluster with its own kitchen/lounge;

• A combination of a clustered grouping (6 bedrooms) with much larger (20+ bedroom) groupings sharing a communal kitchen/dining area;

• Only one application of the fourteen, proposed a standard cluster of 6 to 10 bedrooms per shared kitchen/lounge, as suggested in the 2018 Guidelines.
4.0 Analysis of Shared Accommodation Proposals to Date

Minimum Amount of Space per Person

4.1 One of the principal concerns arising with regard to co-living is the extent of private space available to individual residents, whereby shared accommodation proposals are perceived to constitute a ‘lesser’ form of accommodation than a standard apartment or house, akin to a modern bedsit. This concern must be assessed in relation to the extent of shared amenities/facilities required to be incorporated into Shared Accommodation proposals.

4.2 As a benchmark, the 2018 Guidelines include a minimum space standard per person for standard apartments, that includes all internal bedroom, bathroom, kitchen/living space and storage floor areas, as well as private and external communal amenity space requirements associated with each apartment unit type. It is also a requirement of the 2018 Guidelines that more than half of all proposed apartments must be at least 10% larger than minimum standard, which subject to unit mix, generally equates to a further 5% overall total floor area.

4.3 When fully occupied, this ranges from a minimum of 21.75 to 27.5 square metres per person on average, depending on the number of bedrooms in the apartment. Accounting for a further 5% apartment floor area, this increases to 22.7 to 28.6 square metres per person. Circulation areas such as stairwells and corridors etc. are excluded.

4.4 For example, a 2-bedroom, 4-person bedroom apartment must be at least 73 square metres in area, generate approximately 5% additional floor area in the development, (+3.65sq.m.), also have an additional 7sq.m. of private amenity space and a contribute to a further 7sq.m. of communal amenity space within the development, i.e. 90.65 square metres in total. Fully occupied and divided between four people, this equates to 22.7 sq.m. per person.

4.5 The Shared Accommodation section of the 2018 Guidelines document requires between 16 and 18 square metres private bedroom space per person for co-living development, together with additional communal support facilities and amenities, but with no specified floor area for the latter. From examination of all proposed co-living developments to date, all well as shared kitchens and lounges, facilities and amenities typically include workrooms, libraries, cinema/screening rooms, laundries and gyms. It is noted that existing co-living developments in the UK provide between a minimum of 10 and 16 square metres of private accommodation per unit, together with additional space as a range of shared facilities and amenities.

4.6 Bedroom sizes in all proposed co-living developments in Ireland to date range from 14-47 square metres, but are more typically proposed in the 16-30 square metre range (similar to hotel bedrooms). It is noted that those that have been granted planning permission range from 14-25 square metres. This compares with minimum bedroom sizes of 11.4 - 13 square metres for a double, and 7.1 square metres for a single, in apartments generally, noting that these figures do not include en-suite bathrooms, whereas all co-living proposals must.
In addition to private bedroom space, the average amount of floorspace per person in all proposed co-living developments to date ranges from 20-39 square metres, excluding circulation areas, stairwells and corridors. Those developments that have been granted planning permission range from 22-35 square metres on average per person and those that have been refused/quashed, proposed an average of 20-21 square metres per person.

The average floor area per person of all co-living schemes permitted to date combined, is 27.1 square metres. This exceeds the minimum average required in a conventional apartment development comprising two-bedroom units as per the example in 4.4 above, by around 20%. It is around 6% lower than the minimum floor area required for a one-bedroom apartment occupied by two people, i.e. 45sq.m. apartment +5% (+2.25sq.m). +5sq.m. private amenity +5sq.m. communal amenity space, divided by two, which is 28.6 square metres, however.

Accordingly, to ensure equivalence between co-living development and standard apartment development in terms of minimum average floorspace per person, a minimum floor area requirement per person should be specified for Shared Accommodation in updated planning guidance. There is currently no specified minimum, but it would be reasonable that the minimum requirement per person would be no less than that in any standard apartment.

This would require the minimum floor area per person for Shared Accommodation to be 28.6 square metres per bedspace (to be rounded up or down), which would include private space together with shared support services and amenities, but exclude corridors and general circulation space. This would mean that the 2018 Guidelines would specify the minimum amount of space required per person for the provision of communal facilities and amenities. However, the quality of proposed communal facilities and amenities would also remain a critical consideration for the assessment of development proposals.

Kitchen and Dining Arrangements

Areas of further concern in respect of proposed co-living developments include the number of individual bedrooms sharing communal cooking/dining facilities, which range from 4-46 in proposed developments to date. A directly related issue is the extent to which proposed bedrooms are designed to be self-contained, but without meeting the required standard of 37 square metres for a self-contained studio unit, thereby simultaneously undermining apartment space standards and the shared/communal nature of co-living development as provided for in the 2018 Guidelines.

The number of bedrooms sharing a large communal kitchen/dining area in co-living developments granted planning permission to date ranges from 4-42. All but one of those granted do not exceed 20 bedrooms per shared kitchen, however. A significant number include some element of basic kitchen/dining space within the unit, which is reasonable given the nature of the accommodation type, but this should be provided for occasional use in addition to and not as an alternative to the provision of shared kitchen and dining facilities.
4.13 This means that co-living bedrooms should not be designed or let as fully self-contained units, unless they can comply with apartment guidelines for studio and/or one-bedroom units as appropriate. They may include some basic kitchen/dining element for occasional use, but not in lieu of specified requirements for kitchen/dining space external to the bedroom.

4.14 Further to this, the 2018 Guidelines envisaged at least six square metres of shared kitchen/lounge space per person in addition to private bedroom space and other communal amenities. However, this specifically relates to the six-eight person ‘cluster’ format described in the 2018 Guidance as an example of one co-living development type, and it is apparent that it is not being met in development formats proposed in Ireland to date.

4.15 Instead, the six square metre requirement is replaced in part, by space in bedrooms for cooking/dining purposes and in part by other communal amenities, which were intended to be separately provided, as an additional element. Requiring the inclusion of a greater minimum floor area per bedspace as specified above, will facilitate the kitchen/dining requirement to be met in full as shared kitchen/dining provision, external to the individual bedroom.

4.16 Accordingly, as part of a minimum floor area per person requirement, at least six square metres of kitchen/dining space external to the individual bedroom, should be explicitly specified in planning guidance for Shared Accommodation for all co-living formats. Furthermore, it should be specified that this may not include any such occasional provision made within bedrooms, any other communal facilities and amenities, or any circulation space (corridors, stairwells etc.)

4.17 While such a floor area requirement for kitchen/dining space will render the number of bedrooms sharing communal kitchen and dining areas a less critical consideration, as the size of the kitchen/dining area must increase in proportion with the number of bedspaces, it is considered that the maximum number of bedrooms sharing a kitchen/dining space should be limited to 20-25, with flexibility up to this range allowable subject to building design.

Location of Proposed Co-Living Development

4.18 The 2018 Guidelines make specific reference to ‘city centres’ as the appropriate location for Shared Accommodation development:- Section 5.19

“In assessing proposals for Shared Accommodation, the planning authority shall therefore have regard to the need for such a type of accommodation in an area with reference to the need to cater for particular employee accommodation needs. The prevailing context of the proposed site shall also be considered, with city centres being the appropriate location for such developments”.
Map 1 above illustrates that nine out of fourteen Shared Accommodation proposals to date are located outside Dublin City Centre. While the 2018 Guidelines do not explicitly preclude co-living development outside city centres, in drafting the guidance, it was intended that such developments would be located proximate to higher density employment locations, in support of the particular need for the Shared Accommodation format.

Given references in the 2018 Guidelines to the synergy between Shared Accommodation and high intensity employment locations, further policy guidance that relates proposals for co-living development to proximity to areas of greatest employment density, merits consideration. Central Statistics Office (CSO) ‘Workplace Zones’, which are based on 2016 census data on employment location, effectively define areas of the city with greater than 500 jobs per hectare. This figure corresponds to the areas of highest ‘job density’.

Maps 2 and 3 below show the ‘workplace zones’ with greater than 500 jobs per hectare in Dublin. Only a small number of locations outside the city centre have this level of job density, for example, parts of the Sandyford Business District, the Ballsbridge area, the Eastpoint Business Park and the Mater Hospital.

Map 2: High Intensity Employment Locations/Clusters in Dublin, as defined by the CSO
4.22 While planning guidance is not generally location-specific, as this is the purpose of development plans at planning authority level, it is possible to specify overall parameters for consideration with regard to the location of co-living developments. In particular, there is scope for the 2018 Guidelines to be more explicit with regard to location type, for example in relation to high-intensity employment zones.

4.23 Accordingly, given the nature of co-living development in an Irish city context and also the current concept of the ‘15 minute city’ (i.e. to access most daily needs within 15 minutes on foot from home), it is considered reasonable that proposals for co-living development would be located within 15 minutes walk (i.e. 1km radius), or, a maximum 15 minutes morning peak hour public transport journey (which would also support some locations on Luas, rail/DART or high quality QBC corridors), of a high density employment cluster. Such a ‘cluster’ would comprise at least two defined CSO ‘workplace zones’ with more than 500 employees per hectare in close proximity i.e. within a maximum 400m (five-minutes walk) of each other.

Map 3: High Intensity Employment Locations/Clusters in Dublin City Centre, as defined by the CSO

4.24 It would also be appropriate to make provision for a limited number of exceptions, such as co-living development associated with a major hospital or medical campus or for proposals that would constitute a viable use of a Protected Structure. Historic buildings can frequently be subject to layout and structural constraints that render them unsuitable to accommodate standard apartment layouts, but may be suited to a more flexible shared accommodation development format.
5.0 Options to give effect to Review

5.1 The 2018 Guidelines for apartment development were issued as Ministerial Guidance under Section 28 of the Planning and Development Act 2000, to which planning authorities and An Bord Pleanála must have regard. Under Section 28, it is open to the Minister to amend or revoke guidelines issued under that Section.

5.2 It is of importance that given the recent introduction of commercial co-living development, the final paragraph (5.24) of the 2018 Apartment Guidelines states:-

“Given the relatively new nature of this form of accommodation, the Department will monitor the emerging shared accommodation sector and may issue further additional technical updates to this document as appropriate...”

5.3 As highlighted in previous sections of this Report, while there have not been any purpose-built large-scale commercial co-living developments completed in Ireland to date, more is now known about this form of accommodation and the design formats being proposed by applicants and operators in an Irish development context.

Option 1

5.4 Option 1 is therefore to issue a technical update to the 2018 Guidelines, as provided for by paragraph 5.24 of that document, which would amend the relevant section of the 2018 Guidelines. This would be in the form of a Circular with reference to paragraph 5.24, accompanied by a re-issued amended apartment guidelines document under Section 28, with amendments relating to the Co-living/Shared Accommodation section of the document only. Proposed technical amendments are summarised in Section 6.0 below.

Option 2

5.5 Option 2 is a variation of Option 1, which would enable the co-living format to be addressed separately from apartment development generally. It would be to remove reference to Co-Living/Shared Accommodation from the 2018 Guidelines, re-issue the 2018 Guidelines accordingly, and to issue a new Section 28 Guidelines document that addresses the Co-Living/Shared Accommodation format only. This would facilitate future review of this emerging format, should it be considered necessary, without impacting apartment guidance more generally. As with Option 1 above, proposed technical amendments are summarised in Section 6.0 below.
**Option 3**

5.6 Option 3 is to remove reference to co-living from the 2018 Guidelines altogether and to not issue any separate Co-Living/Shared Accommodation guidance document. It would remain open to anyone to make a planning application for this form of development and any such proposals would be addressed by planning authorities and An Bord Pleanála on a case-by-case basis in the absence of guidance. Immediately available points of reference would include precedent planning permissions already granted in Ireland and existing developments or standards from other jurisdictions.

5.7 Option 3 would ultimately enable Planning Authorities to address the co-living format in City/County Development Plans. This could include prohibiting or restricting the use, in the absence of national guidance. As it would be possible for approaches to co-living at local authority level to vary, this could give rise to some uncertainty. In addition, irrespective of City or County Development Plan policy, it would remain open to An Bord Pleanála to contravene any City or County Development Plan and grant planning permission, subject to Section 37(2) of the Planning and Development Act 2000 (as amended).

**Option 4**

5.8 Option 4 is to amend the 2018 Guidelines to seek to restrict all future commercial co-living development in Ireland. This would require an updated guidance document that includes a Specific Planning Policy Requirement (SPPR) and/or guidance in respect of local authority level City or County Development Plan processes.

5.9 It is noted that Ministerial Planning Guidance has not previously been used to ban or preclude a specific class of development. For example, bedsits were effectively prohibited as a result of legislation that regulated rental accommodation standards in relation to public health. Similarly, primary planning legislation has not been used to ban a class of development, with the exception of Section 37K, which precludes current planning legislation from enabling the authorisation of nuclear fission power generation in Ireland, which is illustrative of the national scale and significance of potential development that would merit specific prohibition.

**Conclusion: Options**

5.10 While it is within the Minister’s powers to change any aspect of planning policy guidance under Section 28 of the Planning and Development Act 2000 (as amended), this is subject to limitation under Section 30 of the same Act. Section 30 states that “Notwithstanding section 28 or 29”…“the Minister shall not exercise any power or control in relation to any particular case with which a planning authority or the Board may be concerned”.

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This means that while the potential actions set out in the options above would clearly influence future planning assessment, there are currently seven planning applications for co-living development in the planning system that have yet to be determined, four of which are at An Bord Pleanála stage and in respect of which decisions are overdue and/or imminent. The other three ‘live’ planning applications at an earlier stage of the assessment process at local authority level.

It is apparent that subject to the decision of An Bord Pleanála and/or the planning authority in each case, this could increase the number of co-living developments with a valid planning permission from five to a maximum of twelve and the number of permitted co-living bedspaces from 739 a maximum of 1,671, in advance of any change to the 2018 Guidance.

While recent planning activity must be taken into consideration, it is the case that all permitted or proposed developments are located in Dublin, those permitted comprise less than 0.05% of all bedspaces permitted in Ireland in 2019, and none has commenced on site to date.

It remains a public policy objective that the Irish planning system, in responding to a form of development intended to meet a particular lifestyle choice as described in Section 2.0 above, would appropriately regulate a recognised international development format, given the nature of the economy and urban employment concentrations in Dublin and other large cities.

Evidence from successfully operating co-living developments indicates that if communal facilities and amenities are provided to a high standard in addition to a sufficient level of private space, and there is ongoing management and operation to a similarly high standard, there is scope for commercial co-living on a limited, niche basis.

While concern has been expressed that co-living developments may be subject to more general residential use in the future, it is apparent that the nature, scale and extent of co-living proposals in Ireland to date, generally share characteristics with hotel development, although some of the more peripheral locations proposed would not appear immediately viable from a hotel development perspective.

It would therefore appear that if there were to be some future change from co-living use, hotel use would be a more likely alternative than another form of residential accommodation. Hotel development would require a change of use permission in any event, but to ensure that future change of use is regulated, any automatic right to change of use from co-living to any other form of residential development should be de-exempted by planning condition, with such conditions were imposed when planning permission is granted for co-living development.
6.0 Proposed Technical Amendments

6.1 It is proposed that technical amendments to the current references to Co-Living/Shared Accommodation in the 2018 Guidelines be made, to further safeguard standards and regulate co-living development proposals. These relate to:-

1) Increasing the minimum amount of living space per person in comparison other forms of residential accommodation;

2) More explicitly specifying the provision of adequate kitchen/dining facilities;

3) Clarifying appropriate locations for Co-Living developments based on 15-minute accessibility to high density employment clusters; and

4) ‘De-exempting’ any change of use from co-living to any other residential use by planning condition when co-living development is granted planning permission.

6.2 These technical proposals are to ensure that Shared Accommodation developments do not constitute a sub-standard alternative to the provision of permanent apartment development that are essential to achieving high quality urban neighbourhoods and communities. Accordingly, the following amendments to the 2018 Guidelines are proposed:

Proposed Amendment 1: Increase Floor Area Standards

6.3 To ensure that there is an equivalence in standards of private, communal and amenity floorspace between Shared Accommodation and conventional apartments under the 2018 Guidelines, it is proposed that the minimum floor area per person/bedspace for Shared Accommodation be set at not less than 29 square metres. This would apply to a combination of private space (the bedroom) together with shared support services and amenities, but would exclude corridors and general circulation space etc.

Proposed Amendment 2: Reinforce Communal Kitchen/Dining Requirements

6.4 To clarify that there would be at least six square metres of communal kitchen/dining space per person external to the individual bedroom, for all co-living formats. It should also be specified that this may not be included as part of any such occasional provision within bedrooms, or within the floor area of any other communal facilities and amenities, or any circulation space (corridors, stairwells etc.). In addition, the maximum number of bedrooms sharing a kitchen/dining space should be limited to 20-25, with flexibility up to this range allowable subject to building design. Furthermore, no bedrooms should be designed or let as wholly self-contained units unless they meet the minimum apartment floor area standard of at least 37 square metres for a studio unit or 45 square metres for a one-bedroom apartment.
Amendment 3: Further Clarify Appropriate Locations

6.5 Co-living development should generally be located within 15 minutes walk (i.e. a 1km radius), or, a maximum 15 minutes morning peak hour public transport accessibility of a high density employment cluster. Such a ‘cluster’ comprises at least two defined CSO ‘workplace zones’ with more than 500 employees per hectare in close proximity i.e. within a maximum of 400m (five-minutes walk) of each other. Exceptions to this requirement would be restricted subject to assessment on a case-by-case basis to:

(i) Protected Structures, in order to ensure their long term rehabilitation and to address sensitive architectural constraints of the subject building;
(ii) Major national level hospitals and health campuses, with any co-living proposal would require to be contractually sponsored/endorsed by the medical institution concerned.

Amendment 4: De-Exempt Change of Use to Other Residential by Planning Condition

6.6 It is proposed that Guidance would specify that planning authorities restrict any change of use from a permitted co-living development to any other form of residential development, with the possible exception of student accommodation, without first having to seek planning permission.