

Informal Planning Guidance

Large-Scale Shared Living Accommodation (Co-living): Report of Consultation



June 2026

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1.0 Introduction and Purpose of the Report of Consultation

- 1.1 This document provides a Report of Consultation for an Informal Planning Guidance (IPG) on Large-Scale Shared Living Accommodation (co-living). Adopted IPGs function as material planning consideration for planning purposes. While not carrying the formal statutory status as documents such as local plan policies, they provide a reasoned explanation for how we interpret and apply existing adopted local planning policy for the topic in question.
- 1.2 This IPG provides guidance on Nottingham City Council's approach in addressing the emerging trend of large-scale shared living accommodation (co-living) development. This type of development is not yet fully addressed by national policy or the adopted Nottingham City Local Plan, hence the need for this guidance document, especially given the growing interest and enquires received regarding this form of development.
- 1.3 This Report of Consultation (RofC) provides a transparent record of the engagement process undertaken during the development of the revised IPG. Although not statutorily required to be produced, it summarises the comments received during the consultation period and sets out the City Council's responses, including any recommended changes to the IPG where necessary.
- 1.4 While it does not attempt to capture every point made nor address issues outside the scope of the consultation it explains the main changes made in response to consultation feedback and, where no changes have been made, the reasons for this.
- 1.5 By consulting on and formally adopting this IPG, the Council strengthens the weight that may be afforded to it in planning decision-making. This enhanced status arises from the greater procedural robustness associated with public consultation and formal adoption, consistent with case law indicating that the weight of non-statutory planning documents depends on their stage of preparation and the level of scrutiny they have undergone. The consultation process has provided an opportunity for public debate and response, while adoption signals that the approach has been tested, refined, and endorsed through an accountable decision-making process.

2.0 Consultation undertaken

- 2.1 Consultation was undertaken in line with the City Council's [Statement of Community Involvement](#) (SCI) widely and proportionately, reflecting the strategic importance of large-scale shared living (co-living) and the level of interest in this emerging form of development. The Council sought to engage with a broad range of stakeholders, including residents, statutory bodies, professional interests, institutional stakeholders, known national co-living

providers and elected members, to ensure that the guidance was informed by a wide spectrum of perspectives.

2.2 In particular, consultation was undertaken with the following groups:

- **Residents and members of the public**, through open public consultation promoted via the Council's website, Local Plan consultation database, Engage Nottingham Hub and deposit locations (Loxley House and Central Library).
- **Developers, agents, architects and operators**, including contacts drawn from the Council's planning consultation databases, recent major planning applications, Strategic Housing Land Availability Assessments (SHLAA) and Call for Sites submissions.
- **Approximately 40 national co-living providers** were directly emailed and invited to participate in the consultation, to ensure that the guidance was informed by current market practice, operational models and experience from across the sector.
- **Purpose-Built Student Accommodation (PBSA) providers** in Nottingham, recognising the relationship and potential overlap between PBSA and co-living typologies and the potential for conversion.
- **Universities and student representative bodies**, including Nottingham Trent University, the University of Nottingham and the Students' Unions, reflecting the relevance of shared living models to graduate and early-career residents.
- **Statutory consultees**, including the Highways Authority, Environment Agency and Historic England.
- **Local businesses and interest groups**, including members of the Council's landlord and letting agent forum.
- **City councillors**, with all elected members notified directly by email.

2.3 This comprehensive approach has ensured that feedback was received from a wide range of perspectives, including those directly affected by potential co-living development as well as those involved in delivering, managing and regulating such schemes. The breadth of consultation has helped to test the draft guidance thoroughly and has informed refinements that strengthen the robustness of the adopted guidance as a material planning consideration.

3.0 Details of the consultation

- 3.1 The IPG was available to view and download from the City Council's web site alongside an online response form. Copies of the IPG were also available at both Loxley House and Central Library. Emails and letters were sent to interested parties as set out in section two, including known developers in Nottingham and approximately 40 national co-living developers. The consultation was also advertised on the Nottingham City's [Engage Nottingham Hub](#).
- 3.2 Comments on the draft IPG were invited from 12 March and Friday 17 April, with an extension on the original 4-week period being made on the original closing date (9 April). This extension was to accommodate the Easter break.
- 3.3 Consultation was undertaken using a survey approach, where specific input was asked on different aspects of the document, with some questions being asked as Likert scale questions (e.g. where the answers range from strongly agree to strongly disagree) and then followed by open text questions where respondents could explain their views.
- 3.4 Some professional respondents instead sent comments by email. These comments were incorporated into the framework set out through the survey questions. For some crosscutting issues (e.g. PBSA conversion) from both email responses and survey answers, these have been grouped and responded to as unique issues in Table 1.

4.0 Representations

- 4.1 Forty-seven representations were received, broken into:
 - 25 respondents were residents,
 - 15 professional respondents from developers, architects, and student accommodation providers,
 - 3 statutory respondents (Highways Authority, Environment Agency and Historic England),
 - 3 respondents from the Universities, with a response from Nottingham Trent University, University of Nottingham, and one joint submission from both student unions,
 - 1 City Councillor.
- 4.2 The consultation revealed strongly polarised views on the appropriateness of large-scale shared living (co-living) as a housing typology. While some respondents supported the model in principle, others objected fundamentally, particularly where it involves residents living in private living space below Nationally Described Space Standards (NDSS).

- 4.3 Many resident respondents opposed below-NDSS private units, frequently arguing that a minimum private floorspace of around 30 m² would provide a more appropriate standard, especially for longer-term occupation to allow for suitable space to live comfortable including sufficient storage facilities. A common concern was that reduced private space could not be adequately offset by communal provision, raising fears of high-density, “bedsit-style” accommodation.
- 4.4 In contrast, several professional respondents supported more compact private rooms where combined with high-quality, well-managed communal spaces, citing wider sector practice and guidance elsewhere. These respondents argued that functional rooms in the range of approximately 18–21 m² can be acceptable within a co-living model and cautioned that larger mandatory room sizes could undermine viability and affordability, particularly on constrained city-centre sites.
- 4.5 There was much stronger alignment on location, with broad support for concentrating co-living developments in highly accessible areas, such as the city centre or major public transport corridors. Respondents linked such locations to reduced car reliance, access to employment and services, and suitability for the intended occupier groups.
- 4.6 Respondents consistently emphasised the importance of communal space as a defining feature of co-living. There was strong support for providing a variety of communal spaces, though views differed on whether these should be well distributed throughout the development or more clustered (such as at ground floor). Across responses, the quality, usability and management of communal spaces were considered more important than quantity alone.
- 4.7 Views on the overall balance between private and communal space were mixed. Supporters saw this balance as supporting affordability and social interaction, while opponents stressed that private space remains central to residents’ wellbeing and should not be compromised.
- 4.8 Affordability emerged as a key cross-cutting concern. Support for flexibility in space standards was often conditional on this approach delivering genuinely lower or more inclusive rents, with caution expressed about the risk of co-living developing into a higher-priced or “luxury” product.
- 4.9 Management quality was repeatedly identified as critical to the success of co-living schemes. Respondents highlighted the importance of clear and robust arrangements for addressing anti-social behaviour, cleanliness, security, safeguarding and day-to-day operational accountability.

- 4.10 Concerns were also raised about safety and wellbeing in high-density shared environments, including safeguarding, noise and conflict including anti-social behaviour between residents, and fire safety and evacuation arrangements.
- 4.11 The relationship between co-living and Purpose-Built Student Accommodation (PBSA) was a recurring theme. Respondents stressed the need for clear differentiation between tenures, raising concerns about functional drift, impacts on student housing supply and potential conflict in mixed or converted schemes.
- 4.12 Many respondents supported prioritising the reuse or conversion of under-utilised PBSA or existing buildings, where appropriate, rather than delivering new large-scale developments, provided conversions involve genuine reconfiguration and suitable management.
- 4.13 Additional concerns related to accessibility, inclusivity and long-term adaptability, including the provision of wheelchair-accessible units, adequate storage, quiet spaces and the ability for buildings to adapt over time to changing housing needs.
- 4.14 Statutory and organisational responses were limited but broadly supportive. National Highways supported the focus on highly accessible locations, the Environment Agency provided no formal comments, a City Councillor considered the approach reasonable, and Historic England recommended stronger consideration of the historic environment where relevant.
- 4.15 A summary of responses per questions asked in the survey is provided in Table 1, with responses on each specific aspects set out.

5.0 Response and changes

- 5.1 This section provides some important clarification regarding or responses to the largest issues, summarising the detailed responses in Table 1.
- 5.2 Firstly, on the status of the document – some respondents challenged the ability of Council's to develop any form of space standards beyond the scope of the local plan. It is important to stress that the IPG does not seek to impose additional space standards beyond the local plan or create any new policy. What it does is set out the circumstances in which a departure from the local plan standards may be justified (in particular regarding NDSS compliance). Or, in instances where the NDSS is not applicable, to provide a starting point on defining what adequate internal living space is likely to require in the case of co-living developments.
- 5.3 Secondly, certain changes are, however, being made in response to issues raised in this consultation, namely:

- As some respondents highlighted, the rationale for the 25 m² supported by 4 m² communal space per bedspace standard was not fully set out in the draft document. A new Appendix A has been drafted to fully explain this.
- A tiered approach to shared amenity space per bedspace is now included. This results in a lower level of internal amenity provision for larger schemes, reflecting the more concentrated and efficient use of shared internal spaces in such developments.
- The position on unit mix has been softened, with the wording that could be read as opposing 100% studio schemes being revised to encourage diversity of layouts and unit types without seeming to impose a requirement to this effect.
- The requirement that a needs assessment should be submitted with all co-living schemes has been removed in light of consultation and expected changes emanating from the new NPPF. However, it is still encouraged that developers do provide commentary on this within appropriate supporting documents, such as the Design and Access Statement and/or Planning Statement.
- Various wording changes throughout the document to improve readability, ensure legal compliance, and to confirm that this is guidance and the document is not introducing new policies.

5.4 Thirdly, in relation to minimum unit sizes, the guidance retains twenty-five sqm as the starting point for sole-occupancy studio units. This issue generated strongly polarised responses through consultation, with residents generally considering this size insufficient, whereas most developers and operators arguing that it is overly restrictive. Having reviewed the evidence, as set out in newly drafted Annexure A in the IPG, the Council's judgement is that 25 sqm represents the minimum size at which essential domestic functions—sleeping, cooking, washing, storage, and circulation—can be accommodated within a single private unit to an acceptable standard (with the correct design, fittings and furnishings). This assessment reflects both spatial functionality and long-term liveability, recognising that communal amenity can enhance overall residential quality but should not be relied upon as a substitute for adequate internal space within individual units.

Table 1: Summary of Comments Received, Officer Responses and Changes to the IPG

Agreement with NDSS standards											
<p>Summary of comments</p>	<div style="text-align: center;"> <table border="1" style="margin: 0 auto;"> <caption>Data for Bar Chart: Agreement with NDSS standards</caption> <thead> <tr> <th>Agreement Level</th> <th>Number of Responses</th> </tr> </thead> <tbody> <tr> <td>Strongly Agree</td> <td>11</td> </tr> <tr> <td>Agree</td> <td>12</td> </tr> <tr> <td>Disagree</td> <td>7</td> </tr> <tr> <td>Strongly disagree</td> <td>12</td> </tr> </tbody> </table> </div> <p>Number of responses = 42</p> <p><i>Question: The draft co-living guidance would allow private unit sizes below Nationally Described Space Standards (NDSS) minimum sizes where sufficient, high-quality shared communal spaces are provided but that minimum rooms sizes are still provided. Applicants would need to demonstrate an acceptable standard of accommodation in line with existing local plan policies. To what extent do you agree or disagree with this approach?</i></p> <p>There was a wide range of views, with a sizeable block disagreeing/strongly disagreeing that sub-NDSS rooms are acceptable, and a smaller but clear block agreeing/strongly agreeing where communal provision is genuinely high-quality and well-managed.</p> <p>Explanatory themes:</p> <ul style="list-style-type: none"> • Against: Many residents argued 25 m² feels too small and that communal areas cannot compensate for a lack of private space or privacy, calling this “bedsit-style” living. Several urged raising the minimum to ~30 m² for dignity and day-to-day functionality. • For: Architects/developers noted that compact, functional rooms can work if paired with meaningful, managed communal facilities, pointing to sector practice with room sizes around 18–21 m² and arguing that larger minimums could undermine affordability. The policies used in London were cited, and some respondents cited example schemes, drawing again from schemes in London. • Cross-cutting concerns included management, cleanliness, safeguarding in shared kitchens, and distinguishing co-living from PBSA/HMO models. 	Agreement Level	Number of Responses	Strongly Agree	11	Agree	12	Disagree	7	Strongly disagree	12
Agreement Level	Number of Responses										
Strongly Agree	11										
Agree	12										
Disagree	7										
Strongly disagree	12										

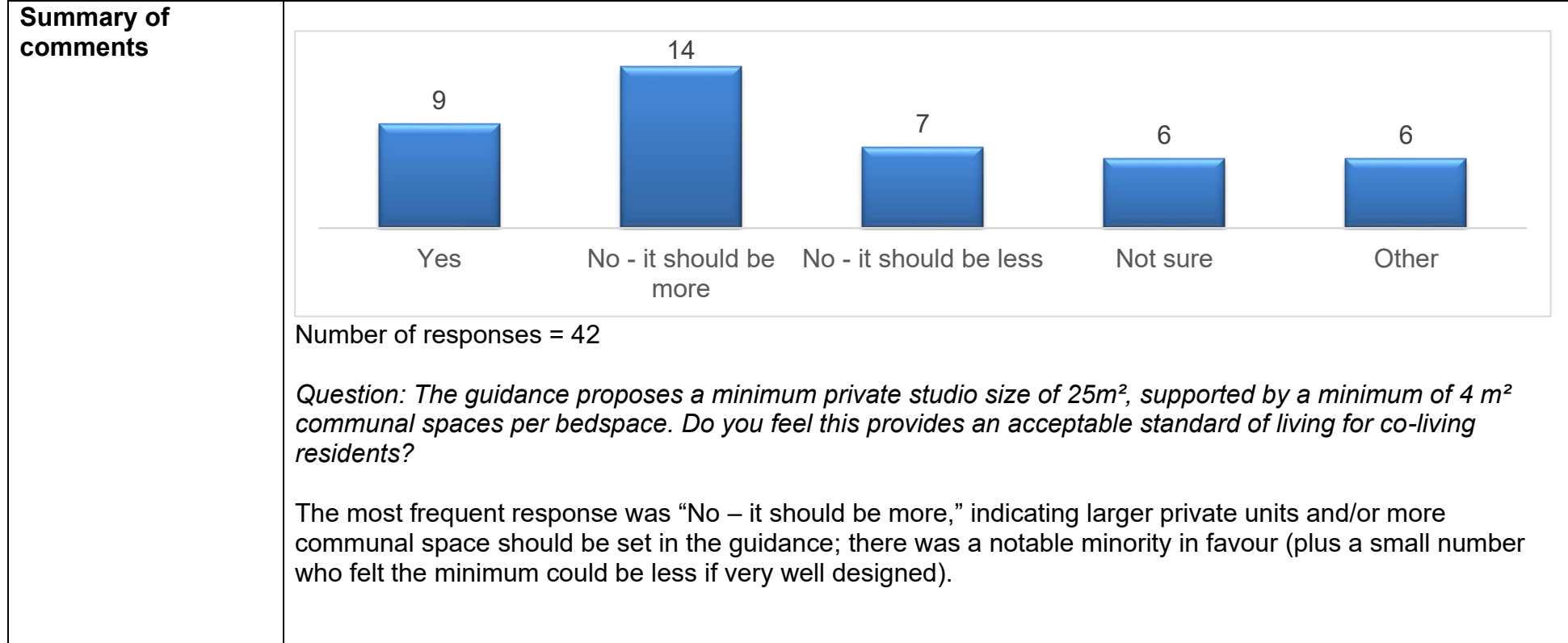
City Council response

Concerns regarding private space standards and the importance of wellbeing, privacy and dignity are noted. However, the IPG recognises that NDSS (designed for self-contained dwellings) is not always the most appropriate benchmark for co-living studios, which rely on high-quality communal provision. The guidance therefore sets out the circumstances in which a justified departure from NDSS may be acceptable.

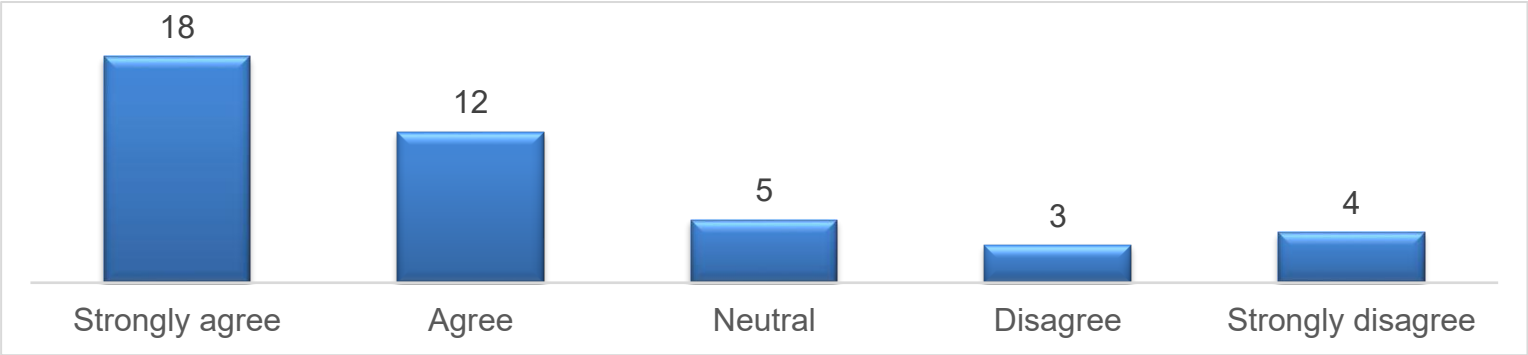
The evidence base in the IPG has been strengthened (including new Appendix A) drawing specifically on non-London precedent, appeal decisions, and research. The guidance sets benchmarks rather than rigid requirements, with flexibility for high-quality schemes.

- Changes to the document**
- Clarification throughout the IPG that it provides guidance only and does not create new policy.
 - Expanded explanation of the Council’s position on NDSS and when departures may be justified.
 - New Appendix A setting out the evidence base for the guidance.

Minimum private studio size of 25 m² supported by 4 m² communal space per bedspace—acceptable?



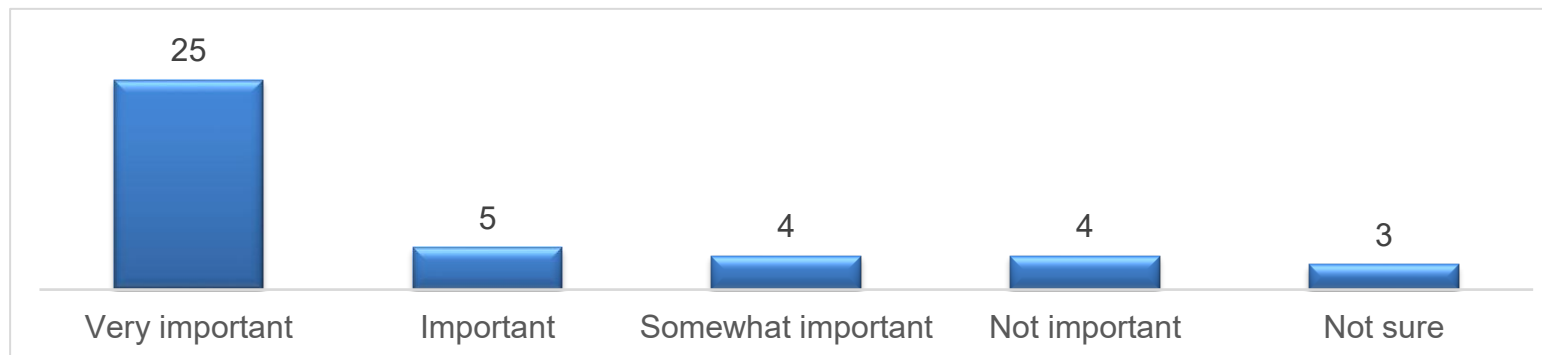
	<p>Explanatory themes:</p> <ul style="list-style-type: none"> • For: Many residents advocated ~30 m² (or more) as a more appropriate baseline for longer-term occupation, citing privacy, storage, and the ability to host visitors. • Against: In contrast, several professionals cautioned that 25 m²+4 m² may push rents up, and some suggested smaller but highly functional rooms can be acceptable, provided the communal offer is genuinely usable (co-working, kitchens, lounges, outdoor space) rather than “tick-box” areas. • Accessibility and inclusivity were raised—e.g., wheelchair-user needs may not be met in very small studios; some asked for higher storage standards and quiet spaces.
<p>City Council response</p>	<p>The Council has carefully considered the feedback calling for larger private studios and the counterarguments regarding viability, affordability and sector practice. The 25 m² private studio + communal amenity guidance is retained as a benchmark, supported by a new Appendix that explains the rationale. However, a tiered approach to communal amenity provision has been introduced to improve proportionality for larger schemes.</p>
<p>Changes to the document</p>	<ul style="list-style-type: none"> • Introduction of a tiered internal communal amenity benchmark: 4 m² per bedspace for smaller schemes (c.150 bedspaces), reducing to 3.5 m² for medium schemes (c.150–300 bedspaces) and 3 m² for larger schemes (over c.300 bedspaces), subject to quality, variety, distribution and management. • New Appendix A provides the evidential and analytical justification for the guidance, demonstrating that the Council’s approach to co-living space guidance is reasoned, proportionate and grounded in planning judgement. • Greater emphasis on minimum (rather than average) guidance and the need for high-quality, usable communal spaces.
<p>Other: NDSS / minimum room size sections</p>	
	<p>Other points raised on NDSS and minimum room sizes:</p> <ul style="list-style-type: none"> • Several professional respondents stressed that numerical standards should operate as benchmarks, not fixed requirements, with flexibility justified by overall quality, viability, and site context (reported in multiple email/PDF submissions). • Some respondents cited appeal decisions and adopted guidance elsewhere (e.g. London Plan, Watford, Chelmsford) as evidence that smaller rooms can function acceptably where communal space, daylight, outlook and management are strong. • A minority of respondents raised concerns that oversized rooms could undermine affordability and reduce delivery, particularly on constrained city-centre sites. • Conversely, several residents argued that private space remains the primary living environment, regardless of communal provision, particularly for longer-term occupation.

	<ul style="list-style-type: none"> • Student representative bodies raised concerns that the guidance could conflict with HMO Amenity Guidance, particularly where higher space standards apply, and that flexibility in co-living schemes should not be used to justify sub-standard HMO accommodation or circumvent national minimum room size requirements. 														
City Council response	<p>The Council agrees that the guidance should be applied flexibly as benchmarks, taking account of overall design quality, site context and viability. The IPG has been strengthened to make clear that it interprets existing policy rather than introducing new requirements. Greater weight has been given to non-London examples and appeal decisions that support the approach in the IPG. The Council acknowledges the need to avoid any ambiguity between co-living and HMO standards. The guidance has been clarified to confirm that the flexibility described applies only to co-living schemes and does not extend to HMOs, which must continue to comply fully with HMO Amenity Guidance and national minimum room size standards.</p>														
Changes to the document	<ul style="list-style-type: none"> • Revised wording throughout to reinforce that the guidance sets out benchmarks and starting points, not mandatory requirements. • Clearer explanation of the NDSS position and the justification required for any departure. • Strengthened evidence narrative in the main document and new Appendix A. • Clarified that co-living flexibility does not apply to HMOs; HMO schemes must meet amenity guidance and national minimum room sizes in full. 														
Location - primarily in highly accessible areas close to public transport, employment and services															
Summary of comments	 <p>Number of responses = 42</p> <table border="1"> <thead> <tr> <th>Response Category</th> <th>Number of Responses</th> </tr> </thead> <tbody> <tr> <td>Strongly agree</td> <td>18</td> </tr> <tr> <td>Agree</td> <td>12</td> </tr> <tr> <td>Neutral</td> <td>5</td> </tr> <tr> <td>Disagree</td> <td>3</td> </tr> <tr> <td>Strongly disagree</td> <td>4</td> </tr> <tr> <td>Total</td> <td>42</td> </tr> </tbody> </table>	Response Category	Number of Responses	Strongly agree	18	Agree	12	Neutral	5	Disagree	3	Strongly disagree	4	Total	42
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	<p><i>Question: Do you agree that co-living developments should primarily be located in highly accessible areas close to public transport, employment, and services (such as the city centre and major transport corridors)?</i></p> <p>Quantitative pattern: There was strong agreement overall that co-living should be focused in high-access, central/corridor locations.</p> <p>Explanatory themes:</p> <ul style="list-style-type: none"> • Supporters linked central siting to non-car travel, access to jobs/amenities, and lower transport costs for typical target residents (graduates/young professionals). • National Highways emphasised highly accessible locations to minimise road network impacts. • Several respondents suggested district/local centres could also work if clearly non-car accessible. • Some residents opposed the model anywhere in the city, but even among sceptics of co-living, central siting was often viewed as preferable to out-of-centre locations. • While strong support was expressed for city-centre and corridor locations, some respondents suggested highly accessible district or local centres could also be appropriate where non-car access is strong. • Statutory consultees linked location explicitly to minimising highway and network impacts. • Several residents associated poor location choices with overspill parking and neighbourhood frustration, reinforcing the need for careful site selection. • Several resident respondents expressed concern that insufficient on-site parking and servicing provision could lead to overspill impacts in surrounding streets, including parking displacement, refuse management issues and servicing conflicts. While some supported low-car approaches in highly accessible locations, others called for clearer safeguards to prevent neighbourhood harm.
City Council response	There was strong support for the location-focused approach. The Council will retain this emphasis, which aligns with national and local plan objectives to reduce car dependency and support sustainable development.
Changes to the document	No substantive changes required. Minor wording refinements for clarity.

Importance of providing a variety of well-distributed communal spaces throughout schemes

Summary of comments



Number of responses = 41

Question: How important do you think it is for co-living developments to provide a variety of well-distributed communal spaces (e.g. co-working areas, lounges, shared kitchens, outdoor areas) throughout the scheme rather than concentrating these in a single location?

Most respondents rated this “Very important” (with additional support for “Important”), showing broad backing for varied, dispersed communal provision.

Explanatory themes:

- Many stressed the need for a mix (quiet rooms, co-working, lounges, shared kitchens, outdoor amenity), and for spaces to be distributed so they are convenient for all residents and do not become over-intense or dominated by certain groups.
- Some operators favoured clustering to keep spaces active and well-used; several suggested the guidance should require applicants to demonstrate accessibility and activation rather than mandating distribution patterns rigidly.
- Practicalities—cleanliness, ASB protocols, booking systems, and fire-safe lithium-ion charging for e-bikes/e-scooters—were frequently mentioned as management essentials.

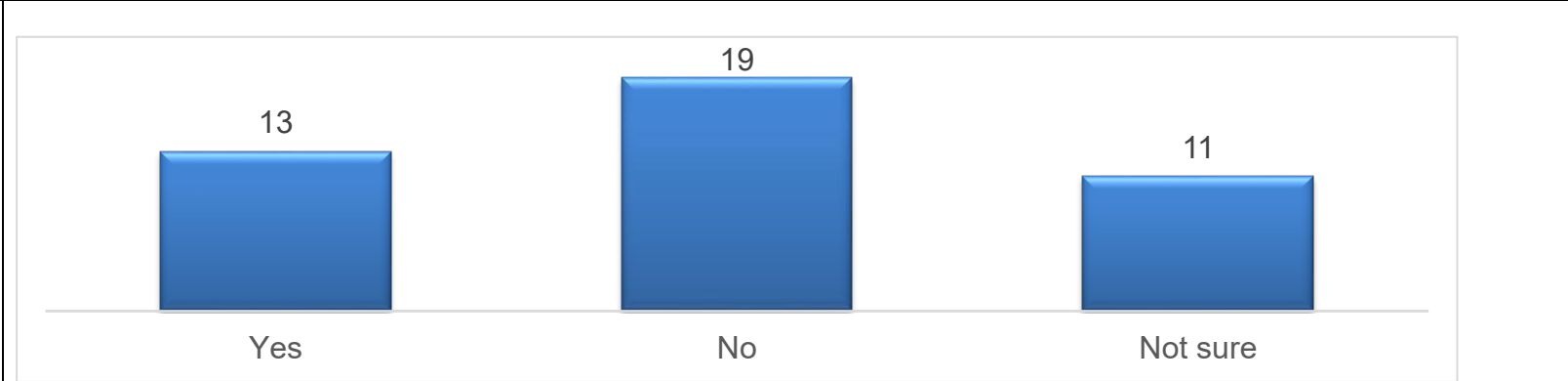
City Council response

The broad support for varied and well-distributed communal spaces is welcomed. The tiered communal amenity guidance, combined with emphasis on quality, usability and management, respond to concerns about activation, over-distribution and practical operation.

Changes to the document	<ul style="list-style-type: none"> • Tiered communal amenity provision introduced. • Strengthened guidance on the need for a variety of usable spaces and effective management arrangements (including cleanliness, booking systems and anti-social behaviour protocols).
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Overall balance - smaller private rooms offset by more generous communal areas

Summary of comments



Number of responses = 43

Question: Overall, does the balance the Council is proposing - smaller private rooms but more generous communal areas - seem like a reasonable way to support high quality co-living development in Nottingham?

Views were mixed, with a significant share disagreeing that the trade-off leads to a high-quality outcome, and a smaller but material share agreeing—mirroring the polarisation seen on Q1.

Explanatory themes:

- Sceptical respondents argued that private space remains primary for daily living and wellbeing; communal areas are complements, not substitutes, particularly for those staying beyond short terms.
- Supportive respondents viewed the model as a way to unlock affordability and community, provided there is strong design quality, management, and good locations.
- Recurrent suggestions included: require clear management plans (to deal with anti-social behaviour, safeguarding, hygiene), provide robust cycle/scooter storage/charging, keep a low-car approach in accessible areas, ensure adaptability (eg ability to combine studios into NDSS-compliant dwellings), and differentiate co-living from PBSA to prevent functional drift.
- A number of respondents argued that communal space cannot compensate for inadequate private space if management standards are weak or enforcement is inconsistent.

	<ul style="list-style-type: none"> • Others stressed that management quality is the critical determinant of whether the private/communal balance works, more than numerical space alone. • Some respondents raised noise, safeguarding and conflict risks as reasons to be cautious about very high densities. • Some respondents advocated more explicit future-proofing requirements, including designing schemes so that multiple studios could be combined in the future to form NDSS-compliant one- and two-bed dwellings, to avoid the creation of inflexible long-term building stock.
City Council response	<p>The mixed views on the private/communal balance are noted. The IPG continues to promote a high-quality balance that supports affordability and social interaction while safeguarding resident wellbeing. Management quality is emphasised as critical to success. The introduction of tiered communal guidance and greater flexibility improves deliverability without compromising standards.</p>
Changes to the document	<ul style="list-style-type: none"> • Tiered approach introduced for shared communal amenity. • Refined wording on the relationship between private and communal space. • Additional emphasis on management plans, adaptability and inclusive design.
Other: Communal space quantity and distribution	
Summary of comments	<ul style="list-style-type: none"> • Respondents repeatedly distinguished between genuine communal living space and utility space, arguing that laundry rooms, reception areas, bike stores or circulation space should not be counted in amenity calculations. • Universities and some residents emphasised that poorly designed or oversized single communal rooms are often under-used, advocating instead for varied, smaller spaces serving defined groups spread throughout the building. • Conversely, developers/operators cautioned that over-distribution can reduce activation and increase management challenges, particularly in larger schemes. • Several respondents referenced cleanliness, booking systems and supervision as essential to making communal spaces function in practice. • Respondents distinguished between genuine communal living space and purely functional areas, emphasising that utility spaces such as laundries, reception areas or corridors although important to the overall scheme, should not be included in calculations to determine the amount of shared amenity space per bedspace. The quality, usability, cleanliness and supervision of communal areas were also highlighted as critical.

	<ul style="list-style-type: none"> • A number of respondents emphasised the importance of access to external or outdoor communal space, natural light and outlook, arguing that a heavily internalised model of communal living could adversely affect health and wellbeing, particularly for longer-term residents. • Detailed operational concerns were raised regarding shared kitchens, including provision of adequate fridge/freezer capacity per bedspace, lockable food storage, cleaning regimes, and measures to manage hygiene and allergen risks in high-turnover shared environments.
City Council response	Feedback usefully distinguished genuine amenity space from functional/circulation areas. The Council agrees that only usable communal living space should count towards the benchmark and that quality and management are as important as quantity.
Changes to the document	<ul style="list-style-type: none"> • Clarification that utility, circulation, reception and similar spaces should not be counted as communal amenity. • Tiered approach to shared amenity introduced along with strengthened guidance on the variety, distribution and management of these shared facilities.
Unit Mix	
Summary of comments	<p>This was not a question directly asked in the form, but raised by some professional respondents, in particular those that submitted responses by email. Views on unit mix varied, with some professional respondents arguing against a prescribed mix of studios and shared units, citing the need for flexibility to support viability, affordability and different operational models. In contrast, university and some resident respondents supported a range of unit types to promote choice, avoid homogeneity and guard against functional drift toward student accommodation.</p> <p>Key themes raised (summarised)</p> <ul style="list-style-type: none"> • A number of developers and operators argued that co-living schemes should not be required to deliver a prescribed mix of unit types, noting that different operational models exist, including studio-only and cluster-based formats. • Several professional respondents suggested that mandating a specific unit mix could undermine scheme viability, affordability, or effective management, and favoured flexibility to respond to site characteristics and market demand. • In contrast, university respondents and students' representative bodies generally supported providing a range of unit types, emphasising the role of mix in promoting choice, avoiding homogeneity, and supporting more diverse and stable communities within larger schemes.

	<ul style="list-style-type: none"> • Some respondents cautioned that an over-emphasis on studio units could encourage functional drift towards student accommodation or higher-priced, less affordable products. • A small number of resident respondents expressed concern that uniform unit types could reinforce perceptions of transience or over-intensification, while others supported flexibility where applicants can demonstrate that the proposed mix responds appropriately to identified housing needs and will be well managed.
City Council response	The range of views on unit mix is noted. Flexibility is important for viability and to respond to different operational models, while diversity can help create more balanced communities.
Changes to the document	<ul style="list-style-type: none"> • Wording on unit mix has been softened with the IPG now encouraging (but does not require) a diversity of layouts and unit types. • Removal of any text that could be read as discouraging 100% studio schemes.
PBSA Conversion	
Summary of comments	<p>These comments relate to concerns raised in different questions. Respondents emphasised that co-living should be clearly distinguished from PBSA, with any PBSA-to-co-living conversions involving substantial reconfiguration and robust management, prioritised where stock is under-utilised, and carefully controlled to prevent functional drift, conflict between occupier groups, or the displacement of dedicated student accommodation.</p> <p>Key themes raised (summarised)</p> <ul style="list-style-type: none"> • Many respondents stressed the need to clearly differentiate co-living from PBSA. Concerns were raised about functional drift, particularly if student occupation is permitted, and about co-living competing with or displacing dedicated student housing. • A frequent suggestion was to prioritise the repurposing of under-utilised or obsolete PBSA and existing buildings before constructing new large-scale developments. Several respondents supported conversions in principle, provided they involve genuine reconfiguration and appropriate management arrangements. • Several respondents emphasised that PBSA-to-co-living conversions should not be treated as a simple re-branding exercise, and that schemes should demonstrate substantial physical reconfiguration on room size, including changes to layouts, communal provision and management, to ensure they function as genuine co-living rather than student accommodation by another name. • Some respondents highlighted the need for clear controls and management arrangements in converted schemes, particularly where PBSA and co-living uses may coexist, to minimise conflict between different

	<p>occupier groups and to ensure that standards of amenity, safety and day-to-day operation are maintained over time.</p> <ul style="list-style-type: none"> • Requirement for clearer management plans in mixed or converted schemes, addressing potential conflict between different occupier groups and setting out protocols for security, noise management and day-to-day operation.
City Council response	<p>Concerns about functional drift and the need for clear differentiation between co-living and PBSA are noted. Conversions of under-utilised PBSA can be appropriate where they involve genuine reconfiguration and include robust management.</p>
Changes to the document	<ul style="list-style-type: none"> • Strengthened guidance on PBSA-to-co-living conversions, including the need for substantial physical alterations and management changes. • Clearer differentiation between the two typologies.
Other comments raised	
Summary of comments	<p>Comments reinforced the polarised views seen in the main questions. Supporters emphasised the potential to improve affordability for young professionals, provided schemes are in high-access locations and come with meaningful, well-managed communal spaces. Opponents stressed wellbeing, dignity and privacy, arguing that co-living risks creating high-density, transient blocks and should not substitute for delivering conventional, good-quality homes.</p> <p>Key themes raised (summarised)</p> <ul style="list-style-type: none"> • Policy and legal context: Some professional and university respondents queried the weight and scope of the IPG, stressing that it should operate as guidance rather than policy and be applied flexibly. Others highlighted the need to reflect emerging changes in tenancy legislation and avoid assumptions about fixed-term or minimum stays. • Affordability and value: A recurring theme was that affordability depends on actual rent levels, not only space standards. Several respondents warned that co-living should not become a higher-priced or “luxury” product, and that smaller units should only be justified where they demonstrably deliver lower, all-inclusive rents. Some respondents argued for more consideration of market viability in setting of private unit and amenity space standard expectations. • Management and operational standards: Strong emphasis was placed on the importance of robust management, including clear ASB protocols, security arrangements, cleaning and maintenance of shared kitchens, conflict resolution, and day-to-day operational accountability. Several respondents noted that weak management would undermine the viability of the co-living model regardless of design quality.

	<ul style="list-style-type: none"> • Safeguarding, wellbeing and safety: Respondents raised concerns about resident safety and wellbeing in high-density shared environments, including safeguarding, noise, and conflict between residents. Specific issues raised included fire safety and evacuation disruption. • Accessibility and inclusive design: Calls were made for inclusive design measures, including wheelchair-accessible studios, step-free communal routes, adequate storage, quiet or low-stimulation spaces, and consideration for neurodiversity. Some respondents expressed concern that very small units may exclude certain groups. • Parking, servicing and neighbourhood impacts: While many supported low-car approaches in highly accessible locations, residents in particular raised concerns about overspill parking, servicing, refuse storage and collection, and potential impacts on surrounding neighbourhoods. • Adaptability and future-proofing: Several respondents suggested that schemes should be designed to allow future adaptability, including the potential to combine studios into NDSS-compliant dwellings, to avoid long-term inflexible building stock. • Planning Obligations: A small number of respondents commented on planning obligations, with some professional respondents querying how contributions (including affordable housing and other Section 106 requirements) would apply to co-living developments, and cautioning that obligations should be proportionate and reflect the distinct characteristics, viability considerations and non-C3 status of large-scale shared living schemes. One respondent argued that a co-living scheme should be considered in the same way as a PBSA scheme, namely that 5 bedspaces should equate to 1 dwelling. • Several respondents argued that flexibility in space standards should be explicitly linked to demonstrable affordability outcomes, suggesting that smaller private units should only be supported where they deliver genuinely lower, all-inclusive rents and do not operate as high-priced or “luxury” accommodation. • Concerns were also raised about safeguarding arrangements for vulnerable groups, including the suitability of very small units for households with children, the need for clear management responsibilities, and expectations around staffing, security and resident support in large-scale shared environments. • Several respondents highlighted the importance of minimum acoustic performance, sound insulation and access to good levels of natural daylight in both private studios and communal areas as essential to resident wellbeing. • A number of respondents expressed strong opposition to new-build co-living developments in principle, arguing that the approach should be limited to the reuse or conversion of existing buildings, particularly surplus PBSA stock.
<p>City Council response</p>	<p>The Council has addressed several cross-cutting issues raised, including affordability, management, safety, accessibility, adaptability and planning obligations. Many of these are now reflected through strengthened or clarified sections in the IPG.</p>

Changes to the document	<ul style="list-style-type: none">• Clarification of the status and role of the IPG (non-statutory guidance that interprets existing policy).• Removal of the requirement for a needs assessment.• Additional emphasis on management plans, inclusive design, adaptability (including future conversion to NDSS-compliant dwellings), and proportionate planning obligations.• Various wording improvements for readability and legal robustness
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