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SPF Response to Glasgow Co-Living Guidance

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Introduction

Q6. If you have any comments, objections or suggestions on the Introduction (pages 1 to 2) please use the space below. Please refer to specific paragraph numbers to help us assess and incorporate your feedback.

We welcome the guidance as co-living has great potential to boost the city centre's population and attract newcomers particularly young professionals. Thus, it aligns well with Glasgow City Council's aspiration to double its city centre population by 2035.

However, we feel co-living should be supported beyond the city centre boundary as shown. Local neighbourhoods outside the city centre can equally provide a range of local supporting facilities including shops, services, leisure and community facilities, and can also be in areas of 'high accessibility' for public transport.

In reference to paragraph 1.7, as two distinct forms of managed living environment LCL and PBSA can, and should be able to successfully exist together and can add to the vitality and vibrancy of neighbourhoods, address their defined needs. There is little doubt that just as with Build to Rent there will be some students and / or graduates and young professionals who wish to seek LCL as a tenure.

In reference to paragraph 1.9, we broadly agree with the space requirements, but some of our members have highlighted that the size parameters are too restrictive. References to unit sizes should be limited to those for co-living only, where these are to be included. Case studies from across the UK by developers have provided evidence that the minimum range for acceptable Co-Living private living areas can start from 18sqm. Providing flexibility in terms of space requirements will improve the range of cost offerings to occupiers.

Policy Framework

Q7. If you have any comments, objections or suggestions on the Policy Framework (pages 3 to 8) please use the space below. Please refer to specific paragraph numbers to help us assess and incorporate your feedback.

We agree that LCL developments should adopt the policy framework as it is in accordance with NPF4, CDP and Tall Building guidance.

Locational Context

Q8. If you have any comments, objections or suggestions on the Locational Context (page 9) please use the space below. Please refer to specific paragraph numbers to help us assess and incorporate your feedback.

We appreciate that the council would like to test this guidance as a 'pilot' in the city centre, but we believe that the boundary should be extended to accessible locations out of city centre on a site-by-site basis. Limiting co-living to the city centre only prevents high-accessibility locations around the city from creating new communities of different types of accommodation.

Given the co-living model lends itself to refurbishment projects, the ability for redundant buildings outside the city centre to provide this type of accommodation would be helpful, noting the housing emergency. Each proposal will be determined on its own merits and accessibility to local services and transport links should be sufficient to ensure this type of development adds to existing local centres' critical mass.

The guidance is overly prescriptive, and we feel residential developments should not be geographically restricted. LCL is a form of accommodation which can provide range, options and amenities in one place. Co-living has become a popular tenure for keyworkers so permitting developments in Glasgow's South Side or East End would support this sector in terms of growth and retention.

Large-scale Co-living space standards

Q9. If you have any comments, objections or suggestions on the Large-scale Co-Living Space Standards (pages 9 to 13) please use the space below. Please refer to specific paragraph numbers to help us assess and incorporate your feedback.

As stated above, we mostly agree with the space requirements but looking at some examples of PBSA and other LCL developments in the UK, the minimum range for acceptable Co-Living private living areas can start from 18sqm. There is no justification in the guidance for the minimum size to be 22sqm. Permitting space flexibility will improve the range of affordable options on offer for residents. The tables which set out requirements for specific amounts of amenity space and the functions of these are unclear.

Tenancies

Q10. If you have any comments, objections or suggestions on the Tenancies (page 14) please use the space below. Please refer to specific paragraph numbers to help us assess and incorporate your feedback.

We recognise that co-living differs from PBSA particularly as student accommodation is exempt from the Scottish Private Residential Tenancy. The Scottish PRT should be the underlying basis of the tenancy agreement.

Management Plans

Q11. If you have any comments, objections or suggestions on the Management Plans (pages 14-15) please use the space below. Please refer to specific paragraph numbers to help us assess and incorporate your feedback.

As stipulated in Para. 6.23, The Tenant Contract Strategy outlines 'at least 6-month tenancy agreements for all LCL residents'. We are concerned with this for several reasons. Firstly, this does not align with industry standards where co-living developments in England have typically set their own contract length to a minimum tenancy period of three months. This is to provide flexibility for tenants and to cater towards those with fixed work contracts. Secondly, this is out of keeping with legislation under Scottish PRT which we understand would capture co-living. Under the Scottish PRT a landlord cannot impose a tenancy

Q11. If you have any comments, objections or suggestions on the Management Plans (pages 14-15) please use the space below. Please refer to specific paragraph numbers to help us assess and incorporate your feedback.

contract length of longer than 28 days. As there is no way of enforcing a 6-month tenancy period, this guidance should not be the grounds for determining LCL approval.

Co-living and build-to-rent ready reckoner

Q12. If you have any comments, objections or suggestions on the Co-Living and Build-to-Rent Ready Reckoner (page 16) please use the space below. Please refer to specific paragraph numbers to help us assess and incorporate your feedback.

Differentiation between co-living and BTR is understood as desirable, but does drive lay-person understanding towards there being a fundamental difference when they are both able to accommodate housing requirements and have a place in 20 minute neighbourhoods. If a metric is necessary, whether or not units are self-contained would appear to be the most appropriate. Development proposals outwith this boundary should be determined on a case-by-case basis where appropriate and where they align with the 20-minute neighbourhood principle.

Glasgow City Centre map

Q13. If you have any comments, objections or suggestions on the Glasgow City Centre map (page 16) please use the space below.

We agree that most co-living developments are likely to be concentrated in the city centre which will support city centre living and may help with bringing disused sites back into use. However, there may be sites outwith this boundary that would be suitable for co-living and they should be considered on a case-by-case basis where they support the principle of 20-minute local living and have direct public transport routes to the city centre. Schemes situated outside of prime city centre locations are likely to result in more cost-effective rents and will bring wider economic benefits that supports the local community. For instance, LCL sites proposed south of new developments around Buchanan Wharf may be suitable locations to enable further regeneration of the Kingston area. Likewise, excluding parts of the East End especially around the Glasgow Green area may pose a barrier to new high quality residential development in this area.

Other Comments

Q14. Do you have any other comments, objections or suggestions? Please use the space below.

Whilst co-living is still in its infancy across the UK, it is an emerging and important tenure which provides high quality, affordable living and amenity space. There is also an increasing awareness of the potential for co-living to address the availability crisis within in the PRS sector, providing a substantial number of units within city centre locations. If Glasgow can ensure an abundance of high quality and convenient city centre living this will help the city to retain and attract new talent resulting in wider economic benefits.

Consider including a requirement for applicants to demonstrate the future 'repurposeability' of proposals, i.e. demonstrate that they can be reconfigured to provide an alternative use type without demolition, with potential exception in the case of refurbishment projects.

Q14. Do you have any other comments, objections or suggestions? Please use the space below.

Overall, we welcome this new guidance to support the growth of the sector, particularly as we are aware that previous planning applications have been dislodged due to a lack of local authority guidance.