

Student accommodation need: analysis and review of evidence

GLA London Plan Team

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Part of the evidence base of the London Plan 2026

Part 1: What is the level of student housing need in London, now and for the period of the next plan?

1. Introduction

- 1.1 National Planning Policy (paragraph 63) requires that as part of the SHMA process, the 'size, type and tenure of housing needed for different groups in the community... includ[ing]...students...' is assessed, and then reflected in planning policy.
- 1.2 Planning Practice Guidance¹ goes on to advise that 'strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus'. It does not however indicate how this sufficiency is defined or quantified, other than suggesting conversations with universities will be important.
- 1.3 This evidence review explores the issue and arrives at conclusions regarding three overarching questions, drawing on publicly available data and expert commentary:
 - What is the level of student housing need in London, now and for the period of the next plan?
 - What proportion of this need should we be seeking to meet in PBSA when considering housing need and delivery in the round and what is the resultant planning requirement in terms of a number (range) and/or planning approaches appropriate to a strategic plan?
 - How should we distribute this requirement across London?
- 1.4 It does so in the context of considerable debate and division amongst stakeholders regarding the extent to which the housing crisis in general needs housing is also evident in respect of student housing in London, and what this means in practice when considering competing uses for land and priorities for 'land value surpluses' / developer contributions. This reflects the fact that the number of students in London has risen sharply in recent years (by the same amount as the total student population in Manchester) with limited delivery of new purpose-built student accommodation². However, Local Planning Authorities also report that PBSA development activity (at various stages of planning and delivery) is prominent relative to other housing development, giving rise to concerns about it 'crowding out' other much needed forms of housing.
- 1.5 For the purposes of this review, student housing need is distinguished from 'general' needs by the fact that it relates to student-only households in either HMOs/flat shares or purpose-built student accommodation, and the students are full time. This is complicated as some student-only households may live in otherwise 'general-needs' conventional housing. However, this appears to be in line with the intent in the Planning Practice Guidance in its reference to self-contained dwellings.

¹ Paragraph: 004 Reference ID: 67-004-20190722 [Housing needs of different groups - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/414444/Housing_needs_of_different_groups_-_GOV.UK_(www.gov.uk).pdf)

² [The London Plan and Purpose Built Student Accommodation Three Years On – Panacea for Growth or Painful Progress? - London Higher](https://www.london.gov.uk/sites/default/files/2019-07/20190722_London_Plan_and_Purpose_Built_Student_Accommodation_Three_Years_On_-_Panacea_for_Growth_or_Painful_Progress_-_London_Higher.pdf)

Defining the baseline

What is the current number of full-time students in London?

- 1.6 The starting point for understanding student housing need is to understand the number of students at London-based higher education institutions³. The best publicly available data here are HESA statistics, typically published one year in arrears. Of the total number of students, those more likely to have a specifically ‘student’ housing need are full time students, given that part-time students’ housing status may be more significantly affected by their employment and wider household circumstances. From this pool, it may be appropriate to discount those that are distance learners, on a ‘thick’ sandwich placement (of at least year) or a year abroad, given that these factors may often mean that the student is not resident in London, or again, may have a more general housing need.

Table 1

Category (all London)	Number of students⁴ 2024/25	Three year average 2022/23 to 2024/25
A1. Total number of students registered in 2024/25	549 365	545 347
A2. Total full time (FT) students	475 945	470 220
A3. Total FT distant learners	14 880	9440
A4. Total on year abroad or ‘thick’ sandwich placement	4575	5220
A5. Total FT students discounting those likely to not need to be resident in London	456 490	455 560

- 1.7 However, it is also recognised that the HESA stats do not include students at London branch campuses of universities headquartered elsewhere, (e.g. University of Northumbria, Loughborough University) and it is also not clear to what extent privately funded universities are fully accounted for in the statistics. One estimate has suggested the total could be uplifted significantly (by around 17%) to account for this and the data lag (the total was suggested to be over 500k for the academic year 2023/4⁵). However, the underlying report⁶ seems to misrepresent HESA stats as not including for instance, Northeastern university, (which it does) so this may be an over-estimate.
- 1.8 A reasonable compromise, given it is also possible that some distant learners and some on placement might still reside in London, is to use the total full-time students as the base

³ As registered with the Office for Students with their main administrative base in London under the Approved (fee cap) or Approved categories.

⁴ [Where do HE students study? | HESA](#) ref DT051 Tables 1, 63, 64, 65.

⁵ [The London Plan and Purpose Built Student Accommodation Three Years On – Panacea for Growth or Painful Progress? - London Higher](#)

⁶ <https://qxglobalgroup.com/london-plan-2024-report> (QX/CBRE 2024).

number (without discounting for students abroad etc). This is also helpful given that this figure is a key total used by HESA to set out other data around for instance, accommodation type. It should be acknowledged however, in looking at potential growth ranges, that the base population could be higher or lower than this figure.

- 1.9 This figure is used in the rest of the report as representative of the approximate number of full-time students in London.

What proportion of these are postgraduate, taught postgraduate and research postgraduate?

- 1.10 It is also worth understanding the proportion of different student types, as this may affect their propensity to live in student-only households. One distinction is between taught undergraduate and postgraduate course students, and postgraduate research students. Research students are typically paid a stipend that acts as a type of wage, and may accordingly be more likely to live with non-students. However, first year international research students may be less likely to know other people in a city and not want to navigate the private rental/house share market independently⁷.

Table 2

Category (all London)	Number of students ⁸
A2. Total full time (FT) students	475 945
B1. Total FT postgraduate research students	18 575
B2. Total FT first year international postgraduate research students	3180
B3. Total FT students minus postgraduate research students other than international first year postgraduate research students	460 550

What proportion are international, compared to domestic, and how many domestic students are domiciled in London?

- 1.11 Another useful segmentation is by domicile ie. main place of residence outside term time, comparing the proportion that are home/domestic (UK) and international students. Traditionally, international students (excepting research students as referenced above) have been seen as a core part of the student housing need pool, however it is now suggested that many (perhaps 20%) on taught postgraduate courses are living with friends and family connections, particularly those in January intakes, and may therefore be part of the general needs pool⁹. Meanwhile, a significant proportion (34%) of London's domestic students are London domiciled, meaning their housing need is accounted for in the general need calculations in the SHMA. This implies a housing need

⁷ This can be triangulated roughly with the number of postgraduate research students in university or private sector halls in HESA DT051, [Table 57](#) (1965 or 875 of first years) suggesting 3180 is a reasonable quantum to add back in as the remainder may be in student-only rental accommodation. [Where do HE students study? | HESA](#)

⁸ [Where do HE students study? | HESA](#) ref DT051 Table 1.

⁹ [Student-Accommodation-The-State-of-the-Nation-in-2024.pdf \(hepi.ac.uk\)](#)

of around 292k (see C6 below). Bringing together this information with the assumptions about postgraduate students above, reduces the number to 282k.

- 1.12 Blakey (2024) suggests that 67% of residential student demand in London comes from international students¹⁰. Sense-checking this figure, reflecting the assumptions in these tables, suggests a slightly lower need-based figure of around 60%, but a similar order of magnitude. This is particularly important for looking at growth in housing need.

Table 3

Category (all London)	Number of students¹¹ (rounded to nearest 5)
A2. Total full time (FT) students	475 945
C1. Total FT international students	197 280 (42%)
C2. Total FT international students on taught postgraduate courses	104 280 (22%)
C3. 20% of C2	20 850
C4. Total FT domestic students domiciled in London	163 505 (34% of A2)
C5. Total FT postgraduate research students domiciled in London	5555
C6. Total FT students minus (postgraduate taught international and domestic students likely to be in general needs housing)	$= A2 - (C4 + C3)$ $= 475\,945 - (163\,505 + 20\,860)$ $= 291\,585$
C7. Total FT students minus (non-London domiciled postgraduate research students excepting first year international + all London domiciled students)	$= A2 - ((B1 - C5) + (C4 + C3)) + B2$ $= 475\,945 - ((18,575 - 5555) + (163\,505 + 21\,750)) + 3180$ $= 281\,745$

What proportion of students live outside their main (family) or own home?

- 1.13 Another way to approach the student housing need pool is to look at existing proportions of students living in different types of housing. In 2024/25 42% (197 745)¹² of full-time students in London lived outside their family or own (permanent) home in a combination of university owned accommodation, private sector halls, and other rental accommodation. This might be suggested to be a reasonable proxy for the student housing need pool. However, 'other rental accommodation' may in some cases include sharing with non-students in the general needs pool, so in some cases it may be an overestimate. While Council Tax rules do incentivise students living in student-only households, census data¹³ suggests in Greater London in 2021 that only 44% of full time students aged 18+ living out of the parental home and not in communal establishments

¹⁰ [Student Accommodation: The State of the Nation in 2024](#). p7, HEPI Policy note 52.

¹¹ [Where do HE students study? | HESA](#) ref DT051 Table 1 and Table 11.

¹² [Where do HE students study? | HESA](#) DT0151 Table 57.

¹³ Table RM129 [Student accommodation by age - Office for National Statistics \(ons.gov.uk\)](#)

were living either on their own or in student-only households. However, this may have been a non-typical year given ongoing Covid restrictions.

- 1.14 Conversely, a further 56,470 students (12%) either lived in ‘other’ accommodation (not defined) or were in an unknown type of accommodation (see D2 below). This may be partly because some of these students were only temporarily resident in London so were more likely to be living in short term arrangements (such as short term lets or sofa surfing) between placements¹⁴. It may also include those lodging or with other in-kind arrangements that might be indicated by the aforementioned estimate of 20% of international taught postgraduate students living with friends and family¹⁵. In both cases however, it is likely that some additional need should be added to the 198k if this is to be taken to be the proxy for the student need pool. If we add the 56k to the 198k (see D3 below) we get to a number closer to that in C7 above. Alternatively, If we assume 42% of this should be in the student need pool (aligned with the wider percentage known to be in accommodation likely to be outside general needs housing) this leads to a lower total (D5).

Table 4

Category (all London)	Number of students¹⁶ to nearest 5 as per HESA data protocols
A2. Total full time (FT) students	475 945
D1. Total FT students living in provider-owned accommodation, private sector halls or other rented accommodation.	197 745 (42%)
D2. Total in other/unknown accommodation	56 470 (12%)
D3. D2 +D1	254 215
D4. 42% of D2	23 720
D5. Adding proportionate re-allocation of unknown/other to D1	= D4 + D1 = 221 460

What about hidden/latent needs?

- 1.15 An argument could be made that high average rents due to constrained supply in both the private rental and purpose-built student housing sectors mean that London has more ‘commuter’ students (using the proxy of living in their parental/guardian’s home) than other cities¹⁷ and that this is an indication of latent need for student housing¹⁸. There is an equalities dimension to this, with double the amount of students in 2021/22 from a black and minority ethnic background living at ‘home’ compared with those from a white

¹⁴ See figures in Table 1 above regarding numbers involved. There are an additional 3715 students on shorter placements/periods abroad.

¹⁵ [Student-Accommodation-The-State-of-the-Nation-in-2024.pdf \(hepi.ac.uk\)](#)

¹⁶ [Where do HE students study? | HESA](#) DT051 Table 57.

¹⁷ [In 2024/25 23% \(108,490\) of London students lived in the parental/guardian home \(compared with 19% of all students nationally\)](#) of UK domiciled students, the figures were 39% in London doing so compared to 27% nationally ([HESA DT05 Table 11](#) and [Table 57](#)).

¹⁸ [Commuter students in London: A briefing note \(londonhigher.ac.uk\)](#)

ethnic background¹⁹. This echoes the findings of a 2019 national survey²⁰ that commuter students were more likely to be Asian students; mature students; working students, and students who are first in their family to take up HE studies.

- 1.16 Various impacts are highlighted, including concerns about travel and time costs, missing out on campus-based opportunities²¹ and expectations not being met²². However, this very quickly morphs into being an issue more about distance, or time spent commuting²³, than student accommodation per se, though the two are linked given that some students spend longer commuting to access cheaper accommodation. In a national survey²⁴ 22% of students said that they expect to commute more than 30 minutes to university. Of these students, 52% chose to live further away to access cheaper rents and 22% did so because no properties were available closer. A pilot study by London Higher found a relationship between distance travelled (from all accommodation types) and continuation/progression rates at 3 of 6 institutions when controlling for other factors²⁵.
- 1.17 Overall, the picture is likely to be complex given that living in London also gives students greater access to a wider choice of institutions than would be the case in other cities, and the ability to live at home has potentially helped drive up participation rates including amongst disadvantaged groups²⁶. Moreover, there may undoubtedly be savings to be made if travel distance is not too great and there is appropriate access to travel discounts, which could be addressed outside of housing policy. Culturally also, some groups may be more likely to live at home even were student housing available. This situation is not considered adequate justification to suggest an uplift to the overall student need pool indicated by the numbers in Table 4.
- 1.18 Another type of latent need that may be more relevant to the overall quantum of student housing need may be indicated by levels of homelessness in the student population. As with pressures evident in the wider private rental sector, and reflecting affordability, it is assumed there will be a degree of homelessness in the student population. In 2024/25 70,740 households in London were owed a homelessness prevention or relief duty of which 1,370 had a student or someone in training as the main applicant²⁷. London-specific data is limited. 2016 research found 27 homeless students (including those couch surfing and living in hostels) in just one department at London Metropolitan University, including both mature students with families and single students – though it is unclear

¹⁹ [Commuter students in London: A briefing note \(londonhigher.ac.uk\)](https://londonhigher.ac.uk/commuter-students-in-london-a-briefing-note/)

²⁰ [Student Academic Experience Survey 2019 \(hepi.ac.uk\)](https://hepi.ac.uk/student-academic-experience-survey-2019/)

²¹ [Student Academic Experience Survey 2019 \(hepi.ac.uk\)](https://hepi.ac.uk/student-academic-experience-survey-2019/) found students living with other students close to campus more likely to report good value and satisfaction. See also [Commuter students in London: A briefing note \(londonhigher.ac.uk\)](https://londonhigher.ac.uk/commuter-students-in-london-a-briefing-note/)

²² 17% of respondents to [HEPI Student Academic Experience Survey 2025](https://hepi.ac.uk/student-academic-experience-survey-2025/), reported a worse than expected academic experience due to time spent commuting. [HEPI's Academic Experience Survey 2026](https://hepi.ac.uk/student-academic-experience-survey-2026/) found that for students with longer commutes who report their experience as 'worse than expected', commuting is more likely to be a factor, with 29% of students who had a 'worse than expected' experience commuting more than six hours a week.

²³ [Unipol student house hunting behaviour survey 2025](https://unipol.ac.uk/student-house-hunting-behaviour-survey-2025/) found that 75% of students whose commute took longer than 30 minutes reported an negative overall university experience.

²⁴ [Unipol Student House Hunting Behaviour Survey 2025](https://unipol.ac.uk/student-house-hunting-behaviour-survey-2025/)

²⁵ [London Higher Commuter Students in London, 2019](https://londonhigher.ac.uk/commuter-students-in-london-2019/)

²⁶ [Commuter students in London: A briefing note \(londonhigher.ac.uk\)](https://londonhigher.ac.uk/commuter-students-in-london-a-briefing-note/) ; [LondonHigher 2019 Commuter-stu-in-London-continuation.pdf](https://londonhigher.ac.uk/commuter-stu-in-london-continuation.pdf)

²⁷ [Live tables on homelessness](https://londonhigher.ac.uk/live-tables-on-homelessness/), MHCLG.

how many students are in the school²⁸. A national survey in 2026²⁹ found 8% of students had experienced homelessness. Not all gave details, but a significant proportion indicated couch-surfing or similar due to unaffordability or other issues with original accommodation.

- 1.19 A proportion of the need indicated by homeless figures will be general needs affordable housing as covered by the wider SHMA. For student housing, it may provide some justification to err on the higher side of need numbers, but it may also be more relevant to defining the proportion of need that is for affordable student accommodation (see below).

Conclusions on current overall student housing need

- 1.20 The above sections set out two contrasting approaches to defining student housing need: one related to assumptions about likely housing choices based on population-based information and provider knowledge; the other based on the approximate revealed preferences in the current market. Both have imperfections as highlighted. It is also clear that student need could be over-stated if significant trends relevant to the London context are ignored, notably the number of London-domiciled domestic students, and extensive social networks that international students from lower income countries tap into in the wider London area.
- 1.21 So using a combination of both, a range is arrived at (221 000 to 292 000 rounded to the nearest thousand). It is considered that taking a midpoint of this range (257 000) provides a reasonable 2025 baseline given the respective deficiencies of each approach set out above, and the need for growth estimates to be applied to a fixed number in order to avoid too much complexity with numerous permutations.

What is a plausible range of student housing need growth that can be anticipated?

What are the key drivers of high/low growth in this need over the plan period?

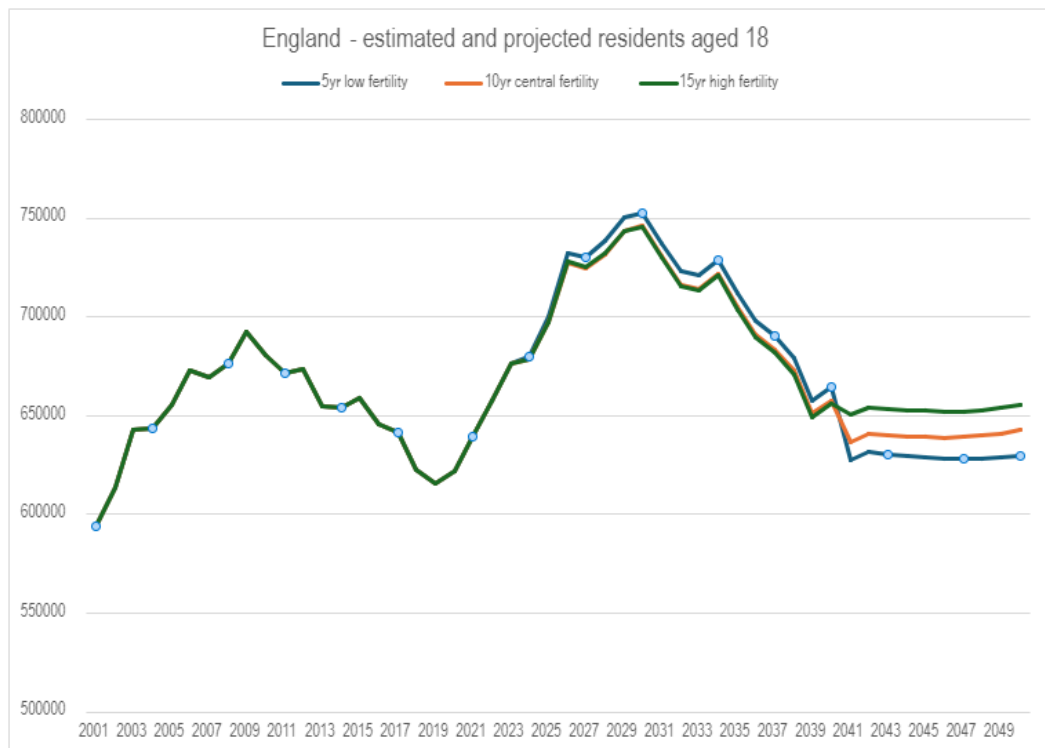
- 1.22 To understand drivers of student housing need growth, it is necessary to go back to the different components of student housing need. These fall into roughly two groups: domestic students from outside Greater London, and international students.
- 1.23 Domestically, key drivers are demographic (the number of 18 year olds) and participation (the proportion of these that choose to go to university outside their home area at undergraduate and postgraduate level). Internationally, key drivers are much more related to immigration policy, acceptance levels, and competitiveness of UK/London universities relative to other international alternatives which drive overall international student numbers. There may also be wider trends in the university sector of significance, but it is important to establish how these relate back to the components of housing need, so are dealt with in the relevant sub-section.

²⁸ [Hidden homeless: the students ashamed to admit they've nowhere to sleep | Student housing | The Guardian](#)

²⁹ [National Student Accommodation Survey 2026 – Results - Save the Student](#)

Demographic

- 1.24 The number of 18 year olds continues to increase, but 2022 trend based projections suggest it is due to peak in England in 2030, and fall subsequently to 2035 until about 2040 when it may level off; trends in Wales mirror this, though in Scotland and Northern Ireland the peak is earlier and smaller³⁰. The reduction from 2030-36 across all trends in England is approximately 7 per cent, compared to an approximately 10-11 per cent increase in the previous 6 year period. Overall, the picture in England by 2036 compared to 2024 is a 2-3 per cent increase.
- 1.25 The London 18 year old population (affecting the proportion of students living at home) broadly mirrors this trend, but peaks earlier around 2026, suggesting there could be a period when there is a smaller proportion of London domiciled students and greater overall student housing need, unless more London domiciled students take up places at London universities.



ONS 2022 based population projections

Participation - overall

- 1.26 UK student numbers were increasing until recently, at both undergraduate and post-graduate level, encouraged by the removal of student number caps, the perceived value of postgraduate education, and improving achievement at A-level³¹. Previously, this has more than offset any downturns in the number of 18 year olds³². In 2023 and 2024, reduced attainment was offset by increased acceptance levels, including through

³⁰ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#)

³¹ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#); [Figure 3 - HE student enrolments by level of study 2020/21 to 2024/25 | HESA](#); [Cushman and Wakefield UK Student accommodation report 2023](#)

³² [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#)

‘clearing’ – this was particularly evident at higher tariff institutions of which there are many in London³³. Since 2016, higher tariff acceptances have risen 27.8%, compared to a 19.6% fall at lower tariff providers³⁴. For Bekhradnia, the expansion of higher-tariff providers into mid-range attainment recruitment, whereby higher tariff providers accept more students achieving lower grades than they would have in the past, represents a significant structural shift in the English higher education system³⁵.

- 1.27 It is also the case that the impacts of previous increases in participation (notably the correlation between graduate mothers and their children going to university) could further drive participation in future³⁶. Bekhradnia (2024) argues that there is ‘headroom’ as English participation rates lag behind those in the other devolved nations, and the UK does not have exceptionally high participation relative to other OECD countries. Even if student number caps were re-introduced, it is suggested that this would be more to help balance out provision in different types of institution, than bring overall participation down³⁷.
- 1.28 However, participation fell during 2023 and 2024³⁸. This downturn is thought partly to reflect a natural drop from the post-covid high (when A level results were higher given different modes of assessment and more people went to university given the economic downturn³⁹). But it could also reflect that the costs of university relative to earning potential, and negative ‘value for money’ narratives are causing potential students to choose employment over study⁴⁰.
- 1.29 This is borne out to some extent by data from student surveys. For instance, the Unite Student Applicants Index⁴¹ found that more than a third of 2026 applicants stated that they may not take up their place at university, with top alternatives considered being degree apprenticeships (particularly if UK students), a full-time job and studying later in life. The same survey found that financial issues were the top reason that might cause applicants to not take up their place at university. Whilst this survey focuses on undergraduates, it seems reasonable to assume similar considerations for postgraduates. Cost of living pressures may also force students to drop out of university part way through their course, which again could have a net impact on participation. Save our Studentreport that 36 per cent of students have considered dropping out of university due to rental costs⁴². It should be noted that some of these matters are relevant to affordable student accommodation provision however, which could arguably offset part of the downward trend.
- 1.30 In terms of overall student numbers, London’s situation differs to that nationally. The number of students enrolled to study in London has risen, not fallen, from 507 505

³³ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#); [Cushman and Wakefield UK Student accommodation report 2023](#)

³⁴ [Cushman and Wakefield UK Student accommodation report 2025](#)

³⁵ [Demographic decline and predatory recruitment: The twin threats to English higher education into the 2040s \(hepi.ac.uk\)](#), Bahram Bekhradnia, 2026

³⁶ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#)

³⁷ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#)

³⁸ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#) See figure 4.

³⁹ [Demand-for-Higher-Education-to-2035_HEPI-Report-134_FINAL.pdf](#)

⁴⁰ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#)

⁴¹ [Unite Students Applicant Index Report 2026 \(unitegroup.com\)](#). See Figure 8, Figure 9 and Figure 11.

⁴² [National Student Accommodation Survey 2026 – Results - Save the Student](#)

students in 2021/22 (428 635 full time), 544 045 students in 2022/23 (467 255 full time), 540 800 in 2023/24 (466 175 full time), to 549 365 students in 2024/25 (475 945 full time).⁴³

Participation – full time and away from home

- 1.31 Even if students do still go to university, cost of living pressures may constrain their choices to local institutions⁴⁴. Given that student finance has yet to be radically adjusted, and is not indicated to be a high priority for the government, these pressures could persist, and may particularly affect the choice of domestic students to leave home to go to university in more expensive London. At the time of writing, however, the number of UK students studying in London continues to increase⁴⁵. This localisation is evident in several wider HE policy scenarios that Husbands (2024⁴⁶) presents, which could arise, for instance, from a split between research and teaching institutions or more regionally-funded participation that encourages more lifelong, but local and part time study. While there may be some scope for this to be offset in overall student number terms by a further increase in London-domiciled students choosing a local university, it seems that in student housing need terms, this could compound the demographic downturn highlighted above.

Participation – closure of participation gaps

- 1.32 Bekhradnia (2024) suggests that another important factor is whether gender (greater female than male) and income-related (greater wealthier than poorer background) participation gaps can be closed, which would drive up overall participation. It is noted that both generally and in London, income-related gaps (in London, particularly due to improved attainment) were narrowing until recently, so this is not ‘without precedent’. The scale of increase were the gaps to close could offset about half of the post 2030 demographic downturn⁴⁷. However, the cost pressures highlighted above may particularly impact low-income groups⁴⁸. The government’s ‘breaking down barriers to opportunity’ mission may suggest that targeting financial and other educational support to the lowest quintile income group could be more attractive as a policy lever.
- 1.33 Gender participation gaps reflect trends of lower male than female attainment. This attainment gap is a global trend⁴⁹. As Bekhradnia⁵⁰ observes, this is not a question of innate differences in intelligence, suggesting that it is plausible the gap could be closed. If the gap (27% in 2024) in gender participation were closed, given the higher male than

⁴³ [HESA DT051 Table 1](#)

⁴⁴ [Opportunity Cost: Access to HE and the cost of living crisis in London - London Higher \(2024\)](#)

⁴⁵ [HESA DT051 Table 1](#) records 278,165 full time domestic students studying in London in 2024/25 (of which 129,210 were first year students) compared with 267,155 (116,080 1st year) in 2023/24, 266,645 (119,785 1st year) in 2022/23 and 258,415 (119,515 1st year) in 2021/22.

⁴⁶ [Four-futures-Shaping-the-future-of-higher-education-in-England.pdf \(hepi.ac.uk\)](#)

⁴⁷ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#); According to London Higher, Londoners are more likely to choose London as their region of study than any other UK region; outperform their peers elsewhere in England in statutory examinations at Key stages 4 and 5 and the disadvantage gap is lower in London than elsewhere in England [The characteristics of students in London higher education and how they link to experience and outcomes](#), 2022.

⁴⁸ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#)

⁴⁹ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#)

⁵⁰ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#)

female birthrate, Bekhradnia⁵¹ notes the difference it could make could more than offset the demographic downturn. However, the fact that it is a global and persistent (static) trend suggests complex underlying issues that may not be easily influenced. In a subsequent paper Bekhradnia also notes that unless participation rises again, projections of future student numbers depend primarily on demographic trends rather than shifts in demand and that this in turn implies a reduction in total student numbers of around 16 per cent between 2026 and 2042, and around 18.5 per cent between 2030 and 2042⁵².

Immigration policy versus university recruitment and growth policy

- 1.34 Much student population growth in recent years has been driven by universities pursuing international student recruitment, given international student fees are uncapped. This is an attempt to offset domestic fee caps that have not kept pace with inflation⁵³. However, international students also contribute to immigration figures, which recent governments have sought to reduce. Student visas, particularly for dependents have been tightened and made more expensive, and there is some indication that this has affected applications⁵⁴.
- 1.35 UK student numbers fell in 2024/25 driven by a 10% decrease in international entrants to postgraduate taught courses^{55 56}. Nationally this is reflected in voids in some types of accommodation⁵⁷. This suggests that even though the targeted population (international students with dependents) may not have been living in student housing, the negative signalling, and overall price increases, together with exchange rate/currency pressures in some countries (notably Nigeria) may be impacting overall international recruitment which has an impact on student housing need⁵⁸. Dependent visas were down by 85% in 2024, and single student visas were also down by 16%⁵⁹.

International competitiveness

- 1.36 There is currently no indication that the government is minded to reverse this tightening⁶⁰, nor take other measures such as removing students from the immigration

⁵¹ [Student-Demand-to-2035.pdf \(hepi.ac.uk\)](#)

⁵² [Demographic decline and predatory recruitment: The twin threats to English higher education into the 2040s \(hepi.ac.uk\)](#), Bahram Bekhradnia, 2026.

⁵³ [Four-futures-Shaping-the-future-of-higher-education-in-England.pdf \(hepi.ac.uk\)](#), 2024

⁵⁴ In the YE March 2026, 409,954 Sponsored Study visas were granted, 3% less than the previous year, and 37% fewer than the peak (YE June 2023) [Why do people come to the UK? Study - GOV.UK](#); [Student Accommodation after 2024 and the Need for Strategic Realignment - HEPI](#); [Priced out: the accommodation costs survey 2024 London edition \(unipol.org.uk\)](#);

⁵⁵ [UK higher education student numbers fall for second year in a row | HESA](#), January 2026.

⁵⁶ There is considerable variation between institutions. See trends with international students in [Higher Education and Funding: Threat of Insolvency and International Students, Ninth report of Session 2024-26](#), House of Commons Education Committee.

⁵⁷ [Student Accommodation after 2024 and the Need for Strategic Realignment - HEPI](#)

⁵⁸ [Priced out the accommodation costs survey-2024 London edition \(unipol.org.uk\)](#), Sarah Jones and Marin Rushall.

⁵⁹ [Student Accommodation after 2024 and the Need for Strategic Realignment - HEPI](#)

⁶⁰ On 1 June 2026 The Government published compliance guidelines setting out stronger requirements for student sponsors. See [House of Commons Research Briefing: Changes to UK visa and settlement rules after the 2025 immigration white paper](#), 3 June 2026.

figures, (given their residency is often limited to the duration of their studies) to disentangle university growth plans from wider immigration pressures.

- 1.37 It is too early to tell what impact the UK rejoining the EU Erasmus scheme in 2027 will have⁶¹. A further factor to consider is how the international student levy universities must pay from 2028, will affect student applications. Were universities to seek to pass on costs through higher fees, this could lead to fewer international students applying to study here⁶².
- 1.38 Without wider policy change, a downward trajectory could be envisaged, making it more difficult to recruit international students as disinvestment then makes institutions less internationally competitive⁶³. That said, the international standing, and (ongoing) investments, of many London-based institutions may moderate this trend in London^{64 65}. It is reported that Chinese students, whom surveys indicate to be particularly influenced by institutional reputation, have recently seen renewed levels of demand, though in 2024/25, with the exception of London, the number of Chinese students enrolling to study in the UK fell compared with the previous year.⁶⁶ Meanwhile, acceptances by Indian and Nigerian students are down, which may particularly affect some post-1992 institutions⁶⁷. Despite fewer international student enrolments in recent years, they remain significantly above pre-Covid levels (including among Indian and Nigerian students)⁶⁸.
- 1.39 Higher Education Providers forecast a 22.5 per cent increase in the number of international students coming to study in the UK between 2024/25 and 2028/29, with increases forecast in all regions, apart from the north east, and the largest increases forecast for London, the West Midlands and the South East. The Office for Students consider this level of increase over optimistic given that UCAS applications rose 2.6% between 2024/25 and 2025/26 and continued volatility with student recruitment⁶⁹.
- 1.40 An internationally competitive university sector – both teaching and research – could become a more important anchor to growth policy than it is currently seen to be. This could imply further sector and international student growth, supported by adequate funding. Husbands⁷⁰ (2024) suggests perhaps to 30 per cent above the levels envisaged in the 2019 strategy (600 000 international students enrolled to study in the UK, reached in 2020/21). This drove the most recent round of growth however, so in reality, this

⁶¹ [Young people from all backgrounds to get opportunity to study abroad as UK-EU deal unlocks Erasmus+](#) Gov.uk press release, 17 December 2025; [Are EU students about to be treated like British students once more – and, if so, what will it mean for UK universities and students?](#), HEPI 18 May 2025.

⁶² [The true cost of the Government's proposed levy on international students - HEPI](#), 2025; [The proposed international student levy could be the tipping point for a fragile sector - HEPI](#), 2025.

⁶³ [Four-futures-Shaping-the-future-of-higher-education-in-England.pdf \(hepi.ac.uk\)](#)

⁶⁴ Four of London's universities rank among the top 100 universities globally, with Imperial College in 2nd place and UCL eighth [QS World University Rankings 2027: Top Global Universities | TopUniversities](#)

⁶⁵ [Cushman & Wakefield UK Student Accommodation Report 2023; Cushman & Wakefield Student Accommodation Report 2025; Student-Accommodation-The-State-of-the-Nation-in-2024.pdf \(hepi.ac.uk\)](#)

⁶⁶ [HESA DT051 Table 11](#)

⁶⁷ [UK student recruitment numbers down, but is that the whole story? - HEPI](#); [HESA DT051 Table 11](#)

⁶⁸ [HESA DT051 Table 11](#)

⁶⁹ [Financial sustainability of higher education providers in England: 2026 - Office for Students](#) Annex E, student number tab shows forecasts by region; [UK Living Roundup June 2026 JLL.com](#)

⁷⁰ [Four-futures-Shaping-the-future-of-higher-education-in-England.pdf \(hepi.ac.uk\)](#)

would be just 50k nationally above the 2022 peak (758 865 students enrolled⁷¹). Alternatively, another scenario set out by Husbands, with a more defined split between research and teaching based institutions (the former already focused in London) might see international student growth of 5 per cent per annum beyond 2024 levels. Or a more ‘place-based’ system scenario, could see more targeted international student growth based on partnerships with particular regions, without the same impetus for fee cross-subsidy⁷², suggesting more moderate growth.

- 1.41 Meanwhile, some commentators argue that to create a more financially resilient higher education landscape the sector should become less reliant on international students and provider growth should be constrained⁷³.

Overall implications for student housing need in London

- 1.42 The implications of these possible trends for student housing need in London are complex, given that a rise or fall in student numbers does not necessarily (or immediately) correspond to an equivalent rise or fall in student housing need. Blakey (2024)⁷⁴ for instance, suggests some of the increases in student numbers in recent years may have been absorbed by part-time sofa surfing – where students commute to their university for a few days a week, staying with friends or family – especially as the number of student shared houses is decreasing. He estimates that this could account for 5-7 per cent of students nationally, perhaps as much as 10 per cent, though as noted above, this can also be taken to be a type of hidden (affordable) need. Similarly, PBSA or student house voids may be a temporary consequence of recruitment downturns, but over time may be addressed by price adjustment, which may in turn entice some students out of this or other sub-optimal housing arrangements.
- 1.43 As noted above, a population-based approach also has lots of segmentation to consider, (beyond international and domestic) that can affect overall student housing need. This segmentation can have inter-dependencies (e.g. as in recruitment terms, universities may also seek to offset downturns in one segment by more active recruitment in another).
- 1.44 As such, it may be helpful instead to think about overarching plausible or reasonable scenarios regarding growth rates.

Conclusions on a plausible range of student housing need growth over the plan period

- 1.45 A reasonable lower bound that takes the lead from the overall domestic demographic trend over the period is a broadly static approach. This applies a minor (2%) uplift across the period (reflecting the projected increase in the number of 18 year olds), as notwithstanding some potential further increases within this period, the longer term trend is the important one, as some short term increases in need can be absorbed in other ways (e.g. living with parents and family). It recognises overall that some of the bigger institutions continue to have significant growth plans which undoubtedly are underpinned

⁷¹ [HESA DT051 Table 1](#). For comparison. in 2024/25 685,565 international students enrolled to study in the UK.

⁷² [Four-futures-Shaping-the-future-of-higher-education-in-England.pdf \(hepi.ac.uk\)](#), Husbands 2024.

⁷³ [A degree of regulation: Building a more financially sustainable and resilient higher education sector HEPI-Debate-Paper-45](#), 2026, Tom Richmond. Calls on the government to implement measures to curtail excessive risk taking among providers and to prioritise sustainability and resilience.

⁷⁴ [Student Accommodation after 2024 and the Need for Strategic Realignment - HEPI](#)

by robust recruitment strategies, but the overall impact of these may be tempered by other factors. For instance, the real risk of institutional failure – or significant cuts – in other institutions, (recruitment to growing institutions potentially absorbing students that might have gone to these) and potentially an increasing domestic tendency to study while living in the family home.

$$257\,000 \times 0.02 = 5140$$

$$257\,000 + 5140 = 262\,140$$

- 1.46 In considering an upper bound, it is proposed to take an approach broadly consistent with the standard method. This opines that it is reasonable to increase stock by 0.8 per cent per year plus apply what is in effect a ‘stretch target’ to account for affordability (this is calculated using an ‘adjustment factor’ and is currently 2.75 in London). Our baseline is a hybrid of a stock and population-based approach, but it is worth calculating this uplift and comparing it against growth rates achieved in recent times.

$$257\,000 \times 0.008 = 2056$$

$$2056 \times 2.75 = 5654$$

$$257\,000 + (5654 \times 12) = 324\,850 \text{ (rounded to nearest 5) [12 is number of years between 2025 and 2037]}$$

- 1.47 The number calculated is an approximate 27% increase in student housing need, which compares to a 48% increase in full-time student numbers in the period 2014/15–2022/23, a growth rate that most commentators agree is unlikely to be sustainable or reproducible. A 27% increase compares reasonably to a growth rate derived from Husband’s differentiated system (internationally expansionist) scenario of 5% annually applied to 63% (the approximate international student housing need component) of the baseline number (257 000), which when added to it, would be 349,520. The lower of the two numbers (324 850) is considered reasonable as, as explained above, an increase in student numbers isn’t reflected 1:1 in student housing need.

Other components of need

What proportion of this need is for ‘affordable’ student housing as defined at present and what growth trends are relevant?

- 1.48 The definition of Affordable Student Accommodation (ASA) was agreed by the cross sectoral Mayor’s Academic Forum as part of the preparation of the 2021 London Plan. It is linked to the maximum student maintenance loan, which in 2026/27 was £14,135: ASA is defined as 55% of this or £7774.25 per annum. This definition is now referenced by other authorities that have sought to introduce similar policy requirements⁷⁵. The current policy sets the requirement for ‘the maximum’ to be secured, with the option of a minimum of 35% to secure fast track eligibility. This is consistent with other affordable housing policy requirements and guidance, reflecting overall levels of affordable housing need in London and viability testing, rather than a specific level of student affordable need.

⁷⁵ <https://qxglobalgroup.com/london-plan-2024-report>

- 1.49 In real terms however, the value of the student loan has not kept pace with inflation⁷⁶, and the income threshold for assessing eligibility has not been revised since 2008⁷⁷. Moreover, the English system assumes parental contributions, even when they themselves may not have enough income to live at an acceptable standard⁷⁸.
- 1.50 As such, actual available living funds may be much lower than even the maximum student loan benchmark, with rent taking an ever-increasing proportion. Various surveys report an increase in students working part time to try to compensate for this, with potential impacts on their studies and wider well-being – some also report recourse to foodbanks and missing meals⁷⁹.
- 1.51 The proportion of students doing paid work during term time has risen markedly from less than 40% five years ago to 65% in 2026, and weekly hours have been increasing⁸⁰. Save the Student report that 36 per cent of students have considered dropping out of university due to rental costs⁸¹ while the Unite Index found that financial issues were the top reason that applicants may not take up their place at university⁸².
- 1.52 Hill et al (2025) found that an annual income of £25k is needed to meet costs of living in London as a first year student in university owned halls; a gap of over £11k for English students (less for those from Wales) from the maximum maintenance support available⁸³. Annual living costs rise for second and third year English students whether renting privately with friends (26.2k) or continuing to live in university owned or private halls (26.5k).
- 1.53 If we take the ASA rent level as an annual benchmark, various student advice sites⁸⁴ and other surveys suggest the cheapest rents plus bills even in inner London could match this (assuming a 38 week rental period), but averages cited across London typically exceed it⁸⁵. While outer London rents are in general cheaper, any saving will be likely offset at least in part by higher transport costs if students attend central London institutions.

⁷⁶ The student loan has fallen in value by around 11% in real terms in the last few years [The value of student maintenance support - House of Commons Library \(parliament.uk\)](#), 2026.

⁷⁷ Equivalent to a 40% cut in the income threshold in real terms - [The value of student maintenance support - House of Commons Library \(parliament.uk\)](#), 2026.

⁷⁸ [A Minimum-Income Standard for Students 2025](#), Katherine Hill et al, HEPI.

⁷⁹ [Students and the rising cost of living - House of Commons Library \(parliament.uk\)](#) 2023; [Natwest Student Living Index 2025](#); [Save the Student National Student Money Survey 2025](#) found that 61% of students reported skipping meals some of the time to make ends meet. 10% had used a food bank over the academic year.

⁸⁰ [Student Academic Experience Survey 2026 \(hepi.ac.uk\)](#)

⁸¹ [National Student Accommodation Survey 2026 – Results - Save the Student](#)

⁸² [Unite Student Applicant Index Report 2026 \(unitegroup.com\)](#)

⁸³ [A Minimum-Income Standard for Students 2025](#), Katherine Hill et al, HEPI. This found that closing the gap would require working 21 hours a week (for an English student) at the minimum wage. Based on data from StudentCrowd, the weekly average cost of renting in a student hall in London ranged from £213 (University owned hall) to £338 (private hall).

⁸⁴ [How much is student accommodation in London in 2026?](#) StudentStudios2Let, estimated rental costs: £200 to £600 per week; see also [Student Accommodation London | Accommodation for Students average rent £330 per person per week](#). These suggest that between £860 - £1,400 -per month for a room in a shared student house/flat in zones 1-2 is achievable: higher with bills on top. It is also suggested however, this may be considerably lower in zone 3 and beyond, but may be offset to some extent by higher transport costs

⁸⁵ [Save the Student National Student Accommodation Survey 2026](#) reports that the average London student rent was £793 a month (£9516 over 12 months). This is similar to [Nat West's Student Living Index 2025](#) survey finding of £742 per month.

- 1.54 Focusing alternatively on PBSA rents, a 2024 survey found a gap of £243 between the average London PBSA rent (both direct let and university-owned and nominated) and the maximum student loan support available to an English student⁸⁶.
- 1.55 Cushman and Wakefield (2023) found only 3% of direct let PBSA beds in London were affordable comparing average rents with the average student loan amount⁸⁷ and report in 2025 that despite the higher Maintenance Loan amount available for students studying away from home in London, fewer than half of beds, (and less than a third of private sector beds), are priced below the maximum Loan⁸⁸.
- 1.56 Moreover, a Unipol survey found university owned and private provider PBSA rents had increased significantly and rental terms were also creeping upwards⁸⁹. At one point, the fixed bill offer of PBSA was apparently closing the cost gap with PRS, however with increased build and operational costs this may no longer be the case⁹⁰.
- 1.57 It is nonetheless acknowledged that 'affordability' can be achieved in a variety of ways. This can include ensuring there are sufficient cheaper 'cluster flats' relative to more expensive studios in the PBSA.
- 1.58 Some commentators have also suggested there should be larger clusters (number of rooms sharing a kitchen) than the 6-8 that is currently typical, or that there may be other design or 'offer' routes to affordability such as smaller rooms, optimally sized buildings, bathroom sharing and use-based utilities bills⁹¹.
- 1.59 Providing a range of room types where students can make their own choices as to what should be 'sacrificed' to bring rents down or an extra that they are prepared to pay for, could be important⁹². There is also evidence that increases in supply in some areas have been able to bring down rents, though this is not necessarily a straightforward relationship as new stock may displace older, cheaper stock⁹³. Equally, landlords exiting the student housing market, and increased controls on converting C3 to C4 HMOs may ultimately exacerbate upward rental pressures in the student housing component of the private rental sector⁹⁴.
- 1.60 To some extent therefore there will be a trade-off with the overall amount of student housing relative to conventional housing. Various aspects of this are not within the control of planning – as wider taxation and licensing policy for instance, and the amount

⁸⁶ [Priced out the accommodation costs survey 2024 London edition.pdf \(unipol.org.uk\)](#)

⁸⁷ [Cushman & Wakefield UK Student Accommodation Report 2023](#)

⁸⁸ [Cushman & Wakefield UK Student Accommodation Report 2025](#), pp52-53.

⁸⁹ [Priced out: the accommodation costs survey 2024 London edition.pdf \(unipol.org.uk\)](#) Found direct let bedspace rents had increased by around 10% for each of the last 2, and an average of 16.5% annually since 2021/22; for university owned this was an increase of one third since 2021/22 or around 9% annually.

⁹⁰ [Student Accommodation after 2024 and the Need for Strategic Realignment - HEPI](#)

⁹¹ [Student Accommodation after 2024 and the Need for Strategic Realignment - HEPI ; Where next for student housing? \(jll.co.uk\)](#)

⁹² [Student-Accommodation-The-State-of-the-Nation-in-2024.pdf \(hepi.ac.uk\)](#); [Knight Frank & UCAS Student Accommodation Survey 2025 | Knight Frank Research](#). Students report they would be willing to forego certain amenities, such as a cinema, gaming or podcast room, for cheaper rents.

⁹³ [Student-Accommodation-The-State-of-the-Nation-in-2024.pdf \(hepi.ac.uk\)](#)

⁹⁴ <https://www.accommodationforstudents.com/student-landlord-guides/4451>

that can be made from short term lets and temporary accommodation may influence this⁹⁵.

- 1.61 Overall, the need for more affordable student accommodation including ASA as currently defined in London, is widespread and increasing year on year, at least while there continues to be inadequate student financial support and bedspace competition in the student housing sector (reflecting both demand and supply) driving up rents.
- 1.62 Blakey (2024) notes that that most universities nationally find that about 20-25% of students need cheaper accommodation than is currently on offer⁹⁶. However, this may be an underestimate in London given price rises and other indicators of latent demand referenced in the previous sections.
- 1.63 Arguably this extent of need is reflected in the practice of most London universities allocating ASA (their own or nominated rooms, or through other rental subsidy) to all first years to whom they offer an accommodation guarantee, though imperfect data and the desire to avoid social stigmatisation of lower income students also play a part.
- 1.64 Significantly, while this may have been conceived as a policy requirement applicable mainly to domestic students, changes in the international student demographic may also be driving need in that sector⁹⁷.

What proportion of this need is for wheelchair accessible housing? Is this being met?

- 1.65 The latest statistics show that 18 per cent of all full-time students enrolled in England have a known disability⁹⁸; this proportion is 23 per cent for UK domiciled fulltime students and 7 per cent for international students⁹⁹.
- 1.66 Engagement with PBSA providers and HEPs has found that they note this is primarily neurological (such as dyslexia) and mental health related. Statistics for full-time UK domiciled students record that 0.47 per cent have a physical impairment that substantially limits one or more physical activities¹⁰⁰.
- 1.67 The Unite Index¹⁰¹ based on an alternative form of self-reporting suggests that 4 per cent of applicants in 2026 had a physical impairment or mobility issue, 4 per cent a longstanding illness or health condition, and 19 per cent a mental health condition. 25 per cent of those declaring a disability expect to require adjustments for day to day life. However, providers report limited uptake of wheelchair accessible rooms (examples of rates of 0.002 per cent and 0.05 per cent were cited in response to the London Plan Guidance (LPG) consultation in January 2023).
- 1.68 An increase in disabled students in recent years is seen in both the UK and non-UK domiciled student body (data available 2020/21 to 2024/25) with a higher rate in the

⁹⁵ [UK's rental market faces housing shortage as landlords leave](#), landlord blog, 2024 Accommodation for students.

⁹⁶ [Student-Accommodation-The-State-of-the-Nation-in-2024.pdf \(hepi.ac.uk\)](#)

⁹⁷ [Student Accommodation after 2024 and the Need for Strategic Realignment - HEP1](#)

⁹⁸ [Figure 5 - HE student enrolments by personal characteristics 2020/21 to 2024/25 | HESA](#)

⁹⁹ [Figure 5 - HE student enrolments by personal characteristics 2020/21 to 2024/25 | HESA](#)

¹⁰⁰ [Table 15 - UK permanent address student enrolments by disability and sex 2014/15 to 2024/25 | HESA](#)

¹⁰¹ [Unite Student Applicant Index 2026 \(unitegroup.com\)](#) Figures 21 and 22.

former¹⁰². The number of those reporting a substantially limiting physical impairment increased by 3700 (of which 2800 study full time) from 2014/15 to 2024/25¹⁰³.

- 1.69 These trends appear to reflect a combination of participation increases as well as an increased willingness to declare learning and mental health related disabilities which may in turn reflect both an increase in prevalence and diagnosis^{104 105 106}.
- 1.70 In the wider population, 13.2 per cent of 20-24 year olds and 11.3 per cent of 15-19 year olds have a disability, and 3.9 per cent of both these age groups have a disability where they face significant limitations (wheelchair users are more likely to fall within this category)¹⁰⁷. In London, the proportion of the population aged 20-24 that has a disability is 10 per cent, (8.5 per cent for 15-19 year olds) and 2.9 per cent (3 per cent for 15-19 year olds) have a disability that limits them a lot¹⁰⁸.
- 1.71 This suggests disabled students with significantly limiting disabilities may be under-represented in the full-time student population, implying barriers to opportunity. Indeed, lack of effective choice for disabled students, including through inadequate suitable housing is highlighted by the Office for Students as a significant equalities issue affecting not only access to higher education, (including choice of course and institution) but also continuation, progression and achievement¹⁰⁹.
- 1.72 2020 research¹¹⁰ found that 49% of disabled students surveyed were in accommodation that didn't completely meet their needs; and 2025 research¹¹¹ found that of students with access needs living in student housing, 36% said their accommodation did not meet these needs. The 2020 research found that cost and physical inaccessibility were highlighted as key issues, followed by accommodation condition and sensory inaccessibility. Discussions held as part of that research also highlighted issues around failure to account for students' specific needs in allocation and management practices¹¹² and wider design (e.g. lack of accessible wider social spaces).
- 1.73 Costs are also a particular issue given the often higher cost of larger rooms (given more space is needed to make them accessible), wider family financial difficulties (intersectional), additional costs of living from being disabled, and difficulty in accessing additional financial support or employment. According to the 2025 Access Insight Report 47% of disabled students who require accessible student housing report having had to

¹⁰² [Figure 5 - HE student enrolments by personal characteristics 2020/21 to 2024/25 | HESA](#)

¹⁰³ [Table 15 - UK permanent address student enrolments by disability and sex 2014/15 to 2024/25 | HESA](#)

¹⁰⁴ Higher Education Commission [Arriving at Thriving: learning from disabled students to ensure access for all, 2020; Support for disabled students in higher education in England \(parliament.uk\)](#)

¹⁰⁵ [Table 15 - UK permanent address student enrolments by disability and sex 2014/15 to 2024/25 | HESA](#)

¹⁰⁶ [Unite Students Applicant Index Report 2026 \(unitegroup.com\)](#) Figures 21-23

¹⁰⁷ ONS [Disability in England and Wales, 2021](#) Table 2.

¹⁰⁸ ONS [Disability in England and Wales, 2021](#) ONS Table 4.

¹⁰⁹ [Equality of Opportunity Risk Register - Office for Students](#) undated; see also gaps in continuation and attainment reported in [Support for disabled students in higher education in England \(parliament.uk\)](#)

¹¹⁰ Higher Education Commission [Arriving at Thriving: learning from disabled students to ensure access for all, 2020](#)

¹¹¹ Disabled Students [UK Access Insights 2025 Report](#)

¹¹² e.g. fines for issues related to a student's mobility and medication; allocation to a wheelchair accessible room when the need was sensory; prevention from using upper floors accessible by lifts due to fire safety rules.

pay extra for it.¹¹³ The Office for Students also identifies that disabled students are more likely to experience cost pressure, again affecting their access to higher education, continuation, progression and achievement¹¹⁴.

- 1.74 A study commissioned by the Office for Students found that disabled students were more likely than the average to have found their accommodation through a private landlord (17 per cent vs 11 per cent)¹¹⁵. This suggests they may be more likely to live in the private rented sector than students who are not disabled.
- 1.75 With the exception of more recently built stock, accessibility in the PRS is poor¹¹⁶, with disabled people more likely to live in unsuitable accommodation compared with other tenures¹¹⁷. Securing adaptations in the PRS is especially challenging¹¹⁸.
- 1.76 In assessing the level of need therefore, there is ‘backlog need’ or constrained choice that should be accounted for, suggesting the importance of headroom above the reported rates of disability.
- 1.77 Accordingly, if provision is at this level, some underuse, (representative of choice) can be expected. Arguably this headroom, if defined correctly, should also give space to account for increasing rates of disability and disabled student higher education participation.
- 1.78 BS Inclusive Design Guidance¹¹⁹ suggests that it is good practice to seek 5 per cent of purpose-built student accommodation as wheelchair accessible, and a further 5 per cent adaptable.
- 1.79 This would seem to be a reasonable proxy for this type of need, with more inclusive design including flexibility, across the board also being desirable. It is also clear that the need intersects with the affordable need, so these should be addressed in tandem.

¹¹³ [2025 Access Insights Report](#), Disabled Students UK.

¹¹⁴ [Equality of Opportunity Risk Register - Office for Students](#) undated; see also gaps in continuation and attainment reported in [Support for disabled students in higher education in England \(parliament.uk\)](#)

¹¹⁵ [Explorations: Student Experiences of Accommodation – Research Report](#), IFF Research, OfS 2026

¹¹⁶ [Research by Abode Impact](#), 2018, reported that 91% of wheelchair users surveyed experienced barriers accessing the PRS.

¹¹⁷ [Housing and disabled people: Britain's hidden crisis](#), Equality and Human Rights Commission. Found that one in three disabled people living in private rented properties live in unsuitable accommodation compared with one in five living in social housing and one in seven living in their own homes.

¹¹⁸ [Disabled people in the housing sector](#), HoC Committee Report, Seventh Report of Session 2023–24

¹¹⁹ [BS 8300-2:2018 | 31 Jan 2018 | BSI Knowledge \(bsigroup.com\)](#)

Part 2: What proportion of student housing need should we be seeking to meet in PBSA when considering housing need and delivery in the round?

2. Introduction

2.1 Having established the level of student housing need in London in Part 1 of this paper, we turn to the question of how much of this need can or should be met within PBSA. To answer this, consideration is given to the proportion of students who currently live in PBSA, London's existing supply of PBSA, student accommodation preferences, how PBSA compares with alternatives such as the PRS, and PBSA's role in contributing towards overall housing delivery. Lastly, consideration is given to how much PBSA London should plan for that would best meet needs.

What proportion of students currently live in PBSA in London? (university or direct let)?

- 2.2 Accurately estimating the number of students in London and their accommodation choices is not straightforward, and various data sources disagree about the actual proportion which are accommodated in PBSA.
- 2.3 Basic HESA stats suggest that the proportion of students living in PBSA in London has reduced in recent years from 18 per cent of full-time students or 42 per cent of those with a student housing need in 2019/20 to 14 per cent of full time students or 26 per cent of those with a student housing need in 2024/25. This is in the context of the rapid rise in student numbers relative to reported bedspace completions¹²⁰. However, these proportions do not account for the high number of 'unknown' place of residence in the data, as discussed in Part 1.
- 2.4 Data obtained from JISC on term time accommodation for 2024/25 records a slightly lower proportion of full-time students living in PBSA (13.2 per cent) than HESA and a higher proportion of students living in their own home (27.5 per cent compared with 21.3 per cent). As with the HESA data, this includes a high number of 'other' or 'unknown' accommodation types¹²¹.
- 2.5 An alternative approach working from the approximate quantity of available bedspaces and assumed occupation levels is considered to get closer to the actual proportion of students living in PBSA. Calibrated against Cushman & Wakefield 2026 data on existing available PBSA bedspaces in London, this suggests that the 2024/25 HESA figures are an undercount, as the total number of bedspaces available is approximately 50% more than those students counted to be living in PBSA in the latest HESA stats (66 800).
- 2.6 Taking this bedspace figure, discounted by 2 per cent to account for frictional vacancies arising, (e.g. due to students dropping out, refit work etc), and using the baseline student housing need pool for 2024/25 calculated in part 1, then a higher reasonably current estimate would be 37% of students with a student housing need live in PBSA.

¹²⁰ <https://qxglobalgroup.com/london-plan-2024-report>

¹²¹ See Appendix.

Table 5

Category (all London)	Number (rounded to nearest 5)
E1: Cushman & Wakefield 2026 count of PBSA bedspaces	98 280
E2: E1 Discounted by 2%	96 315
E3: Total students in student housing need (from Part 1 of the evidence review)	257 000
E4: Percentage of students in student housing need living in PBSA	= E2/E3 x 100 = 37 %

The role of PBSA

What needs are better met in PBSA compared with other student housing?

- 2.7 This question requires us to consider the relative ‘offer’ of PBSA and its relevance to different student needs compared to other student housing in the private rental (PRS) or build to rent (BtR) sectors. There are various qualitative aspects for which PBSA may be better placed to meet student need compared with alternatives. By definition, PBSA is specifically designed and managed around the needs of students – with providers also pointing out that refits and refreshes account for changing needs and preferences over time.
- 2.8 Universities have articulated at the Mayor’s Academic Forum that the security and pastoral/mental health wrap-around support provided by these managed spaces can be particularly valuable. This is particularly the case for first year undergraduates and others living away from home for the first time, and students with mental health conditions. Survey results highlight the importance students place on their accommodation offering well-being support, including pastoral care¹²². This is a key distinction from other managed rental accommodation (BtR and co-living) as well as more dispersed PRS, though clearly wider university pastoral and healthcare provision are available.
- 2.9 Like other modern residential buildings, PBSA may also be more accessible to disabled students than private rental stock where older buildings predominate^{123 124}. Though other modern managed housing such as that in the BTR sector or co-living may also provide many of the facilities available within PBSA, broadening choice is important, and the well-being and welfare angle may be just as important, possibly more so, for disabled students as it is for other students. And locationally, PBSA is generally more likely to be well-

¹²² [Knight Frank & UCAS Student Accommodation Survey 2025 | Knight Frank Research](#) surveyed the expectations and views of 2,500 incoming students. Three-quarters agree that accommodation providers should actively support mental health and 79% believe pastoral care should be a standard part of the offer.

¹²³ Just 22 per cent of private rental stock nationally was built post 1990 ([English Housing Survey 2024 to 2025 Chapter 1 Profile of households and Dwellings Annex Tables](#) Table 1.6) . According to the 2023/24 EHS, the proportion of private rented homes that were built post 1990 was slightly higher in London – 25% compared to 23% across England as a whole.

¹²⁴ [Housing for disabled Londoners - An analysis of secondary data](#), GLA Housing and Land, February 2026

connected and closer to HEP campuses than other rental accommodation, recognising that the connections themselves also need to be accessible. Nonetheless there may be improvements to be made to disabled students' living experiences in PBSA, through for instance better management practices and design that accounts for different disabilities and needs¹²⁵.

- 2.10 A more general dimension is the managed quality and availability of different types of spaces and facilities within PBSA. The quality of private rental sector accommodation has been the subject of various policy interventions, notably licensing and associated enforcement activity, and this has seen some improvements in recent years. Indeed, London's PRS quality has significantly improved over time and London now has the second lowest rate of non-decent PRS homes of any region¹²⁶. However, one student survey found that nationally, 74 per cent of students living in PRS accommodation wouldn't recommend it to others due to building defects, and 59 per cent due to landlord problems, 47 per cent due to cleanliness, compared to 53, 40 and 35 per cent of students respectively in private PBSA¹²⁷. Even accounting for improvements, it is unlikely that London is entirely excluded from these issues.
- 2.11 National survey data also suggests that PBSA in the round is seen to offer better value for money and satisfaction than shared private rental accommodation, which seems likely to be linked to its all-inclusive and on-site managed format¹²⁸. The all-inclusive offer is seen by 62 per cent to help them better manage costs, with 53 per cent suggesting it had become more appealing with a rise in the cost of living¹²⁹. While BtR is clearly seen to be a reasonable substitute by a significant number of students (with more students proportionally living in BtR than PRS in London according to a 2025 survey)¹³⁰, as well as lacking the welfare offer, it also brings affordability concerns for many¹³¹. Conversely, BtR may be attractive to some students looking for less student-dominated environments, perhaps because they are older, have families, or live with non-students. The figures do not indicate the proportion of BtR student residents living in student-only households, nor their age, and nationally, student satisfaction levels with BtR accommodation are on a par with those in private PBSA¹³².
- 2.12 Overall, many of these aspects, particularly in the round, might be seen to have potentially significant impacts on students' health¹³³ and well-being, equality of opportunity and also their studies¹³⁴. Surveys tend to report higher levels of student

¹²⁵ [2025 Access insights report](#), Disabled Students UK.

¹²⁶ This may partly reflect the development of significant amounts of new BtR accommodation in London. [Housing in London annual report – London Datastore; 2024-25 English Housing Survey Headline Report: Housing Quality and Energy Efficiency - GOV.UK Figure 1.5](#) non-decent homes by region

¹²⁷ [Knight Frank & UCAS Student Accommodation Survey 2024 | Knight Frank Research](#)

¹²⁸ [Knight Frank & UCAS Student Accommodation Survey 2024 | Knight Frank Research](#)

¹²⁹ [Knight Frank & UCAS Student Accommodation Survey 2024 | Knight Frank Research](#)

¹³⁰ Students comprise around a third of those living in BtR, compared with 9 per cent of those living in the PRS. [Who lives in Build to Rent? London edition \(businessldn.co.uk\)](#), May 2026.

¹³¹ [Knight Frank & UCAS Student Accommodation Survey 2024 | Knight Frank Research](#) Figure 10.

¹³² [Knight Frank & UCAS Student Accommodation Survey 2024 | Knight Frank Research](#)

¹³³ Access to and the quality of built environment, including housing, are a key determinant of health. [Health profile for England: 2018, Chapter 6: wider determinants of health - GOV.UK \(www.gov.uk\)](#); [Explorations: Student experiences of accommodation research report June 2026](#) IFF Research, Office for Students

¹³⁴ [National Student Accommodation Survey 2025 - Save the Student](#) report that 68% of students say their health suffers and 46% their studying suffers due to rental costs.

satisfaction in PBSA, with a perception that the quality of a student's accommodation affects their academic performance^{135 136}. It is noted that needs can be partially met in other types of student housing than PBSA, and in other ways, even if this is sub-optimal, with students treating some amenities as discretionary if they can tradeoff against for instance, affordability and location. The question then becomes what is the wider impact of student housing needs being accommodated in other types of housing?

What are the other consequences of students being unable to access PBSA, or choosing to meet their needs in other types of housing?

- 2.13 Of greatest potential consequence is the impact of dispersed PRS student housing on neighbourhoods and general needs housing availability. Student households living independently without on-site management – as well as HMO households (and other property such as short term lettings) more generally – can often be associated with issues for neighbourhoods such as noise and poor waste management¹³⁷.
- 2.14 Student housing can also dominate the wider rental sector (both PRS and BtR) to the exclusion of other households who may be better suited to the housing type, particularly when it is family-sized. This is typically due to landlord preferences regarding who they will rent to at what quality level, and the price point at which it is offered¹³⁸. While this is difficult to observe spatially in London, at a London-wide level, pressures on the rental sector, including from student demand are reflected in for instance, the number of families in temporary or overcrowded accommodation¹³⁹. However, it is difficult to precisely quantify the impact of student demand on this situation, given that some of these pressures may relate to other landlord preferences such as for short term lets, and there is also evidence of a contraction in rental stock through sales, particularly in lower cost areas¹⁴⁰.
- 2.15 While PBSA in its typical multi-unit format can also result in a significant increase in students in an area, it is a much more controlled environment, and usually focused on a discrete number of plots, so other housing stock should in theory remain available to enable a demographic mix. This may become more complicated where PBSA introduces students to an area in which they were not particularly prominent before. This has been articulated as a concern by some boroughs, the assumption being that after one year such students move locally into private rented accommodation due to lack of PBSA, or lack of affordable PBSA. There is some indication that this started to happen in the earlier wave of PBSA development in the late 2010s¹⁴¹, however this impact may now be moderated

¹³⁵ [Knight Frank & UCAS Student Accommodation Survey 2024 | Knight Frank Research](#)

¹³⁶ [Knight Frank Student Accommodation Survey 2025/26](#)

¹³⁷ [Mosey, Studentification: the impact on residents of an English City \(brookes.ac.uk\)](#), 2017

¹³⁸ The rent achievable from individual family households may be much lower than that from a larger student group sharing the rent with more intensive building use. See: [De-studentification: emptying housing and neighbourhoods of student populations \(lboro.ac.uk\)](#) 2016 – A Loughborough survey found landlords could get 36% more rental income from a student tenant compared to a non-student.

¹³⁹ On average, 20 in every 1000 households in London, up to 59 per 1000 in one borough; 9 in 1000 housed out of area, [London households in temporary accommodation | Trust for London](#) 2025 Q3. In 2021, 16.9% of households renting in London lived in overcrowded accommodation. [Overcrowding and under-occupancy by household characteristics, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

¹⁴⁰ [Trust for London/Savills Private Rented Housing Supply in London](#), 2024.

¹⁴¹ [The geographies of studentification: here, there and everywhere](#), Darren P. Smith, Joanna Sage and Stacey Balsdon, *Geography* Vol 99 Part 3 Autumn 2014.

given the trend for more second and third years to continue to live in PBSA¹⁴². Arguably though, this demographic change, where students are part of the local demographic mix, may be a feature of wider change in an area seeing significant development that helps meet London's strategic needs.

- 2.16 A lack of PBSA relative to 'need' that is frequently pointed to is high rents in PBSA itself, making it increasingly unaffordable, and spilling over into further rental pressure in the wider market. A Knight Frank/UCAS joint survey found that, nationally, 34 per cent of incoming students report having had to increase their rental budget beyond that which they originally anticipated, 42% stating that this was due to lack of accommodation available within their original budget and 50% because of a desire for better quality accommodation, to get more amenities, or because they felt there was better value for money at higher price points¹⁴³. In some cases this increased spend on housing costs has been supported by additional paid work and other means potentially detrimental to their studies and well-being, or those of their wider family who are also looked to for support.
- 2.17 In London, rents in both the PRS and PBSA have increased significantly in recent years¹⁴⁴, and as described Part 1, this means that the affordability 'gap', particularly between official student finance and living cost needs, continues to rise. However, it is also clear that supply is not the only driver of this, given significant increases in build and running costs¹⁴⁵ in recent years, (noting that PBSA rent as compared to the PRS typically includes utilities bills so there is no incentive to reduce usage) and other factors such as the proliferation of short term lets may also be at play¹⁴⁶.
- 2.18 Another issue flagged is that with the trend for more second and third year students to stay living in PBSA, in the absence of adequate PBSA supply, more first years are living in the PRS, or remaining at home and commuting¹⁴⁷. This is of particular concern to HEPs and student bodies given that first years may be more vulnerable given their new independence, and the experiential impact of not living on campus, as set out above.

¹⁴² [HESA Chart 4 Full-time students by term time accommodation 2014/15 to 2024/25](#) shows a rise in the number of UK students who are not first years across all accommodation types. The number living in private sector halls, while a small proportion of the total, doubled between 2014/15 and 2024/25 a disproportionate rise compared with the increase in the total number of students who are not first years over the same period.

¹⁴³ [Knight Frank Student Accommodation Survey 2025/26](#) Joint Knight Frank UCAS survey of incoming students.

¹⁴⁴ [HRN 09 \(2023\) Understanding recent rental trends in London's private rental market – London Datastore; Priced out? The accommodation costs survey London edition 2024](#), HEPI, Unipol; [Knight Frank Student Accommodation Outlook 2025/26](#), see p11, UK PBSA rental growth by City.

¹⁴⁵ [Student accommodation: Availability and rental growth trends July 2023 \(pwc.co.uk\)](#); [Where next for student housing? \(jll.co.uk\) 2024](#); [Student Accommodation after 2024 and the Need for Strategic Realignment - HEPI](#)

¹⁴⁶ [HRN 09 \(2023\) Understanding recent rental trends in London's private rental market – London Datastore](#)

¹⁴⁷ HESA accommodation data suggests a significant uptick in first year London students living in PRS between 2019/20 and 2024/25 with the proportion of first year students doing so increasing from 19% to 26% over this period. While the number of second and third year students living in PBSA has increased, the proportion doing so has remained around 10% since 2014/15. A smaller proportion of second and third year students live in PRS than did so in 2014/15, however the number of second and third year students living in PRS has risen since 2014/15 [Where do HE students study? | HESA](#) DT051, table 57.

If PBSA supply increases do students move into it from other housing?

- 2.19 The question then arises as to whether, if there were more PBSA supply, students would choose it over conventional private rental options derived from stock that could otherwise meet general needs.
- 2.20 There is some indication this is already happening, with the aforementioned trend of more second and third years choosing to [continue to] live in PBSA than would traditionally have been the case¹⁴⁸. Such students in effect have privileged access to PBSA through re-booking windows that open before first year students have university places confirmed, by-passing supply issues later in the year.
- 2.21 There is also some evidence of 'de-studentification' (increase in student housing vacancies, and then demographic shifts in neighbourhoods) where significant new amounts of PBSA have come on stream, such as Loughborough in the mid 2010s¹⁴⁹. Elsewhere however, while reductions in rental growth in the PBSA sector may be an indicator of the potential for this to happen, (e.g. in Brighton and Leeds)¹⁵⁰ actual evidence of it doing so seems more limited.
- 2.22 As such, there may be limits to this trend. These appear to be affordability related: as PBSA has become more expensive, survey data suggests perceived affordability is eroding, and this is linked to student wellbeing¹⁵¹ – and willingness to pay has limits¹⁵². This implies price remains a moderating factor: indeed, in cities where student numbers have fallen, alleviating supply pressures, there is some indication that it is the most expensive PBSA rooms that remain unfilled¹⁵³.
- 2.23 In 2024/25 rental growth in the lowest quality/lowest priced rooms outpaced those in the highest priced/quality¹⁵⁴. Nationally, studios have become much slower to let than cluster flats. While both have seen a fall in occupancy, in April 2025 this was more marked for studios (14.1 per cent lower than the previous year), than cluster flats (9% lower)¹⁵⁵. While increased competition (with increased supply) should ultimately bring down prices, it may not be sufficient to bring about parity with the private rental sector in cheaper, relatively well-connected locations, given that price reductions will ultimately be limited by build and running cost increases referenced above¹⁵⁶. While this may be partially offset by a policy link between PBSA delivery and delivery of ASA which should ensure a proportion of PBSA is affordable, other policy priorities (including in some Local Plans)

¹⁴⁸ Analysis of HESA DT051 Table 57 statistics filtered by entrant/non-entrant; see also [Knight Frank & UCAS Student Accommodation Survey Report - 2024 | Knight Frank Research](#) page 8

¹⁴⁹ [De-studentification: emptying housing and neighbourhoods of student populations \(lboro.ac.uk\)](#)

¹⁵⁰ [StuRents rental growth annual report 2025](#)

¹⁵¹ 92% of respondents to [Knight Frank & UCAS Student Accommodation Survey 2025](#) considered affordable living costs essential to wellbeing

¹⁵² [Knight Frank & UCAS Student Accommodation Survey Report - 2024; Knight Frank & UCAS Student Accommodation Survey 2025; StuRents Annual Student Accommodation Report 2025; UK student accommodation report, 2025, Cushman & Wakefield](#)

¹⁵³ [Student Accommodation after 2024 and the Need for Strategic Realignment - HEPI](#)

¹⁵⁴ [UK student accommodation report, 2025, Cushman & Wakefield; Knight Frank UK Student Accommodation Outlook, 2025/26;](#)

¹⁵⁵ [StuRents' Annual Student Accommodation Report 2025](#) records Occupancy in September 2025 stood at 84.9% for studios and 86% for cluster flats respectively, compared with 90% and 92.8% in the previous year.

¹⁵⁶ [Where next for student housing? 2024, JLL.](#)

mean that C3 affordable housing contributions reduce the amount of PBSA delivered. As such other policy levers may be necessary to ensure this.

- 2.24 If affordability is the key dimension keeping some students in the PRS where basic needs are met, then this may highlight the importance of PBSA being both in sufficient supply and offering sufficient lower cost options to help improve its relative attractiveness, if alleviation of pressure on the PRS is the objective. This may be helped by further diversifying the location of PBSA to include more lower cost locations. It is unrealistic, however, to assume that all student households can be enticed to live in PBSA. Some students will always prefer living in unmanaged environments and the NUS have reported in the Mayor's Academic Forum that some students prefer to live in diverse communities not 'student bubbles'. PBSA may therefore be more about ensuring increases in student numbers (as part of a growth in the student population) are not reliant on, and do not adversely impact, the wider (general needs) rental sector for their housing needs. This would be by ensuring there is choice in the student housing sector, and additional pressures are not created, rather than seeking to alleviate existing pressures.

What about the role of PRS supply – does contraction in availability warrant more PBSA?

- 2.25 There is an argument that PBSA can help offset a reduction in PRS supply, and may already be doing so – its increasing use by second and third years may in part reflect a lack of choice rather than a preference to live in PBSA¹⁵⁷, particularly where it pushes students over budget. It is widely reported that tax and interest rate changes, plus impending regulatory change (relating to leaseholds and energy performance¹⁵⁸) is causing contraction in the number of HMOs, landlords, and available PRS properties¹⁵⁹. Some of these issues – such as energy performance – may also affect older university-owned PBSA, which could also heighten the importance of new (privately-owned) PBSA.
- 2.26 However, there is some evidence that BtR accommodation is filling this market gap in larger cities, and in some places may work out cheaper (at least per sq m) than PBSA¹⁶⁰. Anecdotally, PBSA providers are now using larger marketing budgets, including to pay international commission fees, not only due to fewer international students and affordability concerns, but also as the competition is wider than would be expected from just analysing PBSA supply¹⁶¹. This would suggest that a contraction in PRS alone is not sufficient justification, unless more affordable student accommodation provision is specifically targeted and considered the priority.

Why else might PBSA be desirable from a housing perspective?

- 2.27 Another justification for increasing PBSA delivery sometimes referenced, is its potential to support delivery of overall housing numbers. This may be through direct, on-site cross-subsidy or payments in lieu when it is relatively viable (as has been the case).

¹⁵⁷ [Unipol Student House Hunting Behaviour Survey 2025](#), reports that, nationally, a quarter of returning students seek to live in PBSA. 71% seek to rent privately.

¹⁵⁸ [What does the King's Speech mean for me? | NRLA](#), May 2026; [Minimum standards for the private rented sector - Energy Saving Trust](#), March 2026; [State of the lettings industry report 2025](#), Goodlord.

¹⁵⁹ [Housing Research note 9](#), GLA Housing and Land, 2023; [Savills Private Rented Housing Supply in London](#), Trust for London, London Councils, 2024; <https://qxglobalgroup.com/london-plan-2024-report> ;

¹⁶⁰ [StuRents' Annual Student Accommodation Report 2024](#)

¹⁶¹ [StuRents' Annual Student Accommodation Report 2024](#)

- 2.28 It can also occur through PBSA being an investment product that means it is not subject to 'for sale' absorption limitations, so contributing further to overall housing numbers (albeit counted on a 2.5:1 ratio at present). However, it is one of several specialised housing products that can have this effect and shouldn't necessarily be prioritised above those products which also address need which is less able to be met in conventional stock (noting that some of these housing types may be more difficult to fund and finance).

What impact will the Renters Rights Act have on the availability of student accommodation and student accommodation preferences?

- 2.29 The Renters' Rights Act 2025 from May 1 2026 ended fixed term tenancies, replacing these with 'or periodic' or rolling' tenancies. PBSA is largely exempted from the Act's provisions. Transitional arrangements are in place for existing tenancies.
- 2.30 It is too early to tell what impact this legislation will have on student accommodation in terms of its availability, cost and the impact on students and their accommodation preferences. It may mean that some PRS landlords leave the sector, which could in turn increase demand for other forms of housing, including PBSA^{162 163 164}.

Conclusion

- 2.31 The question of whether it is preferable for students to be able to live in PBSA has been explored in relation to both student needs, and wider impacts of students having – or not having – this choice. In conclusion, it is apparent that PBSA adds to housing choice and may better meet some students' needs. Overall, this is likely to be a matter of personal preference and influenced by its affordability. Enabling this choice is important, and may have wider housing and other benefits, but this does not mean that it should be expected that every student should be directed to PBSA to meet their housing needs.
- 2.32 Ultimately, there are also other policy and practice levers that can compensate for any relative deficiencies of other housing stock. This is particularly relevant given that PBSA by definition is less flexible to changes in demand – which Part 1 of this paper highlighted is uncertain going forward. And secondly, given that many PBSA sites are also suitable for general needs housing which – given pressing overall housing need – may be a higher priority. Proportionality of provision, then becomes a key consideration.

Is PBSA 'need' best expressed as PBSA 'sufficiency' and how is this best defined? Can we quantify it?

- 2.33 Therefore, the 'need' for PBSA is perhaps much more appropriately expressed as 'sufficiency to provide reasonable choice to those who may wish to pursue it'. The question then becomes, how is 'reasonable choice' defined, and how might it be evidenced that it is lacking or excessive?
- 2.34 One indicator of relevance that consultants have proposed is the bedspace ratio – that is, the overall number of students in the 'demand pool' relative to the number of available PBSA bedspaces. There appear to be several ways in which the 'demand pool' is

¹⁶² [Weekend reading: what's happening with the UK's student accommodation](#), Martin Blakey, HEPI, April 2026; [UK Student Market Update May 2026](#), Knight Frank.

¹⁶³ [Unipol Student House Hunting Behaviour Survey 2025](#)

¹⁶⁴ [Renters Rights Act is a disaster for independent students, Wonkhe, 16/1/2026](#)

calculated, with some consultancies apparently not accounting for the number of London-domiciled students or the proportion likely to be living in non-student households¹⁶⁵. Cushman and Wakefield's (C&W) method, while not transparent, appears to arrive at a ratio closest to that which might be derived using the demand pool (student housing need) calculated and 2026 PBSA count numbers used in Part 1 of the paper ($257\,000/98\,282 = 2.61$). C&W calculate that at 2.93:1 London has the highest student bed ratio of any major city (average 1.8:1), above the national average (2.05:1)¹⁶⁶.

- 2.35 However, as a starting point, a ratio of around 2:1 might be seen to give reasonable choice, giving a 50 per cent chance that a student could live in PBSA. While not as low as some cities have evidently achieved, there is arguably greater flexibility to otherwise absorb student housing need in London with limited detriment, given the extent of the rental market, including growth in BtR, and commuting from 'home' opportunities. Based on current numbers, this would imply an increase of 30 218 bedspaces or 31 per cent on the 2025 count ($=257\,000/2 = 128\,500$; $128\,500 - 98\,282 = 30\,218$).
- 2.36 An alternative approach, or means to sense check this ratio, might be to consider sufficiency as the number of bedspaces that allows a restoration of the proportion of first year first degree students in PBSA to what it was prior to the most recent uptick in student numbers. This appears to be the main group that there is concern about not being able to accommodate in PBSA. The proportion was 75% of those students in student housing need in 2014/15 (including a proportionate re-allocation of those in other/unknown accommodation to PBSA). Such a calculation implies a current shortfall of 8225 bedspaces (rounded to the nearest 5) or an increase of around 8 per cent on the 2026 count number to achieve sufficiency. Expressing this as a bedspace ratio by adding it to the 2026 count number, $(257\,000/(98\,282 + 8225))$ equates to a ratio of 2.4 students to every bedspace. If instead we base the quantification on 100 per cent of first year first degree students, then the shortfall is 21 075 bedspaces, which implies a bedspace ratio of 2.2:1.

¹⁶⁵ See e.g. [Savills](#) and [CBRE](#) cf. [Cushman & Wakefield](#)

¹⁶⁶ Cushman & Wakefield, by email 19/5/2026.

Table 6

Category	Number (rounded to the nearest 5)
F1: First year, first degree students with housing need (including proportionate re-allocation of unknown/other) in HESA accommodation stats ¹⁶⁷	43 930
F2: Proportion of students with student housing need that are first year, first degree	$= 43\,930/D5$ $= 43\,930/221\,460$ $= 0.2$
F3: Number of first year, first degree students with housing need re-based to agreed baseline (E3)	$= 0.2 * 257\,000$ $= 51\,400$
F4: 75% of F3 (2014/15 proportion of first years in student housing need in PBSA)	$= 0.75 * 51\,400$ $= 38\,550$
F5: 59% of F3 (2024/5 proportion of first years in student housing need in PBSA)	$= 0.59 * 51\,400$ $= 30\,326$
F6: Shortfall to 75% from current	$= F4 - F5$ $= 8\,225$
F7: Shortfall to 100% from current	$= F3 - F5$ $= 21\,075$

2.37 Another relevant comparator is the number of students to whom an accommodation guarantee applies, which is something universities stress to be important in giving them a competitive edge nationally and internationally. This extends beyond first years to include international students, and in 2024, CBRE suggests that this figure was 111 000 students. This suggests a shortfall of 17 380, a figure which sits between the two first year proportions above.

2.38 Overall, these comparisons suggest that a bedspace ratio of 2:1 in London is fairly generous – potentially allowing for all first year first degree students, plus a proportion of others (including international students and second and third year students), to live in PBSA. As such it might be seen as a ‘high ambition’ scenario against which to prioritise other policy objectives, including a push for greater PBSA affordability, and/or potentially, cross subsidy of C3 affordable housing to also deliver that in greater quantum. Conversely, the higher ratios, including that presently achieved, may be seen to prioritise giving more development capacity to other suitable investment products, notably BtR, to alleviate rental pressure more broadly. It seems reasonable to consider both of these in relation to the next question.

¹⁶⁷ From [Where do HE students study? | HESA](#) Table DT051 table 65.

What is a plausible and proportionate range of increase in the quantum of PBSA regarded as 'sufficient' over the plan period?

2.39 Taking the two student housing need growth scenarios from Part 1 we can apply these different ratios to them to arrive at a range of increases from the 2026 count of 98 282¹⁶⁸.

Table 7

All numbers rounded to nearest 5	PBSA bedspace number applying current bedspace ratio 2.61:1 (38% of student housing need)	PBSA bedspace number applying 2.5:1 bedspace ratio (40% of student housing need)	PBSA bedspace number applying 2.2:1 bedspace ratio (45% of student housing need)	PBSA bedspace number applying 2:1 bedspace ratio (50% of student housing need)
Lower growth scenario 262 140 Student housing need	= 262 140/2.61 = 100 435 (Increase of 2155 over 12 years or 180 p.a.)	= 262 140/2.5 = 104 855 (increase of 6575 over 12 years or 550 p.a.)	= 262 140/2.2 = 119 155 (increase of 20 875 over 12 years or 1740 p.a.)	= 262 140/2 = 131 070 (increase of 32 790 over 12 years or 2730 p.a.)
Higher growth scenario 324 850 Student housing need	= 324 850/2.61 = 124 465 (increase of 26 180 over 12 years or 2180 p.a)	= 324 850/2.5 = 129 940 (increase of 31 660 over 12 years or 2640 p.a)	= 324 850/2.2 = 147 660 (increase of 49 375 over 12 years or 4115 p.a)	= 324 850/2 = 162 425 (increase of 64 145 over 12 years or 5345 p.a)

2.40 However, another consideration is the refit rate which means not all stock is accessible in any one year. Cushman and Wakefield have advised approximately 800-2400 bedspaces are under refit at any one time, suggesting the 2 per cent discount applied in the first section above should be added as a buffer to the numbers. This may also account for loss of some existing stock and unanticipated voids that cannot be filled mid-year.

¹⁶⁸ Cushman & Wakefield advise PBSA supply in London in March 2026 to be 98 282 bedspaces, by email.

Table 8

All numbers rounded to nearest 5	PBSA bedspace number applying current bedspace ratio 2.6:1 plus a 2% buffer	PBSA bedspace number applying 2.5:1 plus a 2% buffer	PBSA bedspace number applying 2.2:1 plus a 2 % buffer	PBSA bedspace number applying 2:1 plus a 2% buffer
Lower growth scenario 262 140 student housing need	= 262 140/2.61 = 100 435 *1.02 = 102 445 (Increase of 4165 over 12 years or 345 p.a.)	= 262 140/2.5 = 104 855 *1.02 = 106 955 (increase of 8670 over 12 years or 725 p.a.)	= 262 140/2.2 = 119 155 *1.02 = 121 540 (increase of 23 255 over 12 years or 1940 p.a.)	= 262 140/2 = 131 070 *1.02 = 133 690 (increase of 35 410 over 12 years or 2950 p.a.)
Higher growth scenario 324 850 Student housing need	= 324 850/2.61 = 124 465 *1.02 = 126 995 (increase of 28 670 over 12 years or 2390 p.a)	= 324 850/2.5 = 129 940 *1.02 = 132 540 (increase of 34 255 over 12 years or 2855 p.a)	= 324 850/2.2 = 147 660 *1.02 = 150 610 (increase of 52 330 over 12 years or 4360 p.a)	= 324 850/2 = 162 425 *1.02 = 165 675 (increase of 67 390 over 12 years or 5615 p.a)

How do these numbers compare to past levels of delivery and the current pipeline ?

- 2.41 In considering the approach it is worth looking at the current pipeline, which is currently at a high reflecting relative viability, and market catch up (including construction slowdowns) after the 2018-22 lows. Knight Frank reported (in Q4 2025) that in London there were over 14 600 bedspaces under construction in 2025, with 4,350 beds added to the supply¹⁶⁹. According to the GLA Planning London Datahub in 2025 London's PBSA pipeline was in excess of 35,000 bedspaces (approvals). This suggests well over a third of the (consented) pipeline was progressing towards completion. This compares to the annual completion market low in 2019, which saw only 1700 bedspaces delivered, arguably a market adjustment following extreme highs in the period to 2012-2016 (nearly 6000 completions in 2016), and as other types of development became more viable¹⁷⁰. As such, the ratio of 2.2:1 plus 2% when applied to the higher growth scenario) would seem to be the upper limit of deliverable plausibility (see Table 8). And given market interest, the lowest, market-led scenario would perhaps be the 2.2:1 ratio applied to the lower growth scenario, assuming some years would deliver more, and some less.

¹⁶⁹ [Knight Frank Student market update Q4 2025](#); [Cushman & Wakefield Student Accommodation Report 2025](#) reports that London saw a net gain of 3775 new beds in 2025/26 compared with 2024/25.

¹⁷⁰ London Plan: evidence base summary for the Mayor's Academic Forum, Cushman and Wakefield, March 2023.

What are other considerations and proportionate comparators – which of these figures is enough to meet specific needs or not exacerbate private rental pressures?

- 2.42 Encompassed within this range as referenced in Part 1 and above, is the potential for various trends to play out, including fewer domestic students living away from home and changes in the number of international students (some of whom may be more likely to seek to live in PBSA). Quantification of these possibilities as comparative benchmarks is lacking, and may anyway be falsely precise if too granular, however there are a few proxy comparators that can be constructed to help consider sufficiency and proportionality.
- 2.43 Firstly, we could apply the growth rates in each scenario to the accommodation guarantee figure (as a proxy for key needs) and see to what extent such students could be accommodated under the different ratios. This could incorporate a decrease in domestic students need relative to international student need, or vice versa, or a continuation of current priority need pool component scales. This suggests a low of 116 550 bedspaces ($=111\,000 \times 1.02$) and a high of 142 080 ($=111\,000 \times 1.28$) both of which would be accommodated in the 2.2:1 plus 2% ratio range with some headroom, though the 2:1 range would give more headroom for others to be accommodated. This would address the backlog need not currently met in PBSA, and growth in this priority need pool.
- 2.44 Another specific quantification of relevance is a possible reduction in HMOs in London. CBRE report a reduction of 23 per cent (derived from licensing figures) over the 4 years from 2018/19 to 2022/23¹⁷¹. If we apply this percentage reduction to the proportion of students in student housing other than PBSA, ($257\,000 - E2 = 160\,685$) and project the rate forward it suggests that there may be a need for an additional $36\,960/4 = 9240$ PBSA bedspaces per year to compensate for lost HMO supply ($((0.23 \times 160\,685)/4)$). Over a 12 year period, the total could be 110 880, if these trends continue. This suggests a much higher increase in PBSA may be needed than those calculated above. However, this is likely to be an overstatement as it does not account for smaller HMOs, which typically do not need to be licensed, (bearing in mind the average student-only household size nationally is around 2.5, hence the count ratio applied to bedspace completions). It also assumes a simple trend projection which in practice may vary more as taxation and other policy levers vary over time.
- 2.45 Alternatively, it may be helpful to consider what quantum of increase could help avoid additional pressure on the PRS. In this case, the quantification of relevance may be the total increase in students in student housing need. In the low growth scenario, the increase is just 5140 ($262\,140 - 257\,000$)) so would be easily attained with nearly all the bedspace ratios above, assuming an improvement on the 2025 ratio. In the higher growth scenario, the increase would be 67 850 ($324\,850 - 257\,000$) which only the 2:1 bedspace ratio would approach. The ability to achieve the PRS alleviation objective becomes quite dependent on its affordability, format and how it is managed however. As such the assumption that underpins this quantification (that increasing supply in the same quantity

¹⁷¹ [The London Plan three years on: what's been the impact on PBSA?](#), 2024 CBRE; [Housing in London 2025 report](#) Between 2021 and 2023, there was a 29% increase in the number of HMOs issued with mandatory licences in London. After this, the number of HMOs issued with mandatory licences fell by 13% - from 22,768 in 2023 to 19,896 in 2024.

as increase in student housing need will divert additional pressure from the PRS) may be misguided, particularly given the growth in the BtR sector discussed above.

- 2.46 Looking beyond the overall growth in number of students, we consider the level of need which is obtained by applying the principles of the standard method formula to existing PBSA provision. Applying this to the 2025/2026 figure of 98 282 bedspaces, an increase of 2162 per year $((98282 \times 0.008) \times 2.75)$ or 25,944 over 12 years is attained. This is closest to the lowest growth scenario plus 2% at a bedspace ratio of 2.2:1 or the highest growth scenario maintaining the existing bedspace ratio, though if the HDT count ratio (2.5:1) is applied to the bedspaces, it is closest to the higher growth scenario plus 2% derived from the 2:1 ratio. Alternatively, if the PBSA annual growth numbers derived are expressed as a simple percentage of the overall expected annual housing delivery, this ranges from 0.6 per cent to 10.1 (see Table 9 below). Percentages would be lower if the 2.5:1 HDT ratio were applied to the PBSA numbers, which in all cases is very small, especially when the economic significance of London's university sector is considered¹⁷², which the 'offer' to students may affect.

Table 9

All numbers rounded to nearest 5	PBSA bedspace number applying current bedspace ratio 2.61:1 :1 plus a 2% buffer	PBSA bedspace number applying 2.5:1 plus a 2% buffer	PBSA bedspace number applying 2.2:1 plus a 2 % buffer	PBSA bedspace number applying 2:1 plus a 2% buffer
Lower growth scenario 262 140 Student housing need	2.47 102 445 (Increase of 4165 over 12 years or 345 p.a = 0.6% of 55.8k)	106 955 (increase of 8670 over 12 years or 725 p.a = 1.3% of 55.8k)	121 540 (increase of 23 255 over 12 years or 1940 p.a. = 3.5% of 55.8k)	133 690 (increase of 35 410 over 12 years or 2950 p.a. = 5.3% of 55.8k)
Higher growth scenario 324 850 Student housing need	126 955 (increase of 28 670 over 12 years or 2390 p.a = 4.3% of 55.8k)	132 540 (increase of 34 260 over 12 years or 2855 p.a = 5.1% of 55.8k)	150 610 (increase of 52 330 over 12 years or 4360 p.a = 7.8% of 55.8k)	165 675 (increase of 67 390 over 12 years or 5615 p.a = 10.1% of 55.8k)

What level of 'sufficiency' should we plan for?

- 2.48 Overall, it could be argued that the majority of the PBSA growth numbers derived from applying the different growth scenarios and bedspace ratios are plausible and proportionate when looking to account for a variety of potential upward pressures and wider housing delivery trends.

¹⁷² [London Growth Plan](#), 2025, Mayor of London, London Councils.

- 2.49 In wider planning terms we need to manage uncertainty and plan positively for housing need though plan-making, and provide as much clarity as possible for when assessing applications in decision-making.
- 2.50 We are therefore proposing a range that we consider most optimal for plan-making purposes and being clear how the other benchmarks may help assess proportionality and sufficiency in decision-making terms. This is intended to help manage more speculative development proposals that may inflate land values due to certain viability practices, as ultimately, it seems likely that the market itself and actual delivery will cool as demand and supply levels approach the 2:1 ratio.

What is the resultant planning requirement for the London Plan?

Planning positively for PBSA need

- 2.51 It is expected that strategic policies make ‘sufficient’ provision for homes, including affordable housing¹⁷³. And the London Plan, as with other plans, is ultimately subject to the tests of soundness which include being ‘positively prepared’ (such that the strategy will seek to meet objectively assessed needs) and ‘effective’ (deliverable over the plan period)¹⁷⁴.
- 2.52 In this context, planning positively for PBSA need (or sufficient PBSA) means making sure enough housing capacity in appropriate locations is proactively identified to accommodate the relevant quantum. This is important in order to help manage the market interest in PBSA, helping to avoid situations where it dominates the housing pipeline, but ensuring it is nonetheless provided for amidst other housing development. While the London Plan cannot allocate sites, it can provide strategic direction to Local Plan preparation to help ensure the appropriate quantum and distribution of PBSA is attained across London.
- 2.53 Assuming for the most part, PBSA sites will be a sub-set of sites suitable for other housing, when considering what this quantum should be, the key factors of relevance are:
- the scale of need relative to other types of housing need and its wider strategic role, (given the opportunity costs of a housing site being partly or wholly developed for PBSA); and conversely,
 - the role that PBSA might play in helping to achieve wider housing delivery and sufficiency.
- 2.54 It may also be helpful to consider long term, the adaptability of such housing to suit other housing needs in the event that it is not needed for student housing, and what impact differing quanta could have on particular places.
- 2.55 In examining these considerations and their implications for the planned PBSA quantum, it is helpful to work back from the extremes in the tables above – i.e. the highest and lowest numbers.

¹⁷³ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) December 2024, paragraph 20.

¹⁷⁴ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) December 2024, paragraph 36.

How does the scale of 'need' compare with other housing need, and what are other relevant strategic factors?

- 2.56 The scale of student housing 'need' and the PBSA component of that as indicated by the above tables is very small compared to other housing need, particularly for affordable housing.
- 2.57 The scale of affordable housing need is acute, whether measured by the number of households on council waiting lists (341,421 in 2025¹⁷⁵), the number of households in temporary accommodation (on average, 20 in every 1000 households in London, up to 59 per 1000 in one borough; 24 in 1000 housed out of area in another¹⁷⁶) or the envisaged housing delivery of 55.8k homes over the next plan period.
- 2.58 This would suggest that overall PBSA should not be prioritised through the application of what might be regarded as 'stretch' ambition when looking for housing sites, notably the numbers derived from the higher growth scenario and the 2:1 bedspace ratio.
- 2.59 On the other hand, the percentages in the table above suggest that any of these scales of PBSA provision will be small relative to the overall step up needed to meet the draft London Plan housing target. In this sense, given the economic importance of the university sector, the lowest scale of provision is also not considered proportionate.

How do we weigh this with the extent to which PBSA can help housing delivery and reduce pressure on other housing stock?

- 2.60 As noted above, PBSA may help to attract students out of the wider rental sector, alleviating pressure on it, though there doesn't appear to be an exact correlation with supply, and much may depend on relative affordability and availability at key points of the lettings cycle. There is also some logic and evidence of PBSA contributing to wider housing delivery through on and off-site contributions to affordable housing (notably in Southwark) and continued delivery potential when for-sale absorption and investment is constrained. However, this is not limited to PBSA. As such these arguments are not considered to justify the highest range numbers derived from the 2.1 ratio applied to the higher growth scenario. Conversely though, a very tight PBSA supply suggested by no increase on current bedspace ratios is unlikely to help reduce rental pressure. Sufficient PBSA provision is a prerequisite for attracting some students out of the wider general needs rental sector, and greater affordability is also a key aspect of wider student need.

What would happen if 'too much' PBSA were built relative to actual student demand – could it be converted to meet other housing need?

- 2.61 Another dimension to the opportunity cost of PBSA is the embodied carbon and overall built form resulting from them becoming fixed assets oriented at a particular tranche of housing need. Accordingly, the question of adaptability over time is important in the event that demand for PBSA does not emerge as expected, or sees a significant reduction. This has happened in Coventry for instance, where PBSA occupancy levels have apparently dropped to 70 percent following a reduction in international students¹⁷⁷.

¹⁷⁵ [Table 600: Number of households on local authority registers \(waiting lists\) from 1987, by District](#), Live tables on rents, lettings and tenancies, .GOV.UK

¹⁷⁶ [London households in temporary accommodation | Trust for London](#), figures cited for Q4 2025.

¹⁷⁷ [The Canary in the Coal Mine: Lessons from Coventry for PBSA Investors](#) 2025, Dan Smith, LinkedIn.Com

Though a major fall in demand may be less likely to occur in London where there is such a number and range of institutions, there is nonetheless uncertainty over future student housing need and PBSA demand, and the quantum ranges in the above tables are large.

2.62 Such a situation was a key concern raised by stakeholders in a Planning for London focussed group session on specialist housing need. It was suggested in that session that the main suitable alternative use (with minimal modifications) for most PBSA buildings was for co-living, (large-scale purpose-built shared living - LSPBSL). This is typically seen to be an alternative to HMO accommodation for non-students, and like PBSA, adds to housing choice for some. However, the proportionate provision of LSPBSL, which can be relatively expensive, is also a concern, given its non-suitability for the majority of households in acute housing need. It is reported that conversions to hotels, serviced apartments, and temporary housing (e.g. for asylum seekers) are also alternative uses being considered for 'excess' PBSA¹⁷⁸. Whilst the latter is clearly another type of housing need, and it may be more appropriate than hotel or B&B accommodation for such client groups, it is also something for which demand should fall over time. Ultimately, PBSA is less flexible than general needs housing to meet different needs.

2.63 This again reinforces the rationale not to plan for the highest numbers, although it does not mean we should be excessively cautious in relation to 'planning positively'. In a more constrained market, choice of sites may become more important to ensure some delivery and flexibility.

Is there a distinction between what is sufficient and/or proportionate at the London-wide level and how this is experienced in individual boroughs or places?

2.64 Given that not all new residential locations will be suitable for PBSA in terms of their particular offer and connectivity to HEP campuses, it is likely that some clustering will occur, and this may be where it is more likely that housing mix pressures will be felt. This may be experienced both in the ability to meet the range of student housing needs, and to create places that are mixed and inclusive. As such, in arriving at a particular quantum around which to plan positively, the potential impact on individual places (boroughs or other discrete locations) should be considered. To some extent this impact will depend on whether the place is subject to wider strategic change, whether related to a local university campus growth plans, or other strategic development capacity that means it will accommodate *more* than local need (that arising from natural population growth and hidden need). In these instances, larger uplifts in PBSA growth should be more easily absorbed, as they are curated as part of a place's planned evolution, so the higher numbers derived from the higher growth scenario may be most relevant.

Suggested way forward

2.65 The above analysis points to a focus on the ranges associated with the 2.2:1 and 2.5:1 bedspace ratios, (while acknowledging that the 2.1 low growth ratio also incorporates the number derived from the higher growth scenario associated with the existing bedspace ratio and 2.5:1 ratio). Out of the ratios considered, the 2.1 high growth ratio does not seem warranted or unrealistic and the low growth ratios could be viewed as over cautious.

¹⁷⁸ [The Canary in the Coal Mine: Lessons from Coventry for PBSA Investors](#) 2025, Dan Smith, LinkedIn.Com; [Huddersfield PBSA being Repurposed for Asylum Seekers | Unipol Student Homes \(nationalcode.org\)](#)

Returning to consider what these numbers mean for student accommodation, in seeking to address current shortfalls relative to various need components of strategic concern to HEPs and other potential pressures, it is considered that **the 2.2:1** range is most appropriate to work with for plan-making purposes.

- 2.66 As such it is suggested that for areas with strategic housing capacity or experiencing strategic growth, 6 % of their housing capacity is delivered as PBSA. This may need to be higher in discrete locations considered particularly appropriate for PBSA. In other suitable locations, 3 % of their housing capacity should be planned as PBSA, though this may need to be further moderated where such capacity is largely in the form of small sites that could not accommodate an optimally sized student housing block (300-350 to 600 bedspaces)¹⁷⁹.

This analysis suggests an average of around 3150 pa or 31 500 PBSA bedspaces over 10 years should be planned for¹⁸⁰, the majority through this positive approach, with the rest derived from windfall opportunities.

Assessing proportionality in the Development Management context – ahead of new Local Plans or on windfall sites

- 2.67 Ahead of Local Plans being updated to incorporate this provision, or on unallocated windfall sites, the wider range of bedspace ratio benchmarks may be more relevant in assessing proportionality i.e. including those from the 2:1 ratio or up to 7.1 per cent of the borough's housing pipeline (or 5 year land supply). This accounts for the fact that not all consents may be built out, and that the positive planning approach may under-provide in the highest growth scenarios or where other pressures come to bear at the highest rate (e.g. loss of shared PRS accommodation).
- 2.68 Again, the broader borough housing delivery/change context will be relevant in determining whether the upper or lower bound of each range is appropriate, and other factors, such as the extent of existing PBSA in an area, and whether the site had previous consent for general needs housing may also be relevant in moderating downwards to the lower numbers. This may be particularly relevant where student numbers in an area are approaching 25 per cent of the population, which is a level set out in Camden's SPD¹⁸¹ based on several appeal decisions balancing the needs of students and the wider population. Conversely, the higher numbers may be more relevant in assessing proportionality in the early years of the plan period, given the bulge of 18 year olds up to 2030, meaning student need may be at its highest in the early part of the plan period. Again, in some places where clustering of PBSA is particularly appropriate due to the development of a new HEP campus, or new convenient connectivity to one, bespoke benchmarks may be more appropriate.

¹⁷⁹ <https://www.hepi.ac.uk/wp-content/uploads/2024/02/Student-Accommodation-The-State-of-the-Nation-in-2024.pdf>; [Does building size make a difference to the student accommodation experience? | Global Student Living](#)

¹⁸⁰ Based on an average of the lower growth and higher growth scenario assuming a 2.2:1 bedspace ratio, ie.(1940 + 4360)/2.

¹⁸¹ [Student Housing CPG](#), Camden Planning Guidance 2019.

Part 3: How should we distribute London's PBSA requirement?

3. Introduction

- 3.1 Part 1 of this paper estimated the number of students in housing need. Having established the proportion of students who live in PBSA and might do so in future, a basis for apportioning the overall amount of PBSA that London needs to plan for (see Part 2) needs to be established.

Where in London should we plan for PBSA?

- 3.2 The following sets out a basis for distributing PBSA across London, based on the need and growth identified earlier in this paper. This takes into account various factors such as the characteristics of a location, travel time between a location and higher education provider, and the number of full-time students enrolled at a higher education provider.
- 3.3 The steps taken to determine whether a location is appropriate to accommodate PBSA and the amount that LPAs could accommodate are outlined below.

Stage 1: Determining appropriate locations for PBSA

- 3.4 Based on feedback from the sector and from student surveys, for a location to be considered potentially suitable, it should take no longer than 30 minutes for a student to travel door to door from accommodation to campus.
- 3.5 Three types of location are considered: Opportunity Areas, Town Centres and Green Belt Station Catchment. Locations within the Central Activities Zone have been excluded. To take each in turn:

Opportunity Areas (OAs)

- OA with 5000¹⁸² or more students enrolled at an HEP within 30 minutes travel time (rounded up from 4500) are potentially appropriate
- OAs with fewer than 5000 students enrolled at an HEP within 30 minutes travel time have been excluded (rounded up from 4500).

Town Centres

- 3.6 In order to understand what town centres (TCs) would be appropriate to assume capacity for additional student accommodation the following steps have been taken:
- TCs that could be accessed by fewer than 5000 students enrolled at an HEP within 30 minutes travel time have been excluded (rounded up from 4500).
 - Remaining TCs are classified into International, Metropolitan, Major, District and/or marked as Central Activities Zone (CAZ).
 - CAZ TCs have been excluded given that:
 - CAZ has other functions
 - will have more limited capacity to absorb students
 - have already taken a great deal of supply.

¹⁸² 5000 students is considered the minimum likely to create a student resident pool, after taking into account that travel to more than one location within 30 minutes is likely to be possible, and not all students live in or want to live in PBSA.

- TCs that are emerging are also excluded as capacity could not reasonably be assumed to be in places that are yet to form and may not do so over the next ten years (for example, out of centre retail parks).
- One Westminster TC is excluded that is CAZ adjacent.
- TCs that intersect with an OA are excluded to ensure no double counting of potential locations, unless the OA has already been excluded due to low enrolment figures¹⁸³, in which case the TC is retained.
- Strategic Housing Land Availability (SHLAA) capacity figures for remaining TCs determine the extent to which they could accommodate PBSA.
- TCs with a SHLAA capacity of less than 300 units¹⁸⁴ are excluded (rounded from 250), given their inability to support at least one development.

Green Belt Station Catchments

3.7 Consideration was given to Green Belt Station Catchments as follows:

- Green Belt station catchments are classified as to whether or not they are located in a Green Belt Broad Location for Growth (BLG)
- Catchments outside a BLG are considered unsuitable and excluded given the failure to provide for strategic housing growth.
- Green Belt station catchments within a BLG but with fewer than 5000 students able to travel to an HEP/HEPs within 30 minutes (rounded from 4500) are also excluded.

Stage 2: Relationship to the overarching housing target

3.8 The following describes the approach taken to derive a PBSA figure for each local planning authority taking into account its overall housing target (as proposed in the draft London Plan 2026) and the conclusions of the exercise carried out at Stage 1 above. The steps taken are as follows:

- LPAs with a proposed housing target of 10,000 homes or more i.e. are considered to be meeting strategic housing need (draft London Plan Policy HN1), are assumed to have 6% of the housing capacity to be in PBSA.
- In other locations, 3% of housing capacity is assumed to be in PBSA.
- This formed a baseline PBSA figure – further adjustment is then required to account for the identified appropriate locations.
- LPAs were then assessed for the presence of appropriate strategic locations (identified in Stage 1). Where an LPA had:
 - Two out of three types of location present (e.g. at least one town centre and one OA, or several town centres and one GB BLG) an additional 0.25% was applied to the baseline percentage (of 3 or 6%); or
 - Three out of three types of location present (e.g. at least one OA, at least one town centre and GB BLG) an additional 0.5% was applied to the baseline percentage (of 3 or 6%).
- Where any LPAs had a resulting PBSA figure below 300 bedspaces, this was increased to 300.

3.9 The above assumes a 1:1 ratio of student bedspaces to housing units. In practice, the actual percentage of a borough's overall target will be less than 3% or 6%, after adjusting the ratio to account for an assumed ratio of 2.5 bedspaces = one housing unit.

¹⁸³ This meant TCs within Thamesmead & Abbeywood and Croydon were retained.

¹⁸⁴ Optimal size for a PBSA scheme is 300 to 600 bedspaces.

Conclusion

3.10 Following the above analysis, the findings are set out below.

- Five LPAs do not have at least one appropriate town centre, OA or GB BLG location. These boroughs are ‘excluded’ from having to account for PBSA need and no PBSA figure is calculated¹⁸⁵
- Twenty-three LPAs have a general needs housing target of 10,000 homes or more. These boroughs are assigned a baseline of 6% of this target being PBSA. Of these:
 - 3 LPAs receive an uplift of 0.5% to account for 3/3 appropriate locations
 - 20 LPAs receive an uplift of 0.25% to account for 2/3 appropriate locations
- Six LPAs have a general needs housing target under 10,000 homes. These boroughs are assigned a baseline of 3% of this target being PBSA. Of these only one had more than one type of appropriate location present and all required an uplift in their numerical target to reach 300.

3.11 By following the steps above to apportion PBSA provision to LPAs, planned provision for London would total 31,550 bedspaces.

3.12 It is considered that the approach, if implemented, would better help facilitate wider provision in suitable locations across London of PBSA than currently.

3.13 The following table sets out the results of the above exercise for each LPA. The righthand column sets out the amount of PBSA that each LPA will need to plan for over the next London Plan period.

¹⁸⁵ LB Bexley, City of London, LB Merton, LB Richmond-upon-Thames, LB Westminster.

Table 10

LPA	Housing Target satisfies strategic housing need?	Baseline PBSA requirement (bedspaces)	At least one town centre present in the LPA located within 30 minutes of 5000 or more students enrolled in HEPs?	At least one OA present in the LPA located within 30 minutes of 5000 or more students enrolled in HEPs?	At least one GB Station catchment within the BLG present within the LPA, located within 30 minutes of 5000 or more students enrolled in HEPs?	Percentage uplift applied to baseline percentage	PBSA bedspaces required
Barking and Dagenham	N	291	No	Yes	No	0	300
Barnet	Y	1964	Yes	Yes	Yes	0.5	2127
Brent	Y	1519	Yes	Yes	No	0.25	1582
Bromley	N	225	Yes	No	No	0	300
Camden	Y	725	Yes	No	No	0	725
Croydon	Y	1293	Yes	No	Yes	0.25	1347
Ealing	Y	1923	Yes	Yes	No	0.25	2003
Enfield	Y	1264	No	Yes	Yes	0.25	1316
Greenwich	Y	1671	Yes	Yes	No	0.25	1741
Hackney	Y	635	Yes	Yes	No	0.25	662
Hammersmith and Fulham	Y	1007	Yes	Yes	No	0.25	1049
Haringey	Y	1142	Yes	Yes	No	0.25	1189
Harrow	Y	721	Yes	Yes	Yes	0.5	781
Havering	Y	1303	No	Yes	No	0	1303

LPA	Housing Target satisfies strategic housing need?	Baseline PBSA requirement (bedspaces)	At least one town centre present in the LPA located within 30 minutes of 5000 or more students enrolled in HEPs?	At least one OA present in the LPA located within 30 minutes of 5000 or more students enrolled in HEPs?	At least one GB Station catchment within the BLG present within the LPA, located within 30 minutes of 5000 or more students enrolled in HEPs?	Percentage uplift applied to baseline percentage	PBSA bedspaces required
Hillingdon	Y	1442	Yes	Yes	Yes	0.5	1562
Hounslow	Y	1079	Yes	Yes	No	0.25	1123
Islington	N	203	Yes	Yes	No	0.25	300
Kensington and Chelsea	N	177	No	Yes	No	0	300
Kingston upon Thames	N	206	Yes	No	No	0	300
Lambeth	Y	982	Yes	Yes	No	0.25	1023
Lewisham	Y	843	Yes	Yes	No	0.25	878
Newham	Y	1576	No	Yes	No	0	1576
OPDC	Y	680	No	Yes	No	0	680
Redbridge	Y	968	No	Yes	Yes	0.25	1008
Southwark	Y	1668	Yes	Yes	No	0.25	1737
Sutton	N	143	Yes	No	No	0	300
Tower Hamlets	Y	1482	No	Yes	No	0	1482
Waltham Forest	Y	1144	Yes	Yes	No	0.25	1192
Wandsworth	Y	1597	Yes	Yes	No	0.25	1663

Appendix

Full-time students by London borough and term time accommodation 2024/25*

Term time address	Other rented accommodation	Own residence (including rented)	Parental/ guardian home	Private-sector halls	Provider maintained property	Other	Not known/ Not applicable	Grand Total
Barking and Dagenham	3,775	6,435	3,765	85	110	1,450	390	16,010
Barnet	2,975	4,625	4,715	320	275	1,330	255	14,495
Bexley	1,970	2,410	1,985	40	95	490	180	7,170
Brent	6,385	6,235	5,770	2,470	760	1,910	475	24,005
Bromley	505	1,860	2,055	15	25	350	110	4,920
Camden	10,170	3,290	2,600	2,530	7,660	1,085	440	27,775
City of London	760	270	60	75	820	205	50	2,240
Croydon	2,030	4,850	4,020	65	85	1,110	300	12,460
Ealing	5,950	4,860	5,800	735	2,145	1,805	525	21,820
Enfield	990	4,725	4,600	35	60	995	185	11,590
Greenwich	4,845	5,265	2,960	800	985	1,350	450	16,655
Hackney	3,840	3,820	2,650	685	265	915	290	12,465
Hammersmith and Fulham	4,945	3,235	1,900	1,245	240	895	160	12,620
Haringey	2,435	4,655	2,935	960	150	1,045	215	12,395
Harrow	2,850	4,095	3,955	70	270	1,245	290	12,775
Havering	980	3,015	2,265	25	25	575	120	7,005
Hillingdon	4,170	3,155	4,165	105	2,875	1,060	380	15,910
Hounslow	4,450	4,030	4,055	135	135	1,405	420	14,630
Islington	7,425	3,140	1,990	4,280	2,095	1,100	345	20,375
Kensington and Chelsea	4,385	2,570	1,565	365	320	740	190	10,135
Kingston upon Thames	1,990	2,095	1,550	695	2,155	410	160	9,055
Lambeth	4,845	4,520	3,020	665	2,830	1,045	275	17,200
Lewisham	2,980	4,705	2,835	510	815	860	300	13,005
Merton	1,465	2,065	2,260	45	140	515	155	6,645
Newham	12,835	12,205	6,625	1,080	3,660	3,160	1,170	40,735
Redbridge	5,995	7,030	5,895	245	150	1,850	645	21,810
Richmond upon Thames	695	1,255	1,410	25	585	230	75	4,275
Southwark	7,775	5,520	3,125	1,305	5,235	1,390	380	24,730
Sutton	470	1,370	1,795	10	20	305	90	4,060
Tower Hamlets	12,685	7,035	5,295	1,880	3,275	1,820	800	32,790
Waltham Forest	2,900	5,150	3,570	235	120	1,220	290	13,485
Wandsworth	4,545	3,760	2,805	630	2,090	1,010	275	15,115
Westminster	7,870	4,005	2,850	1,005	2,470	1,115	350	19,665
Total	142,870	137,245	106,845	23,365	42,935	36,000	10,730	499,985

*Figures rounded to the nearest 5.

Source: JISC