CDI.05

STUDENT NEED

Proof of Evidence

David Feeney, Partner, Student Accommodation Consulting, Cushman & Wakefield

41-49 and 49-59 Battersea Park Road

APRIL 2025

CUSHMAN & WAKEFIELD

Experience

1. My name is David Feeney, Partner at Cushman & Wakefield. I have 14 years' experience as a student accommodation analyst, and lead Cushman & Wakefield's Student Accommodation Consultancy services in the UK. I advise universities, private sector developers, local authorities, funds, rating agencies and investors on the suitability of purpose-built student accommodation (PBSA) in relation to demand, supply, location, specification and rent levels. I lead a team of five analysts that solely advise on student accommodation demand and supply conditions (and maintain the UK's most comprehensive record of PBSA supply).

2. I provide evidence of student need across the UK, delivering well over 100 such assessments over the last decade. I have acted as an expert witness in relation to student accommodation need a number of times, at public inquiries as well as at The High Court. In 2019 I acted as demand and supply advisor to iQ on the sale of the portfolio to Blackstone, the largest real estate transaction in UK history. I also advise Unite Students, the UK's largest provider of PBSA. I have provided demand due diligence assessments and demand pool calculations used to support the funding of long-term on-campus student accommodation partnership arrangements at universities across the UK totalling over 30,000 bed spaces at universities including Durham University, the University of London, the University of York and the University of Exeter. Reliance is placed on these demand pool calculations by banks and rating agencies to support partnerships of 40+ years. I have also advised a number of local authorities across the UK on student accommodation market conditions to inform Local Plan documents.

3. I regularly speak on national trends at conferences across the UK and produce Cushman & Wakefield's Student Accommodation Annual Report.[1] I have appeared on television and radio discussing the issues of demand for student accommodation, as well as in a variety of national newspapers and publications. I sit on the advisory panel for the National Union of Students' Accommodation Costs Survey and have judged at the national Student Accommodation Awards. All my analysis draws on our methodologies honed over the last decade and which are trusted by the sector's major providers and institutions.

4. I regularly advise on demand-supply conditions in the London market, having acted for and delivered accommodation strategy work for Imperial College, King's College London, Brunel University London, Middlesex University London and the University of East London over the last three years, as well as advising a wide range of private sector providers and developers, especially in relation to student need assessments.

5. Cushman & Wakefield is a global property business that provides industry leading, end-to-end solutions for public and private sector clients. Our client base ranges from multinational corporates through to local authorities and universities. My Student Accommodation Advisory team is a national practice group with a long heritage of advising universities, property developers and funders in the student accommodation sector, providing robust and empirically based market assessments to inform development and decision making.

6. The core areas of my expertise relevant to this planning appeal include:

[1] https://www.cushmanwakefield.com/en/united-kingdom/insights/uk-student-accommodation-report

- Student residential demand and supply analysis
- Demand pool calculations and analysis for student accommodation
- Purpose-built student accommodation quality and specification analysis
- Higher education policy and university strategic trends
- Extensive knowledge of the London market

7. In this Proof of Evidence I provide analysis of student need at the proposed development site, in particular, assessing: the following key areas:
    - The location of the planned development
    - Student number trends across London, commutable areas of the site and within Wandsworth Borough
    - The supply of accommodation across London over time, as well as beds available to commutable institutions and within Wandsworth itself
    - The demand pool for accommodation across London, commutable areas and within Wandsworth (and surrounding boroughs) – i.e., the number of students with a requirement for a bed during their course of study
    - The pursuit of a nomination agreement

8. My evidence will show that full-time student numbers in London, commutable institutions and within Wandsworth (and its surrounding boroughs) are growing and that the demand pool for accommodation bed spaces is rising as the City's universities recruit more students from outside the area (particularly international students). I will present evidence of a need for additional PBSA bed spaces across the city to meet demand.

9. I will also show the proposed development site is well located for students of a wide range of London institutions, including some of the most prestigious institutions globally.

10. My evidence draws on data from the Higher Education Statistics Agency (HESA)[2], which is the central source for the collection and dissemination of statistics about publicly funded UK higher education. HESA publishes a wide range of publicly available data on its website in relation to student numbers, including in London. The licenced HESA data used in my analysis is purchased by Cushman & Wakefield. The purchased data features a wide range of fields in relation to the domicile and geography of students which is not otherwise available publicly. This data allows for a depth of geographic analysis to be applied to my assessment that wouldn't otherwise be possible. HESA is a member of the Code of Practice for Statistics. My analysis also draws on Cushman & Wakefield's Student Accommodation Tracker, the sector's most comprehensive database of all 724,000 PBSA beds in the UK. The Tracker has been running since 2013/14 and forms the basis of all Cushman & Wakefield's supply side analysis, as well as being used in Cushman & Wakefield's Annual Report on the sector for a number of years.[3] The Tracker is used in all my work and that of

[2] https://www.hesa.ac.uk/about
[3] https://www.cushmanwakefield.com/en/united-kingdom/insights/uk-student-accommodation-report

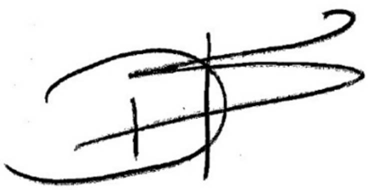
my Student Accommodation Consultancy team to inform universities, developers, operators, funders, rating agencies and local authorities of the scale and composition of PBSA supply in the UK.

11. The Tracker is used by the Office for National Statistics (ONS) annually regarding its statutory functions for statistics and statistics research in accordance with and laid out in the Statistics and Registration Service Act 2007. The Tracker was used by the ONS to support the delivery of the 2021 Census for England and Wales.

12. The Tracker covers a wide range of metrics in relation to every PBSA development in the UK, including number of beds, number of beds by room type, owner, operator, location, whether the development is directly let or under a form of agreement, distance from campus, room quality, amenity space quality, weekly rent, lease length and annual rent.

13. As is standard in the student accommodation sector, my analysis will focus on the full-time student population[4], with fewer than 2% of all part time students needing or choosing to live in purpose-built stock in 2022/23.[5]

14. The evidence that I have prepared and provided for this appeal is true and I confirm that the opinions expressed are my true and professional opinions.

Signed	
Name	David Feeney
Position	Partner
Date	28.03.2025

Locational Context

15. The proposed development is located on the site of 41-49 Nine Elms Lane and 49-59 Battersea Park Road SW8 5AL, in the London Borough of Wandsworth. There are three prominent Higher

[4] Full-time includes students recorded as studying full-time, normally required to attend a HE provider for periods amounting to at least 24 weeks within the year of study, plus those enrolled on a sandwich course (thick or thin), irrespective of whether or not they are in attendance at the HE provider or engaged in industrial training, and those on a study-related year out of their HE provider. During that time students are normally expected to undertake periods of study, tuition or work experience which amount to an average of at least 21 hours per week for a minimum of 24 weeks study/placement.

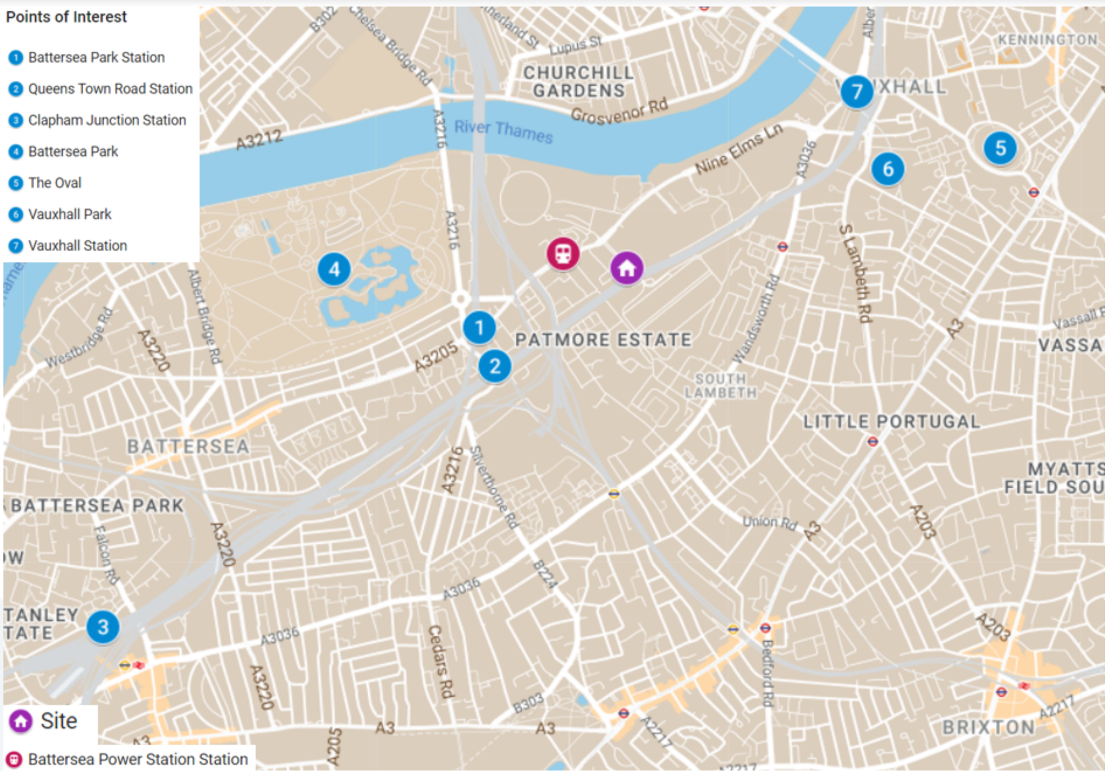
[5] HESA 2019/20

Education providers in the Wandsworth area: The University of Roehampton, St George's University of London, and on the edge of the Borough, a significant campus of Kingston University (Roehampton Vale) which is home to over 1,000 students. The wider locality is also home to London South Bank University and the Guy's and Strand campuses of King's College London (Southwark).

16. The site also benefits from being within an easily commutable distance to 15 of the Capital's most prestigious Higher Education Institutions (not including those located in Wandsworth), which have the potential to create a strong demand pool for the new scheme (considered in detail later in this Proof of Evidence).

17. Battersea is very well connected in terms of public transport. The new Battersea Power Station Underground Station opened in 2021, connecting Battersea to the London Underground network, making the site accessible to the West End and the City within a 15-minute commute. Clapham Junction, Battersea's main transport hub connects to London Victoria in around four minutes, as well as connecting to Waterloo, London Bridge, Croydon, Hounslow and places in the South West such as Richmond, Putney and Wimbledon. The area is also well connected in terms of the London bus network. Further to this Clapham Junction is also a national Railway Station with connections to Gatwick Airport.

Figure 1: Site Location in Relation to Key Transport Locations



18. A key attractor for students to study in London is the wide array of amenities across the Capital. Battersea is no exception, with a variety of bars, restaurants, cinemas and gyms available within easy reach of the site – as shown on the adjacent map.

19. The area is also home to several retail outlets, both chain stores and independents. The surrounding area boasts two gyms, four cinemas and Battersea Park – which hosts a number of live events and concerts throughout the year.

20. Battersea Power Station shopping centre opened its doors to the public from September 2022 and delivered over 100 new retail stores to the area and a unique 18,500²ft food court concept.

Figure 2: Site Location in Relation to Local Amenities

21. As noted, the proposed development location benefits from the extension of the Northern Line between Kennington and Battersea which was completed in autumn 2021. The new Battersea Power Station is less than a 5-minute walk from the site.

22. The Northern Line Extension has been revolutionary for the Battersea area in opening up the West End and the City within around a 15-minute journey time. Cushman & Wakefield's market experience and previous work with the University of London and London institutions shows that student commuting patterns differ from within the regions in that London students are generally willing to travel around 45 minutes to and from a place of study from a place of residence. Of course, this means that outer London areas such as Wembley have become important hubs of accommodation within London, despite them having no critical mass of Higher Education provision within the area.

23. I have modelled that the following institutions are now within an acceptable 45-minute public transport commute time.

24. It is important to note that a wide range of institutions located outside the Borough of Wandsworth are located a longer commute from the site than universities located within the Borough itself. The

University of Roehampton is around 45 minutes from the site, with St George's, University of London around the same distance away. Kingston University's Roehampton Vale campus, also located on the edge of the Borough, is around 55 minutes away by public transport.

Table 1: Public Transport Commuting Times to London Institutions

	Travel Time via Public Transport (mins)
University of Westminster	18
University College London	22
Birkbeck University of London	24
SOAS University of London	25
Royal Veterinary College	30
London South Bank University	31
Imperial College London	32
London Metropolitan University	33
Royal College of Art	36
Royal Academy of Music	37
City University London	38
Queen Mary University of London	39
King's College	41
University of Roehampton	42
London School of Economics and Political Science	45

Source: Cushman & Wakefield

25. Demand associated with these institutions is examined in more detail later in this Proof of Evidence. The proposed site is already well located for students studying at a range of Higher Education institutions in the Capital. While many institutions are accessible within an hour's commute of the site (which is acceptable for some students), I have highlighted the following institutions as being within the typical acceptable 45-minute range of the site (the travel time generally deemed to be suitable for students studying in London). This commuting time has been derived from Cushman & Wakefield's extensive market experience and our conversations and work with leading London universities, including Imperial and King's College.

26. University College London, City University of London, Imperial College, The Royal Academy of Music and The Royal College of Art are located across the River to the North of the site, commutable in under 40 minutes using public transport (currently). Slightly further afield, but within an acceptable commuting time, are the London School of Economics (45 minutes), King's College London (41 minutes) and The University of Roehampton (42 minutes). The closest source of demand is London Southbank University (LSBU), just half an hour from the site on public transport. The small Courtauld Institute of Art is also within commuting distance.

Policy Context

27. The London Plan (March 2021) (CDB.02) sets out the spatial framework for development in London. It sets out an ambition to deliver 66,000 homes per year, with London *"considered as a single*

housing market area" (4.1.2). The Plan sets out an *"overall strategic requirement for PBSA"* to deliver 3,500 beds annually. As set out in this Proof of Evidence (paras 57-58), this ambition is not being met and has not been met for a number of years.

28. No Borough-level targets are set out by the Plan as it is acknowledged that the location of need will change, as will suitable site availability. Policy H15 is set out below.

> ***Policy H15 – Purpose-built Student Accommodation***
>
> *Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that:*
>
> *1) at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood*
>
> *2) the use of the accommodation is secured for students*
>
> *3) the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider*
>
> *4) the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance: a) to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution*
>
> *b) where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications, Part E*
>
> *c) the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation. B*
>
> *5) the accommodation provides adequate functional living space and layout. Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.*

29. Due to the difficulties faced by private providers in securing agreements as part of the planning process (see paragraphs 83-85 of this Proof of Evidence) updated London Plan guidance was adopted in October 2024 in the Mayor's Purpose-built Student Accommodation LPG (CDB.06). The Guidance notes that *"Housing need is met by PBSA directly through housing students and indirectly through helping to alleviate pressure on traditional rented homes".* The Guidance goes on to add that *"a lack of PBSA supply relative to growing numbers of students; this is instead contributing to competition and higher rents in the private rental market".*

30. The Guidance notes that the London Plan's key mechanism to secure *"proportionate alignment with need is the requirement to secure most of the PBSA through a nominations agreement"*. It goes on

to state *"The supporting text to Policy H15 (paragraph 4.15.3) sets out that nominations agreements are expected to be in place by the point of first occupation. HEPs are unlikely to enter into such agreements until plans and, indeed, construction are sufficiently advanced that they can rely on bedspaces being available when needed (e.g. for the start of a particular academic year). However, any Planning Authority will want to ensure a reasonable prospect of compliance with this policy criterion post permission".*

31. Importantly, the Guidance states that *"The best way to provide assurance to the decision-maker assessing a planning application is for the developer to demonstrate engagement with one or more HEPs. This engagement should explore their interest in the scheme, and appetite to pursue further discussions towards a nominations agreement. In doing so, it is advisable to target institutions that are close or well connected to the location. To mitigate any risks of non-delivery, this engagement should have advanced sufficiently, such that ideally one or more 'letters of comfort' can be provided as early as possible in the process before the decision".* Such letters have been provided by the Appellant as evidenced in Appendix 2 of the Proof of Evidence of Mr Sackman.

32. PBSA in Wandsworth is covered by Policy LP28 of the Wandsworth Local Plan 2023-2038 and Policies Map (CDC.01), which sets out the following criteria:

Proposals for Purpose-Built Student Accommodation will be supported where the development:

1. Meets all requirements for student accommodation, including affordable provision through the threshold approach, as set out in London Plan Policy H15;

2. Is accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers, and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood;

3. Has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population;

4. Would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure;

5. Provides a high-quality living environment, including the provision of adequate functional living spaces and layouts, well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation); and

6. Provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users.

The Council will expect developers to demonstrate that they have engaged with the appropriate organisations to ensure that new developments will meet identified need.

33. Wandsworth's January 2025 Housing Background Paper (CDC.06) notes that (paragraph 18.4) *"London Plan recognises there is a need for additional PBSA across Greater London. Unlike the approach taken for other forms of housing, the London Plan does not identify a disaggregated*

Borough-level of need or target for such housing and instead treats the need as being 'pan London.' Whilst there is demand in Wandsworth for PBSA schemes, the existing policy approach makes it difficult to arrive at sensible policy decisions over the level of contribution that a borough like Wandsworth ought to make to meeting London's need for PBSA, particularly given that the PBSA coming forward in Wandsworth typically has no tie to local HEPs".

34. The Wandsworth Housing Need Assessment (CDC.04) at paragraph 5.64 notes that "*Wandsworth provides around 1% of the total PBSA capacity and contains around 2% of the students*".

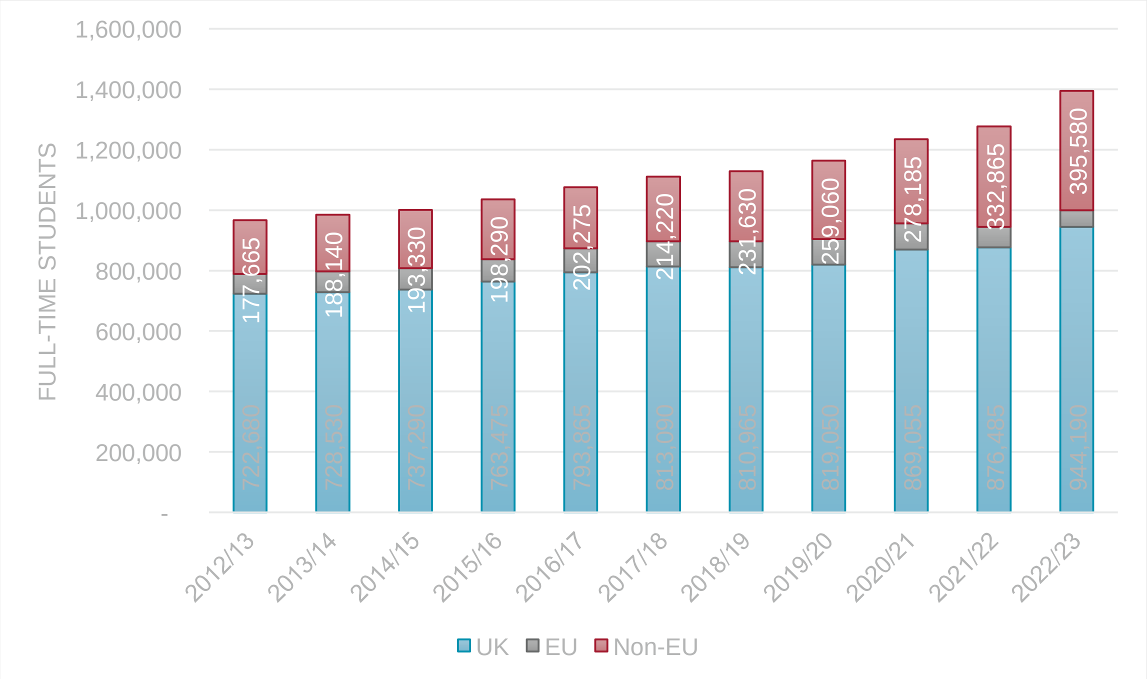
UK Market Context

35. There were a record number of 2,262,530 full-time students studying at UK Higher Education providers in 2022/23 according to the Higher Education Statistics Agency (HESA)[6] – this figure is up by 35,950 students in a single year (+2%). There are 1,745,220 undergraduate students (+16,915 students) and 611,695 postgraduate students (up by 73,290). The past decade in the sector has been characterised by extraordinary growth and change, with consequent impacts on the demand for accommodation (especially over recent years).

36. International students in the UK now total 689,605 students – 83,260 EU students and 606,350 students from outside of the EU, whilst the UK population stands at 1,571,685 students.

37. The last two years alone have seen international students in London grow by over 52,000. Seven locations are now each home to over 15,000 Chinese students, which remain the largest cohort of international students in the UK. The totality of student number growth is outlined below.

Figure 3: UK Full-time Student Population by Domicile Over Time



Source: HESA 2012/13 to 2022/23, Cushman & Wakefield

[6] HESA (Jisc) is the official agency for the collection, analysis and dissemination of quantitative information about Higher Education in the UK

The London Higher Education Market

38. London is the most prominent Higher Education locations in the world, with more institutions in the global top 100 than any other city. The city is a hub of academic excellence, home to a wide array of prestigious institutions, including five of the UK's Russell Group universities. Four universities feature in the global top 50, with all of these located within an acceptable commuting time of the proposed development site.

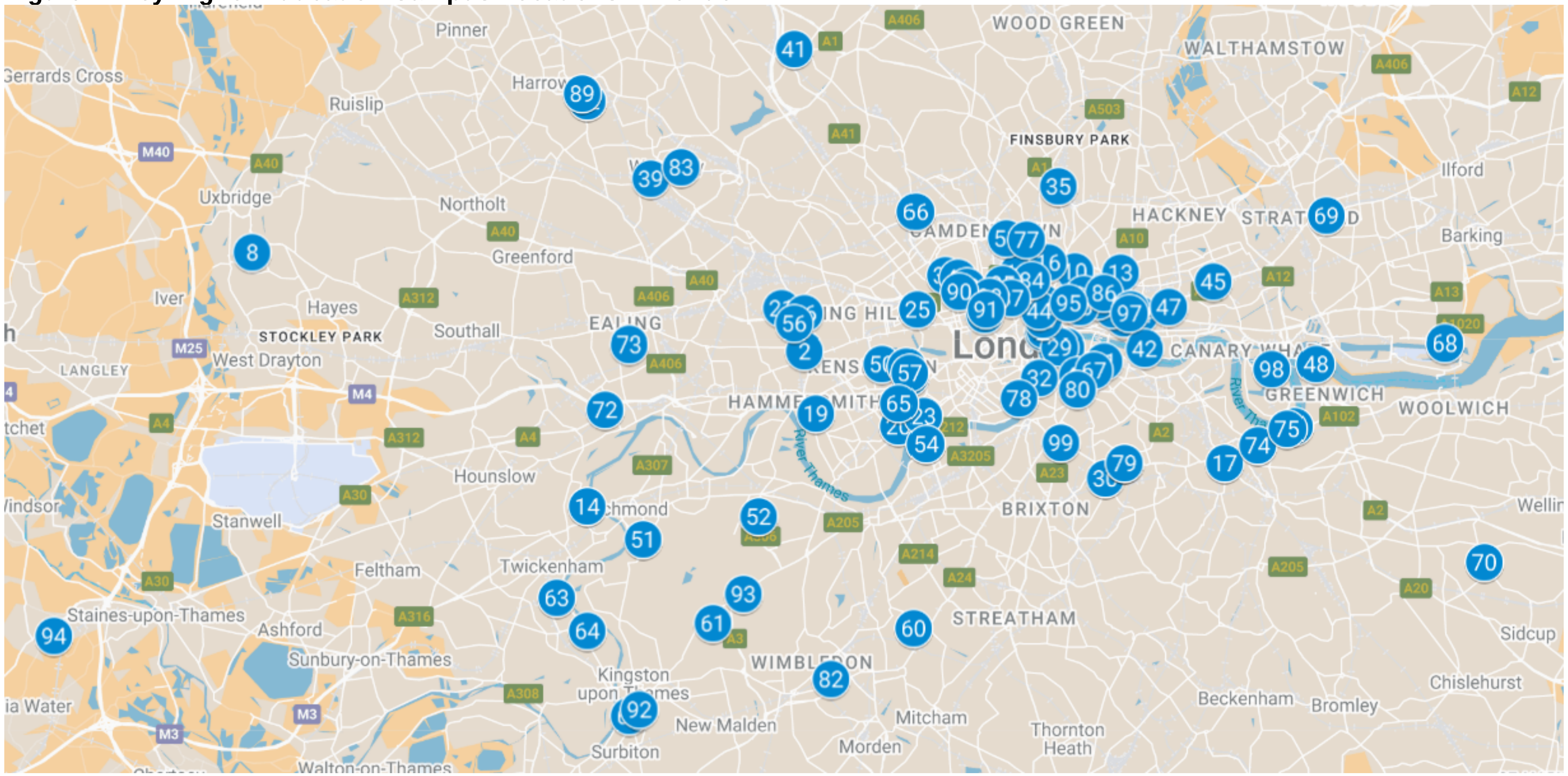
Table 2: London Institutions in Global Top 50 Rankings 2025

	QS 2025
Imperial	2
UCL	9
King's College	40
LSE	50

Source: QS World University Rankings

39. The rapid growth in student numbers in recent years has had a profound impact on the student accommodation market in London, making it one of the most dynamic and competitive sectors in the city's real estate landscape. There are now over 230 different Higher Education study locations across London. As can be seen from the map below which highlights key study locations in London, Higher Education campuses are spread widely across the Capital, resulting in wide flows of students to and from places of residence to their places of study.

Figure 4: Key Higher Education Campus Locations in London

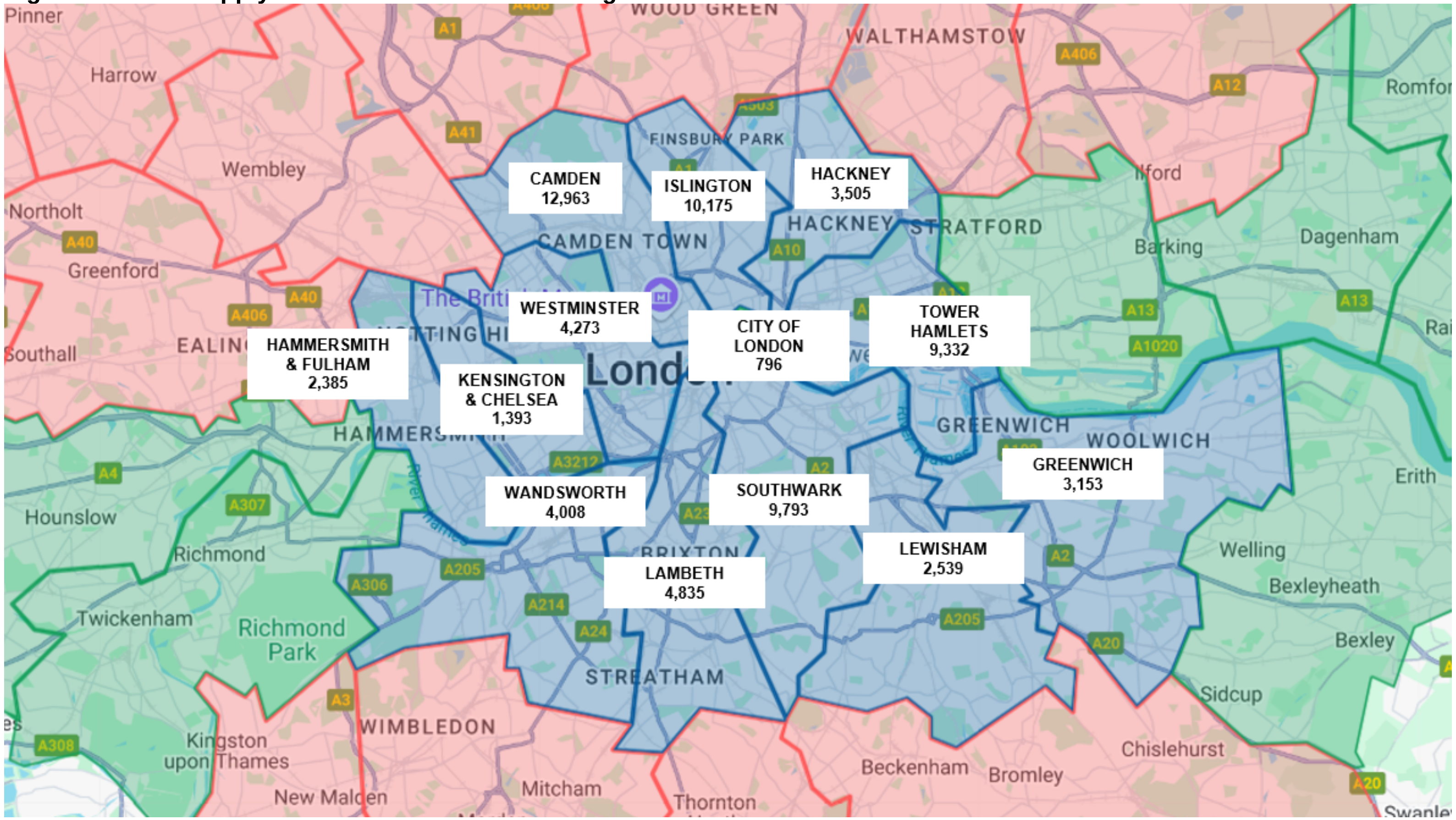


Source: Cushman & Wakefield

40. In terms of PBSA supply there are 95,374 beds available to students for the current 2024/25 academic year and as with campus locations, this supply is also spread widely across London. 14% of all beds are located in the Borough of Camden, followed by 11% in Islington, and 10% in both Southwark and Tower Hamlets. 4% of all beds are currently located in Wandsworth. The last decade has seen a transformation in the supply of new accommodation in London, with a lack of available demand and high development costs meaning new beds have generally been delivered outside of Zone 1 locations. In terms of beds delivered since 2016/17, 16% have been delivered in Brent and 13% in Southwark. 5% of new beds over this period have been delivered in Wandsworth.

41. A map showing the supply of beds across inner London boroughs is outlined below.

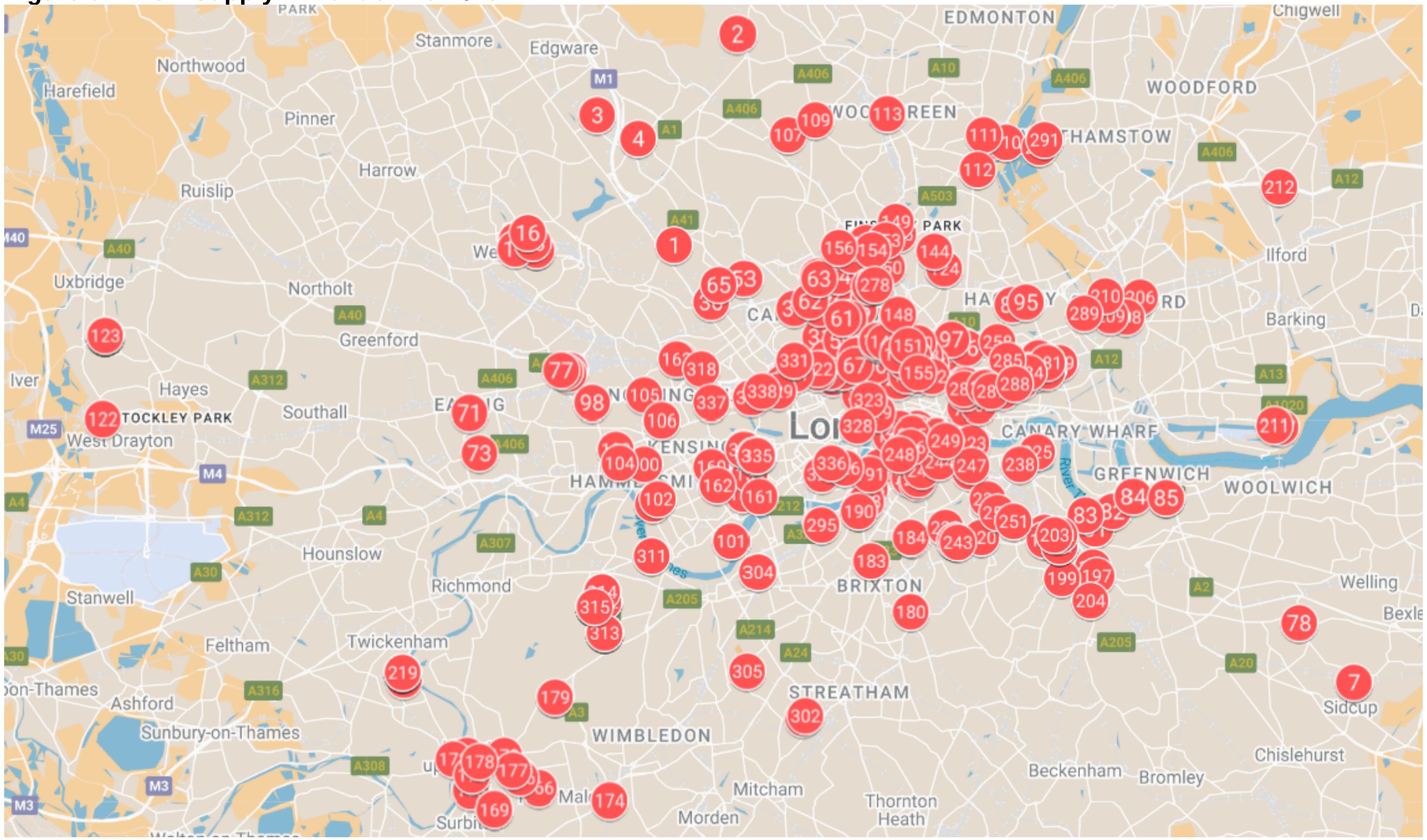
Figure 5: PBSA Supply Across Inner London Boroughs 2024/25



Source: Cushman & Wakefield

42. The existing stock of student accommodation in London is a mix of university-owned halls, privately operated accommodation, and traditional house shares. However, the latter is becoming less popular due to issues related to quality, safety, and management. This shift is creating more opportunities for developers to enter the market with new PBSA developments that cater to modern student needs.

Figure 6: PBSA Supply in London 2024/25



Source: Cushman & Wakefield

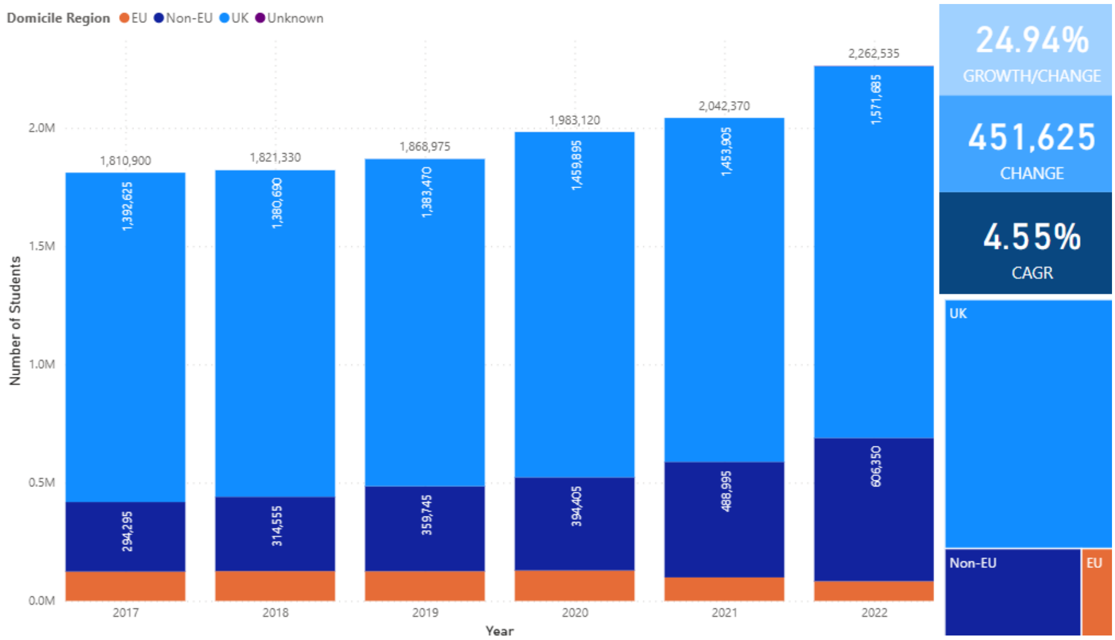
43. Despite fast growing demand, the supply of student accommodation in London has struggled to keep pace, leading to a competitive market where quality and location are key differentiators.

Student Number Growth

44. As is standard in the student accommodation sector, my analysis only focuses on the full-time student population. The reason for this is that fewer than 2% of all part time students need or choose to live in purpose-built stock and in the majority of cases are not allowed to live in PBSA.

45. Since 2017/18, the market has undergone huge growth in full-time student numbers, with this cohort increasing nationally by 451,625 students (to 2022/23). This can be seen below.

Figure 7: UK Full-Time Student Number Growth 2017/18 to 2022/23



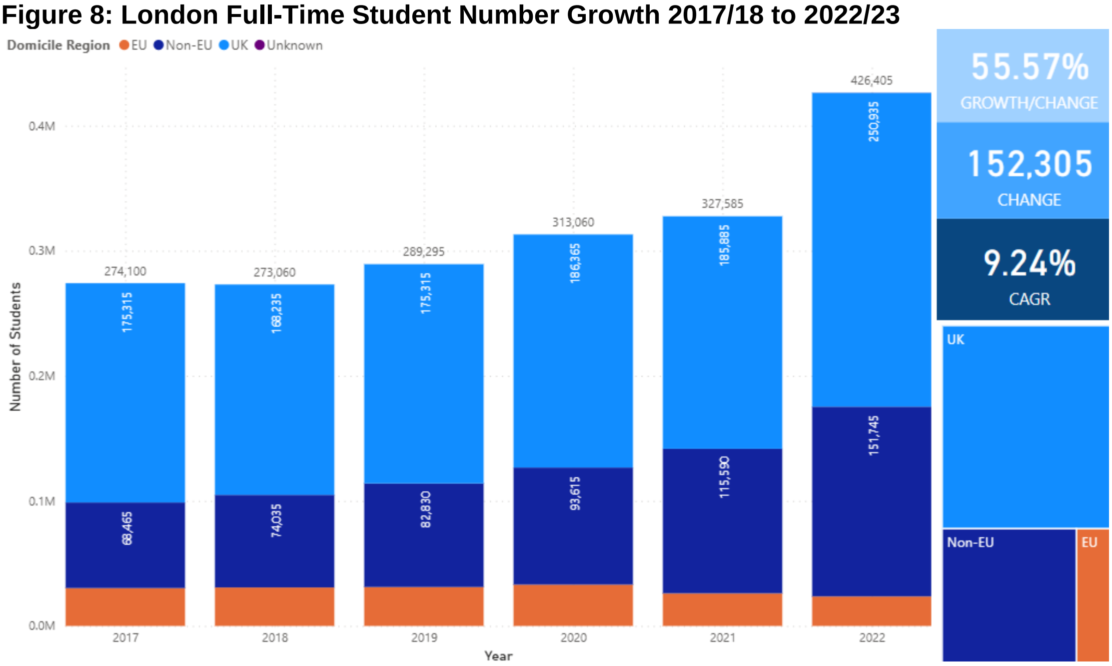
Source: HESA 2017/18 to 2022/23, adapted by Cushman & Wakefield. Note 2022/23 allows identification of alternative providers (i.e., those not in receipt of Office for Students recurrent funding) for the first time

46. Consequently, demand for student accommodation bed spaces has grown hugely over this period.

47. This growth is very much reflected in growth in the London student market, which accounts for around one in five of all full-time students studying in the UK. Publicly available HESA data shows that there were 467,255 full-time students studying at London institutions in 2022/23. However, my own licenced data and analysis shows that of this figure, 426,405 of these students were studying at campuses based within London itself.

48. Growth in the London market has stood at 55.57% since 2017/18, which is over double the rate of 24.94% seen nationally over the same period.

Figure 8: London Full-Time Student Number Growth 2017/18 to 2022/23



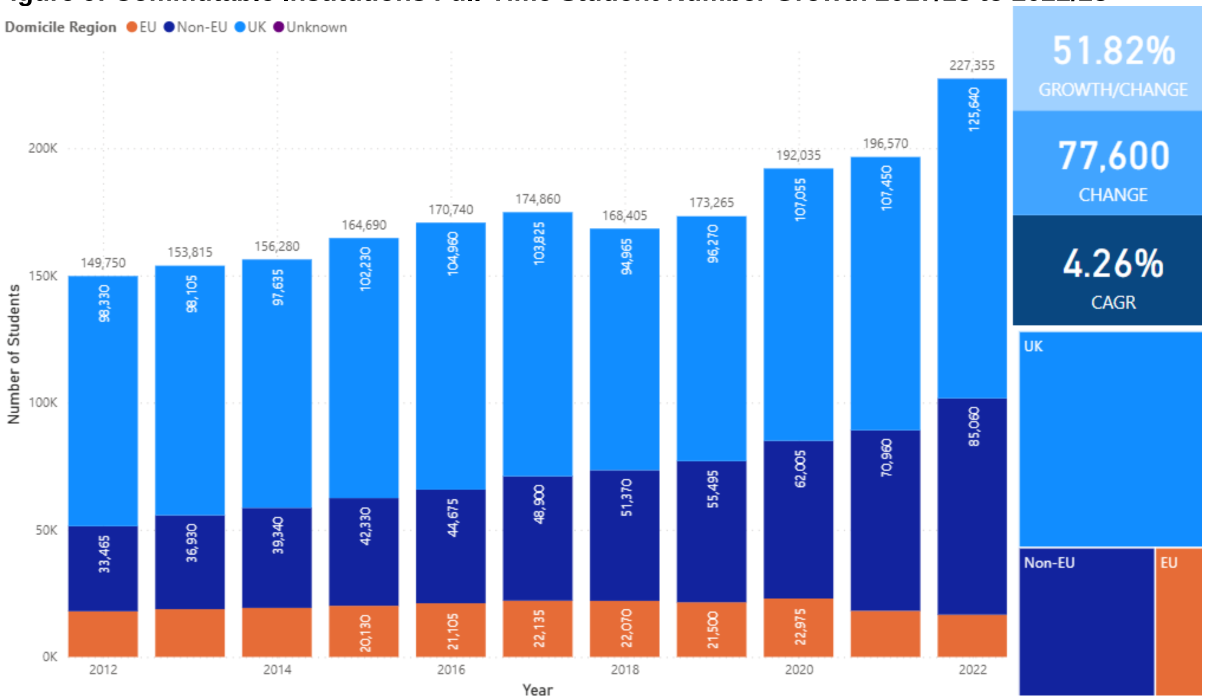
Source: HESA 2017/18 to 2022/23, adapted by Cushman & Wakefield. Note 2022/23 allows identification of alternative providers (i.e., those not in receipt of Office for Students recurrent funding) for the first time

49. Data shows that there are 152,305 more students studying in the Capital than was the case in 2017/18.

50. **Significantly, 115,420 of this growth was from outside the Greater London region, resulting in hugely increased demand for accommodation.**

51. In terms of the commutable institutions previously identified, growth has also been strong, with an extra 77,600 students studying at these institutions than was the case in 2017/18.

Figure 9: Commutable Institutions Full-Time Student Number Growth 2017/18 to 2022/23



Source: HESA 2017/18 to 2022/23, adapted by Cushman & Wakefield. Note, London South Bank University chose not to publicly release detailed recruitment data in 2018/19 to 2021/22. Note 2022/23 allows identification of alternative providers (i.e., those not in receipt of Office for Students recurrent funding) for the first time

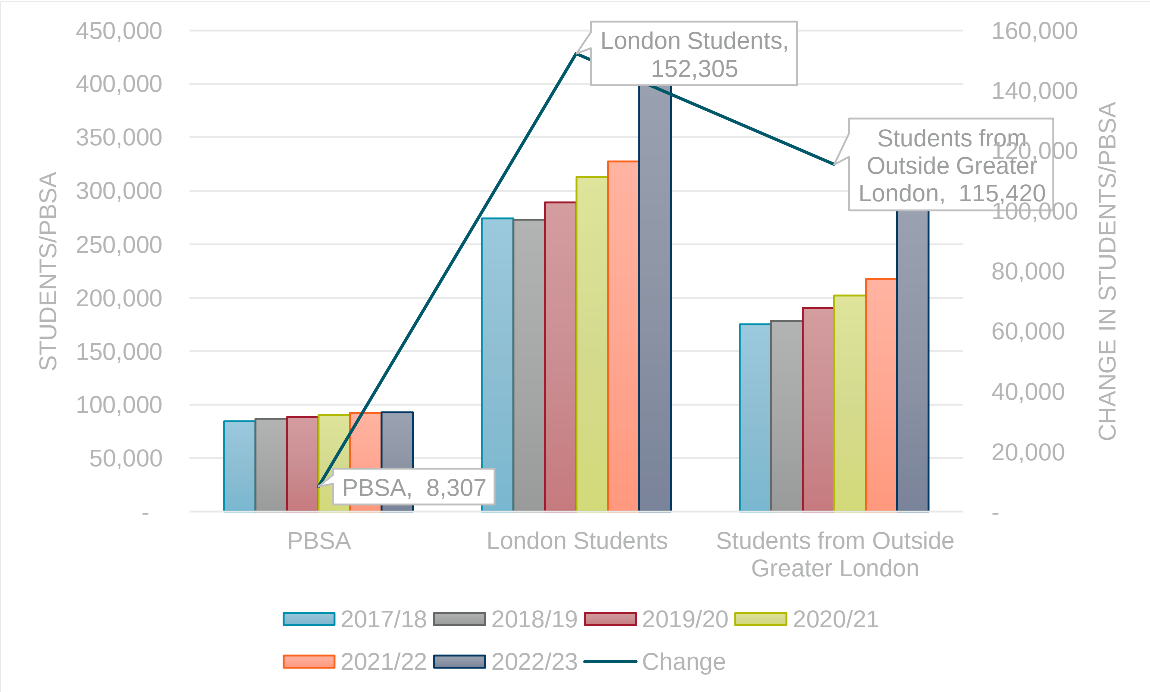
52. **Significantly, 54,690 of this growth in students was from those ordinarily domiciled outside Greater London, resulting in hugely increased demand for accommodation bed spaces.**

53. This growth in student numbers is assessed against accommodation supply below.

London Accommodation Supply

54. Whilst student growth nationally and within London has been extremely strong, at the same time, development of new PBSA in London has not kept pace with growing levels of demand. The chart below shows the change in the number of PBSA beds in London since 2017/18 measured against overall growth in London student numbers and those ordinarily domiciled outside Greater London.

Figure 10: London and non-Regional Full-Time Student Number Change vs Change in PBSA 2017/18 to 2022/23 London Full-Time Student Number Growth 2017/18 to 2022/23



Source: HESA 2017/18 to 2022/23, adapted by Cushman & Wakefield

55. As can be seen from the table, whilst the number of students from outside Greater London has increased by 115,420 students since 2017/18, the number of PBSA beds (net) has only increased by 8,307.

56. As per the London Plan, the table below outlines the fact that the "The overall strategic requirement for PBSA in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified".

Table 3: London Plan Ambition vs Actual Bed Delivery Over Time

London Plan Adoption		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	Overall
		84,525	86,776	88,613	90,300	92,144	92,832	93,961	95,374	
	New Beds (net)	3,253	2,251	1,837	1,687	1,844	688	1,129	1,413	14,102
	Plan Ambition	3,500	3,500	3,500	3,500	3,500	3,500	3,500	3,500	28,000
	Shortfall	- 247	- 1,249	- 1,663	- 1,813	- 1,656	- 2,812	- 2,371	- 2,087	- 13,898

Source: Cushman & Wakefield Student Accommodation Tracker

57. As can be seen from the table, in every year since the Plan's adoption, London has fallen short in delivering an adequate number of beds to meet not only growing demand for accommodation, but also a historic structural undersupply of beds. Indeed, had the Plan delivered in line with its ambition, an additional 13,898 beds would be available over and above the 95,374 currently available across Greater London.

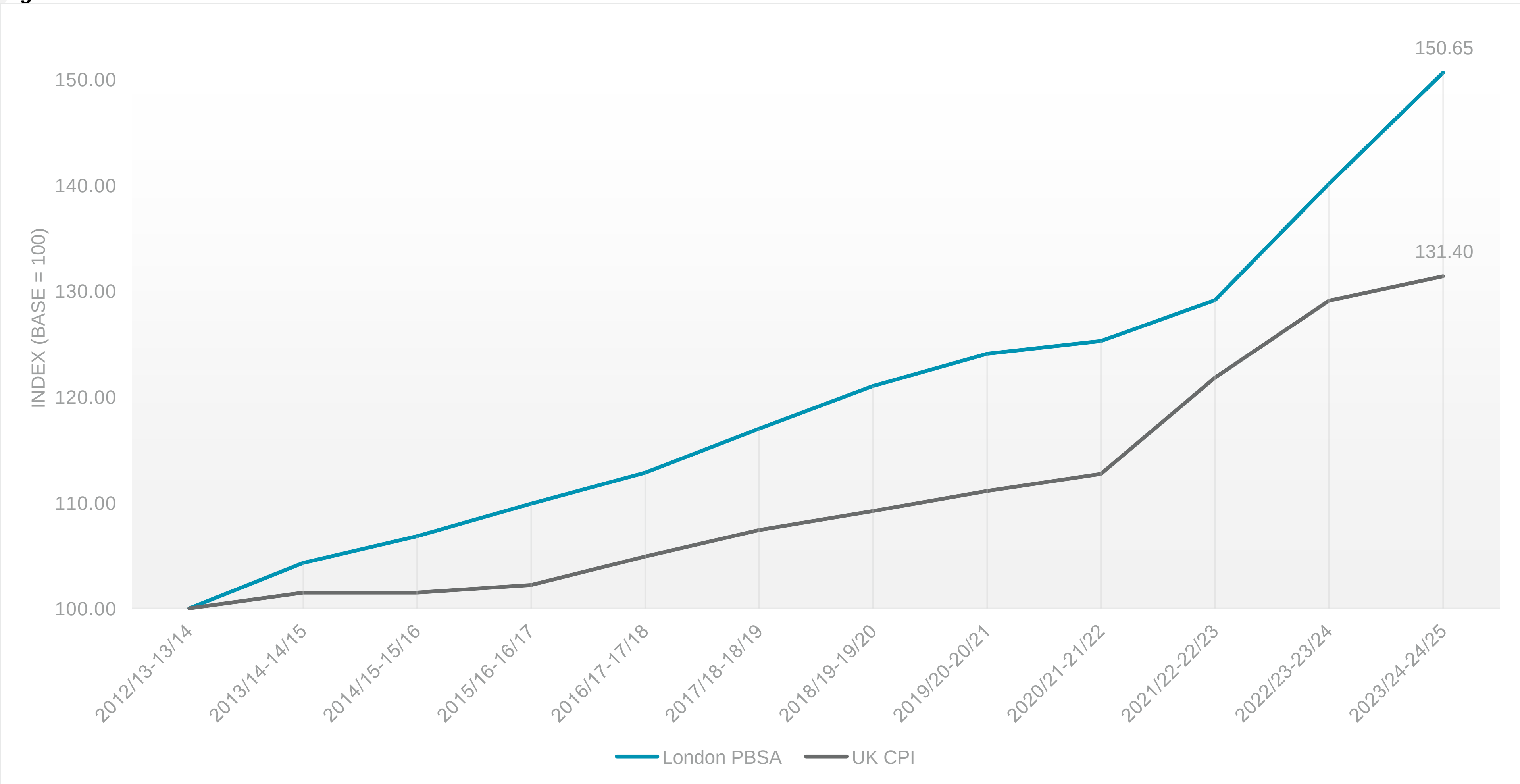
58. As set out in the London Plan, it is noted that *"higher education providers make a significant contribution to its economy and labour market"* and that *"It is important that their attractiveness and*

potential growth are not compromised by inadequate provision for new student accommodation". The analysis above shows that there is potential for this growth to be compromised.

Pricing Impacts

59. Of course, one of the major impacts of this lack of supply, aside from being able to secure accommodation, is escalating rental increases in London. This can be seen on the chart below, with overall rental increases in London private sector PBSA over the last decade over 50% and well ahead of UK CPI over the same period. This has the potential to damage the attractiveness of London as a place to study, as well as impacting widening participation efforts.

Figure 11: London PBSA Rental Growth Over Time vs UK CPI



Source: Cushman & Wakefield Student Accommodation Tracker

Demand-Supply Dynamics

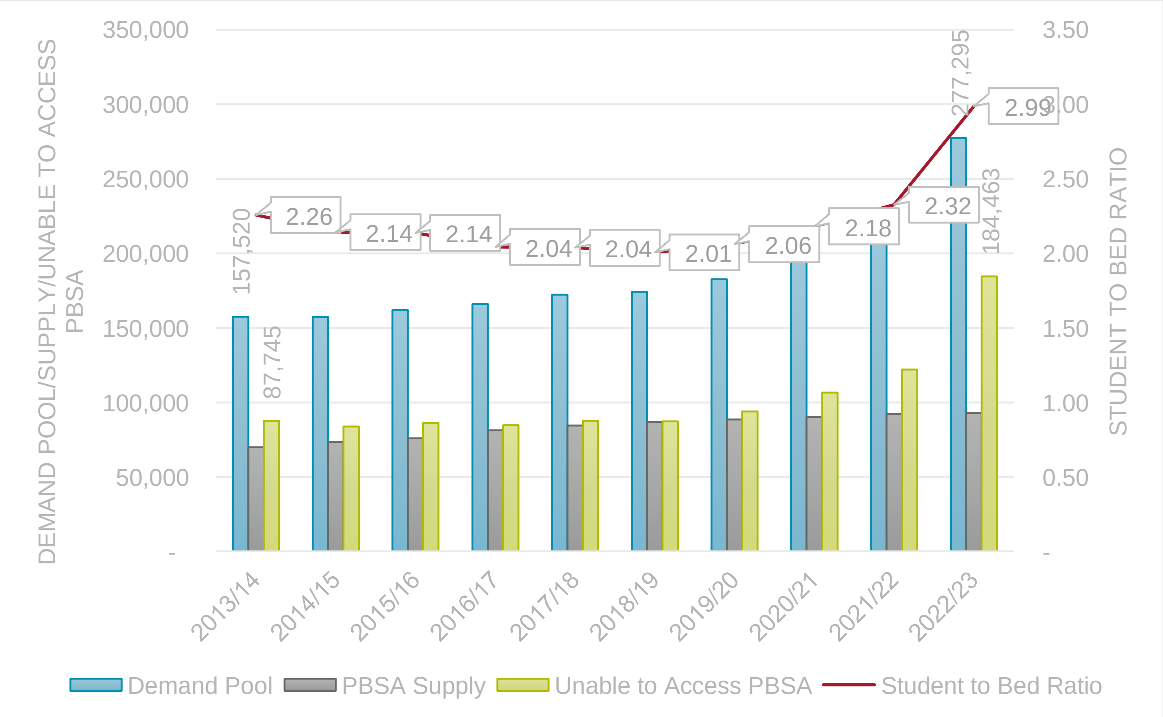
60. The demand and supply analysis above highlights a fundamental mismatch between demand and supply levels across the following areas:

- London overall
- Institutions within a commutable distance of the proposed development site

61. Analysis of the position in specific relation to Wandsworth-located institutions (and the surrounding locality) is included later in this Evidence.

62. Cushman & Wakefield has developed a proprietary tool for analysis of which students require a bed space during their course of study, the "demand pool". The demand pool removes students that do not require a bed space for a number of reasons, e.g., they are commuting students that live in the parental home or their own residence; they are studying on a course validated by an institution but one that is being taught outside the area; or the student is away from the area on a year in industry/placement. The demand pool measured against the supply of PBSA beds gives the student to bed ratio – i.e., the number of students with a requirement for a bed vs the number of PBSA beds available. The London-wide position is outlined below.

Figure 12: London Demand-Supply Dynamics Over Time



Source: HESA 2017/18 to 2022/23/Cushman & Wakefield. Note 2022/23 allows identification of alternative providers (i.e., those not in receipt of Office for Students recurrent funding) for the first time.

63. As can be seen from the chart, across London, the student to bed ratio stands at 2.99:1 (latest available 2022/23 demand vs 2022/23 supply data), with over 184,000 students with a requirement for a bed unable to access one in PBSA. This figure is 96,718 higher than was the case in 2013/14 (an increase of 110%). At four students per household, this is the equivalent of 24,180 additional

Houses in Multiple Occupation (HMOs) being required, placing significant pressure on the private housing market. At 2.5 students per household, this is the equivalent of 38,687 additional households.

64. Nationally, the average student to bed ratio stands at 2.12:1. If London was to offer beds at this level, an additional 37,968 PBSA beds would immediately be available to students. The average ratio across major regional markets stands at 2.07:1. If London was to offer beds at this level, an additional 41,127 beds would immediately be available to students. Therefore, it is clear that London is significantly structurally undersupplied with accommodation, and the proposed development site can play a role in helping to address this imbalance, helping to reduce additional housing market pressures.

Commutable Institution Demand-Supply Dynamics

65. Earlier in this Proof of Evidence, I have examined which institutions are within this public transport travel time of the proposed development site. This includes some of London's largest and most prestigious providers, including those ranked in the global top 50: UCL (22 minutes door-to-door), Imperial (32 minutes door-to-door), King's College (41 minutes door-to-door), and The London School of Economics (45 minutes door-to-door). This is thanks to the site's excellent public transport links, in line with the requirements of Policy LP28.

66. The demand pool for accommodation across these providers is significant, standing at 148,170 students in 2022/23, over half of the total demand pool for accommodation in London. As can be seen from Table 4 below, demand pool growth across these institutions has been significant over time, growing by 48,575 students since 2013/14.

67. Despite the large demand pool for accommodation across these commutable institutions, the universities are very reliant on private PBSA providers (and the wider private housing market) to house students with a requirement for a bed, offering just 29,343 beds to students in 2022/23 (latest available demand vs latest available supply). This means that over 118,827 students with a requirement for a bed at these institutions are unable to access one through their university.

Table 4: Commutable Institutions Demand-Supply Dynamics Over Time

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
All Year Demand Pool	99,595	102,265	107,695	111,325	114,790	112,895	115,055	124,670	130,040	148,170
First Year Demand Pool	49,730	52,310	54,420	55,915	58,885	58,405	60,425	67,220	69,590	78,815
PBSA Supply	27,332	28,010	28,928	30,404	29,815	30,986	30,451	29,683	29,290	29,343
Student to Bed Ratio	3.64	3.65	3.72	3.66	3.85	3.64	3.78	4.20	4.44	5.05
1st Year Student to Bed Ratio	1.82	1.87	1.88	1.84	1.98	1.88	1.98	2.26	2.38	2.69
Unable to Access PBSA	72,263	74,255	78,767	80,921	84,975	81,909	84,604	94,987	100,750	118,827
1st Year Unable to Access PBSA	22,398	24,300	25,492	25,511	29,070	27,419	29,974	37,537	40,300	49,472

Source: HESA/Cushman & Wakefield

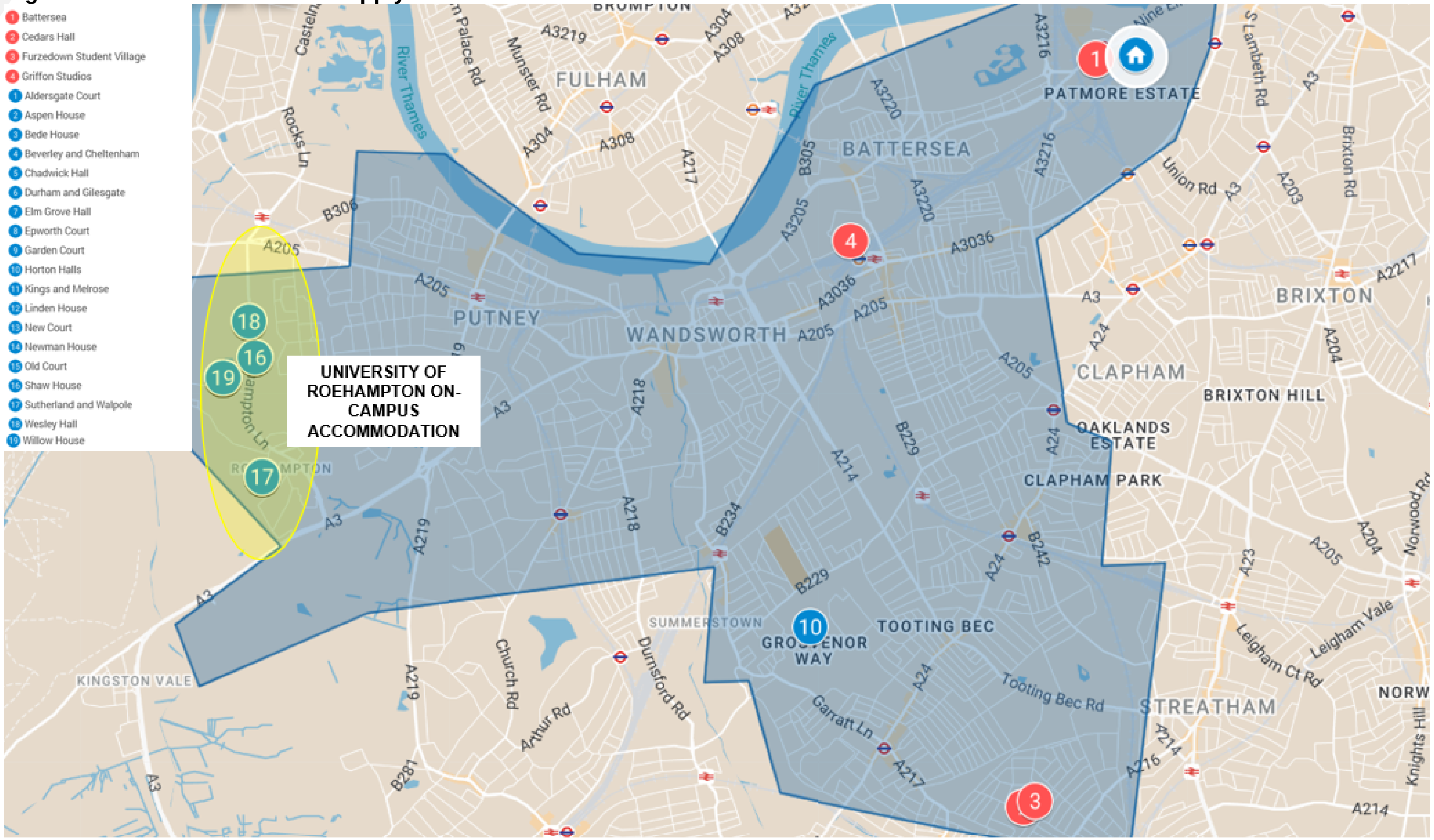
68. Importantly, these institutions are also struggling to adequately house their first-year populations. These are students often studying away from home for the first time with important pastoral care needs. As can be seen, based on latest available data, nearly 50,000 first year students across these institutions are unable to access a PBSA bed.

69. It is therefore clear that the proposed development can play an important role in helping to address undersupply not only at a London level, but also across institutions within a commutable distance of the site.

Wandsworth PBSA

70. In the current academic year (2024/25) Wandsworth offers a total of 4,008 PBSA beds to students, 4% of the total available across London. Ownership of stock is relatively evenly split, with 1,843 beds (46.0%) owned by private sector providers, with the remaining 54.0% owned by the University of Roehampton and St George’s, University of London (a further six beds are available in a small boathouse owned and operated by Imperial). Private sector supply has increased for the 2024/25 academic year with the opening of the 851-bed Urbanest Battersea development. Accommodation locations in relation to the proposed development site are outlined below.

Figure 13: Wandsworth PBSA Supply 2024/25

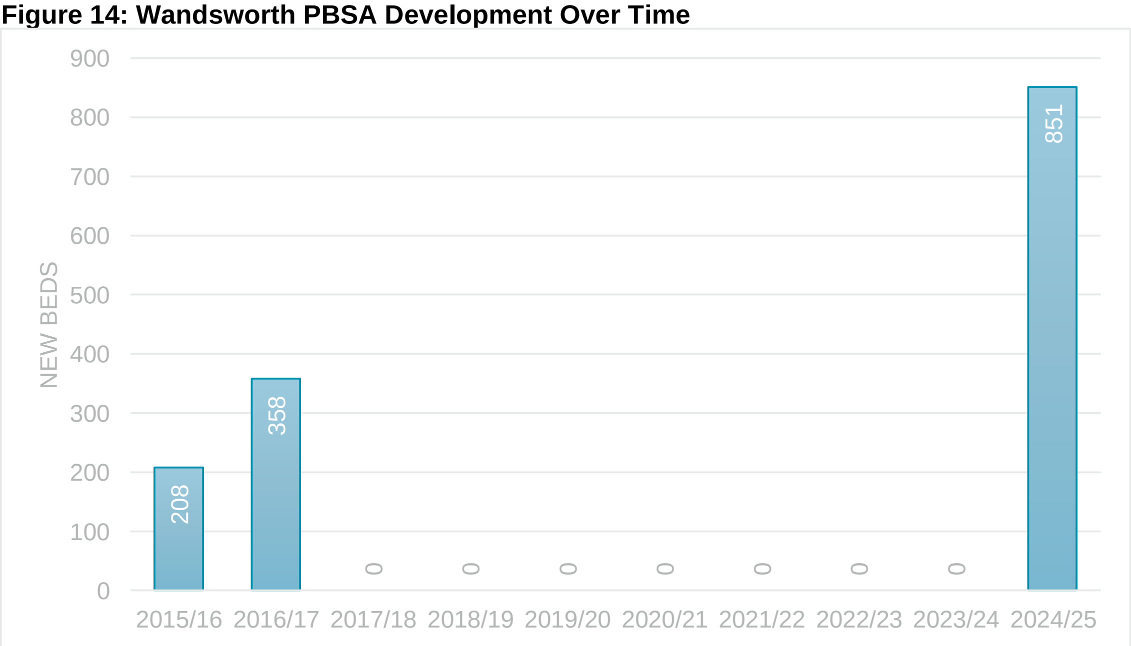


Source: Cushman & Wakefield Student Accommodation Tracker. Note, University of Roehampton operates a range of small developments on campus, not all of which can be shown on map

71. As can be seen, accommodation is spread across the Borough, with a large number of beds located on the University of Roehampton's campus to the west. Griffon Studios is an Imperial joint venture, GradPad, which offers 566 beds to students of any London institution. King's College London has chosen to take 452 beds at Urbanest Battersea (including a number of affordable rooms) and the University of the Arts and BPP have both chosen to take beds at Furzedown Student Village. This highlights the fact that there is demand from institutions across London and they are happy to place their students in Wandsworth.

72. Development of new PBSA in Wandsworth has been relatively limited, with 208 new beds delivered in 2015/16 (Chadwick Hall) and then 358 beds in 2016/17 (Elm Grove Hall). There was then no new development until the current 2024/25 academic year with the opening of Urbanest Battersea (851 beds).

Figure 14: Wandsworth PBSA Development Over Time



Source: Cushman & Wakefield Student Accommodation Tracker

Currently, the development pipeline in the Borough is also limited at 1,213 beds, 2% of the total current PBSA development pipeline across London. One of these is the proposed development, with the other a proposed 434 Downing Student development at 2 Armory Way. I understand no beds are currently under construction.

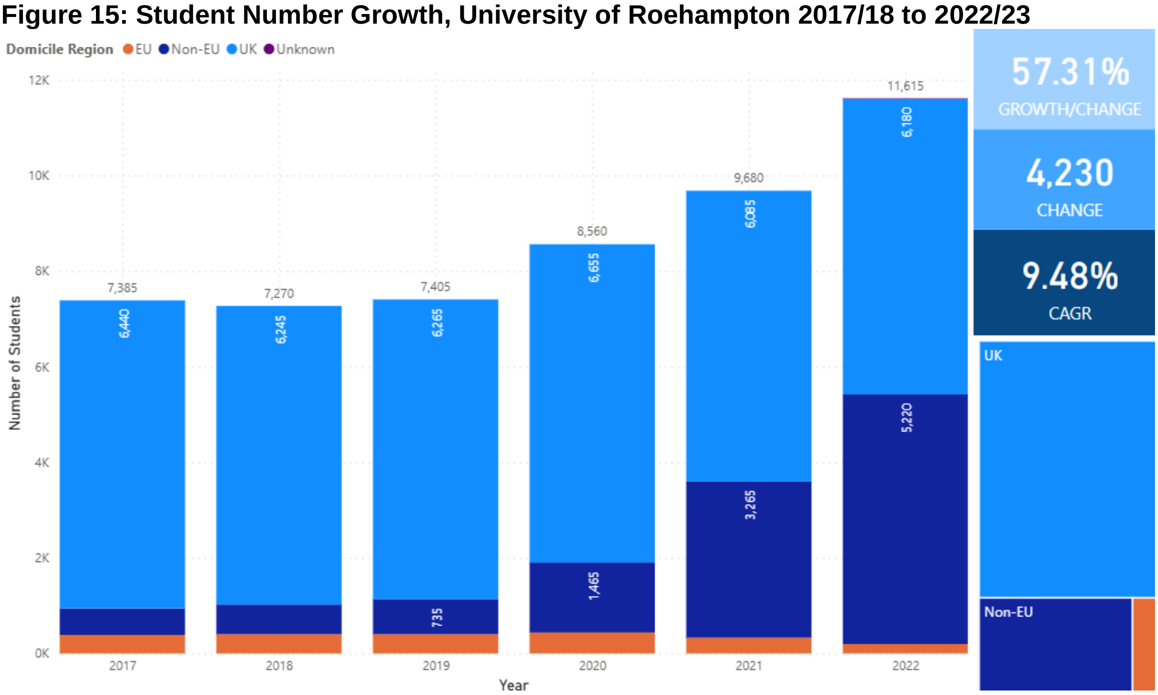
Wandsworth Higher Education Demand

73. In line with the national and London trends examined in this Proof of Evidence, growth in student numbers in Wandsworth has been significant since 2017/18, reflecting the national and London-wide trends highlighted above.

74. The chart below highlights student number growth at Roehampton University since 2017/18. As can be seen, levels of growth over this period have been above those seen nationally and across London, with a particularly pronounced increase in the number of international students studying at the institution, with the non-EU international population growing by 4,665 students (839.21%). Of

course, international students are most likely to demand PBSA for reasons of convenience and safety.

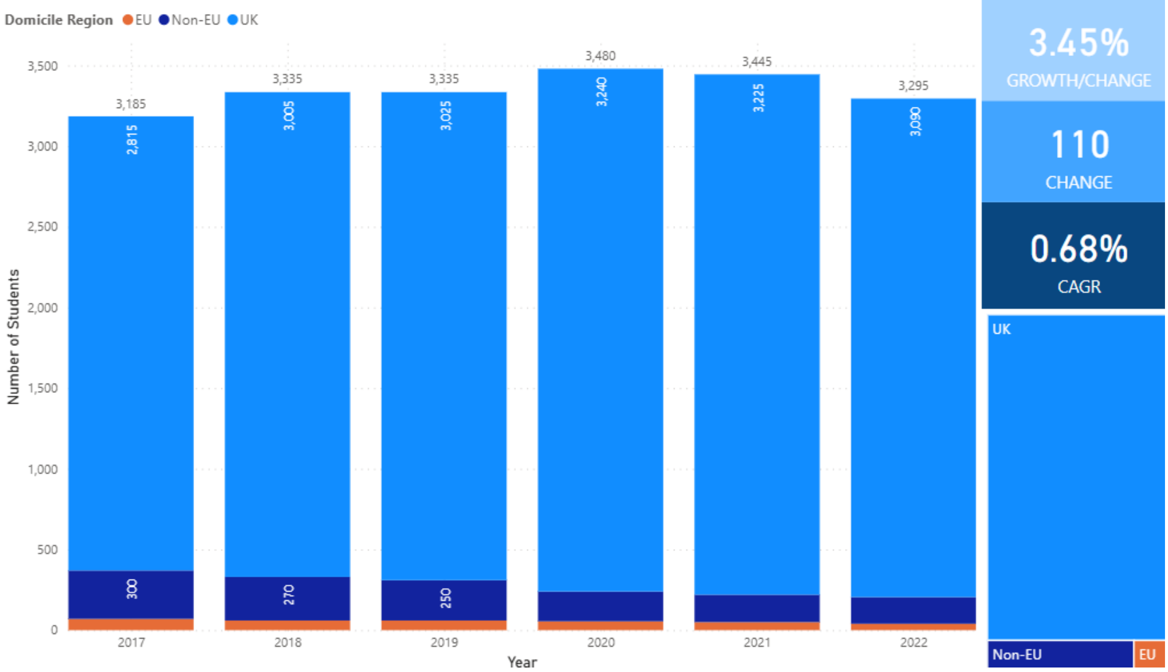
Figure 15: Student Number Growth, University of Roehampton 2017/18 to 2022/23



Source: HESA 2017/18 to 2022/23

75. In line with its strategic ambitions, growth at St George's, University of London, has been muted, with full-time student numbers growing by 3.45% over the same period. However, it should be noted that St George's has plans for significant expansion, with the institution's St George's University of London 2030 Strategic Vision Document (CDM.17) setting out an ambition to increase *"student numbers (FTE) by at least 20% (from 2022).*

Figure 16: Student Number Growth, St George's, University of London 2017/18 to 2022/23



Source: HESA 2017/18 to 2022/23

76. Located on the edge of the Borough is a significant campus of Kingston University, Roehampton Vale, which was home to 1,005 students – all of whom were studying Engineering. 31% of these students were non-EU internationals.

77. The demand pool for accommodation across these institutions measured against the number of beds available over time can be seen below. I have extrapolated the Compound Annual Growth Rate (CAGR) seen between 2013/14 and 2022/23 to show the potential growth in demand to the current 2024/25 academic year.

Table 5: Demand-Supply Dynamics Over Time, Wandsworth-based Institutions

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	*2023/24*	*2024/25*
All year	3,440	3,200	3,330	3,400	3,335	3,310	5,025	5,655	7,110	9,240	*10,109*	*11,061*
First year	1,410	1,430	1,435	1,605	1,445	1,345	1,910	2,700	3,780	4,475	*5,000*	*5,587*
Roehampton	1,904	1,904	2,113	2,183	2,184	2,183	2,183	2,083	1,873	1,680	1,680	1,679
St George's, UoL	486	486	486	486	486	486	486	486	486	486	486	486
Kingston (Roehampton Vale)	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL	2,390	2,390	2,599	2,669	2,670	2,669	2,669	2,569	2,359	2,166	2,166	2,165
Student to Bed Ratio	1.44	1.34	1.28	1.27	1.25	1.24	1.88	2.20	3.01	4.27	4.67	5.11
First Year Student to Bed Ratio	0.59	0.60	0.55	0.60	0.54	0.50	0.72	1.05	1.60	2.07	2.31	2.58
Unable to acess PBSA	1,050	810	731	731	665	641	2,356	3,086	4,751	7,074	7,943	8,896
First Year Unable to Access PBSA	- 980	- 960	- 1,164	- 1,064	- 1,225	- 1,324	- 759	131	1,421	2,309	2,834	3,422

Source: HESA/Cushman & Wakefield.2023/24 and 024/25 pools are my extrapolation based on the CAGR from 2013/14 to 2022/23

78. As can be seen from the table, since 2013/14, Wandsworth's institutions have been unable to house all students with a requirement for a bed in PBSA, with this shortfall growing markedly since 2019/20 to stand at 7,074 students in 2022/23. Importantly, 2,309 first year students with a requirement for a bed are unable to be housed. Based on previous growth trajectories, these figures have the potential to stand at 8,896 and 3,422 in 2024/25 respectively. It is clear that to meet their housing needs, a large number of students at Wandsworth-based institutions are living in other London boroughs.

79. The situation in Wandsworth is similar to that of a number of other London boroughs. For example, Westminster is home to a range of universities and other specialist providers[7]. Even assuming every bed available to students in Westminster was taken by a student at an institution in the Borough, up to 43,386 students would not be able to access PBSA, including up to 21,781 first year students. Again, it is clear that Westminster students are accessing PBSA and accommodation more widely, outside the Borough.

[7] University of Westminster, King's College (Strand Campus), London Business School, LSE, Royal Academy of Music, Chelsea College of Art, London College of Fashion, Courtauld Institute of Art, Imperial, Heythrop College, Royal College of Music, Royal College of Art, American Intercontinental

Table 6: Demand-Supply Dynamics Over Time, Westminster Institutions vs All Westminster Supply

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	*2023/24*	*2024/25*
All year	33,035	34,050	34,710	36,145	37,140	37,925	38,705	41,505	41,830	44,585	*46,096*	*47,659*
First year	17,300	18,050	18,010	18,605	19,780	20,230	20,475	22,150	22,375	24,185	*25,102*	*26,054*
TOTAL PBSA	3,951	3,951	3,882	4,043	4,085	4,064	4,220	3,913	4,003	3,720	3,876	4,273
Student to Bed Ratio	8.36	8.62	8.94	8.94	9.09	9.33	9.17	10.61	10.45	11.99	11.89	11.15
First Year Student to Bed Ratio	4.38	4.57	4.64	4.60	4.84	4.98	4.85	5.66	5.59	6.50	6.48	6.10
Unable to acess PBSA	29,084	30,099	30,828	32,102	33,055	33,861	34,485	37,592	37,827	40,865	42,220	43,386
First Year Unable to Access PBSA	13,349	14,099	14,128	14,562	15,695	16,166	16,255	18,237	18,372	20,465	21,226	21,781

Source: HESA/Cushman & Wakefield. Note, King's College London Strand Campus is excluded from the demand pool calculations so true demand may be higher. 2023/24 and 2024/25 pools are my extrapolation based on the CAGR from 2013/14 to 2022/2

Wandsworth Demand & Surrounding Boroughs

80. As a further sensitivity check as to the scale of demand in the area, I have also considered Wandsworth demand alongside that in the neighbouring boroughs of Lambeth and Southwark. The neighbouring boroughs are home to London South Bank University, was well as King's College London's Guy's and Waterloo campuses, which teach the majority of the institution's medical courses.

81. Alongside previously considered Wandsworth demand, I have also considered demand arising from these two locations, as well as the bed spaces already provided by the two. In terms of King's College, I have included all beds either owned or nominated by the institution south of the River – i.e., SE and SW postcode areas. As can be seen from the table below, King's College supply in the area is higher than all other institutions combined.

Table 7: Demand-Supply Dynamics Over Time, Wandsworth-based Institutions + Demand in Lambeth and Southwark

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	*2023/24*	*2024/25*
Wandsworth	3,440	3,200	3,330	3,400	3,335	3,310	5,025	5,655	7,110	9,240	*10,109*	*11,061*
King's College Guy's & Waterloo	2,560	2,535	2,510	2,285	2,320	4,890	4,855	4,990	5,375	5,575	*6,078*	*6,792*
London South Bank University	4,185	4,195	4,280	4,255	3,860	4,116	4,434	5,150	5,260	5,440	*5,601*	*5,767*
TOTAL POOL	11,200	11,015	11,175	11,135	10,585	13,296	15,734	17,440	19,355	21,825	23,421	25,316
Roehampton	1,904	1,904	2,113	2,183	2,184	2,183	2,183	2,083	1,873	1,680	1,680	1,679
St George's, UoL	486	486	486	486	486	486	486	486	486	486	486	486
Kingston (Roehampton Vale)	-	-	-	-	-	-	-	-	-	-	-	-
King's College Guy's & Waterloo	3,840	3,771	3,890	3,930	3,937	4,605	4,345	3,631	3,631	3,568	3,595	4,147
London South Bank University	1,398	1,398	1,398	1,398	1,398	1,398	1,406	1,406	1,406	1,325	1,325	1,338
TOTAL	7,628	7,559	7,887	7,997	8,005	8,672	8,420	7,606	7,396	7,059	7,086	7,650
Student to Bed Ratio	1.47	1.46	1.42	1.39	1.32	1.53	1.87	2.29	2.62	3.09	3.31	3.31
Unable to acess PBSA	- 3,572	- 3,456	- 3,288	- 3,138	- 2,580	- 4,624	- 7,314	- 9,834	- 11,959	- 14,766	- 16,335	- 17,666

Source: HESA/Cushman & Wakefield. Note, King's College numbers are a breakdown of medical courses as per HESA. Detailed data for London South Bank University is unavailable for 2018/19 to 2021/22 so I have taken full-time student numbers for these years and applied an average of the percentage demand pool across other years (i.e., 41%). 2023/24 and 024/25 pools are my extrapolation based on the CAGR from 2013/14 to 2022/23

82. As can be seen from the table, the number of students unable to access PBSA has grown strongly over time, standing at 14,766 in 2022/23. Modelling to 2024/25 shows that this figure could have grown to 17,666 in 2024/25. Therefore, whilst the proposed development can play an important role in helping to meet demand from Wandsworth-based institutions, it could also play a role in meeting demand from the immediate wider area.

83. It follows that whether one looks at London as a whole, Wandsworth with Lambeth and Southwark, or Wandsworth in isolation, higher education institutions within these areas are unable to house all students with a requirement for a bed in PBSA and this shortfall continues to grow markedly.

Nomination Agreements

84. As set out throughout this Evidence, universities – especially in London – are reliant on private sector providers to help meet their accommodation needs. Therefore, nomination agreements (alongside leases and other long-term partnerships) play a crucial role in housing students. However, universities also need certainty in terms of planning for and securing bed spaces for students. Therefore, whilst the London Plan requires an agreement to be in place for a PBSA development to be operational, it is usual for such agreements to be entered into following the securing of planning permission. This allows a university to be more confident that a scheme will be delivered and so that they can more properly plan for when bed spaces will be available. This is reflected in the Mayor's Purpose-built Student Accommodation LPG in October 2024 (CDB.06) which states that *"HEPs are unlikely to enter into such agreements until plans and, indeed, construction are sufficiently advanced that they can rely on bedspaces being available when needed (e.g. for the start of a particular academic year)".*

85. Further, the Guidance goes on to state that *"The best way to provide assurance to the decision-maker assessing a planning application is for the developer to demonstrate engagement with one or more HEPs. This engagement should explore their interest in the scheme, and appetite to pursue further discussions towards a nominations agreement. In doing so, it is advisable to target institutions that are close or well connected to the location. To mitigate any risks of non-delivery, this engagement should have advanced sufficiently, such that ideally one or more 'letters of comfort' can be provided as early as possible in the process before the decision".*

86. The Wandsworth Officer Report (CDF.01) comments on the Guidance stating *that "HEP's are unlikely to contractually commit to a formal agreement until they are confident that planning permission is secured. GLA officers in their Stage 1 Report have accepted this approach subject to it being secured via the S106 legal agreement".*

87. The Wandsworth Officer Report for the site acknowledges that the Appellant has demonstrated engagement with one of London's key Higher Education providers, the London School of Economics and Political Science (LSE), which has twice expressed support for the scheme and this is set out below.

88. *"LSE supports the application and emphasises the importance of affordable accommodation within commuting distance to its main campus for attracting top global students. The proposed development will offer a mix of affordable rooms, meeting the institutions requirements for high quality student housing. LSE highlights the positive reputation of Watkin Jones for delivering quality accommodation, noting past successful projects. Approval of the application would allow LSE to* *expand its accommodation offerings and ensue guaranteed housing for first year students. The location is deemed suitable, situated in a growing neighbourhood with excellent links to the LSE campus".*

89. *"London School of Economics and Political Science (LSE): Support. It would allow their students to access a blend of affordable bedrooms and studio accommodation with amenity space that meet their requirements for high quality third-party student accommodation. LSE stated their support for the delivery partner Watkin Jones, as the company has a reputation for delivering high quality schemes such as the accommodation constructed in partnership with University of London and UPP at Eleanor Rosa House in Stratford".*

90. At paragraphs 1.33 and 1.34 of the Report, it is noted that *"Whist the applicant has stated that they are in discussions with various HEPs and are committed to entering into a nomination's agreement prior to occupation of the accommodation. Whilst this has not yet been finalised, the applicant's commitment to meet this part of the policy is acknowledged and is considered to address the objections raised regarding the lack of higher education establishments in the area to meet the student population demand". It goes on to state "The applicant has sought flexibility regarding the extent of the nomination's agreement. The relevant policy requires a HEP to have nomination rights for the majority of bedrooms, however the applicant seeks to secure a nomination's agreement across all of the allocated affordable student beds, with 'reasonable endeavours' used in respect of the private student housing".*

91. Indeed, as noted in Mr Stackhouse's Proof of Evidence (CDI.02), the Appellant notes that it is now in *"advanced discussions"* with LSE and that *"We have agreed heads of terms, and both parties have instructed lawyers to draft an Agreement for Nomination Agreement (AFNA)".* In terms of the current draft of the section 106 agreement, the *"nomination agreement will cover the majority of the PBSA bed spaces including all the affordable student accommodation for a period of 10 years. The obligation also documents a cascade style' letting mechanism meaning that students at local HEIs are given priority".*

92. The approach of the Appellant mirrors that of the Urbanest Battersea development at Palmerston Court (2020/2837) which was delivered for the current 2024/25 academic year. The Committee Report (CDM.04) for the application states that:

93. *"Whilst it is not necessarily expected that a contract with an HEI will be entered into during the planning stage, the applicant has submitted a management plan for the accommodation and evidence that they have been in discussions with a number of HEIs. This provides a reasonable indication that the applicant intends to work in partnership with an HEI in relation to the management of the accommodation and placement of students when the scheme is ready for occupation. It is therefore considered that affordable housing policies that would otherwise require an economic viability assessment to be submitted do not apply".*

94. *"Whist the applicant has stated that they are in discussions with the London School of Economics and Kings College London and is seeking to secure a long-term partnership with university partners, with the intention to enter into a nomination agreement with the chosen partner, this has not yet been finalised".*

95. Urbanest has subsequently entered into an agreement with King's College London for a proportion of bed spaces in the development, and the approach taken before planning permission was granted is very much reflective of that of the Appellant.

Summary Conclusions

London: A High-Demand, Undersupplied Student Accommodation Market

96. London stands as the world's most prestigious higher education hub, home to five Russell Group institutions and attracting a rapidly growing student population. Since 2012/13, London has seen an increase of **152,305 students**, with **115,420** of this growth coming from outside Greater London. However, this surge in student numbers has not been matched by an equivalent increase in PBSA, leading to a structural undersupply.

97. The student-to-bed ratio in London has now reached **2.99:1**, the highest of any major UK market, leaving over **184,000 students unable to secure PBSA beds**—an increase of **96,000 students compared to 2017/18**. This shortfall places significant pressure on the private rental market, exacerbating affordability challenges and housing competition across the city.

The London Plan: Ambitious Targets, Persistent Shortfalls

98. The **London Plan** sets a target to deliver **3,500 PBSA beds annually**, yet this ambition has not been met in any year since **2017/18**. Over this period, the student population has grown by **115,420**, while the net increase in PBSA beds has been just **8,307**—a stark imbalance. The Plan explicitly acknowledges that PBSA plays a critical role in housing students, and the ongoing shortfall is contributing directly to increased demand and rising rents in the private rental sector.

Strategic Location and Commutable Institutions

99. The proposed development site benefits from a prime location with excellent transport links, making it accessible to a significant proportion of London's students requiring accommodation. Within a **45-minute commute**, the site serves **15 major higher education institutions**, including globally renowned universities such as **University College London (UCL), Imperial College London, King's College London, and the London School of Economics (LSE)**.

100. Since **2012/13**, full-time student numbers across these institutions have grown by **77,600**, with **54,690** of these students coming from outside Greater London. However, PBSA provision remains critically insufficient, with a **student-to-bed ratio of 5.05:1**—meaning there are **over five students competing for each available PBSA bed**. This has resulted in **118,827 students being unable to secure PBSA accommodation**, including **49,472 first-year students**. Given that the **London Plan does not impose Borough-level targets**, this development has the potential to play a significant role in alleviating unmet demand.

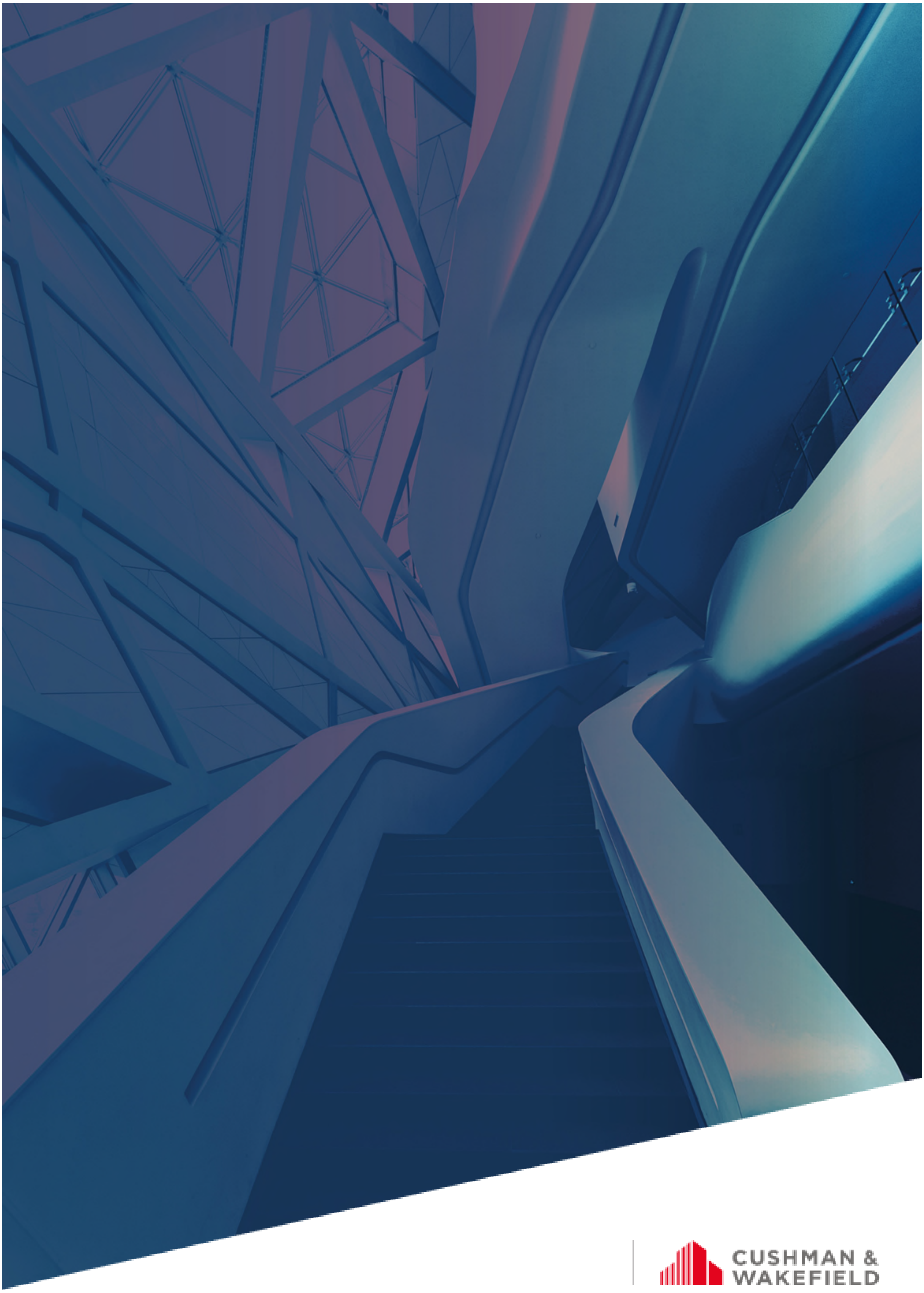
Wandsworth: A Growing Market with Limited PBSA Development

101. Despite its growing student population, Wandsworth has delivered only **5% of new London PBSA supply** since **2016/17**, leading to increasing reliance on the private rental market. The **student-to-bed ratio in Wandsworth stands at 5.11:1**, with **8,896 students unable to access PBSA**, including **3,422 first-year students**. The proposed development presents a strategic

opportunity to address this shortfall and support the borough's growing student accommodation needs.

Conclusion

102. London's student accommodation market faces an acute undersupply, driven by rising student numbers and a lack of sufficient PBSA development. The proposed site, benefiting from strong connectivity and proximity to key institutions, is well-positioned to help bridge this gap. With the **London Plan failing to meet its annual PBSA targets**, targeted developments like this are essential in alleviating pressure on the private rental market and providing high-quality student housing where it is most needed.



CUSHMAN & WAKEFIELD