

Defining Student Housing in Canada

Comparing international student housing strategies to Canadian specialized housing standards to provide a foundation for policy that will enable the creation of student housing at scale.

Julian Wells

April 2026

Table of Contents

Introduction	4
The Current State of Student Housing Policy in Canada	6
Federal	6
Provincial	7
Municipal	7
Canadian Student Housing	9
Student Experience	10
Canadian Specialized Housing Models	12
Seniors Housing	12
Military Housing	13
Indigenous Housing	14
Workforce Housing	14
International Student Housing Models	17
Ireland	17
The Netherlands	18
United Kingdom	18
Australia	19
Austin, Texas (United States)	20
Proposed Canadian Typologies	23
Post-Secondary Residences	24
Purpose-Built Student Accommodation (PBSA)	25
Student Shared Housing	28

Student-Occupied Market Rental	29
Family-Based Student Housing	30
Campus-Oriented Development	33
Coverage Area	34
Incentives	35
Targets and Implementation	37
Conclusion	39
About the Author	41
References	42

Introduction

Canada has no operational definition of purpose-built student accommodation. Build Canada Homes, the federal housing agency launched in September 2025, recently included "Student Rental Housing" in its glossary, marking the first time a federal entity has formally distinguished student housing from general rental, but no building code, zoning bylaw, tax statute, or housing data program in the country has adopted a definition with the specificity needed to administer policy. Federal programs target student housing, provincial legislation references it, and municipal planners encounter it regularly, yet the term still lacks the criteria that would allow any of them to zone for it, finance it as a distinct asset class, or collect data on it.

This gap has measurable consequences.

There are approximately 1.8 million full-time post-secondary students in Canada, and 2.3 million including part-time enrolment.⁵⁷ Enrolment figures vary depending on scope (degree-granting vs. all post-secondary), inclusion of part-time students, and reporting year. We use the Statistics Canada full-time figure for housing demand calculations because part-time students are less likely to require dedicated student accommodation. Approximately 178,662 of them have access to a purpose-built student bed, split between 122,262 university-run beds and 59,556 private beds.¹ Vacancy in existing stock is at an all-time low of 1.5%.² An estimated 400,000 additional beds are needed nationally to meet current demand.² Students who cannot access purpose-built accommodation enter the general rental market, where they compete against applicants with stronger credit histories, employment records, and housing references.⁸ In our survey, 36.1% of students reported that their rent is unaffordable, and 66.2% rely on family financial support to pay for housing.⁴

1.8M

FULL-TIME STUDENTS

~180K

PURPOSE-BUILT BEDS

1.5%

VACANCY RATE

400K

ESTIMATED SHORTFALL

The consequences extend past students. Students who cannot access a purpose-built bed enter the general rental market, competing directly with young professionals, families, and new immigrants for units that were never designed for student occupancy. In our survey, housing availability is the second most important factor in students' university decisions, after quality of program.⁴ Students are already choosing where to study based on where they can afford to live, not where they can get the best education.

Every purpose-built student bed constructed near a campus is one fewer student competing for the same rental unit as a young family.

The most common objection to creating a student housing category is that students are temporary renters who graduate and move on, and that the general rental market serves them adequately. We argue the opposite. Students are a structurally distinct population. They lack employment income, they relocate on academic timelines rather than lease cycles, and they generate concentrated demand in specific geographies. The 400,000-bed shortfall is a permanent feature of a system that has never accounted for this demand.

Other specialized housing types in Canada have established regulatory foundations. Seniors housing is defined in statute in four provinces, each organized around a single qualifying characteristic, age 65 and older.⁹ CMHC publishes an annual Seniors' Housing Report tracking supply, vacancy, and rents by typology.⁵ Military housing is defined by the Canadian Forces Housing Portfolio directive and administered by the Canadian Forces Housing Agency.¹⁰ Indigenous housing operates through dedicated federal programs, including funding committed under the National Housing Strategy's Indigenous-specific streams.¹¹

Student housing has no statutory definition, no regulatory body, no licensing framework, and no structured data collection. The federal government's most significant intervention is CMHC's Apartment Construction Loan Program student housing stream, which created eligibility criteria for a housing type that does not yet carry legal meaning in Canadian law.⁶ Bill C-227, the National Strategy on Housing for Young Canadians Act, passed second reading in the 45th Parliament on February 12, 2026 and is currently at committee stage. The bill mandates a national strategy on student housing but does not define what student housing is.⁷ This paper aims to fill that gap.

This paper draws on original data from the Canadian Student Living Survey, conducted between August and December 2025. The survey data informed the State of Canadian Student Living 2026, released in late January 2026. The survey reached 6,039 post-secondary students across 17 cities and 21 universities through direct outreach on campus, partnerships with student unions, and digital distribution. The sample averages approximately 290 respondents per campus and skews toward students at Tier 1 universities, with less representation from students at other forms of post-secondary education. The survey is the largest dataset on Canadian student housing preferences and living conditions, and the findings cited throughout this paper reflect consistent patterns observed across campuses and cities.

This paper proposes a framework for defining student housing in Canada. We define student housing broadly as any dwelling inhabited by an individual currently enrolled in a post-secondary institution. The qualifying characteristic is enrolment status, the same structural logic that seniors housing uses with age. A retirement home and an assisted living facility are architecturally different, but both qualify as seniors housing because the occupant is 65 or older. Student housing works the same way. A 1,200-bed purpose-built tower and a shared house near campus are architecturally different, but both are student housing because the occupant is enrolled in a post-secondary institution. The broad definition is a measurement tool. It captures the full universe of how students live and gives policymakers visibility into a population that is currently invisible in housing data. The five typologies that follow, Post-Secondary Residences, Purpose-Built Student Accommodation (PBSA), Student Shared Housing, Student-Occupied Market Rental, and Family-Based Student Housing, provide the targeted categories where regulatory and policy action can begin. Each typology carries different regulatory implications, data collection needs, and available policy levers.

Canada has built regulatory frameworks for population-specific housing types before. It has not yet done so for students. This paper provides the definitions, the typological framework, and the planning model to begin.

The Current State of Student Housing Policy in Canada

No level of Canadian government has formally defined purpose-built student accommodation. Federal programs target it, provincial legislation references it, and municipal planners encounter it in development applications, yet none of these operate with a shared definition of what student housing is. What follows is an account of what each level of government has done, where those efforts fall short, and how the private and non-profit sectors have responded.

Federal

The federal government's primary instrument for student housing is CMHC's Apartment Construction Loan Program (ACLP), which was expanded in 2024 to include a dedicated student housing stream.⁶ The program's eligibility criteria were written without reference to how student housing is actually built in international markets. On-campus projects qualify broadly, as both self-contained and non-self-contained units are eligible.¹⁵ Off-campus PBSA must meet five conditions: units must be self-contained, limited to four bedrooms, within "walking distance" of a campus or near transit, subject to a 10-year rent cap, and covered by a nomination agreement with a post-secondary institution.^{15,16}

The self-contained requirement and the four-bedroom cap together eliminate the cluster flat, a four-to-eight-bedroom unit with en-suite bathrooms and a shared kitchen that is the dominant PBSA form in the UK and Ireland.^{16,17,18} The concern behind the self-contained requirement is legitimate, since shared kitchens raise fire safety and maintenance questions, but even if it were lifted, the bedroom cap would exclude most cluster flats on its own. The remaining criteria are similarly misaligned. The nomination agreement requires a university to endorse a private development that could draw students away from its own beds. "Walking distance" has no specified threshold, and the 10-year rent cap has no published baseline or enforcement mechanism. A developer cannot determine whether a site qualifies until CMHC reviews the application, which may come months after the land was purchased.

The ACLP is the most significant federal action on student housing to date. It is also a program built on a definition that does not exist, for a housing type with no statutory meaning in Canadian law, no building code classification, and no data infrastructure behind it. CMHC's Rental Market Survey does not distinguish student-occupied units from general rental housing.¹⁹ When a campus city reports a 1.5% vacancy rate, there is no way to know how much of that vacancy is in student-occupied stock or how the market would respond to purpose-built supply.

Bill C-227, the National Strategy on Housing for Young Canadians Act, passed second reading on February 12, 2026 and was referred to committee.⁷ The bill mandates the federal government to develop a national strategy on student housing but does not define what student housing means, propose a typology, or make

regulatory recommendations. As a private member's bill, it faces uncertain odds. Whether or not C-227 progresses, any national strategy on student housing will need to define what student housing is before it can act on it. This paper aims to provide that foundation.

Build Canada Homes, launched in September 2025 as a \$13 billion federal housing agency, is the first federal entity to formally distinguish student housing from general rental housing, defining "Student Rental Housing (on and off campus)" as "accommodations specifically designed or designated for students who are pursuing post-secondary education." The on-campus and off-campus distinction mirrors the structure proposed in this paper, but a dedicated investment stream would need to differentiate between a 500-bed purpose-built development operated by an institutional investor and a basement apartment listed on a university housing board. The framework proposed in this paper provides the sub-categories that turn a broad definition into an administrable one.

Provincial

Provincial governments in Canada have not created statutory definitions for student housing. Four provinces have statutory definitions, licensing requirements, and regulatory bodies for seniors housing.^{9,10,11,12} None has created an equivalent framework for student housing. Ontario's Provincial Planning Statement (2024) defines "additional needs housing" by listing seniors and persons with disabilities but does not mention students.²⁰

The most significant provincial action is Ontario's Bill 185 (Cutting Red Tape to Build More Homes Act, 2024), which exempts publicly-assisted universities from official plan amendments, zoning bylaw amendments, site plan approvals, and other Planning Act requirements for student housing on institution-owned land.²¹ The exemption does not apply to private institutions, excludes standalone colleges, and most critically, does not apply to land not owned by the post-secondary institution.^{21,22} Forum's Quad Phase 3 at York University, an 841-bed development, is one of the first projects to use the exemption, bypassing the rezoning process that would otherwise add 12 to 18 months to the project timeline.⁹¹ The bill's reach is limited to institutions with existing land. The majority of new supply will need to come from private and non-profit developers on non-institutional land, and Bill 185 does nothing for those projects.

Ontario is the only province with student housing-specific legislation. Other provinces have acted through capital funding and grant programs rather than planning law or regulatory reform. British Columbia has committed over \$2 billion since 2018 toward 12,000 new student beds, with 10,766 underway as of early 2026, including the \$560 million UBC Lower Mall project, the largest provincial student housing investment in Canadian history. BC has no student housing legislation; the funding flows through capital budgets and could be redirected in any future fiscal cycle. Nova Scotia's Student Housing Development Program offers grants of \$25,000 to \$150,000 per unit and forgivable loans for universities and non-profits, but operates with no underlying legislation or planning policy reform. Quebec funds student housing through general affordable housing programs, opting to contribute funds directly to projects instead of developing student-specific programs or legislation. New Brunswick and PEI are in the earliest stages, with feasibility studies and needs assessments. Alberta, Saskatchewan, Manitoba, and Newfoundland and Labrador have taken no action despite significant housing pressure at institutions like the University of Calgary. Where provincial action has been taken, it has been through capital spending directed at specific institutions, with no change to planning frameworks and no data collection requirements.

Municipal

Toronto's zoning bylaw defines "Student Residence" as premises owned and operated by a post-secondary institution.²³ No other major Canadian municipality has an equivalent. The challenge with this definition is that it requires institutional ownership. This means that private PBSA in Toronto is zoned as standard residential. A developer building a purpose-built student residence next to the University of Toronto campus is treated identically to a market rental apartment building. As is, the city cannot incentivize student housing with density bonuses, development charge reductions, or any student-specific expectations. Waterloo and London, Ontario, have rental licensing frameworks that capture some student shared housing, but these regulate existing stock, not new purpose-built supply.²⁴

Edmonton is a notable exception. In August 2025, Edmonton City Council unanimously approved a \$15 million Downtown Student Housing Incentive, funded through the federal Housing Accelerator Fund, offering up to \$30,000 per unit for new student housing construction. As of early 2026, all funding has been allocated across five projects totaling 550 units, with groundbreaking expected in spring 2026. Units must remain student-dedicated for a minimum of ten years at or below average market rent. Concordia University of Edmonton is separately investing \$11.9 million in a 200-bed residence opening January 2027. Edmonton's program demonstrates that municipal governments can act on student housing without waiting for provincial or federal definitions.

Kingston is among the first Canadian municipalities to develop a dedicated student housing strategy. On February 3, 2026, Kingston City Council voted unanimously to direct staff to scope a comprehensive Student Housing Strategy, with a staff report expected in the second quarter of 2026. The motion responded to growing pressure from student conversions of near-campus neighbourhoods, including the loss of single-family homes to student rentals, 19% annual rent increases, and poor housing conditions in converted properties. Kingston has no student housing zoning definition and no rental licensing program. Private PBSA capital is already flowing into the city. Manulife and Cedar Podium are building a 389-bed tower at 283 Queen Street that is expected to complete in fall 2027, and Podium's GEOCentral complex at 575 Princess Street has already delivered units. Kingston is an example of what happens when student housing investment arrives in a municipality that lacks a framework to support it. Density goes where developers can acquire sites, community opposition builds around projects that residents perceive as imposed, and the city has no regulatory basis on which to negotiate outcomes.

Calgary, Ottawa, Halifax, and Montreal lack any student housing zoning definition or municipal incentive program. Vancouver was working towards a strategy in 2024 but has since paused it until future notice. Without a zoning category, every project requires a rezoning application, typically adding a year or more and significant cost. The policy toolkit that municipalities use to incentivize other housing types is unavailable for student housing because the category does not exist in their planning frameworks.

Canadian Student Housing

The policy vacuum exists alongside a market that has already organized itself. Co-operatives in Waterloo, Toronto, and Kingston have housed students continuously since the 1930s. Private institutional capital and non-profit operators have built portfolios worth billions. Every one of these operators works in an uncertain category that Canada does not define, regulate, or track.

In the private sector, Campus Living Centres manages approximately 35,000 beds across a portfolio valued at more than \$600 million.³⁰ Forum Asset Management acquired Alignvest Student Housing in December 2024 for \$1.7 billion, the largest single student housing transaction in Canadian history. Weeks later, Brookfield invested \$100 million in Forum's student housing platform.^{28,29} Forum's student housing REIT, Forum REIF, now owns approximately 10,500 beds at 97.2% occupancy.³ Its Quad Phase 3 project at York University, an 841-bed development, was one of the first projects in the country to use Ontario's Bill 185 planning exemptions.⁹¹ Cedar Podium has delivered over 21,500 beds cumulatively, Knightstone manages thousands with 2,000 more under development, and Hines has indicated it is advancing sites in Toronto and Vancouver.^{31,32,33}

UTILE, the most developed non-market student housing operator in Canada, is a Quebec-based social economy enterprise founded in 2013 by students at UQAM whose work grew out of Quebec's 2012 student strike movement. It operates hundreds of units across Montreal, Quebec City, Trois-Rivieres, and Rimouski, with rents 15 to 30 per cent below market.³⁴ Its total asset value is approximately \$150 million in operating properties, with over \$300 million once the current pipeline completes. The most distinctive element of UTILE's model is its relationship with student unions. Individual campus unions invest directly in UTILE projects through student fee referenda. Concordia's CSU invested \$1.85 million following a 2014 referendum. McGill's SSMU invested \$1.5 million through a \$6.53 per student fee approved in a 2020 referendum. These student equity contributions, typically representing 3 to 10 per cent of a project's total cost, are then leveraged roughly 10:1 through layered government and social finance funding. Students vote to invest in their own housing supply, and that investment unlocks an order of magnitude more capital.

UTILE has achieved all of this without any student housing-specific funding stream. Quebec has no student housing legislation and no dedicated program. UTILE accesses general affordable housing programs designed for other populations and adapts them. The model works because of the depth of Quebec's social economy infrastructure and does not transfer easily to provinces without that ecosystem. Scaling UTILE's approach nationally would require either replicating Quebec's social finance architecture in other provinces or creating the federal student housing funding stream that this paper's framework is designed to support.

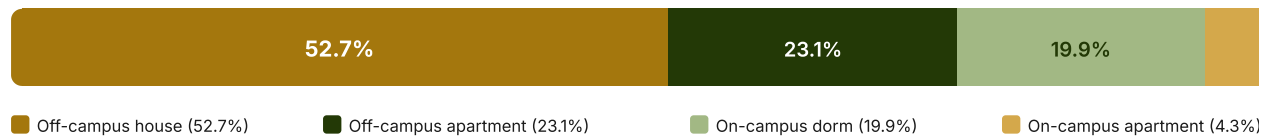
Student Housing Nova Scotia has operated for more than 50 years, managing approximately 120 units across Wolfville and Halifax, and created the DASH Fund modelled after UTILE's referendum approach but standardized at \$5 per semester across participating campuses.³⁵ Student housing co-operatives have even deeper roots: WCRI in Waterloo has 1,300 members, making it the largest student housing co-op in North America.³⁶ Universities are also building at scale. UBC's Lower Mall Residence (\$560 million, 1,508 beds), McMaster's Lincoln Alexander Hall (1,366 beds), Dalhousie (213 new beds), and Western (1,000 beds under construction) collectively represent over \$1 billion in capital and more than 4,000 beds.^{38,39,40,41} None follows a common regulatory pathway because no such pathway exists.

Student Experience

The policy gap produces measurable outcomes. Canada has approximately 178,662 purpose-built student beds serving a total post-secondary population of 2.3 million (of whom approximately 1.8 million are full-time), a provision rate of roughly 7.8% against total enrolment.^{1,2} The provision rate uses total enrolment as the denominator because both university-run and private PBSA beds serve full-time and part-time students alike. Housing demand calculations elsewhere in this paper use the 1.8 million full-time figure, since part-time students are less likely to require dedicated student accommodation. Vacancy in existing PBSA is at an all-time low of 1.5%.² EY estimates that 400,000 additional beds are needed nationally, comparable to the UK's current level.² The exact figure depends on the assumed target provision rate, and reasonable analysts will disagree. In every plausible estimate, the deficit is severe. Students are already making educational decisions that will affect the rest of their life based on the housing options that exist near their school of choice.

Where Canadian Students Live

Source: Studenthaus National Student Living Survey (n = 6,039)



The standard affordability metric does not fit students well. The 30% income threshold was designed for wage earners, and 66.2% of Canadian students receive financial support from their families that fundamentally shifts the relationship between income and affordability.⁴ 60.4% of surveyed students receive 100% of their housing costs from family. Full coverage makes a measurable difference: 72.5% of fully supported students report their rent as affordable, compared to roughly half of students with partial or no family support.⁴ CASA's finding that approximately 40% of Canadian post-secondary students have experienced food insecurity is consistent with a population paying near-market rents on student incomes with limited or no family support.²⁶

Family Financial Support for Housing

Source: Studenthaus National Student Living Survey (n = 6,039)

Do students receive family financial support for housing?



Coverage level among students receiving family support



Roughly three quarters of students live in housing that was never designed or built for student occupancy.⁴ They occupy converted houses, basement apartments, and standard rental units because purpose-built options do not exist at a scale that could absorb them. Students are the residual occupants of a housing stock built for families, couples, and single professionals. How students get to campus reflects the same constraint: 47.4% rely on public transit, 26.6% walk, and 23.5% drive, and among students commuting 30 minutes or more, 81% use public transit.⁴ Long transit commutes are a consequence of being priced out of housing within walking distance of campus. The students who can walk to class are the students who could afford to live nearby. The students on the bus were sorted there by the rental market.

Student Housing Policy Landscape by Province

Assessment of dedicated student housing policy instruments across Canadian provinces

Province	Legislation	Planning Policy	Dedicated Funding	Data Collection
Ontario	✓	✓	✓	—
British Columbia	✓	✓	—	—
Nova Scotia	✓	—	✓	—
Quebec	—	✓	✓	—
New Brunswick	—	✓	—	—
Prince Edward Island	✓	—	—	—
Alberta	—	—	—	—
Saskatchewan	—	—	—	—
Manitoba	—	—	—	—
Newfoundland & Labrador	—	—	—	—

No policy framework at any level of Canadian government accounts for these patterns. Zoning overlays, development charge schedules, financing programs, and data collection instruments all exist for other housing types, but each requires a defined category to act on. Student housing has no such category at any level of government, which means the full set of policy tools that Canada uses to support seniors housing, affordable housing, and social housing cannot be applied to student housing. Canada has not defined student housing, and until it does, these tools remain unavailable.

Canadian Specialized Housing Models

Canada has built regulatory frameworks for other population-specific housing types. Seniors housing, military housing, Indigenous housing, and workforce housing each have some combination of statutory definitions, dedicated agencies, targeted funding, and structured data collection. These frameworks are imperfect, and some have taken decades to develop, but each has at least a statutory basis and a responsible agency. Student housing has no equivalent.

Seniors Housing

Seniors housing is the most developed special-purpose housing category in Canada. Four provinces have built distinct regulatory regimes. Ontario licenses retirement homes through a dedicated authority, British Columbia defines assisted living as a statutory category, Alberta grades supportive living across four tiers with escalating requirements, and Quebec certifies every private seniors residence under provincial health law. In each case, the policy is organized around the age and care needs of the occupant instead of the physical form of the building.

Ontario set the standard in stages. The Long-Term Care Homes Act, 2007 came first, creating a statutory category for higher-care facilities with dedicated governance and operational requirements.⁴⁶ Three years later, the Retirement Homes Act, 2010 defined a retirement home as "a residential complex occupied by persons who are 65 years of age or older and that provides at least two prescribed care services."⁹ This created a second regulatory category with its own licensing, inspection, and enforcement requirements. The Act also created the Retirement Homes Regulatory Authority (RHRA), an independent body that licenses retirement homes, conducts inspections, and enforces standards.⁴⁵

The Ontario model followed a legible pathway. Crisis prompted an independent review (Shirlee Sharkey's "People Caring for People" report, 2008), which led to a statutory definition, which enabled licensing, which created a regulatory body, which made data collection possible. Each step built on the previous one. Without the statutory definition, none of the downstream apparatus would have had a legal category to attach to.

British Columbia, Alberta, and Quebec each followed similar patterns, defining assisted living, supportive living, and private seniors residences as distinct statutory categories with their own licensing, staffing, and building requirements.^{10,11,12}

The federal government collects structured data on all of this. CMHC publishes an annual Seniors' Housing Report with a clear typology covering independent living, assisted living, long-term care, and retirement homes. Supply, vacancy, and rent data are tracked by category.⁵ This data enables targeted policy at every level of government.

Purpose-built student accommodation is most similar to independent living and private retirement homes. It is privately operated, purpose-built for a specific demographic, and has amenity services but no clinical care. Both house a population defined by life stage rather than income and compete with general-market rental for

tenants and sites. The difference is that CMHC tracks independent-living seniors beds by city, publishes vacancy rates, and reports average rents. It does not do any of this for student housing.

Seniors housing serves a population that ages into the category permanently and remains for years or decades. Students occupy the category for two to five years, and most leave it when they graduate, though mature students, part-time students, and those who return to school after time in the workforce may not follow this timeline. Seniors housing regulation can build around long-term occupancy, stable populations, and predictable care needs. In contrast, student housing regulation must account for annual turnover, seasonal vacancy, and a transient population. Regardless, the two have a core similarity. Housing type is defined by the occupant's stage of life. Naturally, the policy mechanisms that sit on top of that definition will continue to differ.

Seniors housing has a statutory definition, a regulatory body, a licensing regime, and a national data program. Student housing has none of these. A developer proposing a 200-bed retirement home can look up vacancy rates, comparable rents, and regulatory requirements in CMHC's annual report. A developer proposing a 200-bed student residence has no equivalent dataset to consult and no regulatory category to build within. Private sector firms like Studenthaus have begun filling this gap with proprietary data products, but the absence of a public, standardized data program means developers must either pay for private sources or operate without comparable market intelligence.

The seniors model has gaps. Provincial definitions vary enough that the same building could be a regulated retirement home in one province and an unregulated residential complex in another, yet the statutory definitions, licensing regimes, and data programs do still exist. An established category allows future progress to focus on provincial alignment instead of spending time convincing government that the sector is worth investing in at all.

Military Housing

The Canadian Forces Housing Agency (CFHA) administers Residential Housing Units (RHUs) for Canadian Armed Forces personnel.¹³ The Canadian Forces Housing Directive defines RHUs as housing tied to active military service. The directive defines military housing by who lives in it.

CFHA manages housing across multiple Canadian Forces bases, with the Residential Housing Response Plan (RHRP) providing capital funding for new construction and renovation.⁴⁸ When a unit needs replacement, the decision chain runs from CFHA to the Department of National Defence to Treasury Board. There is no ambiguity about what qualifies as military housing or who is responsible for it.

Military housing serves active service members and their families within federal defence infrastructure. The federal government both defines the category and delivers the housing, with one level of government owning the entire chain from definition to delivery. This is the simplest possible version of a population-specific housing framework: a single funder building for a single population on land it already controls.

CFHA's 2024-25 annual report confirms a portfolio of more than 11,700 residential housing units across 27 locations. Budget 2024 and the Our North, Strong and Free defence policy allocated more than \$1.4 billion to build up to 1,400 new units and renovate 2,500 existing ones over 20 years, with an additional \$2 billion over 20 years for a broader Canadian Armed Forces Housing Strategy.⁴⁸

The model is effective within its scope, but that scope is limited. Military housing covers a small population within a closed institutional system. It does not need to coordinate across three levels of government, interface with private developers, or fit into municipal zoning frameworks. Student housing does. The military model demonstrates that occupant-status-based housing definitions work in Canada. It does not offer a blueprint for multi-jurisdictional implementation.

Indigenous Housing

Indigenous housing in Canada operates through a distinct governance framework. Indigenous Services Canada (ISC) administers on-reserve housing programs under the First Nations On-Reserve Housing Policy (1996), which remains the governing framework despite repeated calls for its replacement.⁴⁹ CMHC's on-reserve social housing program provides additional funding. Between April 2016 and September 2025, the federal government invested \$3.94 billion in 7,055 housing projects across 611 First Nations communities, with \$166 million in annual ongoing support.⁵⁰

The Assembly of First Nations' National First Nations Housing Strategy (2018) articulates a "By Indigenous, for Indigenous" governance principle.⁵¹ Housing policy follows from the institutional relationship between First Nations governments and the federal Crown, not from the physical characteristics of the housing stock.

On paper, the framework is solid. There is a statutory basis (federal programs under ISC and CMHC), a dedicated funding stream (\$3.94 billion over nine years), an administering body (ISC), and a defined population (Indigenous peoples on-reserve). These are the same four elements present in every other specialized housing category in Canada. Indigenous housing is the only one where all four exist and housing conditions have remained consistently inadequate.

The Parliamentary Budget Officer and the Auditor General have repeatedly documented the gap between funding and need. Overcrowding rates on reserves are nearly seven times the non-Indigenous average, and the Assembly of First Nations' 2024 Closing the Infrastructure Gap report estimated a total infrastructure deficit of \$349.2 billion, with \$135.1 billion attributable to housing alone. The report identified a need for 157,453 new homes to address overcrowding and population growth, with two-thirds of the 85,000 existing on-reserve houses requiring repairs.⁴⁷

Indigenous housing challenges are driven by constitutional, treaty, and colonial factors that have no parallel in the student housing context. There is still a relevant takeaway. Canada can create a statutory category for a specific population, assign an agency, and dedicate a funding stream. It has done so here. The fact that outcomes remain poor reinforces the reality that a definition and a regulatory framework make targeted policy possible, but do not alone produce adequate housing.

Workforce Housing

Workforce housing is the least developed of the four categories, and still has more regulatory structure than student housing. The Temporary Foreign Worker Program imposes federal housing requirements on agricultural employers.⁵² British Columbia defines "industrial camp" as a statutory category and has developed provincial worker housing standards.^{53,55} Ontario regulates agricultural worker housing through the Health Protection and Promotion Act, the Building Code, and the Fire Code.⁵⁴ BC's Residential Tenancy Act creates a separate tenancy category for staff housing.⁵⁶ The PPS 2024's "additional needs housing" references seniors and persons with disabilities but does not mention students or workers.²⁰

None of these streams share a common definition. But each has statutory recognition, minimum standards enforceable by inspection, and a political trajectory toward consolidation. Student housing has none of these.

Each specialized housing category in Canada rests on four components: a defined population, statutory recognition, a responsible agency, and dedicated funding or data collection. Seniors housing has all four at a mature level. Military housing has all four within a narrow federal scope. Indigenous housing has all four, though delivery has fallen short. Workforce housing has statutory recognition in at least some streams. Student housing does not have a statutory definition at any level of government, a responsible agency, a dedicated funding stream, or a structured data program. The typologies proposed in this paper provide the first component, the definitions.

Specialized Housing Framework Components in Canada

Comparison of regulatory infrastructure across population-specific housing categories

Framework Component	Seniors Housing	Military Housing	Indigenous Housing	Workforce Housing	Student Housing
Defined Population Statutory or directive basis for who the housing serves	Age 65+ (statutory)	Active service members (directive)	Indigenous peoples on-reserve (federal programs)	TFW agricultural workers (federal requirements)	<i>No statutory definition at any level</i>
Statutory Recognition Dedicated legislation or regulatory authority	4 provinces with dedicated legislation	Canadian Forces Housing Directive	Federal programs under ISC and CMHC	BC industrial camps, ON agricultural housing	<i>None</i>
Responsible Agency Designated body with oversight or coordination mandate	RHRA (Ontario), provincial bodies	CFHA	ISC, CMHC	Provincial ministries (fragmented)	<i>None</i>
Data Collection Systematic supply, demand, or outcomes tracking	CMHC Seniors' Housing Report (annual)	CFHA annual report	PBO / Auditor General reporting	Limited provincial data	<i>None</i> (private sector only)

Key finding: Student housing is the only specialized housing category in Canada with no statutory definition, no dedicated legislation, no responsible agency, and no systematic public data collection. Every other population-specific housing category has at least one of these basic framework components, and most have all four.

Canada has not built a framework for the approximately 1.8 million full-time post-secondary students who need housing every year.⁵⁷ Each existing framework had a specific political driver pushing for recognition. For seniors, that was care-home scandals and organized lobbying efforts through CARP. Students lack an equivalent. The Canadian Alliance of Student Associations (CASA) has called for a Canada Student Housing Strategy through Build Canada Homes, comprising \$1 billion in grants and loans for residences and non-profit student housing. The Canadian Federation of Students has raised housing affordability as a broad concern. Neither organization has advocated specifically for a statutory definition of purpose-built student accommodation.

Students are transient. Most live in a city for two to five years and then leave. Young Canadians are one of the least consistent voter demographics, which makes it less politically feasible for targeted solutions to be included in party platforms. While you can explain the gap in student housing, it is difficult to justify it. If anything, the transience makes the case for statutory definition stronger. Without one, the policy argument has to be rebuilt from scratch every electoral cycle, by a population that has largely moved on by the time the next election arrives.

International Student Housing Models

Canada lacks the statutory, regulatory, and data infrastructure for student housing that peer jurisdictions have built over the past two decades. One benefit of this delayed entry is that other countries have already tested different models for purpose-built student accommodation, generating evidence that Canada can draw on. Ireland built a statutory definition into planning law. The Netherlands defined student housing through lease law and backed it with the best data infrastructure in the world. The UK let a market emerge without a unified definition and is now managing the consequences. Australia built a thriving PBSA market despite fragmented regulation, and its own industry is now calling for the kind of planning framework this paper proposes. Austin, Texas created a density overlay around campus that functions as the closest North American precedent to what this paper proposes.

Canada can leverage international expertise from these five countries as it explores student housing policy frameworks. Although the Canadian context is unique, the mechanics and tradeoffs experienced by others is still relevant. Proposals can be adapted for the thousands of municipalities that each have their own planning acts and zoning bylaws.

International Student Housing Frameworks at a Glance

How five peer jurisdictions define, regulate, and track purpose-built student accommodation

Jurisdiction	Definition Mechanism	Regulatory Body	Data Infrastructure	Key Metric
Ireland	Planning law (2016 Act)	Residential Tenancies Board	National Strategy with bed targets	33,000+ beds built; 42,000 more by 2035
The Netherlands	Lease law (campus contract, Civil Code)	Municipal governments	Annual national monitor	60,000 additional units by 2030
United Kingdom	Planning classification (sui generis)	Local planning authorities	HESA annual statistics	£7.6B in transactions (2022)
Australia	Building code (NCC Class 3)	State-level planning	No national monitor	~105,000 beds; A\$1.8B transactions (2025)
Austin, Texas	Zoning overlay (UNO, 2004)	City of Austin	Overlay monitoring	572 units / 911 income-restricted beds

Ireland

Ireland is the only Western country that has built a complete policy stack for purpose-built student accommodation, with a statutory definition in planning law, a tenancy registration system through the Residential Tenancies Board (RTB), national bed targets coordinated across two government departments, and tax treatment that incentivized construction of more than 33,000 beds.

The foundation is the Planning and Development and Residential Tenancies Act 2016, which defines student accommodation as "a building or part thereof used or to be used to accommodate students whether or not provided by a relevant provider," among other provisions including the use of such accommodation for tourist purposes outside academic term times.⁵⁸ This definition covers both public and private PBSA, is defined by use regardless of ownership, and is embedded in planning law, triggering specific requirements the moment a project qualifies. Compare this to Canada, where Toronto's zoning bylaw defines a "Student Residence" as premises "owned and operated by a public school, private school, post-secondary school or educational facility." That definition excludes every private PBSA operator in the country. Ireland's does not.

This framework developed incrementally. Tax incentives for student housing construction came first in 1999, establishing the category as distinct.⁵⁹ Tenancy registration followed in 2004, requiring all "Student Specific Accommodation" to be registered with the RTB, which functions as a licensing body similar in structure to Ontario's Retirement Homes Regulatory Authority.⁶⁰ The statutory definition came in 2016. The 2017 National Student Accommodation Strategy then set a target of an additional 21,000 bed spaces by 2024, coordinated between the Department of Education and the Department of Housing.⁶¹ Each layer built on the one before. Ireland did not set bed targets until it had defined what a "bed" in this category means, and did not register providers until it had defined the tenancy category they operate in.

Ireland delivered 16,266 of its 21,000-bed target by 2024, with a further 14,279 beds holding planning permission but stalled by construction costs and viability challenges. In March 2026, Ireland responded with a second National Student Accommodation Strategy targeting 42,000 additional beds by 2035, backed by €250 million in capital funding, a VAT reduction from 13.5% to 9% on PBSA sales, and €176 million per year in direct student affordability supports. The new strategy formally adopts nomination agreements, where universities commit to filling beds in private developments for a fixed period, and introduces 60-year campus land licences that revert to institutions on expiry. The 2026 strategy did not need to redefine student housing because the 2016 Act had already done that work. Every mechanism in the new strategy, from the nomination agreements to the VAT treatment to the capital funding, operates on top of a statutory definition that has been in place for nearly a decade. That is the sequence this paper argues Canada should follow.

Ireland's Student Housing Policy Sequence

27 years from first tax incentive to comprehensive national strategy



The Netherlands

Every year, the Dutch government publishes the Landelijke Monitor Studentenhuisvesting, a national student housing report that tracks supply, demand, shortage projections, satisfaction rates, and rent levels at the city level.⁶² The 2024 edition projects a shortage of up to 42,000 student housing units by 2032.⁶² The national government uses this data to hold municipalities accountable against the targets set in the Landelijk Actieplan Studentenhuisvesting 2022-2030, which calls for 60,000 additional student housing units by 2030.⁶⁵ When a city falls behind on construction, the data makes it visible. Without a formal definition, CMHC cannot collect student housing data as a separate category, and without data, no level of government in Canada can set or track supply targets.

The underlying definition takes a different form than Ireland's. The campus contract, introduced in 2006 through the Wet campuscontracten and codified in the Dutch Civil Code, allows a landlord to terminate a lease when a tenant loses their student status.^{63,64} This is the only country that defines student housing primarily through the tenancy relationship rather than the building itself. In the Netherlands, a unit is "student housing" because of who lives in it and under what lease terms.

The Actieplan's target of 60,000 units is delivered at the municipal level. Dutch cities negotiate directly with housing corporations and institutions to allocate specific sites and set construction timelines. The national government sets the aggregate target and provides the data infrastructure through the annual monitor, then municipalities execute. When Amsterdam falls behind its target, the monitor makes that visible in the next annual edition.

The Netherlands also distinguishes between short-stay and long-stay student housing. An exchange student on a four-month semester and a domestic student enrolled in a four-year program have different housing needs. The Dutch system recognizes this by regulating and taxing the two categories differently at the municipal level. Canada does not differentiate. A Canadian university hosting 2,000 exchange students per year has no regulatory category that separates their housing needs from those of a domestic student living in the same city for four years. Canadian planning law treats them identically because it lacks a definition for either one.

The Dutch model suggests that a functioning system can be built without a planning law definition, provided the definition exists somewhere in statute and the data infrastructure exists to track what is being built.

United Kingdom

The UK has the most mature PBSA market in the world, attracting an estimated 7.6 billion GBP in transactions in 2022 alone. It also has no single national definition of student housing. The system functions through planning classifications, tax exemptions, licensing carve-outs, and local plan policies that vary from one council to the next.

Several elements function well. Under the Town and Country Planning Use Classes Order, PBSA is generally classified as sui generis, falling outside the standard use class system and requiring a specific planning application.^{66,67} The Council Tax Order exempts student-occupied dwellings from council tax, reducing operating costs and helping attract institutional investment at a scale no other country has matched.^{71,72} The

Higher Education Statistics Agency publishes annual accommodation breakdowns by type, so the UK government knows how many students live in private PBSA in Manchester.⁷⁵ Canada does not know how many purpose-built student beds exist in the entire country.

The sui generis classification creates favourable financial conditions through the council tax exemption, but gives each planning authority discretion over how PBSA is treated. A 300-bed scheme approved in Leeds might be refused in Oxford under different local plan policies. Canada has no equivalent financial incentive, which means the planning barriers would be harder to overcome without one. The National Planning Policy Framework (NPPF) references student housing but its glossary does not include a standalone PBSA definition.⁷⁰ London applies a 35% affordable housing threshold and requires nominations agreements with higher education institutions, but those requirements apply only within the Greater London Authority.^{68,69}

Despite this infrastructure, the market is undersupplied and politically exposed. New PBSA delivery is significantly below pre-pandemic levels despite near-total occupancy across major operator portfolios.⁷⁶ Several councils have moved to restrict or cap new PBSA, driven by backlash against premium pricing and dependence on international students. Canada has learned how fragile that demand stream can be when new international student arrivals in early 2026 dropped 97% from two years prior. Without affordability requirements built into the definition, institutional capital flows toward premium product, domestic students get priced out, and NIMBYs push back against the only housing type designed for the student population.

This raises the strongest counterargument to this paper's central thesis. If a PBSA market can emerge without a statutory definition, why does Canada need one? The UK answers both sides. Thirty years in, England still has no national PBSA definition in the NPPF glossary, the market is fragmented across council jurisdictions, and the cities where PBSA grew fastest are now the most hostile to it. Canada's planning system makes a unified definition even more necessary. England operates under a single NPPF, while Canada has thousands of municipalities with separate zoning bylaws. Without a common definition, every municipality must invent its own PBSA zoning category.

Australia

Australia has built one of the most dynamic PBSA markets in the Asia-Pacific, with approximately 105,000 existing beds, 95 to 100% occupancy rates, and A\$1.8 billion in transactions in 2025 alone. Scape, Greystar, UniLodge, Iglu, Campus Living Villages, and The Switch all operate at scale. Canada's market has not yet reached this level of maturity as it relates to institutional capital.

The market grew because the demand signal was clear. Australia hosted 846,321 international students as of December 2025, only 6% of whom can access PBSA, producing unmet demand estimated at 10,000 beds in Melbourne and 25,000 in Sydney alone. The Australian government reinforced this signal by linking university enrolment caps to housing supply: universities that demonstrate they are providing additional student accommodation can push for higher caps. Canada is on the opposite trajectory. New international student arrivals dropped 97% in early 2026, and even the best regulatory framework cannot sustain a PBSA market if the government eliminates the demand that makes investment viable.

None of this growth happened because of Australia's planning framework. No Australian state treats PBSA as a standalone planning category. The National Construction Code classifies student accommodation alongside boarding houses, hostels, and backpacker accommodation.⁷⁷ State-level frameworks route PBSA through

adjacent categories like "co-living housing" in New South Wales and "rooming accommodation" in Queensland.^{78,79,81} The planning system cannot see the difference between a 500-bed purpose-built student development and a 12-room rooming house.

The market thrived despite this regulatory gap, driven by international student demand, sovereign wealth capital, and university partnerships with experienced global operators. The industry itself now recognizes that the absence of a planning framework is constraining further growth. The Australian Student Accommodation Council, formed in May 2022 under the Property Council of Australia, is advocating for PBSA to be recognized as a distinct planning use class with consistent regulatory frameworks across states. Cushman and Wakefield's 2025 report proposed priority development zones near universities and standardized approval processes. More than 10,000 beds are stalled in planning or feasibility stages due to zoning complexity, just like Canada. Australia is evidence that PBSA markets can attract institutional capital and build at scale without a unified planning definition. It is also evidence that the industry, once it reaches sufficient scale, demands exactly the regulatory clarity this paper proposes.

Austin, Texas (United States)

The United States has no federal definition of student housing. Federal law actively excludes students from the two main affordable rental housing programs: the Internal Revenue Code excludes student housing from "residential rental property" for tax-exempt bond financing, and a separate provision makes student-occupied units ineligible for Low-Income Housing Tax Credit credits, which finance roughly 90% of affordable rental housing production in the country.^{84,85}

The most relevant American precedent for Canada is a municipal one, the University Neighborhood Overlay (UNO) in Austin, Texas. Adopted in 2004, the UNO covers three neighbourhoods adjacent to the University of Texas at Austin and overrides standard site development codes with reduced parking, increased building height, mixed-use ground floors, and pedestrian-friendly design standards.⁸⁶ Affordability provisions were added in 2014 and 2019. The results through 2023 are 572 units and 911 income-restricted beds, but aligned with the single university scope.⁸⁶

The UNO is the closest North American precedent to what this paper calls Campus Oriented Development. It treats proximity to a university campus as the organizing principle for land use policy, the same way Transit Oriented Development treats proximity to a transit station. The density bonuses, reduced parking, and affordability mechanisms are tied to location rather than to the student status of the occupants, avoiding the definition-related challenges that have stalled federal action while channeling development toward the places where students actually live.

The UNO is held back by its limited scale of three neighbourhoods around one university in one city. Columbus, Ohio has adopted a similar University District Zoning Overlay, but no Canadian municipality has attempted anything equivalent.⁸⁷ This paper proposes a Campus Oriented Development framework modelled on the UNO's density mechanisms but applied systematically across Canadian university cities, with a 15-minute transit radius overlay, density graduated by street type, PBSA-specific incentives, and minimum bed targets tied to institutional enrolment.

Canada is the only G7 country with no statutory, regulatory, or planning definition of purpose-built student accommodation at any level of government. Ireland, the Netherlands, the UK, and Australia each found a different entry point for making student housing visible to the planning system, whether through planning law, lease law, a sui generis planning classification, or building code categories. Austin found an entry point that bypasses the definition question entirely by tying land use incentives to geography rather than building type. The form varies. The function is the same: giving planners, regulators, and investors a shared category they can act on. Canada has no such category. The typologies proposed in this paper provide that foundation, giving Canadian planners a shared vocabulary for the full spectrum of student housing, from on-campus residences and purpose-built student accommodation to shared houses, market rental, and family-based housing.

Proposed Canadian Typologies

Canada has built typology frameworks for every other specialized housing type. Seniors housing has independent living, assisted living, and long-term care, each linked to specific funding programs, building code classifications, and zoning permissions. Student housing has no equivalent. No Canadian jurisdiction defines student housing types, which means no policy tool, from zoning overlays to development charge reductions to CMHC financing, can target it. Attempts to address student housing have been made by CMHC through the ACLP and Build Canada Homes in its request for partnerships, but neither go far enough. That starts with defining student housing as a distinct category. We propose a broad definition for student housing.

"Student housing is defined as any home, apartment, unit, or dorm that is inhabited by an individual or individuals currently enrolled in a post-secondary institution."

The purpose of this broad definition is to capture the full range of housing in which students live. A student renting a condo downtown, living in a purpose-built residence near campus, or staying with their parents and commuting an hour each way are all examples of student housing. If we do not acknowledge and plan around these realities, we cannot build environments that serve this population. The broad definition is a measurement tool that captures the full universe of student housing, while the typologies that follow are where the regulatory and policy work begins.

This structure mirrors how seniors housing typologies are linked to the age and care needs of the end user. In seniors housing, the distinction between independent living and long-term care determines which provincial programs apply, which building code requirements govern the project, and which financing tools are available. Each of the five student housing typologies faces different barriers and requires different levels of policy intervention, just as each seniors housing typology connects to a different set of funding and regulatory mechanisms. The key eligibility factor across all five is the inhabitant's enrolment in a post-secondary institution, as set out in the broad definition.

The five student housing typologies that we propose are:

1. Post-Secondary Residences
2. Purpose-Built Student Accommodation (PBSA)
3. Student Shared Housing
4. Student-Occupied Market Rental
5. Family-Based Student Housing

On their own, the definitions tell governments what student housing is. Campus Oriented Development (COD), proposed later in this paper, tells municipalities what to do about it, where to zone for it, how to incentivize it, and how to set supply targets calibrated to local enrolment data.

Three of these, Student Shared Housing, Student-Occupied Market Rental, and Family-Based Student Housing, are measurement categories. This paper does not propose regulation of these housing types. Their purpose is to close the data gap that makes it impossible to quantify how many students are in shared arrangements, how many are absorbing general rental stock, and how many are priced out of the market entirely. Without these three categories, the framework captures purpose-built supply but misses the demand-side pressure that justifies building it.

Students who change enrolment status mid-lease retain their typology classification for the duration of the lease term. Graduate students living with family are classified under Family-Based Student Housing. Co-living developments marketed to mixed populations (students and young professionals) are classified based on the operator's primary target market and lease structure.

Student housing co-ops, including the Waterloo Co-operative Residence Inc. (WCRI), Campus Co-operative in Toronto, and the Kingston Student Housing Co-operative, do not fit neatly into any single typology. They are purpose-built for students, which aligns them with PBSA, but they are tenant-governed under provincial co-op housing legislation, which distinguishes them from the professionally managed PBSA model. This framework acknowledges co-ops as a cross-cutting governance model that operates across the typology boundaries rather than within a single category. While a co-op building may meet the PBSA definition in terms of building form and student-only occupancy, it would be classified as non-market PBSA for planning and data purposes, while its governance remains subject to co-op housing legislation.

The co-op model also presents challenges specific to student housing. Student tenants typically occupy a unit for two to four years. This short tenure means that the residents who govern the co-op today will not be the residents who live with the consequences of deferred maintenance or capital investment decisions made in their tenure. The misalignment between governance responsibility and long-term occupancy creates incentive problems that do not arise in seniors housing co-ops or general-population co-ops, where residents may stay for decades. Co-operatives have provided affordable student housing in Canada for nearly a century, and their contribution is significant. The governance model, however, requires careful consideration in a student housing context where regular resident turnover is a defining characteristic of the population being served.

Students experience housing insecurity differently than other populations. The standard 30% income threshold was designed for individuals earning employment income. 66.2% of students receive financial support from their families, which fundamentally shifts the relationship between individual income and housing cost.⁴ Family household income is a more relevant measure than individual income. Any student housing strategy that applies standard affordability metrics from the general rental market will systematically misclassify student housing cost burdens.

01

Post-Secondary Residences

Housing owned and operated by a post-secondary institution, or operated on its behalf under a formal institutional agreement, located on institutional lands, providing accommodation exclusively or primarily to enrolled students.

- Located on institutional lands (campus or adjacent)
- May include meal plans and residence life programming
- Forms: dorms, suite-style, townhouse clusters
- Owned by institution or operated under P3 agreement
- Tenancy tied to enrolment status
- Ontario Bill 185 exempts from Planning Act

~122,262 university-run beds nationally · 38.1% demand vs. 24.2% supply

This typology of student housing is the most widely recognized in Canada today and has, accordingly, attracted the strongest policy frameworks, led by Ontario's Bill 185. Most institutions cannot close the supply gap on their own. University balance sheets have weakened significantly over the past several years. At least 13 Canadian universities projected operating deficits for 2025-26, with sector-wide shortfalls estimated at \$134 million and forecasts of a collective structural deficit reaching \$5 billion by 2028.³⁸ The federal international student cap has made this worse. New study permit arrivals fell 61% in 2025, and the 2026 cap will cut new admissions to 155,000, roughly half the prior year's target.³⁹ International tuition is the revenue stream most institutions relied on to cross-subsidize capital projects, and its contraction further limits debt capacity for residence construction. Public-private partnerships, or P3s, have emerged as the primary mechanism for adding on-campus beds without consuming institutional borrowing capacity.

Even if institutions could build sufficient on-campus housing, not all students prefer on-campus accommodation. The majority express a preference for off-campus options. In our 2025 survey of 6,039 students across 17 major Canadian cities, 24.2% of students indicated that they live in on-campus dorms or apartments. Demand for on-campus housing (38.1%) exceeds current supply (24.2%) by roughly 14 percentage points. These figures can be interpreted in two ways. First, fewer students live on-campus because supply is insufficient. Second, not all students want to live on-campus, and the majority prefer off-campus options. Our research prioritized Tier 1 university institutions and had less representation from colleges. We expect that there would be a difference in data between college and university students in both demographics and housing preferences.

On-campus residences differ from off-campus student housing in ways that matter for policy. A first-year student living in a traditional dormitory has a tenancy agreement tied to enrolment, not a standard residential lease governed by provincial tenancy legislation. Their rent typically bundles a meal plan, residence life programming, and building maintenance into a single fee set by the institution, not by the market. When that student's enrolment ends, so does their housing. These characteristics, institutional control over pricing, bundled services, and enrolment-contingent tenancy, do not exist in any off-campus housing arrangement, which is why on-campus residences require a standalone typology.

The P3 model is emerging as the primary delivery mechanism for new on-campus beds. UBC's Lower Mall Residence is the largest provincial investment in student housing in Canadian history at \$560 million for 1,508 beds. McMaster's Lincoln Alexander Hall, developed by Knightstone Capital, will deliver 1,366 beds when it opens in fall 2026. Western University has 1,000 beds under construction. Dalhousie is self-financing 213 beds at a cost of \$67.4 million.^{40,41,42,43} These projects signal that institutions recognize the supply gap but increasingly need private backing and development expertise to close it.

Post-secondary residences are the most extensively governed typology in this framework, but existing policy has not resolved the supply constraint. Bill 185 removed the Planning Act approval requirement for on-campus housing, but only in Ontario. P3s bring private capital that does not appear on institutional balance sheets. Even so, campus land is physically limited. UBC has over 70,000 students and a housing waitlist that exceeded 8,000 applicants in 2022, growing each time new beds open. Even with Canada's largest single student housing investment at Lower Mall, on-campus supply will remain far short of demand. The students who do not get a residence bed need somewhere to go. For most, the next option is off-campus purpose-built accommodation, which is why PBSA is the centrepiece of this paper.

02

Purpose-Built Student Accommodation (PBSA)

Residential accommodation of 10+ beds, located off institutional lands, purpose-built or substantially converted for post-secondary student occupancy, with professional management and bed-based or unit-based individual leasing.

- Off institutional lands, proximate to campuses
- Bed-based or unit-based individual leasing
- May include nominations agreements
- 15-minute transit commute proximity guideline
- Professional management required
- Market and non-market sub-categories

~59,556 private beds nationally · 1.5% vacancy · 400K bed shortfall

We propose a framework that defines PBSA as off-campus housing built only for students, intentionally separating on-campus residences from PBSA. These are two different typologies that should be measured in different ways. Together, they make up the two kinds of student housing that new policies should be expected to support.

Private operators and institutional developers have collectively built and operated thousands of beds in Canada, proving demand for the product. The pace of construction, however, has not matched the pace of demand, because every project must navigate a regulatory system that does not recognize what is being built. Without a definition, municipalities cannot zone for PBSA, CMHC cannot finance it, and operators cannot access standardized approvals. With a definition, policy can target the specific barriers that both market and non-market developers face. Each purpose-built student bed is one fewer student competing for a rental unit that a working Canadian needs. Canada has approximately 2.2 million purpose-built rental apartments nationally, according to CMHC's Rental Market Survey. With 178,662 purpose-built student beds against the full-time student population, roughly 90% of the student population is absorbed into that general rental stock. If the estimated 400,000-bed shortfall were filled, approximately 400,000 students would move out of the general rental market, the equivalent of returning a mid-sized city's entire rental stock to non-student households. This is obviously a lofty goal to achieve.

The definition includes a proximity guideline because our survey data shows that location relative to campus is the primary driver of student housing decisions. 51% of respondents want a maximum commute of 15 to 20 minutes, and preferences cluster around a proximity threshold rather than scaling linearly with distance.⁴ The 15-minute transit radius is a guideline that municipalities adapt to local transit networks. The Campus Oriented Development section of this paper explains how the radius is operationalized as a planning overlay.

The standard PBSA unit in the UK and Ireland is a cluster flat: typically four to eight individual bedrooms, each with an en-suite bathroom, sharing a common kitchen and living area. Residents sign individual leases by the bed. The cluster flat delivers lower per-bed costs than conventional apartments while offering private sleeping and bathroom space, which is the reason PBSA achieves financial viability at price points that standard apartment construction cannot match. Canadian building codes, zoning bylaws, and financing programs do not recognize this form, and this absence prevents developers from permitting cluster flats through a standard approvals process.

PBSA splits into two sub-categories that require the same definition but different policy treatment. Market PBSA is privately developed at market rents by institutional developers and private operators. Non-market PBSA is delivered through university partnerships, non-profit operators, or co-op models. We propose that non-market PBSA be defined by a pricing threshold tied to on-campus residence rates. An operator qualifies as non-market if its beds are priced at or below the city-wide average of university residence housing fees in the same municipality, excluding meal plans and bundled services. Because every Canadian university publishes its residence fees annually, the threshold is publicly verifiable, adjusts automatically by market, and requires no new data collection. The Campus Oriented Development section describes the specific incentives that non-market operators receive under this threshold.

The standard 30% of income threshold used in general affordable housing policy does not apply to students, as this paper has argued. Tying the non-market threshold to on-campus residence rates grounds affordability in a benchmark that was designed for this population, set by public institutions through a governance process that already considers student affordability.

Germany's Studentenwerk system operates approximately 196,000 beds through regional non-profit organizations, showing that non-market student housing can reach national scale when supported by institutional infrastructure. Canada's non-market sector is small by comparison, but operators like UTILE, Student Housing Nova Scotia, and WCRI have decades of track record. Both sub-categories build the same product. The distinction is in financing, operator type, pricing threshold, and eligibility for public subsidy. Non-market status is a voluntary operator classification: an operator qualifies by being a non-profit, operating in formal partnership with a university, or being directly institution-affiliated, and by pricing at or below the residence fee benchmark. The incentive structure proposed later in this paper rewards non-market operators with deeper benefits, including full development charge elimination.

Nomination agreements are a critical mechanism for both sub-categories. In a nomination agreement, a university commits to filling an agreed number of beds in a private PBSA development for a fixed period, typically five years. The developer gains occupancy certainty, which de-risks the project for lenders and improves financing terms. The university gains access to off-campus beds without committing capital or taking on development risk. Ireland's 2026 National Student Accommodation Strategy formally adopted nomination agreements as a central delivery mechanism, describing them as "new in Ireland but proven internationally." In the Canadian context, nomination agreements bridge the gap between what Bill 185 can do (streamline on-campus development on institutional land) and what the market needs (private capital building off-campus PBSA with institutional demand backing). The PBSA definition proposed in this paper includes nomination agreements as an optional attribute because they strengthen the financial case for development without requiring public subsidy.

Canada has approximately 180,000 purpose-built student beds nationally.^{1,2} Campus Living Centres manages approximately 35,000 beds.³⁰ Cedar Podium has developed over 21,500 beds across more than 40 buildings. These operators have deployed capital into a product category that no Canadian statute, regulation, or zoning bylaw defines. The non-market sector has operated for decades under the same regulatory vacuum. The current pipeline of 27,333 beds over the next five years covers 6.8% of the estimated national shortfall.^{2,3} Each year that passes without accelerating construction, a new cohort of students enters a rental market where purpose-built student beds exist for roughly one in ten full-time students.

In our 2025 survey, 78.1% of students are open to living with roommates, validating the cluster flat model.⁴ 63% do not own a car, meaning reduced parking requirements reflect actual demand.⁴ 67% would pay \$250 or more per month for a shorter commute.⁴ 48% want an en-suite bathroom while 52% prefer shared facilities to save money, supporting both configurations within the same building.⁴ 41% would pay more for a gym compared to 15% for a games room.⁴ Two limitations apply: PBSA barely exists in Canada, so these preferences reflect stated willingness rather than revealed behaviour, and the survey overrepresents students at Tier 1 research universities relative to colleges.

In our work with operators and developers across Canadian markets, the same barriers surface at every stage of the approvals process, from site selection through financing to building permits. No Canadian city outside Toronto has a student housing zoning definition, and Toronto's requires institutional ownership, excluding private PBSA entirely.²³ Every project requires a rezoning application, typically adding one to two years in extensive risk and extra costs.⁹⁰ Municipalities cannot differentiate student housing from general residential in their bylaws, which means development charge calculations and parking standards cannot reflect the actual infrastructure profile of student housing. A statutory PBSA definition would create the basis for CMHC to update its eligibility criteria and to create a student housing data category in its Rental Market Survey. Private-sector data providers have already built student housing datasets covering supply, demand, and student preferences across Canadian markets. A partnership model between CMHC and existing data providers would allow evidence-based policy development to begin with data that already exists, rather than building a new collection program from scratch. When a developer tries to get a building permit for PBSA, the building official has no code classification to apply, forcing case-by-case interpretation or standardization into purpose-built rental that introduces cost and delay at the permitting stage.

Density overlays, development charge structures, and minimum PBSA targets within designated zones are the mechanisms that translate this definition into planning policy. Until that supply arrives, students without a purpose-built bed live wherever they can find one. The most common arrangement, and the least visible to any government dataset, is a shared house near campus.

The framework proposed here does not depend on continued growth in international student enrolment. New study permit arrivals fell 61% in 2025, and the 2026 cap will cut new admissions to 155,000. If international enrolment stabilizes at lower levels or declines further, the demand base for PBSA shifts toward domestic students, who represent the majority of the 1.8 million full-time enrolment and who face the same housing constraints. In our survey, domestic students report comparable rates of housing unaffordability, commute dissatisfaction, and reliance on family financial support. The 400,000-bed shortfall was estimated against total enrolment; even a significant reduction in international numbers leaves a supply gap that domestic demand alone cannot close. The framework is designed for the structural reality that Canadian post-secondary institutions generate concentrated, location-specific housing demand regardless of the

composition of the student body. A zoning overlay near the University of Waterloo serves 60,000 students whether 15% or 25% of them are international. The policy tools proposed here respond to the scale and geography of demand. The nationality of the students generating that demand is irrelevant to the framework.

03 Student Shared Housing

A residential dwelling occupied by three or more unrelated individuals, the majority of whom are enrolled in a post-secondary institution, with individually leased bedrooms or a shared lease arrangement.

- Existing homes, townhouses, duplexes, conversions
- Private individual landlord (typically 1-5 properties)
- Unrelated students sharing common areas
- Individual room leases or whole-house lease
- No student-specific services
- Governed by provincial tenancy legislation

52.7% of students live off-campus in houses · 53.3% have 2+ roommates

The distinguishing factor is the number of unrelated tenants sharing common spaces. Three or more unrelated students sharing a kitchen, bathroom, or living area qualifies as Student Shared Housing. Two students sharing a standard rental unit more closely resembles a conventional roommate arrangement and falls under Student-Occupied Market Rental. A student or couple occupying a self-contained unit also qualifies as Market Rental. Where building form creates ambiguity, the building type is the tiebreaker. Ground-oriented dwellings (houses, townhouses, duplexes, semis) with three or more unrelated students are Shared Housing; units in purpose-built multi-unit residential buildings (apartments, condos) are Market Rental regardless of the number of student occupants. The boundary is inherently fuzzy. Municipalities implementing this typology may need to refine it as local housing stock and student living patterns present cases the rule does not cleanly resolve.

Shared housing is the most common form of accommodation among Canadian post-secondary students. In the Studenthaus 2025 survey of 6,039 students across 17 cities and 21 universities, 52.7% reported living in an off-campus house.⁴ 53.3% had two or more roommates. 78.1% were open to living with roommates.⁴ This is the default housing arrangement for Canadian post-secondary students, and no other data source captures it. CMHC's Rental Market Survey records a house rented room-by-room to four students identically to a house occupied by a single family. Statistics Canada's census collects household composition data but does not publish student-specific tabulations. The Studenthaus survey is, to our knowledge, the only instrument that measures how many Canadian students live in shared housing, where they live, and under what conditions.

No Canadian jurisdiction has a regulatory category for this housing form. No building code classification distinguishes it from a single-family home. No data collection instrument systematically tracks the size or condition of this market. A municipal planner in Kingston, where Queen's University students fill entire residential neighbourhoods, cannot answer how many houses in the University District are rented room-by-room to students. The City of Kingston, Statistics Canada, CMHC all do not know.

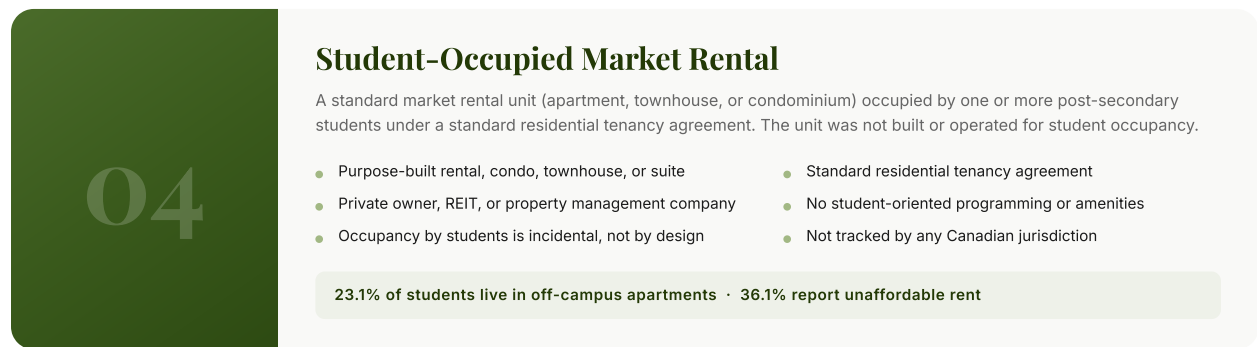
The municipalities that have attempted to regulate shared housing have focused on neighbourhood management. The City of Waterloo's lodging house provisions emerged from decades of tension between long-term residents and the student population surrounding the University of Waterloo and Wilfrid Laurier University. The bylaw's primary concerns are parking, noise, property maintenance, and neighbourhood

character. London's rental licensing program has similar origins. Both improve baseline safety through inspections, but neither frames student tenants as the intended beneficiaries. Enforcement depends on tenants who are transient, often first-time renters, and unlikely to pursue complaints against a landlord they will need a reference from in twelve months.

The students with the fewest financial resources occupy the housing with the fewest practical safeguards. Students living in off-campus houses with roommates, filtered by those receiving no family financial support, pay a median rent of \$950 per month in the Studenthaus survey. They have the same legal standing as a tenant in a professionally managed apartment, but no property manager to call when the furnace fails in January. If they withhold rent or file a complaint with the Landlord and Tenant Board, they risk losing the landlord reference they need for their next lease. Provincial residential tenancy acts apply on paper, but the enforcement mechanisms assume a tenant who can afford to use them.

This paper does not propose regulation of shared housing. The category exists to be defined and counted. A licensing regime risks burdening small landlords and reducing the supply students depend on, since student rental income often subsidizes mortgage payments for small property owners. Regulation may follow the definitions, but the definitions must come first.

Every student who moves into a purpose-built student accommodation bed is one fewer tenant competing for a room in a shared house. Developing more PBSA shifts bargaining power back toward the tenants who remain searching. In Waterloo, where the University of Waterloo and Wilfrid Laurier University enrol roughly 60,000 students combined, expanding the supply of purpose-built alternatives is the most direct mechanism for improving conditions in the shared housing stock. The density and zoning tools proposed elsewhere in this paper serve that objective. Shared housing will not disappear, but the goal is to ensure that students who live in it do so by choice, not because no better option exists within their budget. Students who do not share a house often rent conventional apartments and condos, competing directly against non-student renters for units that were never designed for a student population.



04

Student-Occupied Market Rental

A standard market rental unit (apartment, townhouse, or condominium) occupied by one or more post-secondary students under a standard residential tenancy agreement. The unit was not built or operated for student occupancy.

- Purpose-built rental, condo, townhouse, or suite
- Private owner, REIT, or property management company
- Occupancy by students is incidental, not by design
- Standard residential tenancy agreement
- No student-oriented programming or amenities
- Not tracked by any Canadian jurisdiction

23.1% of students live in off-campus apartments · 36.1% report unaffordable rent

When students cannot access purpose-built accommodation, they enter the general rental market. They compete against applicants with established credit histories, employment income, and housing references. Students typically lack all three. To protect their asset, it makes sense for landlords to choose the most qualified applicant, and students end up near the bottom of the rental hierarchy.⁸⁸

Students are not the only ones affected. Every student who occupies a market rental unit is one fewer unit available to a young professional, a family, or a new immigrant. In tight markets, this displacement is not theoretical. The City of Toronto estimates that over 350,000 students are enrolled in the city's post-secondary institutions, yet BONARD data shows Toronto's PBSA provision rate sits well below the national average.^{1,89} The gap between enrolment and purpose-built supply is measurable pressure on the city's general rental stock. Naming this category is the first step toward quantifying that pressure and building the policy case to reduce it through purpose-built supply.

CMHC's annual Rental Market Survey counts every occupied rental unit in Canada. It tracks rents, vacancy rates, and turnover by building age, unit size, and geography, but it cannot distinguish a unit occupied by a student from one occupied by anyone else. Consider the Annex neighbourhood in Toronto, where the University of Toronto's St. George campus borders a dense rental stock of low-rise apartments and converted houses. CMHC reports a vacancy rate for the survey zone, but it cannot tell a planner what share of those units are occupied by students who will vacate in April and return in September. The seasonal demand cycle that defines student tenancy is invisible in the data. Municipalities adjacent to major campuses can see the pressure in rising rents and falling vacancy, but they cannot attribute a share of that pressure to student demand because the survey does not collect occupant enrolment status.

In our survey, 23.1% of respondents reported living in off-campus apartments, the housing type most likely to represent standard market rental.⁴ Among all respondents, 36.1% described their rent as unaffordable.⁴ Canada has approximately 178,662 purpose-built student beds against demand from approximately 1.8 million full-time post-secondary students.^{1,88} Purpose-built supply covers roughly 10% of full-time enrolment. The remaining 90% enters the general rental market, the family home, or shared housing. The 23.1% of survey respondents in off-campus apartments represent the segment that competes directly with non-student renters for the same units, on the same lease terms, with weaker applications.

Without a way to measure student-occupied market rental, cities cannot answer basic planning questions. How much of the rental vacancy pressure near a university campus comes from student demand? If 1,000 new PBSA beds were built, how many market rental units would that free up? What share of a city's rental stock is functionally absorbed by a transient population that turns over every 12 months?

The most common objection to this category is that student occupancy of market rental units cannot be prevented and therefore does not need its own measurement. The policy case for PBSA depends on proving the opposite. Every purpose-built bed is one fewer student competing for a market rental unit, but that claim is only useful if it can be quantified. Without baseline data on how many students occupy market rental stock, there is no way to model the displacement effect, track progress, or justify the investment. We would propose a census question that identifies occupant enrolment status in rental housing.

Students will always occupy market rental units. No amount of purpose-built supply will eliminate this category, nor should it. Students who prefer market rental, who live with a partner, or who choose a neighbourhood away from campus will continue to rent conventional apartments. The goal is to measure this category. Measurement turns assumptions into evidence, and evidence is what justifies the public investment case for purpose-built supply. For the students who cannot afford even this option, the last resort is the family home, a category that current housing data does not recognize at all.

05

Family-Based Student Housing

A post-secondary student residing in a dwelling owned or leased by a parent, guardian, or extended family member, where the student does not hold a separate residential tenancy agreement.

- No separate tenancy agreement
- Driven by affordability, proximity, or cultural preference
- May contribute to household costs
- Student commutes to campus from family home
- Not captured by CMHC or any housing inventory
- Represents pent-up housing demand

34.4% of students live with family · 50%+ want to move out

More than half of students living with family want to move out.

In the Canadian Student Living Survey, 34.4% of respondents live with family.⁴ More than half of them want to move out and would do so if affordable options existed near campus. These students represent pent-up demand that no housing dataset currently captures, and their absence from supply projections means that estimates of the national bed shortfall likely understate the actual gap.

CMHC does not track students living at home. Universities may know that a student listed a suburban postal code, but that tells the institution nothing about whether the student wants to be there. The University of Toronto enrolls approximately 73,000 students across its three campuses, but does not publish how many commute from outside the city or how many would move closer to campus if they could afford to. No Canadian university does. Every supply projection that treats these students as non-participants in the housing market understates actual demand.

Among students living with family, the two largest segments are those with the highest flexibility scores and longest commutes. They report the lowest housing satisfaction of any group. 67% of all surveyed students would pay \$250 or more per month for a shorter commute, and only 10% find a commute over 30 minutes acceptable.⁴ 78.1% of all respondents are open to having roommates.⁴

A student commuting 75 minutes from Surrey to Simon Fraser University's Burnaby campus, who would pay \$800 per month for a shared room within 20 minutes of campus, is a participant in the housing market whose demand has no supply to absorb it. That commute limits their ability to participate in campus life, access office hours, or hold part-time employment near school. Rising rents near campus do not reduce this student's demand. They extend the commute.

The most common objection to including this population in a housing framework is that these students are not in the housing market. The objection contains the answer. Without measurement, policymakers cannot distinguish between students who choose to live at home and students who are priced out of the market. That distinction determines whether supply is adequate or whether a shortage is being masked by family absorption. Current supply gap estimates (400,000 beds nationally) do not account for this conversion potential because the baseline population is unmeasured.^{1,2,3}

The most practical measurement instrument is a single binary question added to Statistics Canada's Postsecondary Student Information System (PSIS) or to the CMHC Rental Market Survey: "Do you live with a parent or guardian?" PSIS already collects enrolment records for every student at every public post-

secondary institution in Canada. Adding a housing-status field would immediately produce national estimates of the family-based student population, broken down by institution, city, and program. The Netherlands tracks this population through its annual Landelijke Monitor Studentenhuisvesting, which reports the share of students living with parents by city and uses the data to calibrate municipal supply targets. Canada could produce the same baseline with a single additional data point.

Family-based housing functions as the overflow valve for the other four typologies. When on-campus residences are full, PBSA waitlists are long, and shared housing rents exceed what a student can afford, the family home absorbs the excess. When affordable supply expands, this category shrinks, but only among students commuting by necessity. Students who live at home by choice, whether for cultural reasons, family proximity, or financial prudence, do not convert. More than half of students living with family want to move out. The policy question is straightforward, and it can only be answered with data that does not yet exist at scale.

The planning framework proposed in the next section targets the conversion-ready segment of this population directly. New PBSA within a defined campus proximity zone, priced at the shared-room rate these students have already indicated willingness to pay, converts latent demand into occupied beds. That conversion is how supply gap estimates become supply targets, and it is why measurement of family-based housing is a prerequisite for any credible demand projection.

Campus-Oriented Development

Canadian cities have built planning systems around transit stations because transit stations generate predictable, concentrated demand for housing within walking distance. Post-secondary campuses provide the same pattern. These institutions are demand generators at a scale that few transit stations match, and they have been growing that demand in the same location for decades. Transit-Oriented Development (TOD) responds to this concentrated demand by upzoning the surrounding area, reducing parking requirements, and enabling mixed-use development. Campus-Oriented Development (COD) applies the same planning logic to the land surrounding post-secondary campuses.

The case for this policy framework is grounded in student data. Students are 47.4% transit users, and housing built near campuses generates ridership that supports service frequency on routes the municipality has already funded.⁴ Students who live near campus spend money at local businesses, sustain year-round foot traffic for commercial corridors, and reduce car dependency in ways that advance municipal climate and transportation targets. The transit infrastructure, road networks, and utility connections that serve campuses already exist. A 500-bed student building near a campus with an existing transit connection is among the most infrastructure-efficient forms of new housing a municipality can approve.

The closest North American precedent is Austin's University Neighborhood Overlay (UNO), which ties density bonuses and reduced parking to proximity to the University of Texas campus. By 2023, the UNO had delivered 572 units and 911 income-restricted beds.⁸⁶ The program demonstrated that student housing development responds to geography-based incentives, even in a limited number of neighbourhoods around a single university. COD extends the approach to a national framework applicable to all university campuses, and it does so in a policy environment that did not exist when Austin adopted the UNO. At least 15 major Canadian university campuses sit inside existing or planned TOD zones. The University of Toronto has four subway stations within its footprint. York University has two. The University of Alberta has an underground LRT station beneath its campus. McGill and Concordia sit on the Montreal Metro. UBC will be on SkyTrain once the Millennium Line extension opens. In most major Canadian cities, the campus is already the transit node. The density fight around these campuses has already been won through TOD policy. COD adds only the incentive layer that directs some of that density toward student housing.

51%

WANT 15-20 MIN COMMUTE

63%

NO CAR

67%

PAY \$250+/MO FOR
SHORTER COMMUTE

15+

CAMPUSES IN
TOD ZONES

Coverage Area

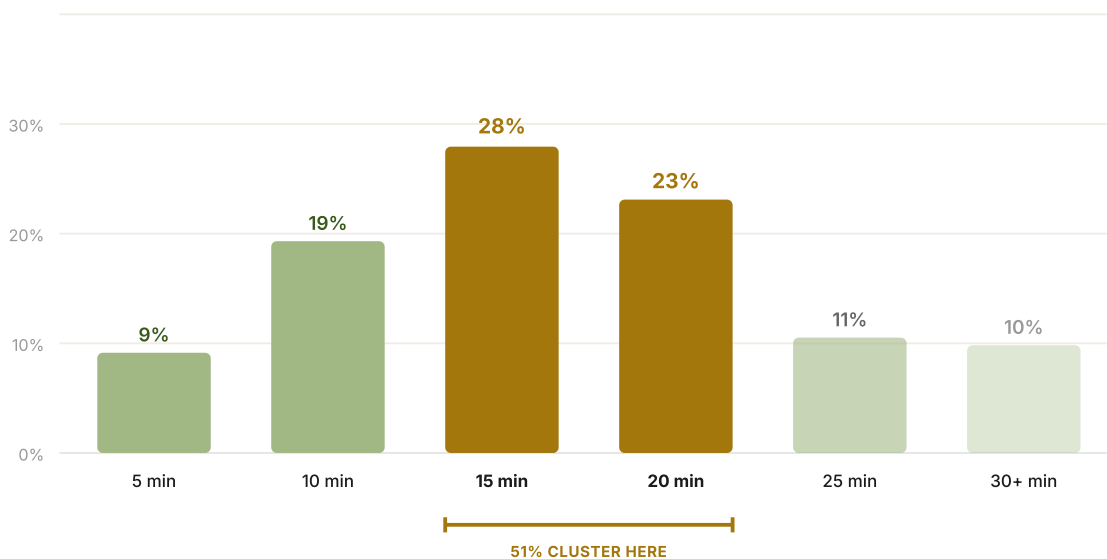
COD establishes a 15-minute transit radius around a university campus. Everything within that radius receives upzoning. There are no graduated distance tiers or concentric rings.

The evidence supports this boundary. In our 2025 survey of 6,039 students across 17 Canadian cities, 51% of respondents want a maximum commute of 15 to 20 minutes.⁴ Students do not meaningfully differentiate between 5 and 15 minutes. The preference clusters around a proximity threshold rather than distributing linearly across the range. A 15-minute transit commute in Toronto covers different ground than in Kelowna, and municipalities should adapt the radius to local transit networks. The underlying demand signal is consistent across cities. Students want to live close enough that the commute does not define their day.

Student Commute Preferences

Source: Studenthaus National Student Living Survey (n = 6,039)

% of students who find this commute acceptable



67%

WOULD PAY \$250+/MO FOR SHORTER COMMUTE

63%

DO NOT OWN A CAR

51%

WANT 15-20 MIN MAX COMMUTE

Within the radius, density allowances are graduated by street type, not by distance from campus. Properties on arterial roads receive higher density allowances. Properties on residential side streets receive modest upzoning. This protects neighbourhood character on local streets while enabling scale where road width,

transit capacity, and existing infrastructure already support it. This framework also aligns with how provinces and municipalities are already approaching upzoning, for ease of implementation.

Where a campus sits inside an existing TOD zone, the COD overlay stacks on top rather than replacing it. British Columbia's Bill 47 mandates 20 storeys and 5.0 FSR within 200 metres of SkyTrain stations. Ontario has designated 120 Protected Major Transit Station Areas in Toronto with FSI of 8.0 within 200 metres and no parking requirements. The federal Canada Public Transit Fund, \$30 billion over 10 years beginning 2026-27, conditions transit funding on municipal zoning reform to build housing near transit. For campuses already inside these zones, the province or municipality has already accepted the density. A PBSA developer building within 200 metres of a SkyTrain station that is also within the 15-minute COD radius of UBC would receive the province's mandated 20-storey minimum, zero parking requirement from the TOD layer, and incentives from the COD layer. The stacking reframes the political question. Opponents of campus-adjacent density would need to argue not against density itself, which the city or province has already approved, but against the proposition that some of that approved density should serve students. That is a harder argument to make when the students are already there, generating tens of thousands of daily trips to a fixed location.

The proposed upzoning applies to all housing types. Market rental, affordable housing, condos, workforce housing, and purpose-built student accommodation all build under the same density rules. Student housing should be an integral part of neighbourhood fabric, but not the only thing being built. Post-secondary employees need housing too. The UK experience in cities such as Leeds and Nottingham showed what happens when PBSA concentrations displace existing residents and commercial tenants. It led to backlash, restrictive planning directions, and a political environment hostile to further student housing development. A COD zone that produces a mix of housing types creates the neighbourhood diversity that sustains political support for density over time. It also avoids the 'studentification' tensions visible in Kingston and Waterloo, where decades of conflict over student-oriented development in residential neighbourhoods have made density a politically charged subject at municipal council.

Without the incentive layer, COD is a general density overlay. The incentive layer converts it into a student housing framework.

Incentives

Within the COD zone, purpose-built student accommodation receives incentives that other housing types do not.

Market-rate PBSA receives development charges reduced by 50%. The rationale follows from the infrastructure cost profile of student housing. 63% of students do not own a car, which means a 500-bed student building generates roughly 185 vehicle trips compared to the 350 to 400 a comparable market rental building would produce.⁴ There are no school-age children generating demand on the municipal education system. Students are seasonal occupants: a 500-bed PBSA building operates at reduced capacity from May through August, lowering peak demand on water, waste, and transit infrastructure during the summer. A standard development charge formula, calibrated to a household that owns two cars, sends children to school, and occupies the unit year-round, overstates the municipal cost of a student housing building. A 50% DC reduction corrects that overstatement and reflects the position that student housing is a public good. Every purpose-built student bed relieves pressure on the general rental market, reduces competition for units

that families and working Canadians need, and supports the educational infrastructure that universities depend on to attract and retain students. Implementing this reduction requires provincial enabling legislation, as no Canadian province currently authorizes municipalities to reduce development charges specifically for off-campus student housing. Student housing DC reform is part of a broader movement to restructure how development charges are calculated in Canada, with proposals ranging from performance-based funding tied to actual population growth, to removing non-committed projects from DC background studies, to alternative financing through municipal service corporations that reduce infrastructure delivery costs without shifting the burden to property tax bases. We welcome further discussion on different ways to support growth other than DCs.

In the COD framework, non-market PBSA receives full development charge elimination. Non-market PBSA, as defined in this paper, is priced at or below the city-wide average of university residence housing-only fees, excluding meal plans and other bundled services. The benchmark uses published housing-only fees from all degree-granting universities in the municipality, averaged annually. A non-market PBSA operator in Toronto would need to price beds at or below the average of housing-only residence fees at the University of Toronto, Toronto Metropolitan University, and York University. In Kingston, the benchmark reflects Queen's University's fees. Every Canadian university publishes residence fees. The rates are publicly available, vary by city to reflect local cost of living, and are updated each academic year. The threshold adjusts automatically by market without requiring a new affordability metric or new data collection. The standard 30% of income threshold does not make sense for students. More than 66% receive financial support from their families, meaning individual income is an unreliable measure of what a student can afford. An operator qualifies as non-market by being a non-profit, operating in formal partnership with a university, or being directly institution-affiliated, and by pricing at or below the residence fee benchmark. Full DC elimination for non-market PBSA reflects the additional public benefit of housing governed by a university or non-profit mandate rather than a profit-maximizing one.

In our survey, 67% of students would pay \$250 or more per month for a shorter commute.⁴ A student paying \$800 per month for a shared room 40 minutes from campus would pay \$1,050 for the same room 10 minutes away. Multiplied across thousands of students per campus, this willingness to pay represents concentrated demand that the market would supply if zoning permitted the density. We propose the COD framework as one mechanism that would permit this, while incentive layer tilts the economics so that student housing competes for sites it currently loses to condominiums and market rental.

PBSA developments within the COD zone would also qualify for the ACLP on the same terms as purpose-built rental. Under current CMHC guidelines, a PBSA developer applying for ACLP financing faces ambiguity about whether bed-by-bed leasing, shared amenity configurations, and seasonal occupancy patterns meet the program's definition of "purpose-built rental," according to industry participants. This ambiguity adds months to the financing timeline and pushes developers toward conventional construction loans at higher rates. COD resolves this by making PBSA eligibility within the zone explicit. Parking minimums are reduced to reflect the car ownership rates described above. Parking ratios designed for general residential development impose construction costs borne by tenants without corresponding utility. Where the COD zone overlaps with a TOD zone, parking minimums may already be eliminated. Where it does not, COD reduces them independently, based on the same infrastructure cost logic.

Two developers looking at the same site within the COD zone will run different pro formas. The PBSA developer pays half the development charges and builds less parking, lowering per-unit costs materially. The market rental developer pays full development charges and meets standard parking requirements. The differential creates a financial tilt toward student housing on sites where both are viable.

COD Incentive Structure: Market vs. Non-Market PBSA

Proposed incentives within the Campus-Oriented Development overlay zone

Incentive	Market PBSA	Non-Market PBSA
Development charges	50% reduction	Full elimination
Parking minimums	Reduced (63% no car)	Reduced (63% no car)
ACLP financing eligibility	✓	✓
Pricing threshold	Market rate	≤ avg. university residence fees
Operator qualification	Any professional operator	Non-profit, university-affiliated, or formal partnership
Nomination agreements	Optional	Recommended

Targets and Implementation

Broad upzoning without guardrails carries risk. General market development could absorb available sites and density before any student housing gets built. If land values within the COD zone rise because of the upzoning, and condo margins exceed PBSA margins, rational developers will choose condominiums. COD proposes addressing this through minimum PBSA targets. Municipalities set a minimum number of purpose-built student beds that must be delivered within the overlay, informed by local enrolment data, existing PBSA supply, and projected demand. If the target is not being met, the municipality can adjust the incentive layer with deeper DC reductions, additional height allowances for PBSA, or further measures meant to spur the development of market and non-market PBSA.

We do not propose requiring below-market rents as a condition for PBSA incentives within the COD zone. Canada needs more student beds before it can regulate their pricing. Every purpose-built student bed reduces competition in the general rental market, freeing a unit for an employed renter who would otherwise be competing with a student. Minimum PBSA targets ensure the zone produces student housing. The incentive layer ensures it is financially attractive to build. Affordability outcomes at the market level are driven by aggregate supply meeting demand.

The jurisdictional model mirrors how TOD was adopted across Canadian provinces. The federal government defines COD as a planning concept and conditions housing funding on provincial adoption. The Housing Accelerator Fund incentivizes greater density near transit, and Edmonton's student housing incentive was funded through the HAF, demonstrating that the program can support student housing objectives at the municipal level. Provinces incorporate COD into provincial planning statements, requiring municipalities with university campuses to establish COD overlays. Municipalities implement the overlay with locally calibrated density parameters and PBSA targets, using the same site plan approval process they already apply to TOD zones.

The sequencing matters because the first steps do not require new legislation. CMHC can create a student housing data category and align ACLP eligibility with the PBSA definition through administrative action within its existing mandate. Provincial governments can incorporate the typological framework into provincial planning statements through policy updates, which in most provinces do not require legislation. Municipal COD overlays follow from the provincial mandate, using the same planning tools municipalities already apply to TOD zones. The federal administrative steps can begin immediately, provincial adoption can proceed in parallel over one to two years, and municipal implementation follows within three to five years of the provincial framework being in place. A more ambitious approach would be to legislate a national student housing framework directly, but this sequencing represents the path of least resistance. It proposes uses existing administrative mechanisms, avoids delays tied to new legislation, and produces measurable progress within a single electoral cycle. It does so because the student housing crisis is at a crossroads and requires immediate action.

COD applies to universities only. The Studenthaus survey sample of 6,039 respondents covers students at degree-granting universities. College and polytechnic students may have different commute preferences, car ownership patterns, and housing needs. Extending COD to colleges is a logical next step, and we note that college students in many Canadian cities face equal or greater housing pressure than university students, often with lower household incomes and fewer institutional supports. The limitation is in the data. Once college-specific survey evidence is available to calibrate commute thresholds and infrastructure profiles, the framework should expand. A college-specific survey, comparable in scope and methodology to the Studenthaus university survey, is the prerequisite for that extension and is a near-term research priority. Cities with multiple university campuses, including Toronto, Vancouver, Ottawa, and Montreal, develop coordinated city-wide student housing plans. Each campus receives its own COD overlay. But the minimum PBSA targets are set at the city level, not the campus level, allowing the market to concentrate development where sites are available and economics work best.

COD does not replace existing university-specific policies. Ontario's Bill 185 exempts publicly-assisted universities from the Planning Act for student housing projects on institution-owned land. A university can build a residence on its own campus without a full rezoning application. COD addresses the municipal land surrounding the campus, where a private developer can build PBSA with reduced development charges and parking requirements. One policy handles institutional land, while the other handles everything around it. A university with limited developable campus land, as is the case for most urban Canadian universities, benefits from both.

The five typologies and the COD framework together form a complete proposal. The typologies give every level of government a shared vocabulary for student housing, while COD translates that into zoning, incentives, and supply targets.

Conclusion

Build Canada Homes has taken the first step by including student housing in its glossary. This paper proposes the typological depth that first step needs.

We proposed a broad definition anchored to enrolment status, a five-tier typological framework that distinguishes between post-secondary residences, purpose-built student accommodation, student shared housing, student-occupied market rental, and family-based student housing, and a Campus Oriented Development planning model that connects these typologies to municipal land use policy. Each element is designed as a starting point for adoption into statute, regulation, and planning policy.

The sector is already operating at scale. There are 178,662 purpose-built student beds in Canada.¹ Forum Asset Management acquired Alignvest Student Housing for \$1.7 billion in December 2024, the largest student housing transaction in Canadian history.²⁸ International operators and investors, including UniLodge, Harrison Street, and Greystar, are entering or expanding into the Canadian market. Campus Living Centres has operated non-profit and for-profit residences, including PBSA, for over 35 years. These actors underwrite assets, sign ground leases, and structure financing for a housing type that has no clear definition that could be adopted in policy. The definitions that govern seniors housing, social housing, and affordable housing do not exist for student housing. Without these definitions, the consequences are specific and compounding. Canada does not have visibility into the true extent of the challenges that students and young Canadians face in the housing market, because the housing market does not recognize them as a distinct population with distinct needs. Despite this, the data points highlighted in this paper on affordability, family support, and choice of school are worrying.

Today, a developer proposing a 400-bed PBSA building must apply for a rezoning because no municipal zoning category recognizes the use, adding a year or more to the project timeline. CMHC administers financing programs for a housing type it cannot define. Provincial planning statements reference student housing without specifying whether a privately operated residence and a university dormitory require the same or different regulatory treatment. The national shortfall will not close when the active pipeline covers a fraction of unmet demand.^{2,3} Capital that could build student housing in Canada will continue flowing to UK, US, and Australian PBSA markets, where the definitions, the data, and the planning pathways already exist.

A market can emerge without a definition. Between 1990 and 2020, the UK built the world's largest PBSA market without a national regulatory framework, producing fragmented local planning responses, inconsistent quality standards, and a concentration of luxury product that priced out the students who needed purpose-built housing most. Australia built over 105,000 PBSA beds without establishing national registration standards. Canada is now where the UK was in the mid-1990s. Institutional capital is entering, the first large-scale assets are trading, and no framework exists to shape what gets built.

Bill C-227, the National Strategy on Housing for Young Canadians Act, creates a federal obligation to act on student housing.⁷ The definitions proposed here are what comes next, giving every level of government the vocabulary to distinguish between housing types that require different regulatory treatment. The next step is

specific to each level. The federal government should direct CMHC to create a student housing data category paralleling the Seniors' Housing Report, using the five typologies proposed here to classify existing and planned supply. Private-sector data providers have already built student housing datasets covering supply, demand, and student preferences across Canadian markets. A partnership model between CMHC and existing data providers would allow evidence-based policy development to begin with data that already exists, rather than building a new collection program from scratch. The federal government should also align ACLP and other financing program eligibility criteria with the proposed PBSA definition. Provincial governments should incorporate the typological framework into provincial planning statements, requiring municipalities with degree-granting campuses to distinguish student housing in their official plans. Municipalities should establish COD overlays with 15-minute transit radius boundaries, density graduated by street type, and PBSA-specific incentive layers calibrated to local enrolment data.

The National Housing Strategy is approaching renewal. Incorporating the typological framework and Campus-Oriented Development into the next iteration would establish student housing as a recognized category within the federal government's primary housing policy instrument, creating the top-down signal that provinces and municipalities need to act.

Canada can define the sector before the market outgrows the absence of a framework, or it can spend decades correcting the consequences of building without one. With these definitions in place, the distortions begin to correct. In our survey, housing availability is the second most important factor in students' university decisions, after quality of program.⁴ A framework that produces purpose-built supply means students choose universities based on education, not on which city they can afford to live in. Families looking for a two-bedroom apartment in a university city are no longer competing against four students willing to split the rent. A developer can finance a PBSA building through CMHC without months of regulatory ambiguity. A municipal planner can answer the question that none can answer today: how many students live here, and how many more beds does this city need?

About the Author

Julian Wells is the founder and CEO of Studenthaus. He led the design and administration of the Canadian Student Living Survey and the publication of the State of Canadian Student Living 2026. Julian advises PBSA developers, institutional investors, and university housing offices on student housing market conditions across Canadian cities. He was named to the BCBusiness 30 Under 30 in 2024 for his work in student housing. He is based in Toronto. He can be reached at julian@studenthaus.com.

Studenthaus is a Canadian student housing data and research platform founded in Victoria, British Columbia in 2023. The company conducts the annual Canadian Student Living Survey and publishes the State of Canadian Student Living report, which has been covered by CP24, the Daily Hive, RENX, and other national outlets. The survey reached over 6,000 students across 17 cities and 21 universities in its 2025 edition, producing city-level and university-level analysis on rent expectations, housing type preferences, commute tolerance, amenity demand, affordability dynamics, and family financial support patterns. Studenthaus provides market intelligence to PBSA developers, institutional investors, and university housing offices, including rent benchmarking, demand projections, student persona segmentation, and site-level feasibility analysis. The company also provides consulting services to operators and institutions evaluating the Canadian student housing market.

Disclosure

Studenthaus has commercial interests in the Canadian student housing market, including data products, consulting, and advisory services. This paper was independently researched and the policy recommendations reflect the author's analysis of available evidence. The Canadian Student Living Survey data cited throughout was collected and analysed by Studenthaus.

References

- [1] BONARD. "Global Student Housing Report." 2024.
- [2] EY Canada. "Student Housing Strategy for Canadian Universities." 2024. https://www.ey.com/en_ca/insights/government-public-sector/student-housing-strategy-for-canadian-universities
- [3] Forum Asset Management. "REIF Filings and Investor Presentations." 2024–2025.
- [4] Studenthaus. "State of Canadian Student Living 2026." Survey data (n = 6,039, Aug–Dec 2025, 17 cities, 21 universities). <https://www.studenthaus.com/>
- [5] CMHC. "Seniors' Housing Report." 2024. <https://www.cmhc-schl.gc.ca/professionals/housing-markets-data-and-research/housing-research/research-reports/housing-needs/seniors-housing-report>
- [6] CMHC. "Apartment Construction Loan Program: Student Housing." 2024. <https://www.cmhc-schl.gc.ca/professionals/project-funding-and-mortgage-financing/funding-programs/all-funding-programs/apartment-construction-loan-program/student-housing>
- [7] Parliament of Canada. "Bill C-227, National Strategy on Housing for Young Canadians Act." 45th Parliament, 1st Session. Sponsor: Braedon Clark (Liberal, Sackville–Bedford–Preston). Second reading passed February 12, 2026 (Vote 68: 169 Yeas, 152 Nays). <https://www.parl.ca/legisinfo/en/bill/45-1/c-227>
- [8] CMHC. "Rental Market Report." 2024.
- [9] Ontario. *Retirement Homes Act, 2010*, S.O. 2010, c. 11. <https://www.ontario.ca/laws/statute/10r11>
- [10] British Columbia. *Community Care and Assisted Living Act*, SBC 2002, c. 75. https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/02075_01
- [11] Alberta. *Supportive Living Accommodation Licensing Act*, SA 2009, c. S-23.5. https://kings-printer.alberta.ca/1266.cfm?page=S23P5.cfm&leg_type=Acts&isbncIn=9780779812844
- [12] Quebec. *Act Respecting Health Services and Social Services*, CQLR c. S-4.2. <https://www.legisquebec.gouv.qc.ca/en/document/cs/S-4.2>
- [13] Department of National Defence. "Canadian Forces Housing Portfolio." <https://www.canada.ca/en/department-national-defence/services/benefits-military/military-housing.html>
- [14] Government of Canada. "National Housing Strategy, Indigenous Housing."
- [15] CMHC. "ACLP Highlight Sheet: Student Housing." 2024. <https://assets.cmhc-schl.gc.ca/sites/cmhc/professional/project-funding-and-mortgage-financing/funding-programs/all-funding-programs/apartment-construction-loan-program/apartment-construction-loan-program-highlight-sheet-student-housing-en.pdf>
- [16] Scion Advisory. "Requirements Announced for CMHC Student Housing Loan Program." 2024. <https://scionadvisory.com/news/requirements-announced-for-cmhc-student-housing-loan-program/>
- [17] Savills. "UK Purpose Built Student Accommodation (PBSA)." 2024.
- [18] JLL. "UK Student Housing Market Report." 2024.
- [19] CMHC. "Rental Market Survey Methodology." Housing Market Information. <https://www.cmhc-schl.gc.ca/professionals/housing-markets-data-and-research/housing-data/data-tables/rental-market/rental-market-report-data-tables>
- [20] Ontario. "Provincial Planning Statement." 2024. <https://www.ontario.ca/page/provincial-planning-statement-2024>
- [21] Goodmans LLP. "Shifting Sands: Ontario Proposes More Changes to the Land Use Planning Framework Through Bill 185." 2024. <https://www.goodmans.ca/insights/article/shifting-sands-ontario-proposes-more-changes-to-the-land-use-planning-framework-through-bill-185>
- [22] Cassels LLP. "New Day for Publicly Funded Universities: Proposed Changes for Public Post-Secondary Institutions Under the Cutting Red Tape to Build More Homes Act, 2024." <https://cassels.com/insights/new-day-for-publicly-funded-universities-proposed-changes-for-public-post-secondary-institutions-under-the-cutting-red-tape-to-build-more-homes-act-2024>

- [23] City of Toronto. "Zoning By-law 569-2013, Section 800.50." <https://www.toronto.ca/legdocs/bylaws/2013/law0569-schedule-a-vol1-ch1-800.pdf>
- [24] City of Waterloo. "Zoning By-law 2018-050." <https://www.waterloo.ca/en/government/zoning-by-law.aspx>
- [25] City of Vancouver. "Zoning and Development By-law, Section 2 (Definitions)." <https://bylaws.vancouver.ca/zoning/zoning-by-law-section-2.pdf>
- [26] Canadian Alliance of Student Associations (CASA). "Living in the Red." August 2023. https://www.casa-aca.com/living_in_the_red
- [27] BONARD. "Canada Purpose-Built Student Accommodation Report." 2024.
- [28] Forum Asset Management. "Alignvest Student Housing Acquisition Announcement." December 2024.
- [29] Forum Asset Management / RENX. "Brookfield Invests \$100 Million in Forum Student Housing Platform." February 2025.
- [30] Campus Living Centres. "Corporate Filings."
- [31] Cedar Podium. "Corporate Disclosures and Project Announcements."
- [32] Knightstone Capital. "Corporate Disclosures and Development Pipeline." As of March 2026.
- [33] RENX. "Canadian PBSA Transactions Reporting." 2024–2025.
- [34] Utile. "Annual Reports and CMHC Project Filings."
- [35] Student Housing Nova Scotia. "DASH Fund Announcement." 2024.
- [36] WCRI (Waterloo Co-operative Residence Inc.). "About WCRI." <https://wcri.coop/> Note: WCRI claims "largest student housing co-operative in North America."
- [37] Campus Co-operative Residence Inc. "About Us." <https://campus.coop/> Note: Founded 1936; Canada's oldest student housing co-operative.
- [38] UBC. "Lower Mall Residence Project Announcement (Board of Governors Capital Project Approval)." 2024.
- [39] McMaster University / Knightstone Capital. "Lincoln Alexander Hall Project Filing."
- [40] Western University. "Campus Development Plan / Residence Construction."
- [41] Dalhousie University. "Residence Expansion Announcement."
- [42] Kingston Student Housing Co-operative.
- [43] Nova Scotia. "Student Housing Development Program Guidelines." 2024.
- [44] British Columbia. "Budget 2024: Student Housing Commitments."
- [45] Retirement Homes Regulatory Authority (RHRA). <https://www.rhra.ca/>
- [46] Ontario. *Long-Term Care Homes Act, 2007*, S.O. 2007, c. 8. <https://www.ontario.ca/laws/statute/07108>
- [47] Shirlee Sharkey. "People Caring for People." 2008.
- [48] Canadian Forces Housing Agency. "About CFHA." <https://www.canada.ca/en/department-national-defence/services/benefits-military/military-housing/about-canadian-forces-housing-agency.html>
- [49] Indigenous Services Canada. "On-Reserve Housing." <https://www.sac-isc.gc.ca/eng/1100100010715/1521125536057>
- [50] Indigenous Services Canada. "First Nations On-Reserve Housing Program." <https://www.sac-isc.gc.ca/eng/1100100010752/1535115367287>
- [51] Assembly of First Nations. "National First Nations Housing Strategy." 2018. <https://www.afn.ca/housing/>
- [52] Employment and Social Development Canada. "Agricultural Stream Housing Requirements." <https://www.canada.ca/en/employment-social-development/services/foreign-workers/agricultural/agricultural/requirements.html>
- [53] British Columbia. "Worker Housing Standards." <https://engage.gov.bc.ca/workerhousingstandards/>

- [54] Ontario. "Seasonal Workers Housing Guidelines." 2010. <https://farmsontario.ca/wp-content/uploads/2020/12/Seasonal-Workers-Housing-Guidelines-April-8-2010.pdf>
- [55] British Columbia. *Industrial Camps Regulation*, BC Reg 70/2012. https://www.bclaws.gov.bc.ca/civix/document/id/loo99/loo99/70_2012
- [56] British Columbia. *Residential Tenancy Act*, Section 48. https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/10_477_2003
- [57] Statistics Canada. "Table 37-10-0018-01: Postsecondary Enrolments, by Registration Status, Institution Type, Status of Student in Canada and Gender." 2023/2024. <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3710001801>
- [58] Ireland. *Planning and Development (Housing) and Residential Tenancies Act 2016*, Section 13(d). <https://www.irishstatutebook.ie/eli/2016/act/17/section/13>
- [59] Ireland. *Finance Act 1999*, Section 50. <https://www.irishstatutebook.ie/eli/1999/act/2/section/50/enacted/en/html>
- [60] Ireland. *Residential Tenancies Act 2004* (as amended), Student Specific Accommodation Provisions. <https://rtb.ie/renting/types-of-tenancies/student-specific-accommodation/>
- [61] Ireland, Department of Education and Skills & Department of Housing. "National Student Accommodation Strategy." July 2017. <https://assets.gov.ie/24591/94db5e29bc344f9fb354638c23f7f39c.pdf>
- [62] Kences / ABF Research. "Landelijke Monitor Studentenhuisvesting 2024." September 2024. <https://www.kences.nl/wp-content/uploads/2024/09/LMS2024.pdf>
- [63] Netherlands. *Burgerlijk Wetboek (Dutch Civil Code)*, Book 7, Article 274d. <https://www.huurregels.nl/titel-4-huur-op-wetgeving/afd-5-huur-van-woonruimte/onderafd-4-het-eindigen-van-de-huur/177-art-7-274d-bw-eigen-gebruik-studenten>
- [64] Kences. "Handleiding Campuscontract." https://www.kences.nl/wp-content/uploads/2021/11/kences_handleiding_campuscontract.pdf
- [65] Netherlands. "Landelijk Actieplan Studentenhuisvesting 2022–2030." <https://www.kences.nl/publicaties/landelijk-actieplan-studentenhuisvesting-2022-2030-2/>
- [66] United Kingdom. *Town and Country Planning (Use Classes) Order 1987* (as amended). <https://www.legislation.gov.uk/uksi/1987/764/contents>
- [67] Lichfields. "The Student Accommodation Use Classes Order Predicament." May 2016. <https://lichfields.uk/blog/2016/may/16/the-student-accommodation-use-classes-order-predicament>
- [68] Greater London Authority. "The London Plan 2021, Policy H15: Purpose-Built Student Accommodation." <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-online/chapter-4-housing>
- [69] Greater London Authority. "Purpose Built Student Accommodation, London Plan Guidance." October 2024. <https://www.london.gov.uk/sites/default/files/2024-11/Purpose%20Built%20Student%20Accommodation%20LPG%20FINAL.pdf>
- [70] United Kingdom, Ministry of Housing, Communities & Local Government. "National Planning Policy Framework." December 2024, Paragraphs 63, 71; Annex 2. <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>
- [71] United Kingdom. *Council Tax (Exempt Dwellings) Order 1992* (SI 1992/558), Classes M and N. <https://www.legislation.gov.uk/uksi/1992/558/contents>
- [72] United Kingdom. *Local Government Finance Act 1992*. <https://www.legislation.gov.uk/ukpga/1992/14/contents>
- [73] United Kingdom. *Housing Act 2004*, Schedule 14. <https://www.legislation.gov.uk/ukpga/2004/34/schedule/14>
- [74] Anthony Gold Solicitors. "PBSA Providers and HMO Licensing." <https://anthonygold.co.uk/insight/purpose-built-student-accommodation-hmo/>
- [75] HESA. "Higher Education Student Statistics: UK, 2023/24." March 2025. <https://www.hesa.ac.uk/news/20-03-2025/sb271-higher-education-student-statistics>

- [76] Unite Group PLC. "Annual Report and Accounts 2024." https://www.unitegroup.com/wp-content/uploads/2025/03/UNITE-STUDENTS_AR24_BOOK_WEB.pdf
- [77] Australia. "National Construction Code, Building Classifications, Class 3." <https://ncc.abcb.gov.au/ncc-navigator/building-classifications>
- [78] New South Wales. *SEPP (Housing) 2021*. <https://legislation.nsw.gov.au/view/whole/html/inforce/current/epi-2021-0714>
- [79] Ethos Urban. "Housing SEPP: Co-Living and Student Housing." <https://ethosurban.com/insights/housing-sepp-co-living-and-student-housing/>
- [80] New South Wales. *SEPP (Transport and Infrastructure) 2021*, Chapter 3. <https://legislation.nsw.gov.au/view/whole/html/inforce/current/epi-2021-0732>
- [81] Queensland. *Planning Regulation 2017*. <https://www.legislation.qld.gov.au/view/whole/html/inforce/current/si-2017-0078>
- [82] MinterEllison. "Purpose-Built Student Accommodation Market Trends." 2024/25. <https://www.minterellison.com/articles/purpose-built-student-accommodation-market-trends>
- [83] Australian Bureau of Statistics. "Student Accommodation in Australia."
- [84] United States. *Internal Revenue Code*, Section 142(d). <https://www.law.cornell.edu/uscode/text/26/142>
- [85] United States. *Internal Revenue Code*, Section 42(i)(3)(D). <https://www.law.cornell.edu/uscode/text/26/42>
- [86] City of Austin. "University Neighborhood Overlay Program." <https://www.austintexas.gov/page/university-neighborhood-overlay-program>
- [87] Columbus, Ohio. "University District Zoning Overlay, Chapter 3325." https://library.municode.com/oh/columbus/codes/code_of_ordinances?nodeId=TIT33UNDIZOOV
- [88] Studenthaus. "Student Housing Initiative 2023 Outlook." 2023.
- [89] University of Toronto. "Enrolment Report." 2024.
- [90] CMHC. "Housing Supply Report." 2023.
- [91] Forum REIF / Campus Suites. "The Quad Phase 3 at York University."

Notes

- fn1** CLC's approximately 35,000 beds includes beds managed on behalf of universities. Cedar Podium's 21,500 is a cumulative development figure. These operator totals reflect portfolio scale rather than current private ownership, which is why they exceed the 59,556 private beds figure reported nationally by BONARD.
- fn2** BONARD reports approximately 180,000 total purpose-built student beds and separately reports 122,262 university-run and 59,556 private beds. The sub-categories sum to 181,818 rather than 180,000, likely reflecting rounding in BONARD's classification methodology.

