

Call for Evidence – More and Better Homes

CWAG Response - September 2026

Introduction

Councils with ALMOs Group (CWAG) represents stock owning local authorities where council housing is managed by arms-length management organisations (ALMOs). CWAG is a Special Interest Group of the Local Government Association. There are currently 15 ALMOs managing around 170,000 council properties.

We have mainly focused our comments on the section on regulatory issues associated with more and better homes.

Response

More Targeted Regulatory Approach

Following completion of the first inspection cycle, we would support a regulatory model that makes greater use of performance intelligence, including Tenant Satisfaction Measures (TSMs), compliance data, complaints, tenant feedback and other regulatory intelligence, to identify landlords presenting higher levels of risk and emerging concerns.

A more targeted approach should enable regulatory resources to be focused where they can have the greatest impact on tenant outcomes, while reducing unnecessary intervention where there is strong evidence of compliance with the consumer standards.

Risk assessments should, however, draw on a broad range of evidence sources and balance landlord-provided data with independent intelligence, including tenant feedback, complaints and wider regulatory information. This is essential to ensure a rounded understanding of the outcomes experienced by tenants and to minimise the risk of overreliance on any single data source. Using intelligence to identify areas of concern and develop targeted improvement plans with underperforming landlords has the potential to improve outcomes and keep tenants safer.

At the same time, we would be keen to retain the Regulator's engagement-led and relationship-based approach. Any shift towards a more data-driven model should continue to be underpinned by regular dialogue and constructive engagement with all registered providers, regardless of their perceived level of risk. In our experience, the Regulator has been more collaborative and approachable than many other regulatory bodies, encouraging openness, transparency and constructive challenge. If regulation becomes overly reliant on data submissions, there is a risk that relationships with inspection teams become more distant, potentially reducing opportunities for early intervention, trust and effective information sharing.

As the regulatory framework evolves, it will remain important to maintain open and constructive dialogue between landlords and the Regulator to support the early identification and resolution of emerging risks before they develop into more significant compliance concerns.

Greater Clarity on Regulatory Expectations and What Good Looks Like

The first inspection cycle has provided valuable insight for both landlords and the Regulator into compliance with the consumer standards and has helped establish a stronger shared understanding of regulatory expectations across the sector.

While we support the Regulator's co-regulatory approach and recognise its desire not to be overly prescriptive in how landlords deliver services or demonstrate outcomes, there would be value in providing greater clarity on the characteristics of effective governance, assurance, self-assessment and performance management arrangements that support compliance with the consumer standards.

Additional guidance in these areas would help landlords assess compliance more consistently, target assurance activity effectively and identify emerging risks at an earlier stage, while preserving flexibility for different organisational models, sizes and local circumstances.

As regulation becomes increasingly risk-based, it will also be important that assessments of higher and lower risk landlords remain transparent, responsive and evidence-led. Landlords should have a clear understanding of the factors influencing the level of regulatory engagement they receive, together with an identifiable pathway for demonstrating improvement where concerns have been identified. This would help ensure that enhanced regulatory oversight is seen primarily as a tool to support improvement and mitigate risk, rather than as an additional burden.

Equally, a lighter-touch approach should not be interpreted as an indication that a landlord has reached an optimal position. Continuous improvement, innovation and the pursuit of better outcomes for tenants should remain expectations for all landlords, irrespective of their assessed level of risk.

More Assertive Regulation

The first round of inspections have provided important insights into compliance with the consumer standards. However, the extent to which this activity drives sustained improvements in services and tenant outcomes will only become apparent over time. Ultimately, the success of the new regulatory regime will be measured by the degree to which identified weaknesses are addressed and meaningful improvements are embedded and sustained.

We would support the Regulator taking a more assertive approach where landlords are unable or unwilling to address identified shortcomings. Where significant concerns

persist, it is important that the Regulator follows through and makes appropriate use of its powers to secure improvement.

However, regulatory intervention should remain proportionate to both the nature of the issue and the level of risk posed to tenants. Enforcement activity should focus on securing tangible improvements in outcomes and compliance, while avoiding unnecessary burden where landlords are engaging positively and demonstrating a clear commitment to addressing concerns.

Making the Best Use of Existing Stock

We believe the Regulator should place greater emphasis on how effectively landlords make use of existing housing stock.

This could include consideration of landlords' approaches to stock disposals and related consent arrangements, as well as proactive measures to maximise the utilisation of existing homes in the context of significant housing need. Examples include rightsizing initiatives, making best use of adapted properties, reducing long-term voids, tackling housing fraud and improving mobility within the housing stock.

Given the continued pressure on social housing supply, effective stewardship of existing homes should be recognised as an important component of delivering positive outcomes for tenants and communities.

Financial Viability and Pressures on Local Authority HRAs

Financial pressures within some council HRAs may directly affect their ability to maintain homes, invest in services and deliver the outcomes required by the consumer standards. This creates a degree of tension within the current regulatory framework, as consumer regulation is not always considered alongside the financial capacity required to deliver those expectations.

It would therefore be helpful for the Regulator to provide greater clarity on how regulatory priorities and expectations should be considered in the context of factors such as landlord size, stock profile, rent levels, financial capacity and local market conditions. While all landlords should be expected to meet the minimum consumer standards, expectations beyond that baseline could be applied more proportionately.

For example, landlords operating with comparatively low rental income and high levels of debt may need to focus primarily on safety, compliance and the maintenance of existing homes. In contrast, larger and financially stronger providers may be better placed to make a greater contribution to housing growth and development. Similarly, TSM benchmarking should place greater emphasis on meaningful peer comparison to ensure organisations are assessed against landlords operating in comparable circumstances.

Monitoring Business Plans

Whilst a stronger focus on delivery against a landlord's own published plans and commitments would be welcome, regulatory expectations should recognise differing organisational capacities and strategic objectives. Landlords with greater financial and operational capacity could be assessed against more ambitious growth, regeneration and development commitments, while those operating within more constrained environments may appropriately focus on maintaining existing stock and delivering high-quality services.

Finally, regional differences in land values, construction costs and housing market pressures should be reflected in expectations relating to housing delivery. A framework that considers both local housing need and landlord capacity could support a fairer and more effective distribution of investment and new affordable homes across England.

For example, where large housing associations commit to delivering substantial numbers of new homes nationally, greater transparency regarding the geographical distribution of that investment would help identify which areas benefit most and whether development activity aligns with local housing need. This would support a more balanced and equitable approach to meeting housing demand across different regions.