

Real Estate:UK response to RSH discussion paper 'More and better social homes'

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Real Estate:UK

Real Estate:UK (RE:UK) brings together global and domestic capital, world-leading expertise and forward-thinking policy to drive growth.

With over 500 member organisations spanning investors, developers, advisers and operators, we represent the full breadth and diversity of the commercial real estate market, worth £950bn to the UK economy.

We represent members from across the affordable housing sector, including investors, developers, operators and advisers, as well as traditional Registered Providers (RPs) (typically referred to as Housing Associations) and Institutionally Backed Registered Providers (IBRPs) (typically referred to as for-profits).

We champion the role of private capital in delivering affordable homes and advocate for a regulatory system that supports innovation and long-term investment in the sector. By promoting collaboration, RE:UK works to ensure that private investment complements the work of traditional providers and strengthens the resilience, capacity and overall effectiveness of the UK's affordable housing system.

General Comments

We recognise the case for change set out by RSH and strongly support the ambition to unlock more development while keeping tenants and homes protected. However, we would urge a degree of caution when approaching changes to existing regulation. The current regulatory model has broadly worked – the sector has not experienced predatory losses to creditors, and investor confidence remains strong. We believe many of the barriers to more development sit less in RSH's tolerance for risk and more in process – registration timescales, reporting burdens, and the capacity of both landlords and the regulator to understand newer financing models.

We would also encourage RSH to provide greater clarity about how it defines and applies key regulatory concepts. Terms such as “higher risk”, “strategically important”, “sufficient” financial resilience and “proportionate” intervention appear throughout the proposals, but greater clarity about the factors and thresholds that sit behind these judgements would help landlords understand what is expected of them. This would also support more consistent decision-making across different landlords and reduce the risk that organisations respond to uncertainty by taking unnecessarily cautious approaches to investment and development. Clarity should not mean rigid rules or numerical thresholds in every case; rather, landlords should have a clear understanding of the factors RSH will consider and the circumstances that would lead to increased regulatory scrutiny.

We would also highlight that regulatory pressure on the sector is cumulative and does not come from RSH alone. The UK real estate sector as a whole has seen a marked drop-off in development, particularly in London, as landlords have had to funnel money into their existing estates to meet building and fire safety obligations rather than into new supply – and this context should inform how much new RSH requirement is layered on top.

Our overall message in this response is that RSH should prioritise making existing processes faster, clearer and better resourced over loosening risk tolerance or increasing regulatory burdens. Where new requirements are introduced, they should be targeted at material risks, proportionate to the circumstances of individual landlords, and accompanied by clear guidance on what RSH is seeking to achieve.

Discussion prompt 1: essentials for more and better homes

Please give your views on how we can further promote the essential characteristics of social landlords to deliver more and better social homes. We are keen to hear your thoughts about:

- ensuring social housing is central to all landlords
- independence and autonomy of landlords to protect tenants and social housing
- ensuring there are clear expectations of landlords that promote growth and resilience
- promoting good governance across all landlords
- protecting tenants and their homes in the case of failure
- enabling growth and new entrants with novel models or structures whilst protecting tenants, public funds and the value of the sector

Innovation and risk

We are interested in views about how the risk to tenants and homes should be balanced against the potential for new homes. We would welcome ideas for how we could offer protection to tenants and homes if we and all our stakeholders accepted a higher level of risk.

Increasing risk profiles should not be taken on lightly. We believe the existing regulatory model has worked, and the sector has avoided losses to creditors under it. Rather than loosening the sector's overall tolerance for risk, we believe improvements to the current regulatory regime would encourage more and better social homes. For example, faster registration processes would unlock capital without changing that tolerance at all. Additionally, caseworkers would benefit from a better understanding of newer financing structures (for example, joint venture arrangements) so that risk can be assessed accurately rather than avoided by default.

We would also note that some development approaches that might look higher-risk on paper are risk-reducing in practice. Traditional procurement (land, planning, then a single- or two-stage design-and-build tender) is increasingly outdated. Bringing a construction partner in much earlier, alongside partnering with other RPs or local authorities, brings technical due diligence expertise into the design process sooner, which can lower delivery risk even though the model itself looks less conventional. Regulatory engagement with new delivery models should recognise this distinction rather than treating unfamiliar structures as inherently riskier.

Ultimately, the reporting that RPs must submit to RSH is a bigger practical constraint on development than underlying risk appetite. Whilst we recognise and support RSH's need to assess risk, better partnership models for development, and viewing risk through a different lens, would in our view have more potential to improve delivery than a general increase in risk tolerance.

Centred on social housing

We are considering introducing a requirement that sets out more clearly the central role social housing should take in a social landlord. This could be in relation to the proportion of social housing assets, or turnover, or it could take another form.

We are interested in views about whether in principle a requirement would help landlords to have the right focus on social housing and reduce the risk that non-social housing activity has a negative impact on social housing. We are also interested in how you think we could best deliver this outcome.

In principle, we support a requirement that makes clear social housing should sit at the core of a registered provider's activity, but we would caution against a rigid single metric (e.g. a fixed % of assets or turnover), and would prefer an approach built around transparency, stress testing and board accountability rather than a hard threshold.

A flat asset or turnover ratio risks being a poor proxy for risk. Some landlords with a smaller proportion of "non-core" activity could pose more risk than others with a larger proportion, depending on gearing, structure and governance quality. It could also penalise providers who use commercial activity prudently to cross-subsidise development, and may not capture risk sitting in group structures below the level RSH currently regulates.

Rather than a blanket ratio, we would suggest that RSH:

- Require separate, explicit stress testing and reporting of non-core/non-social activity, so its risk to the social housing business is visible rather than netted off in group-level metrics.
- Strengthen powers over acquisitions and changes of control, so a transaction that dilutes an organisation's social housing focus does not fall outside the regulatory perimeter.
- Introduce a disposals transparency requirement, particularly for cross-boundary disposals, giving local authorities visibility of social homes leaving the sector.
- Take a proportionate, tiered approach: closer scrutiny of non-core activity for larger or "strategically important" providers, without imposing disproportionate burden on smaller and medium-sized providers with limited exposure to this risk.

We would welcome the opportunity to discuss how any threshold or reporting requirement would interact with existing V1/V2 grading and stress testing expectations, to avoid duplicating existing regulatory tools.

Independent and autonomous

We are interested in views about how we could best ensure that landlords have enough independence and autonomy to protect tenants and social housing while still allowing new models and ways of working that could deliver new supply to flourish.

We believe board autonomy over risk appetite should be preserved rather than tightened, provided decisions are transparent and well-explained. The existing regulatory model has avoided predatory losses to creditors, and a more prescriptive approach risks pushing some providers toward taking on more risk than they otherwise would, purely to satisfy compliance testing. We would encourage landlords to make fuller use of the existing V1/V2 grading system to take on more risk where it is properly explained.

For new entrants specifically, we are concerned about the long registration timescale and the uncertainty it creates for investors. This means investors cannot reliably forecast interest rates or market conditions for the point at which they achieve registration, which undermines the capital commitment needed for the sector. In our experience registration can be achieved in 12–15 months, but greater consistency and predictability in the timescale for all applicants, including those with new models, would help investors plan with confidence.

We would also recommend RSH invest in skilled, specialist caseworkers for different financing structures, so that faster or more flexible regulation of new entrants does not have to mean riskier regulation, and so RSH can be more explicit about the type of new entrants and structures it wants to see in the sector.

In short, we believe independence is best protected by pairing board-level autonomy with clearer disclosure obligations, dedicated regulatory expertise in newer financing models, and a more predictable, multi-year regulatory outlook for new entrants, rather than by constraining autonomy directly.

Financially sustainable

Our current standards require landlords to have access to sufficient financial liquidity at all times. We are considering whether to expand the range of requirements to include further elements of financial resilience, so our expectations are clearer. We are interested in views on whether this would be useful for landlords and their stakeholders and views on which areas any minimum performance benchmarks should focus on.

We are broadly cautious about introducing prescriptive minimum benchmarks in addition to the existing liquidity requirements. Landlords already undertake extensive financial stress testing, including against a wide range of adverse scenarios. In some cases, this can already be quite demanding, including testing scenarios that are highly unlikely to materialise. A further layer of standardised benchmarks risks increasing compliance costs without necessarily improving financial resilience or changing landlord behaviour.

If RSH considers expanding its requirements, we would therefore support a focus on providing greater clarity about its expectations and what constitutes “sufficient” financial resilience, rather than introducing rigid numerical thresholds. This would give landlords and their stakeholders greater certainty while allowing sufficient flexibility to reflect different business models, financial structures and legitimate investment and development activity.

Any new requirements should also be focused on identifying material risks and supporting early intervention, rather than encouraging landlords to manage to a regulatory threshold, particularly given the interaction between regulatory metrics and the credit ratings process.

Able to deliver effectively

We consider that appropriate and effective governance is essential for social landlords of all sizes and ages. We welcome views about good governance and how we regulate for it, including in our regulation of new landlords.

Good governance is most effective when it supports genuine co-regulation and allows boards to retain responsibility for making strategic, financial and investment decisions. Boards should be able to take

different approaches to risk, borrowing and investment where they have properly considered the implications, understand the risks involved and can clearly explain and justify their decisions.

There is a risk that overly prescriptive governance requirements could move beyond assessing the quality of decision-making into RSH effectively directing strategic choices, for example by influencing whether or how much a landlord should borrow. This could undermine board accountability rather than strengthen it.

We would therefore favour regulation that focuses on the quality of governance and decision-making: whether boards have the right information and expertise, properly understand and challenge the risks they face, and can demonstrate how significant decisions have been reached. This approach would set clear expectations while allowing different governance models and strategies to work effectively across the sector.

Capable of failing safely

We welcome suggestions about how our regulation can better protect tenants and homes in the regulated social housing sector if a landlord fails.

We would welcome clarity as to what “failing safely” means across different landlord models. For traditional RPs, there is a well-established expectation that the social housing stock and tenants will be protected through appropriate intervention, transfer or rescue arrangements.

The position for IBRPs is different in important respects. Equity holders sit at the bottom of the waterfall and are not protected by the moratorium in the same way as creditors. IBRPs are, in effect, funded as residential investment vehicles, with lenders and investors carrying out their own due diligence and taking investment risk. RSH's messaging around “no loss” should therefore be sufficiently clear about the distinction between protecting social housing and tenants and protecting the financial position of particular investors or creditors.

We would encourage RSH to robustly test its approach to the potential financial failure of an RP, including how this would affect tenants, lenders, investors and the wider sector. At present, the lender and investor community does not have a clear picture of how different failure scenarios would play out in practice. Greater clarity would help market participants to price and manage risk appropriately, rather than assuming that all landlord models carry equivalent protections.

Ultimately, failing safely should be about ensuring continuity of social housing and protecting tenants, rather than solely protecting financial counterparties. This should include clarity on how social housing would be maintained where tenure, ownership or management arrangements change as part of a failure or rescue.

Becoming a social landlord

We are interested in your ideas on how we could further enable the registration of organisations intending to become social landlords to encourage new supply to the sector, whilst also ensuring good quality affordable homes, protecting the value of the sector and ensuring that those who are registered are able to deliver a good service to tenants.

We consider the registration process broadly workable and understand the need for RSH to undertake appropriate scrutiny of new entrants. However, we are concerned that lengthy registration timescales can create an unintended incentive for organisations seeking to enter the sector to acquire an existing registered provider instead. This can result in organisations effectively avoiding the level of scrutiny applied to new registrations.

We would therefore support reforms that make the registration process more proportionate to the complexity and risk of the applicant's proposed model, while ensuring that equivalent scrutiny applies where an organisation acquires an existing registered provider. A change of control could provide an appropriate trigger for RSH to assess whether the organisation remains suitable to be registered and whether its proposed activities meet the required standards.

We would also reiterate the point made in our response to *Independent and autonomous* about developing greater specialisation within RSH caseworker teams. Building expertise in particular areas of the sector could help RSH assess more complex applications efficiently, while maintaining the level of scrutiny needed to protect tenants and the value of the sector.

Models for financing social housing

We welcome suggestions about how our regulation can better:

- set reasonable expectations around financial sustainability, parental support and the underwriting of risk
- manage approaches where ownership, financial benefit and management of assets are separated

We see scope for RSH to strengthen its understanding of newer financing and operating structures, particularly for-profit-within-not-for-profit models. In our experience, there have been instances where caseworkers have been less familiar with these structures and, as a result, have not always been able to identify or explore the key questions around ownership, control and financial benefit.

We would support RSH developing greater specialist, model-specific expertise so that regulatory scrutiny focuses on the underlying risks rather than the unfamiliarity of the structure itself. This could include assessing issues such as gearing, financial benefit extraction, governance and the alignment of incentives between different entities.

RE:UK would welcome the opportunity to work constructively with RSH to help develop any training or guidance that would support caseworker teams in understanding these models and identifying the risks that genuinely warrant regulatory attention.

Discussion prompt 2: accountability for more and better homes

We want our regulation to drive the delivery of more and better social homes while protecting tenants, homes and investors. This section sets out specific ideas that could do this through requirements focused on landlords' strategy, decision making, planning and delivery in the following areas:

- Maximising value throughout the business plan
- Delivering landlord responsibilities
- Understanding ability to develop and acting on it

- Testing financial resilience
- Keeping the long-term value of social housing in the sector
- Increasing efficiency

Maximising value throughout the business plan

We are interested in views on how we should scrutinise landlords' plans and performance to assess how well more and better homes are being delivered.

We would caution against using regulatory scrutiny to create an expectation that landlords should maximise development regardless of their circumstances. Most RPs already assess their capacity to develop and report on this to some degree, and boards should retain responsibility for deciding the level of development risk that is appropriate for their organisation. Regulatory expectations should not inadvertently encourage boards to take on risks they would otherwise consider unsuitable simply to demonstrate a commitment to increasing supply.

Any assessment should also recognise that development capacity varies significantly across the sector. Smaller and medium-sized RPs may have latent capacity to deliver more homes but lack the development expertise, resources or access to finance needed to realise it. In these cases, pressure to increase delivery without addressing underlying capability constraints could be counterproductive.

We would therefore support RSH focusing on whether landlords have properly assessed their capacity, risks and opportunities to contribute to new supply, rather than setting expectations around a particular level of development. Where latent capacity is identified, there may be greater value in supporting collaboration, partnerships and capability-building to unlock it.

Delivering landlord responsibilities

We are interested in views about whether asking landlords to set themselves specific targets as part of the business planning process would help the sector to deliver more and better social homes.

We would favour a "carrot" approach, using incentives such as grant or other funding mechanisms, rather than a "stick" approach based on mandated delivery targets. Landlords should retain responsibility for determining an appropriate level of development based on their financial position, capacity and understanding of risk. We would also caution against expecting RPs to deliver outcomes that are primarily the responsibility of local authorities, such as matching council housebuilding ambitions.

More broadly, we would question whether additional delivery targets would address the underlying reasons for the recent decline in development. The sector has seen a significant reduction in development, particularly in London, while landlords have faced substantial demands to invest in their existing estates, including meeting building safety and fire safety obligations. These competing demands inevitably affect the resources available for new supply.

RSH should therefore consider whether aspects of the wider regulatory framework are inadvertently constraining development before introducing additional delivery expectations. Where landlords have capacity to develop, incentives and support to unlock that capacity are likely to be more effective than targets that risk encouraging organisations to take on development beyond what is financially or operationally sustainable.

Understanding ability to develop and acting on it

We are interested in views about whether an appraisal of development capacity and capability alongside related targets would help the social housing sector as a whole to create more homes.

We support requiring landlords to assess their development capacity, as this could usefully surface latent capacity in smaller/medium not-for-profits and prompt honest explanation of why they are not developing. However, this needs pairing with support to build capability (partnership working, shared expertise) rather than functioning as a bare compliance exercise. Smaller RPs with land assets but no development expertise face real risk if pushed to develop alone.

Development capacity has two distinct dimensions that any assessment framework should separate: physical capacity (what an organisation's resources could actually build) and financial capacity (what it could build while staying within a risk appetite it is comfortable with). Most landlords already assess both as part of normal business planning, and we would be cautious about a requirement to publish this, which could create pressure without adding much beyond what boards already know.

We also note a barrier that discourages SME landlords from even exploring development: abortive feasibility spend (design fees, site investigation, etc.) that has to be written off if a scheme does not proceed can be a material hit to the income and expenditure account, with no guarantee of capital funding to offset it. A revenue and feasibility match-fund, developed jointly with Homes England, the GLA and the devolved combined authorities, could share this risk with smaller organisations, recycling revenue grant into capital once a scheme proceeds, and would do more to unlock latent development capacity than a disclosure requirement alone.

Finally, we wish to flag that capacity assessments should account for workforce restrictions. Several larger developing RPs have significantly reduced their development teams during the recent slowdown, and rebuilding that capacity, whether by rehiring or training, takes time. There is a real risk that RPs are asked to deliver a step-change in output over the next two to three years without yet having the workforce capacity to do so safely, and RSH's approach to capacity and delivery expectations should be sensitive to this lag rather than assuming capacity can scale immediately alongside funding.

Testing financial resilience

We are interested in views about whether asking each large landlord to carry out a specific and common set of stress tests and flexes and publishing the results alongside mitigation plans would help large landlords manage and demonstrate their financial resilience effectively so that they could deliver more and better homes.

We believe a common, published stress testing regime may add limited value: most large landlords already stress test extensively, and the real risk tends to be cumulative/compound rather than single-point failures that standard tests capture well. Where there are significant weaknesses in an organisation's governance, oversight or approach to regulation, additional reporting requirements will not necessarily identify or mitigate the underlying risk. An organisation can appear resilient against prescribed scenarios while material risks develop elsewhere in its business.

We would therefore prefer to see greater focus on ensuring that existing “golden rules” stress testing is undertaken to a consistent and meaningful standard, rather than creating a parallel framework. In particular, non-core activities should be explicitly considered within stress testing, as these can present risks that are less well captured by tests focused on the core social housing business. This would allow RSH to focus on whether landlords are identifying and managing the risks that are genuinely material to their business, rather than adding further standardised requirements.

Keeping the long-term value of social housing in the sector

We are interested in views about whether requiring landlords to explain how their disposal decisions contribute to the continued provision of social housing over the long term would help ensure more and better social homes.

We support a disposals transparency requirement, particularly around cross-boundary disposals where a landlord sells in one local authority area without reinvesting there. Landlords should retain the ability to make their own strategic decisions, but local authorities should have visibility of disposal plans and possibly a right of first refusal (e.g. for temporary accommodation use) before homes leave the social sector, alongside a clear explanation from the RP of what is being done and why.

We also highlight a specific barrier that pushes homes toward disposal when a more flexible regulatory approach could keep them in the sector. Current rent standards make it considerably harder to convert a home from social rent to intermediate or market rent for a defined term (for example, letting to key workers while a void is being funded) than it is simply to sell the asset. This particularly affects older or higher-value stock where refurbishment costs are significant. We would support RSH adapting its approach to allow this kind of temporary tenure flexibility, with a clear route back to social rent once the necessary investment has been recovered, rather than the current rules effectively pushing landlords toward permanent disposal as the path of least resistance.

There is also a potential unintended consequence where homes that are not considered viable to bring up to standard are sold into the private sector, refurbished, and subsequently leased back to local authorities as temporary accommodation, often at a significantly higher rent than the landlord could have charged directly.

A regulatory approach that supported landlords to invest in these homes and retain them within the social housing sector, including through direct leasing to local authorities at a fair and sustainable rent, could provide better value for the public purse while also supporting continuity of housing provision.

Increasing efficiency

We welcome views about how we could identify and challenge landlords’ efficiency and effectiveness more strongly, such as using more sophisticated data analysis to steer our engagement where we identify potential concerns.

We would encourage RSH to make greater use of granular data, including asset-level cost data, to identify potential efficiency opportunities and focus its engagement where there is evidence of underperformance. Approaches already being used by newer entrants demonstrate the value of understanding costs and performance at an individual building or scheme level, rather than relying primarily on aggregate data.

This could be particularly valuable for more established providers, where asset-level information is not always captured or used in a way that enables meaningful comparison between schemes. Better analysis could therefore help landlords identify where costs or performance differ and understand the reasons behind those differences, supporting more targeted efficiency improvements.

Any greater focus on efficiency should complement, rather than replace, existing value-for-money assessments, ensuring that efficiency is considered alongside service quality, tenant outcomes and the wider objectives of the social housing sector.

Discussion prompt 3: regulating for more and better homes

We intend to change our approach to regulatory engagement, data and reporting as we complete the round of inspections in 2028. This section sets out ideas for how we might do this by:

- More targeting and tailoring of our work using risk
- Improving data and making more use of good quality data to identify risks
- Taking quicker action to address weaknesses and failure
- Promoting collaborative innovation

Targeting our efforts

We welcome stakeholders' views on our proposals for further developing the extent to which our regulation of landlords is targeted using risk.

Before adding further risk-based targeting, we would encourage RSH to set out what problems are intended to be solved through development of regulation. Organisations that have experienced significant regulatory difficulty have, in some cases, never breached a loan covenant, remained cash positive throughout, and sold assets for more than they cost- suggesting the current level of risk-based regulation may already be appropriately calibrated in at least some of these cases.

We would encourage caution before regulating at sub-portfolio or board level, which we think could prove difficult to apply in practice. For example, a landlord that chooses to run a loss-making but socially valuable service (such as a homelessness or domestic abuse project) should not necessarily need to justify that choice to the regulator on a line-by-line basis. We also think climate/ESG risk is becoming a more immediate consideration and may be somewhat under-represented in current risk categorisation, with smaller/medium landlords potentially benefiting from more targeted mitigation support alongside closer monitoring.

Regulating below landlord-level

We would welcome views about our proposals for the regulator applying a more risk-based approach to localised failures to deliver the outcomes required by our standards. We are also interested in ideas about how best to be transparent about any localised failures we find.

We support RSH developing greater capability to identify and act on significant failures below whole-landlord level. A landlord may perform well overall while serious issues persist within a particular service, geographical area or type of stock, meaning that portfolio-level oversight can sometimes mask problems affecting particular groups of tenants.

We would particularly encourage RSH to consider how its approach can identify risks in specialist stock types, where issues may be less visible within overall landlord performance. A more granular, risk-based approach would allow RSH to focus intervention where it is most needed, without treating isolated issues as evidence of wider organisational failure.

Where localised failures are identified, RSH should also be transparent about their nature and scale, making clear which part of a landlord's operations is affected. This would provide accountability for affected tenants while avoiding the impression that the landlord as a whole is failing where the evidence does not support that conclusion.

Small landlords with higher risk

We are interested in views about how we should try to identify which small landlords are at higher risk and how we could more actively regulate them without discouraging growth and innovation.

We support RSH taking a proportionate, risk-based approach to smaller landlords, with greater regulatory attention where there is evidence of higher risk. RSH should be explicit about the factors it considers when assessing risk, rather than leaving smaller providers to infer expectations from the wider regulatory framework. This could include financial resilience, governance and operational capacity, the complexity of their activities and exposure to risks such as building safety, climate change and ESG requirements.

At the same time, regulatory expectations should reflect the size and capacity of the organisation. Smaller and medium-sized landlords may have fewer resources and less specialist expertise than larger providers, particularly in areas such as climate risk and asset management. Regulation should therefore focus on whether risks are being appropriately identified and managed, rather than imposing requirements that are unnecessarily burdensome relative to the level of risk.

This is particularly important to avoid creating a barrier to new entrants and growth. A clear and proportionate approach to risk identification would give smaller providers greater certainty about what is expected of them, while allowing well-run organisations to innovate and grow without facing a disproportionate regulatory burden.

Strategically important providers

We are interested in views about how we could define which landlords we consider strategically important to the sector and what extra regulatory requirements would be proportionate to the risk involved.

We favour differentiated regulatory approaches for strategically important providers, recognising that the failure of a large or highly interconnected landlord could have consequences beyond its own tenants and organisation. However, strategic importance should not be defined solely by the number of homes owned or the size of an organisation. Factors such as financial interconnectedness, reliance on particular funding sources, concentration of specialist stock, complexity of corporate structures and the availability of alternative providers should also be considered.

Strategically important providers may warrant closer scrutiny of activities outside their core housing operations, particularly where these involve significant financial, operational or reputational risk. This should be proportionate to the nature of the risk and should not create unnecessary regulatory burden where activities are well managed.

We would also encourage RSH to consider the question of resolution risk. In particular, could some organisations become so large or complex that they are effectively “too big to save” without significant disruption to tenants, lenders or the wider sector? This suggests that strategic importance should take account not only of the potential impact of a landlord's failure, but also how difficult it would be to manage or resolve that failure. This could provide a more meaningful basis for identifying which providers require enhanced regulatory oversight.

Improving data

We welcome views on the potential for developing better predictive risk identification models and the issues that we need to consider in doing so.

We support RSH encouraging RPs to collect asset-level data, comparable to Build to Rent reporting, and would encourage a “unit-up” approach rather than relying on top-down aggregate reporting. This would give both landlords and RSH greater visibility of how individual buildings and schemes are performing.

However, we would not support requiring RPs to routinely submit all this detailed data to RSH. This could create a significant volume of information for RSH to process, potentially overwhelming its capacity and causing delays in identifying and responding to genuine risks. Instead, RPs should maintain this information and have it readily available to provide to RSH where required, allowing the regulator to access granular data when it is relevant to a particular risk or investigation.

Forecasting at this level presents genuine practical challenges. Actual spend can diverge materially from forecasts within the first year and any predictive model should therefore recognise the inherent uncertainty in long-term forecasts and avoid treating early variance as a risk indicator in itself.

We would support greater use of forward-looking data, such as multi-year forecasts and smart meter data, but would encourage RSH to be clear about the specific regulatory problem each new data requirement is intended to address. This will help ensure that data collection supports meaningful risk identification rather than becoming an exercise in demonstrating the absence of risk.

We would welcome views on what further steps we could take to strengthen the quality and comparability of data across the sector.

We support a common methodology for asset-level reporting, using a “unit-up” approach similar to Build to Rent. This would improve consistency and allow meaningful comparison between individual schemes and buildings. The approach should apply across the sector, including established and legacy providers, rather than only newer entrants already reporting at this level.

We would also encourage RSH to establish clear and consistent definitions for the data it requests, so that information is collected on a genuinely comparable basis. Higher-frequency sources, such as smart meter data, could further improve the timeliness and reliability of reporting.

Addressing weaknesses and failure

We are interested in views on the advantages and disadvantages of intervening more readily and robustly when a landlord is unable or unwilling to act in an acceptable timescale.

We support earlier and more robust intervention where landlords are aware of significant weaknesses but are unable or unwilling to address them within a reasonable timeframe. Delayed intervention can allow issues to become more serious, increase the eventual cost of remediation and, most importantly, leave tenants exposed to poor outcomes for longer than necessary.

We would also encourage RSH to take a broad view of risk when considering whether intervention is necessary, rather than focusing predominantly on physical asset condition. This should include the quality and safety of specialist housing and other areas where poor outcomes may not be immediately apparent through traditional stock-condition measures.

A proportionate, risk-based approach would allow RSH to distinguish between issues that landlords should reasonably be given time to resolve and situations where continued delay warrants regulatory action.

Promoting collaborative innovation

We are interested in views about specific challenges that could benefit from this kind of collaborative innovation, the types of expertise and approaches that might be helpful.

We would encourage landlords with development expertise and capacity to work more closely with those with the potential to develop but lacking the necessary expertise or capacity. We see this primarily as a sector-led solution rather than something RSH should mandate directly, with the regulator potentially helping to facilitate the sharing of expertise and good practice.

We have also seen how new entrants requiring more granular property and cost data can have positive knock-on effects, encouraging greater efficiency and knowledge-sharing across the sector. This suggests that improving data standards can itself be a useful lever for encouraging innovation and collaboration.

End of response