

To: All relevant public authorities, regulators, oversight bodies, auditors and investigative agencies

Subject: Request for coordinated cross-agency review and investigation of Section 106 affordable-housing obligations, variations, delivery and public accountability

Request for coordinated review and investigation

I am submitting the accompanying evidence pack because the matters identified within it warrant a coordinated review across the public bodies responsible for planning, affordable housing, local government, public finance, regulation, official statistics and, where appropriate, investigation.

The purpose of this submission is not to accuse any individual, organisation or profession of wrongdoing. It is to ask a straightforward public-interest question: can every affordable home originally secured through a Section 106 planning obligation be properly accounted for through an identifiable and lawful chain of delivery, variation, substitution, financial contribution or discharge?

The evidence collected so far shows that this question cannot presently be answered simply from the national published datasets. The investigation therefore preserves the original affordable-housing obligation as a fixed historical baseline and separately records everything that subsequently happened to it.

This allows us to distinguish homes delivered as originally agreed; homes delivered later or in phases; lawful changes in tenure; lawful reductions or variations; homes moved to another site; commuted financial contributions; changes involving Registered Providers; properties that remain in development; incomplete or inconsistent public records; data-quality problems; and obligations for which the currently available evidence does not yet provide a complete reconciliation.

An unreconciled obligation is not automatically evidence of wrongdoing. It is a request for the missing part of the evidential chain. Likewise, where an original agreement was later varied, the purpose of this work is not simply to object to the fact that a variation occurred. The relevant questions are what changed, why it changed, what evidence supported the change, who authorised it, whether that person or body possessed the necessary authority at the time, whether the appropriate legal process was followed, whether the change was properly executed and recorded, and what ultimately happened to the housing, money or other public benefit concerned.

These questions can protect everyone involved. They can distinguish legitimate planning decisions from administrative mistakes, incomplete records, inconsistent statistical classifications and circumstances that genuinely require further investigation.

A request to work together

I respectfully ask that the agencies receiving this submission do not treat it simply as a matter to be passed from one organisation to another. Different organisations understandably have different statutory powers and areas of responsibility. No single organisation may be able to answer every question raised by this work. That is precisely why cooperation is necessary.

Planning authorities hold the agreements and variations. Local authorities hold monitoring, financial and decision-making records. Registered Providers hold acquisition and housing-management records. Homes England may hold relevant affordable-housing information. Government departments maintain national policy and statistical systems. Regulators oversee housing providers and official statistics. External auditors examine local public finances. Fraud and law-enforcement bodies have responsibilities where evidence eventually crosses the relevant evidential threshold.

Each organisation may therefore hold only one part of the same evidential chain. I ask that those parts be considered together rather than in isolation. Where a matter falls outside one body's jurisdiction, I would be grateful if that body could identify the correct organisation, preserve any relevant evidence it holds and, where legally possible, communicate with or refer the matter to the appropriate counterpart rather than allowing the evidential trail to end there.

The objective is not to create conflict between public organisations. We are on the same side in wanting public systems to work properly and people to receive the housing and resources that public decisions intended for them.

It is acceptable to ask for help

These systems are extremely complicated. Planning law, housing regulation, local-government finance, property ownership, statistical reporting and corporate structures overlap in ways that can be difficult for any individual officer or organisation to follow completely.

If an officer, department or organisation is overwhelmed by the volume or complexity of the work, there should be no shame in saying: 'I need more help with this.' That should be regarded as responsible public administration, not failure.

It may require another department, another regulator, additional investigators, analysts, auditors or staff. That creates capacity and, where necessary, employment while improving public services. The answer to an overloaded system should not be to conceal uncertainty or move responsibility somewhere else until the issue disappears. The answer should be to bring in enough people and expertise to resolve it properly.

We want to work with the people operating these systems, not against them.

Why this matters

Affordable housing is not simply a number in a spreadsheet. Behind every unit are people and families who may be waiting for secure housing, living in temporary accommodation, paying unaffordable private rents, living far from support networks, unable to move because suitable housing is unavailable, or experiencing homelessness or housing insecurity.

When planning permission is granted subject to affordable-housing obligations, those obligations therefore represent something tangible. If circumstances legitimately require them to change, the public should be able to understand what happened. If money replaced housing, the money should be traceable. If housing moved to another location, the replacement housing should be identifiable. If an obligation was reduced, the lawful decision and reasoning should be identifiable. If the original obligation was fulfilled, the evidence should allow that to be demonstrated clearly. Where the available evidence does not reconcile, that should prompt a request for further information rather than an assumption in either direction.

What I am requesting

1. Preserve the original Section 106 affordable-housing obligations as the historical baseline for review.
2. Identify every subsequent variation, modification, discharge, substitution or commuted payment affecting those obligations.
3. Verify the legal instrument and statutory authority used for each material change.
4. Verify who authorised each change and whether that individual or body held the appropriate delegated authority at that time.
5. Trace the physical delivery of affordable housing against the original and subsequently enforceable obligations.
6. Trace off-site replacement housing where obligations were transferred elsewhere.
7. Trace financial contributions where housing obligations were converted into money, including receipt, allocation, expenditure and any repayment.
8. Reconcile national planning, affordable-housing and local-authority statistics with the underlying development-level evidence.
9. Identify and correct data-quality or classification problems where they explain apparent discrepancies.
10. Identify cases that remain genuinely unreconciled after those explanations have been exhausted.
11. Where appropriate, refer individual cases for specialist legal, regulatory, audit or investigative examination.

12. Develop, if possible, a continuing reconciliation mechanism so that the public can see what was originally promised and what ultimately happened without having to reconstruct the evidence manually.

Requested approach to responsibility

I recognise that each recipient must operate within its statutory powers. I am not asking organisations to exercise powers they do not possess. I am asking that the response to a cross-system problem should be coordination rather than fragmentation.

Where responsibility overlaps, please cooperate. Where responsibility changes hands, please document the handover. Where evidence belongs to another organisation, please identify it. Where more expertise or capacity is required, please request it. Where uncertainty exists, please record the uncertainty rather than replacing it with an assumption. Where the evidence shows that everything was properly delivered and accounted for, that result should be recorded just as clearly as any discrepancy.

The purpose of this work is resolution, not accusation.

Evidence supplied

- the full-frame Section 106 affordable-housing audit and original-promise methodology;
- national developer-agreement, contribution and transaction datasets;
- national Affordable Housing Supply and Local Authority Housing Statistics data;
- reproducible analysis workpapers and transaction-status analysis;
- evidence classifications, legal/authority tests and possible processing routes;
- proposed property/provider tracing and rental benchmarking;
- source references and file hashes supporting independent verification.

The analysis deliberately avoids treating an absence of data as proof that housing is missing. Instead, it identifies where the available evidence presently reconciles and where further evidence is required. That distinction should remain central to any subsequent investigation.

Closing request

Please consider this submission as a request for a cooperative public-interest reconciliation exercise and, where the evidence warrants it, coordinated investigation.

There may ultimately be innocent explanations for many apparent discrepancies. There may be administrative or data problems that can simply be corrected. There may be lawful decisions which only need to be made clearer. There may also be individual cases requiring closer examination. We cannot know which is which without following the evidence through properly.

The people affected by housing shortages should be able to trust that when public authorities secure affordable housing through the planning system, somebody remains responsible for ensuring that the resulting housing or substitute resource can ultimately be accounted for.

I therefore ask all relevant organisations to assist one another in establishing that complete record. If the work is too large for one person, team or organisation, please say so and seek assistance. That is not a failure. It is how a complex public system should work.

Please work together. We want to be there for the people administering these systems as well as the people depending upon them. We are all trying to establish the same thing: what was promised, what changed, what was authorised, what was delivered, and where the public resource ultimately went.

Thank you for considering the evidence and for any assistance you can provide in resolving these questions constructively and transparently.

Yours faithfully,

AL

Cross-agency submission routing

Recommended approach: use a coordinated core distribution for the national/systemic issue, then route case-specific evidence to the body with jurisdiction. Statistical or reconciliation gaps should not be characterised as criminal conduct unless case-level evidence supports that conclusion.

Route	Body	Email / route	Use
Primary national policy / system	MHCLG general correspondence	GOV.UK correspondence route	National planning/housing policy and system ownership.
Planning data	MHCLG Planning Statistics	Planning.Statistics@communities.gov.uk	Planning/developer-agreement data methodology and reconciliation.
Housing data	MHCLG Housing Statistics	Housing.Statistics@communities.gov.uk	Affordable Housing Supply and LAHS methodology.
Statistics oversight	Office for Statistics Regulation	regulation@statistics.gov.uk	Independent concerns about official statistics/data quality and use.
Public-sector fraud risk / coordination	Public Sector Fraud Authority	psfa@cabinetoffice.gov.uk	Advice/coordination where evidence indicates public-sector fraud or error risk.
Registered provider - conditional	Regulator of Social Housing	enquiries@rsh.gov.uk	Named registered-provider governance, standards, rent or data concerns.
Homes England - conditional	Homes England	enquiries@homesengland.gov.uk	Funding/programme records or S106 Affordable Housing Clearing Service issues.
Individual scheme - local	Council Monitoring Officer / Head of Planning	Authority-specific	Validity, delegation, deed chain, planning register, monitoring and enforcement.
Public money / commuted sums	Council Section 151 Officer + appointed external auditor	Authority/year-specific	Financial governance, receipts, spending and audit.
Central government value for money	National Audit Office	enquiries@nao.org.uk	Central-government/systemic value-for-money issues.
Complaint escalation	Parliamentary and Health Service Ombudsman	phso.enquiries@ombudsman.org.uk	Normally after the relevant departmental complaint route.
Fraud - evidence threshold reached	Report Fraud / City of London Police	reportfraud.police.uk	Case-level suspected fraud; online reporting route.
Serious/complex fraud - conditional	Serious Fraud Office	public.enquiries@sfo.gov.uk	Potential serious/complex fraud, bribery or corruption only.

Coordination request: Please acknowledge receipt, provide a reference number, identify the team responsible for each part, record any onward referral or handover, preserve relevant evidence, and state clearly where further information or specialist assistance is required.

22 September 2026

To: Ministry of Housing, Communities and Local Government - national planning/housing routing

Email copies: Planning.Statistics@communities.gov.uk; Housing.Statistics@communities.gov.uk

CC / oversight: psfa@cabinetoffice.gov.uk; regulation@statistics.gov.uk

Subject: Request for coordinated review and preservation of evidence concerning Section 106 affordable-housing obligations, later variations and delivered outcomes

I am submitting the enclosed evidence pack because publicly available national data make it possible to identify the original quantity of many affordable-housing obligations, but do not currently provide a complete property-level reconciliation showing how every originally secured unit was ultimately delivered, lawfully varied, substituted, converted to a financial contribution, transferred, released or left outstanding.

The analysis deliberately preserves the first executed affordable-housing requirement as an immutable historical baseline - the Original Promise Baseline (OPB). Later deeds and decisions are not ignored or treated as automatically improper; they are recorded as subsequent events so that the public benefit originally secured can be distinguished from the current enforceable position after any lawful modification.

A reproducible analysis of five national datasets identifies 946 unit-bearing affordable-housing contribution records representing 21,879 originally recorded units. Only 256 of those obligations can be strictly matched, using an authority-scoped contribution key, to a national transaction record containing a unit quantity. This is not evidence that the remaining homes were not delivered. It demonstrates that the currently published national transaction data do not by themselves provide a complete reconciliation.

The same analysis identifies 53 unit-bearing affordable-housing contribution records with an end-date, representing 1,037 originally recorded units. Government publication guidance states that an end-date is used when a version has been superseded, for example by a deed of variation. Only six of these records have a matching unit-bearing transaction in the downloaded national extract. This cohort is therefore a useful priority sample for retrieving the successor instrument, decision record, delegated-authority evidence and final physical or financial outcome.

I ask the receiving authorities to treat this as a request for coordinated evidential triage rather than as a concluded allegation. In particular, I ask that the relevant bodies: identify who owns the national reconciliation question; preserve and make accessible original S106 agreements, deeds of variation, decision/delegation records, monitoring records, commuted-sum records and transfer evidence; examine whether national datasets can be linked more reliably to final property-level outcomes; identify any cases in which a current enforceable obligation remains unfulfilled; and refer any case to the appropriate audit, regulatory or law-enforcement body only if the underlying evidence reaches that threshold.

The report also proposes a property-specific rent-screening method. It is a screening tool only. The legal Affordable Rent test depends on the applicable rent policy and property-specific market valuation, not simply an ONS area average. Where a property apparently associated with an affordable-housing obligation is let in a way inconsistent with its stated tenure, the next step is to inspect the deed, title, provider status, tenancy, service charges and valuation evidence.

I would be grateful for written acknowledgement, a reference number, identification of the team or body taking ownership of each part of the referral, and an explanation of any part that should be redirected elsewhere. I am not asking the recipient to accept numerical gaps as evidence of wrongdoing; I am asking for the original obligations and subsequent outcomes to be reconciled against the underlying legal and property records.

Yours faithfully,

AL

[preferred written contact details]

Submission routing sheet

Recommended approach: send the national/systemic pack first to MHCLG specialist statistics contacts and the MHCLG correspondence route; copy OSR for the data-quality/statistics issue and PSFA for advice on public-sector fraud-risk methodology. Route individual developments to the relevant local authority and only escalate to regulators or police bodies when case-level evidence makes that route applicable.

Route	Body	Email / route	Use
Primary national policy / data owner	MHCLG general correspondence	GOV.UK correspondence form (no general email currently published)	Planning, housing and national-system routing.
Specialist email	MHCLG Planning Statistics	Planning.Statistics@communities.gov.uk	Developer-agreement / planning-data methodology and routing.
Specialist email	MHCLG Housing Statistics	Housing.Statistics@communities.gov.uk	Affordable Housing Supply and LAHS methodology/reconciliation.
Oversight / data quality	Office for Statistics Regulation	regulation@statistics.gov.uk	Independent issue route for production/use/quality of government statistics and analysis.
Counter-fraud methodology / coordination	Public Sector Fraud Authority	psfa@cabinetoffice.gov.uk	Ask whether PSFA can coordinate or advise on public-sector fraud/error risk; statistical gaps alone are not proof of fraud.
Provider-specific, conditional	Regulator of Social Housing	enquiries@rsh.gov.uk	Use where a named registered provider and possible standards/governance/rent/data issue is evidenced.
Homes England-specific, conditional	Homes England general enquiries	enquiries@homesengland.gov.uk	Use where funding, programme records or the S106 Affordable Housing Clearing Service is relevant.
Homes England service complaint only	Homes England Information Governance	infogov@homesengland.gov.uk	Complaints about Homes England itself, not council/housing-association complaints.
Individual scheme - primary local route	Relevant council Monitoring Officer / Head of Planning	Authority-specific	Validity/authority of decisions, planning register, S106 monitoring and enforcement.
Public money / commuted sums	Relevant council Section 151 Officer + appointed external auditor	Authority/year-specific	Accounts, financial governance, commuted sums and public-money audit.
Central-government value for money	National Audit Office	enquiries@nao.org.uk	Central-government/systemic issues. NAO says individual local-authority concerns should go to the local external auditor.
Central-government complaint escalation	Parliamentary and Health Service Ombudsman	phso.enquiries@ombudsman.org.uk	Normally after the department/agency complaint route; an MP referral is generally required.
Fraud reporting - conditional	Report Fraud / City of London Police	Online reporting service at reportfraud.police.uk; no public reporting email	Use only when case-level evidence supports suspected fraud; online report produces a crime reference number.
Serious/complex fraud - conditional	Serious Fraud Office	public.enquiries@sfo.gov.uk	Only where evidence indicates potentially serious or complex fraud, bribery or corruption.

Important: Do not CC every body automatically. Keep the initial national distribution narrow, then route individual cases to the body with jurisdiction. This reduces the risk that a data-quality issue is mischaracterised as criminality and makes it easier for each recipient to identify the action requested.

SECTION 106 AFFORDABLE HOUSING ORIGINAL PROMISE, VARIATION, DELIVERY AND PUBLIC-RECORD RECONCILIATION AUDIT

Preliminary national evidence pack for regulatory, audit and investigative triage

Prepared by: AL
Date: 22 September 2026
Jurisdiction: England

Purpose of this pack

To preserve the original affordable-housing obligations secured through planning agreements as an immutable historical baseline, reconcile those promises against later variations and delivery records, identify data and evidential gaps, and provide a structured route for competent authorities to determine whether each unresolved case reflects normal timing, lawful variation, reporting weakness, maladministration, regulatory non-compliance, financial irregularity or - only where supported by evidence - fraud or other criminal conduct.

Important: this report does not allege that every statistical discrepancy represents an undelivered house or an offence. It deliberately separates observed data, lawful possibilities, unresolved evidence and potential legal consequences.

Covering letter - request for coordinated review and preservation of evidence

To: Ministry of Housing, Communities and Local Government (Planning / Housing / Chief Planner routing); Public Sector Fraud Authority; Regulator of Social Housing where registered providers are implicated

Copy / oversight: Office for Statistics Regulation for the official-statistics and data-quality element; Homes England where funding or the S106 Affordable Housing Clearing Service is relevant; relevant local Monitoring Officer, Section 151 Officer and external auditor for each authority examined.

Subject: Request for national and case-level reconciliation of Section 106 affordable-housing obligations, variations and delivered outcomes

I am submitting the enclosed evidence pack because publicly available national data allow the original quantity of many affordable-housing obligations to be identified, but do not currently provide a complete property-level reconciliation showing how every originally secured unit was ultimately delivered, lawfully varied, substituted, converted to a financial contribution, transferred, released or left outstanding.

The analysis deliberately keeps the first executed affordable-housing promise as a permanent historical baseline. Later deeds and decisions are not ignored or treated as automatically improper; they are recorded as subsequent events. The purpose is to distinguish the original public benefit secured when permission was granted from the current enforceable position after any lawful modification.

A reproducible analysis of the five attached national datasets identifies 946 unit-bearing affordable-housing contribution records representing 21,879 promised units. Only 256 of those contribution records can be matched, using a strict authority-plus-contribution key, to a national transaction record containing a unit quantity. This is not evidence that the balance of homes was not delivered. It is evidence that the currently published national transaction data do not themselves provide a complete reconciliation.

The same analysis identifies 53 unit-bearing affordable-housing contribution records with an end-date, representing 1,037 originally promised units. Government publication guidance states that an end-date is used when a version has been superseded, for example by a deed of variation. Only six of those 53 records have a matching unit-bearing transaction in the downloaded national transaction extract. These records are therefore a useful priority sample for retrieving the actual deed chain, decision record and physical outcome.

I ask the receiving authorities to treat this as a request for coordinated triage rather than as a concluded allegation. In particular, I ask that the relevant bodies: (1) confirm which authority is responsible for a national reconciliation exercise; (2) preserve and make accessible the original S106 agreements, deeds of variation, delegated-authority records, monitoring records, commuted-sum records and transfer evidence; (3) examine whether the national datasets can be linked more reliably to property-level outcomes; (4) identify any cases in which current obligations remain unfulfilled; and (5) refer any case to the appropriate audit, regulatory or law-enforcement body if the underlying evidence reaches that threshold.

The report also proposes a rent-screening method. This is intended only as a screening tool: the legal Affordable Rent test uses an appropriate property-specific market valuation, not merely an ONS area average. Where a property described as affordable housing is being let in a manner inconsistent with its stated tenure, the appropriate next step is to inspect the planning deed, title, provider status, tenancy and valuation evidence.

I would be grateful for written acknowledgement, a reference number, confirmation of the team or body taking ownership of each part of the referral, and an explanation of any part that should be redirected elsewhere. I am not asking the recipient to accept the numerical gaps as evidence of wrongdoing; I am asking for the original obligations and subsequent outcomes to be reconciled using the underlying legal and property records.

Yours faithfully,

AL

[preferred written contact details]

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Reading rule

Where this report says “unreconciled”, it means that the specified public dataset or evidence chain does not presently account for the original obligation. It does not mean the house was necessarily missing, unlawfully diverted, privately appropriated or fraudulently reported.

1. Executive findings and evidential cautions

Item	Finding / value
Affordable-housing contribution records	2,993
Unit-bearing affordable-housing obligations	946
Original units represented	21,879
Authorities represented among unit-bearing obligations	46
Distinct parent agreement keys	799
Unit-bearing obligations with a matched unit-bearing transaction	256
Promised units within the matched subset	6,224
Conservative transaction comparator (maximum units per obligation)	4,934
Arithmetic reconciliation difference in matched subset	1,290 - not a missing-homes figure

Item	Finding / value
Unit-bearing obligations with no matched unit transaction	690
Promised units represented by those 690	15,655 - publication/evidence gap, not proof of non-delivery
End-dated unit-bearing obligations	53
Originally promised units in that end-dated cohort	1,037
End-dated records with matched unit-bearing transaction	6
Five-year-or-older unit-bearing obligations (cut-off 22 Sep 2021)	697 representing 15,823 units
AHS S106 completions recorded 2000-01 to 2024-25	336,849

The central finding is not that a specified number of homes are “missing”. The central finding is that the published national data architecture does not, by itself, permit a complete property-level reconciliation between the original affordable-housing quantity secured in each planning obligation and the final physical, legal and tenure outcome. That gap is an appropriate basis for document-level audit.

- The original obligation must be preserved as history even where a later lawful variation changes the current legal obligation.
- A missing transaction row cannot be equated to a missing house because authority coverage, historical publication and unit fields are incomplete.
- A transaction quantity below the original promise may reflect phasing, timing, lawful variation, an off-site solution, money substitution, data omission or potential non-compliance; the deed chain decides which.
- A transaction quantity above the recorded promise is a valuable data-quality control showing that identifiers, phasing or later changes may not be represented cleanly.
- Aggregated Affordable Housing Supply and LAHS statistics are corroborative datasets; they are not substitutes for the executed deed and property evidence.

2. Scope, datasets and reproducibility

The audit uses the five data files supplied for this investigation. File hashes are included in Appendix A so that a receiving authority can reproduce the exact calculations on the same inputs.

Dataset	Rows	Primary role
Developer agreements	12,786	Parent legal-document index: agreement type, application reference, dates, document URL.
Developer agreement contributions	39,272	Individual obligations, including affordable-housing purpose, amount and non-financial unit quantity.
Developer agreement transactions	49,831	Recorded statuses/transactions against contributions, including unit quantities where supplied.
Affordable Housing Supply 1991-2025	68,336	Independent aggregate record of affordable-housing starts/completions, S106 flag, provider and tenure.

Dataset	Rows	Primary role
Local Authority Housing Statistics 1978-2025	16,075 rows / 618 columns	Long-run council housing return; recent sections include developer-contribution and net-supply information but historical comparability varies.

The government's publication specification states that non-financial contribution "units" can be used to record the quantity promised (for example 100 affordable homes) and transaction "units" can quantify how much of that commitment has been met. Old/superseded versions should not be deleted; an end-date should be used and the new version published as another entry. [R1]

3. Audit model: Original Promise Baseline (OPB)

For this investigation, the first executed affordable-housing requirement is recorded as an immutable Original Promise Baseline (OPB). A later lawful decision changes the current enforceable obligation; it does not change the historical fact that the original planning decision secured a particular quantity or tenure.

Measure	Definition
OPB	Quantity and tenure secured by the first executed S106 / qualifying planning obligation.
Variation delta	Change subsequently made by a valid legal instrument or other lawful mechanism.
Current legal obligation	OPB adjusted by verified lawful variations.
Original-site delivery	Verified units delivered on the original development.
Off-site physical substitute	Verified affordable units delivered elsewhere because of a documented substitution.
Financial substitute	Verified commuted sum replacing physical units under a documented lawful change.
Original-promise physical gap	OPB minus verified physical affordable units attributable to the original promise.
Current compliance gap	Current legal obligation minus verified fulfilment of that current obligation.

Why keep OPB fixed?

A later variation can be lawful while still reducing or changing the public benefit originally secured. Recording both prevents a later figure from erasing the planning history and allows reviewers to ask what evidence justified the change.

4. How the national data were processed

1. Filter the contribution file to contribution-purpose = affordable-housing.
2. Convert the units field to a numeric value; retain only records with an explicit unit quantity for the unit-reconciliation population.
3. Build authority-scoped keys. Local references are not nationally unique: 9,159 contribution references in the complete contribution file occur in more than one organisation. Therefore the audit never joins on the local reference alone.

4. Link a contribution to its parent agreement using organisation-entity + developer-agreement reference.
5. Link transactions to contributions using organisation-entity + the transaction's developer-agreement-contribution identifier matched to the contribution reference.
6. Where multiple unit-bearing transactions exist for one contribution, use the maximum reported unit quantity as the primary conservative comparator rather than summing statuses. Summation may double-count the same physical units as they pass through secured / received / transferred / spent stages.
7. Run a stricter sensitivity test limited to transaction statuses received, transferred and spent. This is not treated as legally definitive because the government status schema is primarily financial in wording while the units field is used for non-financial fulfilment.
8. Separately analyse records with an end-date and records at least five years old as priority cohorts; age is a triage factor only, not proof that a trigger should already have been met.
9. Compare aggregate S106 completions in Affordable Housing Supply by provider and tenure, but do not attempt a direct row-by-row join because that file is aggregate statistical data rather than a planning-obligation/property ledger.
10. Use LAHS as an additional authority-level cross-check, with explicit caution that detailed net-supply / developer-contribution sections are relatively recent and MHCLG acknowledges discrepancies within LAHS and revisions to historical data. [R6]

5. Detailed national findings

Reconciliation state	Obligations	Meaning
No unit-bearing national transaction match	690	National transaction file does not provide unit quantity evidence under the strict key. This is an evidence/publication gap, not proof of non-delivery.
Exact unit quantity	188	Maximum reported transaction units equal original recorded units.
Below original quantity	62	Maximum reported transaction units are lower than the original recorded unit promise; requires deed/timing/delivery investigation.
Above original quantity	6	Transaction quantity exceeds recorded promise; indicates phasing/version/linkage/classification issue or other data inconsistency requiring source-document review.

Within the 256 obligations that have usable unit quantities on both sides, the original recorded promises total 6,224 units and the sum of the per-obligation maximum transaction quantities is 4,934. The arithmetic difference is 1,290 units. This number is deliberately called a transaction-reconciliation difference, not a shortfall or missing-home count.

A stricter status sensitivity test using only received, transferred or spent produces 138 matched obligations: 3,159 promised units and 2,080 maximum units on the selected transaction statuses. The resulting arithmetic difference is 1,079. Because the transaction status vocabulary is not a clean physical-handover ontology, this figure is also a screening metric only.

Status among unit-bearing transactions linked to affordable-housing obligations	Transaction rows	Distinct contributions
secured	183	152
received	170	120

Status among unit-bearing transactions linked to affordable-housing obligations	Transaction rows	Distinct contributions
transferred	18	18
(blank)	15	15
spent	8	8
allocated	6	6

5.1 Older cohort

Using 22 September 2021 as a five-year triage cut-off yields 697 unit-bearing obligations representing 15,823 original units. Only 224 have a strict matched unit-bearing transaction. Those matched obligations represent 5,340 promised units versus 4,325 maximum reported transaction units, an arithmetic difference of 1,015. The remaining older obligations represent 10,483 units without a unit-bearing transaction match in this national extract. Age does not establish breach because triggers, phasing, later variation and publication coverage must be checked.

5.2 Independent Affordable Housing Supply totals

Recorded provider code	S106 completions 2000-01 to 2024-25
RP - Private Registered Provider	242,613
U - Provider unknown	72,899
NR - Non-registered provider	11,368
LA - Local authority	9,969
Total	336,849

Tenure	S106 completions
Affordable Rent	114,416
Shared Ownership	81,906
Social Rent	68,547
Affordable Home Ownership	48,867
Intermediate Rent	13,034
London Affordable Rent	9,184
First Homes	687
Unknown	208

These figures show why “houses received by government” is not a universal measure: most S106 affordable completions in the statistical dataset are associated with private registered providers rather than local-authority ownership. The question must therefore be “what entity, tenure and legal mechanism fulfilled the original obligation?”

6. Meaning and significance of end-date

Government publication guidance says an end-date should be blank while a version remains current. If the original agreement or contribution is superseded by a new version - for example a deed of variation - the old version should receive an end-date and the new version should be added rather than the original being overwritten. [R1]

Item	Finding / value
Unit-bearing affordable-housing records with end-date	53
Original units represented	1,037
Records with a matched unit-bearing national transaction	6
Units in end-dated records without unit-bearing transaction match	940

The end-date is therefore a version-control signal, not proof of fulfilment, discharge, expiry or lawful reduction. For each end-dated contribution the audit must retrieve the successor instrument and determine what changed.

- What legal document superseded the original version?
- Was it an executed deed, a statutory s106A decision, or another legally valid instrument?
- Did the quantity, tenure, site, timing, cascade, transfer mechanism or financial substitute change?
- Who approved and executed the change, and did they hold the necessary authority at that date?
- What physical or financial outcome followed?

7. Legal framework for Section 106 obligations and later modification

Section 106 planning obligations are legal obligations used to mitigate development impacts; government guidance states that they run with the land, are legally binding and enforceable. [R3] Planning Inspectorate guidance states that the planning obligation must identify the land and parties, precisely state enforceable requirements and triggers, and be executed as a deed. [R2]

The law also provides a route for later modification. Planning Inspectorate guidance states that planning obligations can usually only be modified or discharged under section 106A: by agreement with the local planning authority (which must be executed as a deed) or by statutory application where the relevant time conditions are met. It also warns that an executed obligation will not usually be capable of unilateral withdrawal or modification. [R2]

This means later “bargaining” is not automatically unlawful. The audit question is whether the modification was made through a lawful route, by authorised parties, using a valid instrument, on a rational evidential basis, and whether the resulting obligation was then honoured.

Government guidance also requires local authorities to keep copies of planning obligations together with details of modification or discharge and make them publicly available on the planning register. [R4]

Contract analogy - useful but incomplete

A S106 obligation is binding, but it is a public-law planning obligation rather than an ordinary private commercial contract. The existence of a statutory/mutual modification route means a later change can be lawful. The fact of the original promise and the legitimacy of the later change are separate audit questions.

8. Legality and authority audit for every variation

Audit test	Required evidence
Original deed	Obtain signed/sealed/executed S106 or unilateral undertaking, schedules and plans.
Original quantity/tenure	Record the OPB exactly as first secured.
Trigger	Identify occupation/completion/transfer trigger and determine whether it occurred.
Legal route for change	Identify s106A agreement/application, deed of variation or other stated power.
Applicant standing	Confirm person(s) against whom obligation was enforceable / relevant land interest.
Decision-maker	Identify officer, committee or authority that approved the change.
Delegated authority	Obtain the council constitution/scheme of delegation in force on the decision date. Section 101 permits delegation, but the actual local scheme matters. [R19]
Execution	Verify signatures, sealing/witnessing/delivery requirements and date.
Reason/evidence	Obtain officer report, viability evidence, RP marketing evidence, valuations and legal advice references where disclosable.
Public record	Confirm planning-register publication, modification/discharge record and local land charge position.
Replacement outcome	Trace off-site site, replacement units, commuted sum, spending or return.
Current obligation	Calculate enforceable quantity/tenure after verified lawful changes.
Compliance	Trace current obligation to physical/financial fulfilment and enforcement action if outstanding.

The decision-maker test is material. A planning officer's job title alone is not evidence of authority. Government guidance notes that section 101 of the Local Government Act 1972 permits a local authority to arrange discharge of functions by committee, sub-committee or officer, so the historical constitution and delegation scheme applicable on the actual date must be checked. [R19]

9. Plausible routes that can produce apparent discrepancies

Possible route	Data appearance	Test
Development / phase incomplete	Promise exceeds current delivery	Check phasing, commencement and occupation triggers.
Trigger not reached	No transaction yet	Check deed trigger and site occupation.
Phased handover	Partial units in transactions	Check phase schedules and transfer dates.
RP purchaser unavailable	Homes built/planned but transfer stalled	Check marketing evidence / clearing service.

Possible route	Data appearance	Test
Tenure variation	Quantity may remain but social rent / affordable rent / ownership changes	Check deed of variation and provider agreement.
Lawful unit reduction	Original quantity falls in current obligation	Verify legal route, authority and evidence.
Off-site substitution	Original-site deficit appears	Identify replacement site and trace physical units.
Commutated sum	Physical units replaced by money	Trace deed, calculation, receipt, allocation, spend and any refund.
Cash unspent or returned	No physical replacement yet / ever	Check IFS, accounts and return provisions.
Cascade/fallback clause	Private/open-market outcome may be permitted after specified marketing	Read exact cascade conditions and evidence they were met.
Provider/owner changes	Recorded provider differs from current name	Check RSH register, Companies House, title and stock transfer/merger.
Managing agent confusion	Estate agent or manager appears to be landlord/provider	Check HM Land Registry owner and legal landlord.
Statistical completion before final tenure/transfer state	Aggregate supply appears complete while legal transfer is unresolved	Compare building completion, title transfer, nomination and tenancy dates.
Wrong or reused local identifiers	Transaction appears against wrong obligation	Use authority-scoped keys and source documents.
Historic publication gap	No national transaction despite completed scheme	Check council monitoring system, planning register and IFS.
Improper/unauthorised variation	Record says obligation changed but valid power/instrument is not established	Obtain deed, decision, delegation and legal execution evidence.
Current obligation not honoured	Verified current obligation remains unsatisfied after trigger	Refer to LPA enforcement / audit; escalation depends on evidence.
Misrepresentation / diversion / fraud	Only where evidence shows dishonest false representation, abuse or appropriation	Preserve records and refer to competent counter-fraud / police bodies; do not infer from statistics alone.

10. Provider, ownership, agency and property-level reconciliation

Where a case is selected for detailed investigation, labels such as “housing provider”, “management company” or “estate agent” are insufficient. The audit should trace the actual legal and operational chain.

11. Original S106 plot / affordable-housing schedule
12. UPRN and postal address
13. HM Land Registry title and registered proprietor
14. Companies House entity and controlling/related entities where relevant
15. RSH register status and registration number
16. Transfer deed / nomination agreement / restrictions
17. Managing or letting agent
18. Tenancy type and stated tenure
19. Actual rent and service charges
20. Council / provider statistical return and stock record

A third-party agent can manage a lawful social or affordable tenancy; a related company can own land lawfully; a registered provider can restructure. The purpose of the chain is not to treat those arrangements as suspicious by themselves, but to prevent an administrative label from being mistaken for proof that the original S106 obligation was fulfilled.

11. Rent checker / market benchmark methodology

A rent checker is useful as a screening layer, but the legal benchmark must be applied correctly. The RSH Rent Standard 2026 states that for a new tenant of Affordable Rent housing, the maximum weekly gross rent is the higher of 80% of weekly gross market rent and the applicable social rent. Gross market rent is a property-specific estimate inclusive of service charges based on a recognised valuation method. [R7]

ONS publishes monthly private-rent price levels and indices, including local-area and property-size information. The 16 September 2026 edition provides the current statistical benchmark. [R9] An ONS local-authority average is not itself a substitute for the property-specific valuation required for Affordable Rent, but it is an excellent outlier screen.

Layer	Method	Use
1. Official area benchmark	ONS PIPR local-authority / size / property-type level where available	Detect broad outliers.
2. Local comparables	Collect several genuinely comparable current listings; use median, not a single advert	Improve local market context.
3. Property-specific evidence	Tenancy-start valuation, service charges, floor area, bedrooms, condition and location	Test the actual market-rent basis.
4. Tenure rule	Apply Social Rent formula or Affordable Rent rule appropriate to the tenancy/date	Assess regulatory consistency.
5. Historic reconstruction	Use market evidence and rent policy in force at the date the rent was first set	Avoid judging an old decision against today's market.

Screening formula

Market Rent Ratio = observed gross rent / benchmark gross market rent. A high ratio is a prompt to verify the property, tenancy and valuation; it is not by itself proof of unlawful rent-setting.

12. Official statistics and data-quality limitations

MHCLG describes S106-funded affordable-housing figures as a “best estimate” because of limitations in source data and current methodology. The technical notes identify estimation and classification issues, including London estimates and limitations around S106 acquisition classification. [R5]

LAHS is quality assured, but MHCLG rates its administrative-data risk as medium and states that the department is aware of discrepancies between Sections A/B and Section K. Section K was voluntary in 2021-22 and mandatory from 2022-23; historical data before 2011-12 may be more prone to error. [R6]

Observed data-quality feature in supplied files	Count / implication
Agreement end-date earlier than start-date	13 agreement records; some are 1970 defaults, indicating date-quality defects.
Contribution end-date earlier than start-date	30 contribution records.
Transaction end-date earlier than start-date	460 transaction records; date fields cannot be assumed clean without context.
Unit-bearing affordable contributions with no matched parent agreement	55; parent/link coverage incomplete under the downloaded identifiers.

Observed data-quality feature in supplied files	Count / implication
Unit-bearing affordable contributions with direct document URL	684 of 946; source documents are often reachable but not universal.
Local contribution references reused across organisations	9,159 local reference strings collide across authorities; national analysis must scope identifiers by authority.

13. Evidential classifications and thresholds

Code	Meaning
V1	Original executed planning obligation verified.
V2	Original quantity / tenure verified.
V3	Subsequent variation/discharge instrument verified.
V4	Decision-maker and delegated/legal authority verified.
V5	Physical or financial substitute verified.
V6	Final provider/title/tenure outcome verified.
U1	National transaction unit evidence absent.
U2	Supersession/end-date visible but successor chain unresolved.
U3	Quantity conflict or over-reconciliation.
U4	Provider/ownership identity unresolved.
U5	Tenure/rent classification inconsistent or unresolved.
U6	Decision authority/execution unresolved.
U7	Physical outcome cannot presently be traced.
N1	Evidence indicates a current enforceable obligation may remain outstanding.
L1	Validity/interpretation requires specialist legal review.
F1	Evidence reaches a reasonable basis for counter-fraud/criminal referral; statistics alone can never produce F1.

This coding prevents ambiguity from being converted prematurely into an allegation. An unresolved record is a request for evidence. A potential breach requires an established current obligation, a triggered duty and evidence of non-performance. A fraud referral requires additional evidence relevant to dishonesty or other offence elements.

14. Agency routing and current contact points

No single body has jurisdiction over the entire chain. The appropriate recipient depends on whether the issue is planning enforcement, council governance/finance, registered-provider regulation, national statistics, central-government value for money or suspected crime.

Body	Email / route	Role in this audit
Relevant local planning authority: Monitoring Officer + Head of Planning	Validity/authority of deeds; planning register; current S106 enforcement. Monitoring Officer email is authority-specific.	Primary for each individual development.
Relevant local authority: Section 151 Officer + appointed external auditor	Commuted sums, accounts, financial legality, public-interest audit issues. Auditor/email varies by council and audit year.	Primary where money/substitution/public accounts are involved.
MHCLG - planning statistics	planning.statistics@communities.gov.uk	National planning/data methodology; request internal routing to planning policy / Chief Planner as appropriate.
MHCLG - housing statistics	housing.statistics@communities.gov.uk	Affordable Housing Supply / LAHS methodology and reconciliation.
MHCLG - general correspondence	No current general email published; use GOV.UK correspondence form.	National policy/systemic referral. [R18]
Regulator of Social Housing - Referrals and Regulatory Enquiries	enquiries@rsh.gov.uk	Registered provider standards, governance, viability, rent and data concerns. [R10]
Homes England - general enquiries	enquiries@homesengland.gov.uk	Where Homes England funding, programme records or S106 clearing-service evidence is relevant.
Homes England - complaints about Homes England service	infogov@homesengland.gov.uk	Only for Homes England's own service/procedures, not council or housing-association complaints. [R11]
Public Sector Fraud Authority	psfa@cabinetoffice.gov.uk	Systemic public-sector fraud/error expertise; supports departments and public bodies, including data analytics and enforcement support. [R12]
Office for Statistics Regulation	regulation@statistics.gov.uk	Concerns about production/use/quality of government statistics and analysis. [R13]
National Audit Office - general	enquiries@nao.org.uk	Central-government value-for-money / enquiry route. NAO states that local-authority whistleblowing concerns should go to the local authority's external auditor. [R14]
Local Government & Social Care Ombudsman	New complaints: online form/post; no public complaint email.	Maladministration/service failure after council complaint process; not a criminal investigator. [R15]
Parliamentary and Health Service Ombudsman	phso.enquiries@ombudsman.org.uk	Escalation after eligible central-government / agency complaint processes, usually via MP where required.
Report Fraud - City of London Police service	Online report at reportfraud.police.uk; no public reporting email.	Police fraud reporting where case-level evidence suggests fraud. [R16]
Serious Fraud Office - public enquiries	public.enquiries@sfo.gov.uk	Conditional escalation only for evidence potentially involving serious/complex fraud, bribery or corruption; SFO takes a small number of major cases. [R17][R24]
Planning Inspectorate	enquiries@planninginspectorate.gov.uk	Not a general investigator of council S106 administration; relevant if an appeal/Inspectorate case or Inspectorate service is specifically implicated. [R22]

14.1 Recommended initial distribution

- National/systemic pack: send to MHCLG via its current correspondence form, and separately to planning.statistics@communities.gov.uk and housing.statistics@communities.gov.uk for the data-methodology element.
- Copy the data-quality concern to regulation@statistics.gov.uk.
- Send the public-resource/fraud-risk methodology to psfa@cabinetoffice.gov.uk, asking whether PSFA can coordinate or advise on the appropriate counter-fraud route; do not describe the statistical gaps as proven fraud.
- Send provider-specific extracts to enquiries@rsh.gov.uk only when a registered provider is actually identified.
- Send Homes England only those cases involving its funding, programme records or clearing service.
- For each individual development, the decisive first recipient is normally the relevant local authority's Monitoring Officer / planning enforcement or S106 monitoring team, with the Section 151 Officer and external auditor where public money is involved.
- Use Report Fraud / local police, or the SFO in a genuinely serious/complex case, only after document-level evidence supports a suspected offence. This preserves evidential credibility and prevents a data-quality problem being mischaracterised as criminality.

15. Questions requested of receiving authorities

21. Does any national body currently maintain a property-level ledger capable of reconciling each original S106 affordable-housing unit obligation to final delivery, lawful substitution, financial conversion, discharge or outstanding status?
22. If not, which body has responsibility for assuring that this reconciliation is performed at local-authority level and for detecting systemic failure?
23. Can MHCLG provide or require a stable version-chain identifier so that original agreements and deeds of variation can be mechanically linked without relying on local identifiers?
24. Can authorities provide a definition distinguishing “secured”, “received”, “transferred”, “spent” and physical unit delivery when a transaction contains a units value?
25. For the 53 end-dated unit-bearing records identified in this dataset, can the successor instrument be identified and the original 1,037-unit baseline reconciled?
26. What controls verify that an officer or committee modifying an affordable-housing obligation had the correct delegated authority at the date of decision?
27. What controls verify that off-site substitutions and commuted sums ultimately produce the affordable housing or other benefit specified in the lawful variation?
28. How are affordable units protected from being treated as fulfilled merely because construction completed where transfer, nomination, tenure or rent requirements remain unsatisfied?
29. How are provider restructures, non-registered providers, managing agents and third-party owners represented so that the public can trace the final legal owner and tenure?
30. Where national affordable-housing completion statistics and council/provider records disagree, what source is treated as authoritative and how are revisions propagated?
31. Would MHCLG, OSR and/or PSFA support a cross-government reconciliation pilot using the 946 unit-bearing obligations identified here as a defined test population?
32. Where the underlying documents establish an unfulfilled current obligation, what enforcement/recovery mechanism has been used or considered and why?

16. Recommended next-stage case audit

The national analysis has now done what aggregate data can reliably do: identify the population and priority anomaly classes. The next stage should be document-led.

Priority	Population	Action
Priority A	53 end-dated unit obligations / 1,037 OPB units	Retrieve successor deed and authority record for every case.

Priority	Population	Action
Priority B	62 matched obligations below OPB	Check phasing, trigger, variation and final physical delivery.
Priority C	6 matched obligations above OPB	Resolve identifier/version/phasing error before any broader inference.
Priority D	Older obligations with no unit-bearing national transaction	Sample by authority and retrieve council S106 monitoring evidence; use results to estimate publication coverage before extrapolating.
Priority E	Cases involving commuted sums/off-site provision	Trace money to accounts/IFS and replacement physical supply.
Priority F	Cases with provider/rent concerns	Trace title, RSH status, tenancy and rent valuation.

A full national property-level investigation should not begin by downloading every title. It should first resolve the legal/document chain, then use property/title work only where the obligation remains unresolved. This keeps the exercise proportionate and allows missing publication data to be separated from substantive non-compliance.

Appendix A. Dataset integrity and hashes

File	Rows	Bytes	SHA-256
developer-agreement(1).csv	12,786	2,519,546	edc89267cf3bf6487d1d9e345fb144261caf3c561230a0c789c6d76914b78385
developer-agreement-contribution(1).csv	39,272	6,964,996	07b090159a0ea03418b2bc1fd1bb12b71d863a281350f017c8ae4076ff0a3c28
developer-agreement-transaction(1).csv	49,831	8,761,137	79c604286be13247f059c803e7bc5dd4151276141b28f867d025fd0cf3c2acce
affordable-housing-supply-1991-2025.csv	68,336	12,143,017	5e40d28acb1cc3dbbd0d518c0829f8b963a1842de204eb5469b20803b566f162
local-authority-housing-1978-2025.csv	16,075	39,133,636	6b5f0105d34488c96a8b0669113da2507f3c34b1e52afdbde276c2357da57fe4

Row figures exclude the CSV header. Hashes permit exact reproduction against the files analysed for this report.

Appendix B. Reproducible calculation rules

Rule	Definition
Affordable record	contribution-purpose exactly equals affordable-housing.
Unit-bearing obligation	Affordable record with numeric units.
Authority-scoped contribution key	organisation-entity + local contribution reference.
Parent agreement key	organisation-entity + developer-agreement reference.
Matched unit transaction	Transaction has same authority-scoped contribution key and numeric units.

Rule	Definition
Primary transaction comparator	Maximum numeric transaction units observed for each contribution; chosen to reduce double counting across repeated status stages.
Exact	maximum transaction units = original contribution units.
Below	maximum transaction units < original contribution units.
Above	maximum transaction units > original contribution units.
No unit transaction	no strict-key transaction with a numeric units field.
Older cohort	contribution start-date on/before 22 September 2021.
End-dated cohort	contribution end-date populated.
AHS S106 completion	Affordable Housing Supply row where s106=Y and Completions=Completion; units summed.
Non-inference rule	Neither "below" nor "no unit transaction" is labelled missing/undelivered without source-document and trigger evidence.

Appendix C. Example high-priority anomaly classes

The following examples are included to demonstrate the audit mechanics, not to allege wrongdoing by the named/identifiable development or authority. Each requires the underlying deed and monitoring record before any conclusion.

Org entity	Planning application	Contribution ref	OPB units	Tx max	Gap	Statuses
29	A/40/18/OUT	818-da-3-S106NF	158	12	146	received
242	13/00781/OUT	18/00608/S106/2	148	11	137	received
242	15/00945/FUL	15/01941/S106/1	115	37	78	received
29	Y/92/17/OUT	817-da-7-S106NF	90	19	71	received
86	22/00474/FUL	COV-00084	71	0	71	secured
242	12/02025/FUL	14/01941/S106/1	107	37	70	received
145	14/01470/OUT	COV-00176	54	0	54	secured
145	20/00315/OUT	COV-00157	49	0	49	secured

Above-OPB controls:

Org entity	Planning application	Contribution ref	OPB units	Tx max	Gap	Statuses
31	V/2019/0129	558-737	5	12	-7	nan
59	3PL/2020/0462/F	408-da-6-S106NF	8	12	-4	received; transferred
59	3PL/2019/1076/O	424-da-1-S106NF	14	15	-1	secured

Org entity	Planning application	Contribution ref	OPB units	Tx max	Gap	Statuses
59	3PL/2017/1171/O	443-da-5-S106NF	20	48	-28	received
234	PA/2018/1363	20181363AH	32	54	-22	secured
303	19/01740/FU4	19/01740/FU4-S3.1	6	11	-5	received; secured

Appendix D. Source and authority list

[R1] MHCLG, Publish your developer contributions data. <https://www.gov.uk/guidance/publish-your-developer-contributions-data>

[R2] Planning Inspectorate, Planning obligations: good practice advice (updated 5 February 2025). <https://www.gov.uk/government/publications/planning-obligations-good-practice-advice/planning-obligations-good-practice-advice>

[R3] MHCLG, Planning obligations guidance. <https://www.gov.uk/guidance/planning-obligations>

[R4] MHCLG, Viability guidance - publication of section 106 agreements. <https://www.gov.uk/guidance/viability>

[R5] MHCLG, Affordable housing supply statistics in England 2024-25 - technical notes. <https://www.gov.uk/government/statistics/affordable-housing-supply-in-england-2024-to-2025/affordable-housing-supply-statistics-in-england-2024-to-2025-technical-notes>

[R6] MHCLG, Local Authority Housing Statistics 2024-25 - technical notes. <https://www.gov.uk/government/statistics/local-authority-housing-statistics-technical-notes-2024-to-2025/local-authority-housing-statistics-technical-notes-2024-25>

[R7] Regulator of Social Housing, Rent Standard 2026. <https://www.gov.uk/government/publications/rent-standard-2026>

[R8] MHCLG, Policy statement on rents for social housing. <https://www.gov.uk/government/publications/direction-on-the-rent-standard-2026/policy-statement-on-rents-for-social-housing>

[R9] ONS, Price Index of Private Rents - monthly price statistics, 16 September 2026 edition. <https://www.ons.gov.uk/economy/inflationandpriceindices/datasets/priceindexofprivaterentsukmonthlypricestatistics>

[R10] Regulator of Social Housing, How to make a referral. <https://www.gov.uk/guidance/how-to-make-a-referral-to-us>

[R11] Homes England, complaints/contact information. <https://www.gov.uk/government/organisations/homes-england/about/complaints-procedure>

[R12] Public Sector Fraud Authority, About our services. <https://www.gov.uk/government/organisations/public-sector-fraud-authority/about/about-our-services>

[R13] Office for Statistics Regulation, Raise an issue. <https://osr.statisticsauthority.gov.uk/raise-an-issue/>

[R14] National Audit Office, Guidance for whistleblowers. <https://www.nao.org.uk/about-us/contact-us/whistleblowing/guidance-for-whistleblowers/>

[R15] Local Government and Social Care Ombudsman, How to complain. <https://www.lgo.org.uk/how-to-complain>

[R16] City of London Police, Report Fraud. <https://www.reportfraud.police.uk/reporting-a-fraud/>

[R17] Serious Fraud Office, About us / Statement of Principle. <https://www.gov.uk/government/organisations/serious-fraud-office/about>

[R18] MHCLG, Contact and complaints. <https://www.gov.uk/guidance/contact-the-ministry-of-housing-communities-and-local-government>

[R19] MHCLG, Determining a planning application - delegation under Local Government Act 1972 s101. <https://www.gov.uk/guidance/determining-a-planning-application>

[R20] MHCLG, Enforcement and post-permission matters. <https://www.gov.uk/guidance/enforcement-and-post-permission-matters>

[R21] MHCLG, Statistics at MHCLG. <https://www.gov.uk/government/organisations/ministry-of-housing-communities-local-government/about/statistics>

[R22] Planning Inspectorate contact/complaints. <https://www.gov.uk/government/organisations/planning-inspectorate/about/complaints-procedure>

[R23] Public Sector Fraud Authority mandate/about. <https://www.gov.uk/government/organisations/public-sector-fraud-authority/about>

[R24] Serious Fraud Office, SFO Statement of Principle. <https://www.gov.uk/government/collections/sfo-statement-of-principle>

All web sources checked 22 September 2026. Statutory interpretation should be verified against the legislation and the specific deed in force for each case; this report is an audit/research document, not legal advice.