House of Commons

Committee of Public Accounts

Unlocking land for housing

Eleventh Report of Session 2026–27 HC 87

Committee of Public Accounts

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Contents

Summary 1

Conclusions and recommendations 3

1 Measuring the success of unlocking land funding 7

Introduction 7

Measuring the success of the National Housing Delivery Fund 8

Tracking homes built on legacy unlocking land programmes 9

2 Delivering the National Housing Delivery Fund (NHDF) 12

Planning for local government reorganisation 12

Achieving the objectives of the National Housing Delivery Fund 13

Evaluating the National Housing Delivery Fund 14

Formal minutes 16

Witnesses 17

Published written evidence 18

List of Reports from the Committee during the current Parliament 19

Summary

Since 2016–17, the Ministry of Housing, Communities & Local Government (the Department) has allocated £10.5 billion to programmes intended to unlock land for around 713,000 homes. The Department reports that at the end of December 2025, 57,671 homes had been delivered by housing developers on land unlocked by its legacy programmes. It did not initially put in place arrangements to track the number of homes built on land unlocked by some of its legacy programmes meaning this number is likely to be an underestimate.

The Department and Homes England are continuing to work out how many homes were built on land that it did not previously track. However, there is uncertainty over how homes will be attributed to sites with no clear boundary, such as land unlocked following infrastructure investments.

In March 2026, the Department launched the £21 billion National Housing Delivery Fund (NHDF) and a new National Housing Bank. It is currently finalising the business case for the NHDF. The NHDF's remit extends beyond unlocking land, and the Department has not set out how much of the funding will be available to unlock land for housing. The Department has several broad objectives for the NHDF but could not provide its success criteria, such as its ambition for the number of homes to be delivered, arguing that it wants the flexibility to balance its objectives and not focus entirely on the number of homes delivered. Once projects come forward and the Department has agreed which ones to support it will set out how many homes it expects will be delivered. Without clear measurable success criteria to assess outcomes, the Department cannot be held to account for how it spends this substantial public investment.

The Department and Homes England need a clear, strategic approach to investment to be successful and maximise impact and value for money. Their current approach relies on schemes coming forward on a project-by-project basis to build a pipeline of projects. Without a more proactive approach, there is a risk that the final portfolio does not contain a strategic balance of projects across locations. The Department and Homes England will also need to ensure that their approach to unlocking land adapts to changes resulting from ongoing local government reorganisation.

There will be pressure to use the schemes to unlock the largest number of houses in the short term. It may be that a longer-term strategic approach providing key infrastructure such as roads will produce more housing and better spatial planning in the longer term.

Homes England could not tell the committee how it decides which type of financial investment to make in projects to achieve the greatest impact. In addition, the Department has yet to decide how it will carry out an external evaluation of the NHDF, which risks gaps in information of what works and losing early learning opportunities.

Conclusions and recommendations

1. **Neither the Ministry of Housing, Communities & Local Government (the Department) nor Homes England have set out how they will judge whether the National Housing Delivery Fund (NHDF) has been successful, or how many homes they expect will be built on land unlocked by the NHDF, or by when.** The NHDF is worth £21 billion of public money and was launched in March this year. It is a long-term fund with a broad set of aims including boosting housing supply, economic growth, place-making, improving housing quality and making a financial return on investment. However, the Department has not set out how it will measure if the NHDF has been successful for each of these aims. The Department wants the fund to deliver as many homes as possible, in the right places, but believes it is too early to specify its housing delivery expectations as it does not yet know which projects will receive funding. As Homes England agrees what to fund, there will be a specific number of expected homes attached to those projects meaning the Department will develop in time a clearer idea of the number of homes to be built. It is currently finalising the business case for the NHDF and with no clear and measurable success criteria against which to assess outcomes, the Department cannot robustly assess the performance of the NHDF, weakening its accountability to Parliament.

RECOMMENDATION

a. Alongside its Treasury Minute response to this report the Department should write to us and explain the success criteria for each of its broad aims, against which it will assess the performance of the NHDF. This should include milestones for the achievement of these aims, and the key risks to the success of each aim.

b. Within six months and annually thereafter the Department should report to the committee on:

- the number of homes completed on land unlocked by the NHDF; and

- the number of homes expected to be built on land unlocked by the NHDF and how and why this forecast has changed since any previous updates.

c. The Department should write to the committee to confirm the business case for the NHDF has been finalised and provide the committee with an explanation of the key issues and risks identified.

2. **The Department and Homes England have not been fully transparent about their plans for tracking the number of homes built on land unlocked by legacy programmes.** The Department and Homes England are retrospectively tracking how many homes were built on land unlocked by the various legacy programmes that they initially did not track. The Department reports that as at the end of December 2025, 57,671 homes had been delivered by legacy programmes, 24,400 of which were identified through retrospective analysis. The Department is continuing this process and expects to understand the total number of homes built on land unlocked by all its legacy programmes by May 2027. The Department explained it is using geospatial analysis of site boundaries to do this, but it can be hard to assess which homes to attribute to unlocking land investments in certain cases, such as where the funding has provided infrastructure like road junctions. There is a lack of transparency about the Department's approach to tracking the number of homes built on land unlocked in these more complicated cases. It is essential for the Department to understand the outcomes of its investments in order to make good quality assessments of performance and judgements on value for money which can lead to improvements in the design of future programmes.

RECOMMENDATION

a. As part of its Treasury Minute response the Department should set out its methodology for tracking the number of homes built on land unlocked by legacy programmes, and how it plans to evaluate the success of this methodology

b. Within the next twelve months the Department should report to the committee with the final number of homes completed on the remaining legacy funds.

3. **It will be important that the Department and Homes England have clear plans to adapt how the NHDF operates to the changes in local government structures.** The shift from two-tier councils to unitary authorities, alongside the creation of Mayoral Strategic Authorities with devolved powers and funding from central government, is ongoing.

For the NHDF, the Department has devolved £1.3 billion of grant funding to the Established Mayoral Strategic Authorities through integrated settlements to support projects to unlock land for housing. Homes England has a new target operating model, which sets out how it is organised and delivers work, so it can provide more support locally. Its aim is to strengthen collaboration with mayors, local leaders and partners and ensure solutions for housing and regeneration are tailored to, and reflect, local priorities. As local government structures continue to change, it is important that MHCLG and Homes England ensure funding doesn't get disrupted, accountability remains clear and that areas remain focused on delivery.

RECOMMENDATION
By the end of the year, the Department and Homes England should write jointly to the committee setting out their expectation on how their approach to unlocking land will be impacted by changes in local government structures, and what plans they have to mitigate any such impact, and how Homes England's new target operating model will adapt to the new landscape of unitary authorities.

4. **We remain unconvinced that the Department and Homes England have a strategic approach to allocating the NHDF to ensure a balanced portfolio of projects in a range of locations which support the objectives of the NHDF.** The Department launched the NHDF without a pipeline of projects suggesting its approach to creating a portfolio of projects is reactive and demand led rather than strategically planned. This means there is a risk that the final portfolio does not contain a strategic balance of projects which support the objectives of the NHDF and maximise the impact of funding and value for money. In addition, we are not convinced a demand-led approach will lead to a balanced portfolio of projects across a range of locations. The Department has 10 Strategic Place Partnerships linked to Mayoral Strategic Authorities which will provide strategic direction in those places. The Department is aiming to work in partnership with local areas to align housing delivery with place-based growth strategies. The Department says the NHDF was deliberately designed to be flexible, and it considers a range of criteria when assessing projects and determining the best investment type, such as grants, loans or equity, but we are not satisfied that the Department has explained this process to us sufficiently well.

RECOMMENDATION
As part of its Treasury Minute response, the Department and Homes England should clearly articulate how the NHDF will:

a. select and balance projects to maximise impact in a range of locations, in particular, those with Strategic Place Partnerships.

b. decide which type of investment to make in projects to achieve the greatest impact and value for money.

5. **The Department failed to put in place external evaluation at the launch of the NHDF, risking gaps in early data collection and limiting opportunities for timely improvements**. Despite launching the NHDF in March 2026 the Department has given itself another twelve months to finish its scoping and feasibility work for external evaluation. It is important the Department concludes this work at the earliest opportunity so it knows which data is needed to conduct quality evaluations and can put in plans to collect it. Early learning based on robust analysis of performance increases understanding of what works to unlock land and enables timely improvements to the NHDF, increasing its effectiveness over the long term. The Department is planning to run internal evaluations alongside its external evaluation and plans to have clear review points with HM Treasury and the National Infrastructure Service Transformation Authority (NISTA) to ensure lessons can be learned and applied. It is important the Department continues work to get its evaluation in place without delay.

RECOMMENDATION

a. As part of its Treasury Minute response, the Department should update the committee on progress letting contracts for the evaluation of the NHDF.

b. The Department should write to the Committee setting out in detail how its evaluation of the NHDF will work once it has finalised its plans.

1 Measuring the success of unlocking land funding

Introduction

1. On the basis of a report by the Comptroller and Auditor General, we took evidence from the Ministry of Housing Communities and Local Government (the Department) and Homes England on Unlocking land for Housing.[1]

2. The government has set a milestone to deliver 1.5 million new homes over this Parliament to July 2029. This will require building more than 300,000 homes per annum on average, a level of housebuilding that was last achieved in the 1960s. The government says a chronic undersupply of land underpins the housing crisis. It believes there is suitable land in England for housebuilding that is not being developed by the market as it is not profitable or attractive enough for developers to build on in its current form. This can be due to factors such as the need for remediation work, a lack of infrastructure such as roads, or pieces of land making up a site being owned by different people or companies.[2]

3. The Department aims to address these market failures, boost the supply of land for housing development and ultimately increase the supply of housing via several 'unlocking land' programmes.[3] The Department has allocated £10.5 billion to its unlocking land programmes since 2016–17, supporting 768 projects aiming to provide 713,000 homes.[4] Unlocking land and building homes takes a long time but as at December 2025 only 140 out of the 768 projects had completed. The Department reports that, as at the end of December, 57,671 homes had been delivered by housing developers on land unlocked by these programmes.[5]

4. In March 2026 the Department launched the £21 billion National Housing Delivery Fund (NHDF).[6] This new fund will combine and continue the funding and work of its legacy programmes for unlocking land.

1 C&AG's Report, Unlocking land for housing , HC 1645, 11 February 2026
2 C&AG's Report, para 1
3 C&AG's Report, para 2
4 C&AG's Report, paras 8-9
5 Letter from MHCLG, 19 May 2026
6 MHCLG, National Housing Delivery Fund (NHDF), 31 March 2026

However, the Department expects the scope of the NHDF to be broader than unlocking land programmes alone, including things such as supporting small housebuilders.[7] The legacy programmes and the NHDF provide a range of support including grants, loans, land acquisition and capacity support.[8] The Department is accountable for the support delivered by its delivery partners which includes Homes England, the government's housing and regeneration agency in England.[9]

5. We also received written submissions from a range of different sources including voluntary sector bodies, a local authority and researchers as well as wider government stakeholders. The written evidence we received is available on the inquiry page of the Committee's website.[10] Some issues raised were not covered by our inquiry such as whether land availability is the main barrier and how land values influence incentives for development. Issues and concerns drawn to our attention covered in our inquiry included:

- that success should be measured by homes delivered not land unlocked;
- weaknesses in data, transparency and tracking the numbers of homes delivered;
- the need for a more strategic, proactive approach to identifying and prioritising sites and building on place-based strategies;
- the importance of aligning funding and delivery with local and devolved local government structures; and
- the need to match funding for example, grants, loans or infrastructure investment to the specific barriers on each site.

Measuring the success of the National Housing Delivery Fund

6. As stated above the Department launched the £21 billion NHDF in March 2026.[11] The remit of the NHDF will include activity beyond unlocking land programmes, including support for social housing providers and small housebuilders.[12]

7 C&AG's Report, para 7
8 C&AG's Report, paras 2 and 3
9 C&AG's Report, para 2
10 Committee of Public Accounts, Unlocking land for housing written evidence
11 Q 1
12 C&AG's Report para 7

7. The Department told us it is finalising the business case for the NHDF now.[13] We asked it how much of the NHDF will be available for unlocking land investments. It told us that it has deliberately set the NHDF to be flexible so it can support a range of interventions that will lead to new homes. As such it has not specified a sum of money that it expects to be used on unlocking land projects.[14]

8. We questioned the Department on what it wants the NHDF to deliver, including how many homes will be built on land unlocked by the fund. The Department told us that it has a broad range of objectives for the NHDF including increasing the housing supply, boosting economic growth, improving the quality of new homes and contributing to placemaking.[15] We pressed the Department further on how it will know whether it is maximising the impact of the £21 billion funding without clear delivery targets.[16] The Department told us that the aim was to deliver as many homes as possible in the right places rather than to set a specific numerical target whilst at the same time meeting the wider objectives.[17] It emphasised that setting a single figure could create the wrong incentives, prioritising volume over quality or longer-term outcomes.[18]

9. We challenged the Department on when it would be able to set out its expectation of how many homes will be built on land unlocked by the NHDF. The Department told us that it is too early to provide a meaningful estimate because the NHDF does not yet have a pipeline of projects.[19] The Department said a specific number of homes would be available when a portfolio of projects is agreed but emphasised that its expectations may change over time.[20]

Tracking homes built on legacy unlocking land programmes

10. Delivery of new homes is one of the key long-term outcomes the Department expects from its financial support for unlocking land.[21] However, it did not put in place arrangements to track the number of homes built on land unlocked by some of its legacy programmes.[22] The legacy

13 Q59
14 Q10
15 Qq 23 and 30
16 Qq 13 and 19
17 Qq 13 and 23
18 Q 13
19 Q 63
20 Q 63
21 C&AG's Report Para 11
22 C&AG's Report Para 11

unlocking land programmes are the seven that predate the NHDF.[23] The Department reported that as at the end of December 2025 housing developers had delivered 57,671 homes on land unlocked by its legacy programmes, 24,400 of which were identified through retrospective analysis, out of an expected capacity of 713,000.[24]

11. We asked the Department whether it has a clear understanding of the homes delivered resulting from its legacy investments to unlock land. The Department acknowledged the initial lack of tracking and told us it is now retrospectively tracking how many homes have been built on land unlocked by initially untracked legacy programmes.[25] Homes England explained that it has completed retrospective tracking for 90% of land projects and 30% of infrastructure projects and expects to take 12 months to complete this analysis.[26]

12. We asked how the number of homes delivered through legacy programmes were being tracked. Homes England told us it is using geospatial imaging to set boundaries around sites, and identify which homes can be attributed to unlocking interventions.[27] The Department explained that attributing homes to financial investments is more challenging for some projects.[28] It gave the example of improvements to junction 10 of the M5, where it is not straightforward to define a boundary and attribute all new homes within it to the intervention, noting that a degree of judgement is required.[29]

13. We challenged Homes England on how it ensures transparency and consistency in its method. It confirmed its method is evaluated and checked internally and suggested the NAO could review it as well.[30] We expect the Department and Homes England to include timely and robust review of the methodology for tracking the number of homes built on land unlocked by legacy programmes, including making use of external expertise, to ensure robust challenge and improve decision-making. Homes England noted in most cases it is quite clear which homes to attribute to its investment such as Beaulieu Station in Essex where

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23 C&AG's Report Figure 3. The legacy programmes covered by the NAO report were: Housing Infrastructure Fund; Home Building Fund – Long Term Fund; Land Release Fund; Land Assembly Fund; Brownfield Land Release Fund; Brownfield, Infrastructure and Land Fund; Home Building Fund – Infrastructure Loans.

24 Letter from MHCLG, 19 May 2026; C&AG's Report Para 11

25 Q 2

26 Q 3

27 Q 3; Geospatial imaging is using map-based images of the Earth to see, measure, and verify what's happening in a specific place.

28 Qq 51 and 54

29 Qq 3 and 51

30 Qq 4 and 54-55

the local authority said no homes could be built without the infrastructure.[31] It told us the alternative to using geospatial imaging was to make reporting of homes contractual but explained it did not want to put the extra burden on developers.[32]

31 Q 54
32 Q 4

2 Delivering the National Housing Delivery Fund (NHDF)

Planning for local government reorganisation

14. The scope of regional devolution has increased since the early years of the the Department's unlocking land programmes, with Established Mayoral Strategic Authorities due to receive funding from the NHDF through their integrated settlements.[33] In addition, local government is undergoing reorganisation to create unitary authorities where there are currently district and county local authorities.[34]

15. We questioned Homes England on how it is adapting its delivery approach to the changes in local government structures. It acknowledged that local government reorganisation is absorbing a large amount of energy and attention.[35] In response, Homes England told us it has introduced a new target operating model to allow it to work directly with local authorities. It told us it wanted to be a genuine delivery partner and gave us an example of where its teams were working directly with local authority staff in Leeds and Sheffield.[36]

16. We asked how accountability and delivery would be maintained where funding has been devolved to the Established Mayoral Strategic Authorities. The Department told us that it had devolved about £1.5 billion of funding from the NHDF to the Established Strategic Mayoral Authorities as they have demonstratable capacity to deliver.[37] However in subsequent correspondence it said it had devolved £1.3 billion.[38] The Department said it had agreed and published bespoke measures against which it will measure

33 C&AG's report, para 3.16
34 MHCLG , English Devolution White Paper, CP1218, 16 December 2024
35 Q 29
36 Q 29
37 Qq 9 and 29
38 Letter from the MHCLG, 1 June 2026

delivery by the Established Strategic Mayoral Authorities, and that these measures would be monitored through governance arrangements such as a quarterly National Housing Delivery Fund Board.[39]

17. We also explored how areas without established mayoral structures would be supported. Homes England told us that it would assess their capacity and readiness to deliver and could provide both funding and advisory support, including helping local authorities develop pipelines and masterplans.[40] Homes England acknowledged that some authorities do not have the capacity to, for example, develop master plans and that Homes England could provide support in these cases.[41]

Achieving the objectives of the National Housing Delivery Fund

18. The Department has taken various approaches, driven by shifting policy priorities, to where it invests unlocking land funds. However, frequent change reduces confidence in the sector and risks wasting applicants' efforts in developing plans that are unlikely to be supported.[42] To support the delivery of the NHDF and National Housing Bank, Homes England is developing an overarching agency-wide investment strategy. The first part of this strategy was the publication of the Homes England Investment Roadmap in December 2025 which set out the scope of the NHDF, the Bank and the agency-wide investment principles and investment themes that will guide the future activity of Homes England.[43]

19. We questioned the Department on how it is selecting and prioritising projects for the NHDF. The Department explained that funding decisions for individual projects are based on a range of criteria including deliverability, affordability, and strategic fit with government policy and the local area's priorities.[44] It added that it is oversubscribed with projects coming forward and so it must be "hard-nosed" about whether the costs are realistic.[45] The Department told us that for loans it will look at ability to repay and risk ratios.[46] It acknowledged that the process is complex and it tries to look at all aspects of the criteria and then make a decision.[47]

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39 Q 44
40 Q 43
41 Q 43
42 C&AG's report, para 4.10
43 C&AG's report, para 4.12
44 Qq 26 and 28
45 Qq 28 and 40
46 Q 28
47 Q 28

20. We asked the Department how it is prioritising locations for funding. It told us its Ministers want to see a balanced portfolio across the country. It explained that it works with 10 Strategic Place Partnerships (SPPs) which are linked to Mayoral Strategic Authorities to help bring projects forward that the area needs most.[48] It uses agreed measures with the Established Mayoral Strategic Authority to ensure it delivers in line with the NHDF's priorities.[49] We asked about places not part of a SSP and the Department told us it looks at relevance and readiness to deliver.[50] It emphasised that when deciding whether to invest in an area it considers housing affordability and densification as criteria.[51]

21. We pressed the Department on how it expects to ensure an overall balanced and effective portfolio of projects which maximises the impact of the funding. It acknowledged that the final distribution of funding will depend on what projects come forward.[52] It added that the NHDF has been designed to be flexible, and it does not want to constrain itself by being overly scientific when some of this is about judgment, previous examples and where it would want to prioritise funding.[53]

Evaluating the National Housing Delivery Fund

22. Evaluations of the legacy unlocking land programmes helped shape the design of the NHDF.[54] However, the NHDF will launch before the outcomes of these programmes have been fully evaluated. The Department will need to put in place evaluation that provides timely evidence from the early implementation of the NHDF to inform its understanding of the likely outcome of its interventions.[55]

23. We asked the Department what evaluation arrangements were in place for the NHDF and when these would be available. The Department told us that it is finalising the business case for the NHDF now and that further work is still required before the evaluation is fully established.[56] But it aims to procure

48 Qq 26 and 42
49 Q 44
50 Q 43
51 Qq 24-25, 27 and 40
52 Q 40
53 Q 28
54 C&AG's report para 15
55 C&AG's report, para 15
56 Q 59

the evaluation by the end of the year.[57] In subsequent correspondence the Department told us it is designing the external evaluation and will have completed its scoping and feasibility work within the next 12 months.[58]

24. We also asked how the Department intends to ensure that lessons are learned and applied early in the life of the NHDF. The Department told us that it is designing its evaluation with clear review points so that it can learn lessons continuously and amend its approach to delivering the NHDF.[59] In its letter following the session the Department told us that these review points will include working with and reporting to HM Treasury and the National Infrastructure and Service Transformation Authority (NISTA).[60]

57 Q 60
58 Letter from the MHCLG, 1 June 2026
59 Q 60
60 Letter from the MHCLG, 1 June 2026

Formal minutes

Monday 13 July 2026

Members present

Sir Geoffrey Clifton-Brown, in the Chair

Mr Clive Betts

Catherine McKinnell

Sarah Hall

Sarah Olney

Tristan Osborne

Unlocking land for housing

Draft Report (*Unlocking land for housing*), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 24 read and agreed to.

Summary agreed to.

Conclusions and recommendations agreed to.

Resolved, That the Report be the Eleventh Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available (Standing Order No. 134).

Adjournment

Adjourned till Thursday 16 July at 9.30 a.m.

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the inquiry publications page of the Committee's website.

Thursday 21 May 2026

Sarah Healey, Permanent Secretary, Ministry for Housing, Communities and Local Government; **Joanna Key**, Director General, Regeneration, housing and planning, Ministry for Housing, Communities and Local Government; **Amy Rees**, Chief Executive, Homes England; **Alison Crofton**, Chief Regional Delivery Officer, Homes England; **Cathy Francis**, Co-Director for New Towns, Infrastructure and Housing Delivery, Ministry for Housing, Communities and Local Government Q1-66

Published written evidence

The following written evidence was received and can be viewed on the inquiry publications page of the Committee's website.

ULH numbers are generated by the evidence processing system and so may not be complete.

1	Burrows, Ms Jessica	ULH0006
2	Buziuk, Hleb	ULH0001
3	Clean Lines Decorators Ltd	ULH0007
4	Community Planning Alliance	ULH0002
5	Elektra, (ddd, House of Commons)	ULH0013
6	Fairer Share	ULH0005
7	Gardner, Paul	ULH0003
8	Greater Manchester Combined Authority	ULH0018
9	Greenshields, Mr John	ULH0011
10	Hill, Stephen (Founder, C2O futureplanners); and See Annex A in Evidence	ULH0021
11	Historic England	ULH0015
12	Homes for the South West	ULH0017
13	Labour Land Campaign	ULH0012
14	Makovsky, Dr Lukas	ULH0008
15	National Housing Federation	ULH0014
16	Okara, Dr Goodtime	ULH0010
17	The Nationwide Foundation	ULH0019
18	The Royal Town Planning Institute	ULH0020
19	Umar, Dr Tariq	ULH0009
20	Wetzel, Ms Heather	ULH0004

List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the publications page of the Committee's website.

Session 2026–27

Number	Title	Reference
10th	Government shared services	HC 85
9th	Large business tax compliance	HC 86
8th	Northern Powerhouse Rail	HC 97
7th	Financial resilience of government-sponsored museums and galleries	HC 96
6th	The Access to Work scheme	HC 92
5th	MoD follow-up Spring 2026	HC 95
4th	Regulating for growth	HC 93
3rd	The MoD's tackling of economic crime and misconduct	HC 91
2nd	NAO financial audit insights 2024–25	HC 94
1st	An analysis of the asylum system	HC 89

Session 2024–26

Number	Title	Reference
79th	Supporting people with frailty outside hospitals	HC 1706
78th	The Bank of England's Real-Time Gross Settlement Renewal Programme	HC 1732
77th	Accountability in small government bodies	HC 887
76th	New Hospital Programme update	HC 1705
75th	Government use of data analytics on error and fraud	HC 891
74th	Environmental regulation	HC 1687

Number	Title	Reference
73rd	Financial sustainability of adult hospices in England	HC 1236
72nd	BBC World Service	HC 1299
71st	Government's use of external consultants	HC 1521
70th	Home-to-school transport	HC 1238
69th	Whole of Government Accounts 2023-24	HC 1243
68th	Excess Votes 2024-25	HC 1711
67th	NS&I's transformation programme	HC 1237
66th	Tackling fraud and error in benefit expenditure 2024-25	HC 1231
65th	Efficiency and resilience of the Probation Service	HC 1235
64th	Costs of clinical negligence	HC 1234
63rd	Increasing police productivity	HC 1239
62nd	Faulty energy efficiency installations	HC 1229
61st	Financial sustainability of children's care homes	HC 1233
60th	DWP follow-up: Autumn 2025	HC 1447
59th	Ministry of Justice follow-up: Autumn 2025	HC 1240
58th	Government services: Identifying costs	HC 1421
57th	Government services: Generating income	HC 890
56th	BBC Accounts and Trust Statement 2024–25	HC 1230
55th	Reducing NHS waiting times for elective care	HC 820
54th	Afghanistan Response Route	HC 1391
53rd	Cost of maintaining the FCDO's overseas estate	HC 884
52nd	Resilience to threats from animal disease	HC 885
51st	The UK's F-35 stealth fighter capability	HC 1232
50th	Local bus services in England	HC 892
49th	Administration of the Civil Service Pension Scheme	HC 888
48th	Smarter delivery of public services	HC 889
47th	First Annual Report of the Chair of the Committee of Public Accounts	HC 1300
46th	Improving local areas through developer funding	HC 886
45th	Improving family court services for children	HC 883
44th	Governance and decision-making on major projects	HC 642
43rd	MoD's oversight of Reserve Forces' and Cadets' Associations	HC 893
42nd	Water sector regulation	HC 824
41st	UK Research and Innovation	HC 826
40th	Collecting the right tax from wealthy individuals	HC 827

Number	Title	Reference
39th	Government's use of private finance for infrastructure	HC 821
38th	Increasing teacher numbers: Secondary and further education	HC 825
37th	Immigration: Skilled worker visas	HC 819
36th	Jobcentres	HC 823
35th	Introducing T Levels	HC 822
34th	Department for Business and Trade Annual Report and Accounts 2023-24	HC 818
33rd	Supporting the UK's priority industry sectors	HC 1070
32nd	The Future of the Equipment Plan	HC 716
31st	Local Government Financial Sustainability	HC 647
30th	Antimicrobial resistance: addressing the risks	HC 646
29th	Condition of Government property	HC 641
28th	Decommissioning Sellafield	HC 363
27th	Government's relationship with digital technology suppliers	HC 640
26th	Tackling Violence against Women and Girls	HC 644
25th	DHSC Annual Report and Accounts 2023-24	HC 639
24th	Government cyber resilience	HC 643
23rd	The cost of the tax system	HC 645
22nd	Government's support for biomass	HC 715
21st	Fixing NHS Dentistry	HC 648
20th	DCMS management of COVID-19 loans	HC 364
19th	Energy Bills Support	HC 511
18th	Use of AI in Government	HC 356
17th	The Remediation of Dangerous Cladding	HC 362
16th	Whole of Government Accounts 2022-23	HC 367
15th	Prison estate capacity	HC 366
14th	Public charge points for electric vehicles	HC 512
13th	Improving educational outcomes for disadvantaged children	HC 365
12th	Crown Court backlogs	HC 348
11th	Excess votes 2023-24	HC 719
10th	HS2: Update following the Northern leg cancellation	HC 357
9th	Tax evasion in the retail sector	HC 355
8th	Carbon Capture, Usage and Storage	HC 351

Number	Title	Reference
7th	Asylum accommodation: Home Office acquisition of former HMP Northeye	HC 361
6th	DWP Customer Service and Accounts 2023-24	HC 354
5th	NHS financial sustainability	HC 350
4th	Tackling homelessness	HC 352
3rd	HMRC Customer Service and Accounts	HC 347
2nd	Condition and maintenance of Local Roads in England	HC 349
1st	Support for children and young people with special educational needs	HC 353