All Party Parliamentary group on Leasehold and Commonhold Reform, supported by The Leasehold Knowledge Partnership charity

A preliminary report on improving key areas of leasehold and commonhold law

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Foreword

The APPG group on Leasehold and Commohold Reform was created in 2016 and held its first meeting in November of that year. The group has rapidly grown to over 70 Parliamentary members. We include all the main parties in England and Wales. Scotland began steps to remove leasehold as a form of tenure system some time ago.

The group knows that the laws and practices which apply in the leasehold and commonhold sectors face a number of difficulties and contain a number of important defects as well as appearing to allow too many opportunities for abuse.

The group hope to assist parliament and the government in understanding that the level of complexity in the legislation gives rise to consumer detriment and to inefficiencies for suppliers in the market.

The complexity of the law had limited parliamentary debate in the past. Some wrongly assumed there were no problems. One of the roles of the APPG is to improve the level of understanding of its members in addition to help raise awareness and take input from across the sector.

We now know that over the recent decades successive governments have consistently underestimated the size and importance of the leasehold sector. In 1993 when Leasehold Reform, Housing and Urban Development Act was under consideration by the Conservative Government of the time it was advised that there were about 1 million leasehold homes. By the time the Labour Government came to consider the Commonhold and Leasehold Reform Act in 2002 that number have grown with the sector using estimates of between 2 and 2.5 million leasehold homes until as recently as 2014

The government now accepts there are at least 4 million privately owned leasehold homes in England. In addition there are a large number of socially rented flats not included in this total. In February 2014 the charity Leasehold Knowledge Partnership (LKP kindly support this APPG as our secretariat) research showed there were 5.37 million flats across England

and Wales[1]. Government data shows there are a further 1 million leasehold houses. Residential leaseholds make up a very important part of our current and of our future housing stock. The intended growth in commonhold tenure has not happened.

Leasehold building provides the homes for an ever increasing proportion of our population. By value leasehold construction represented almost 50% of England's new build development in 2016. A far greater proportion is located in the larger urban conurbations rising to almost 90% of new build in London. In terms of the number of leasehold homes built in 2016 it was over 40%.

We note the change from 2010 when government suggested that the leasehold system was "mostly working well" and that the system was "balanced" to 2017. It is now accepted that there are many difficulties in this part of our "broken housing system". In recent months the Housing Minister, the Secretary of State and the Prime Minister have each commented on leasehold housing issues.

Sir Peter Bottomley MP

Jim Fitzpatrick MP

Co-Chairs of the APPG for leasehold and commonhold reform.

[1] http://www.leaseholdknowledge.com/wp-content/uploads/2014/02/LKP-leasehold-market-evaluation-final.1.pdf

Introduction

This, our first preliminary report, looks at a number of areas for reform for the new Government and Parliament to consider and to tackle from June 2017. We accept that not all of these issues might be addressable immediately. We will work with Ministers, the DCLG Select committee, officials and others in helping set the priorities for reform and to achieve needed change for the better.

Some issues mentioned in this report are already actively under consideration by the current government; some have already been considered by the Department or by the Law Commission. Action remains outstanding. We add topics to the list for review.

Recommendations

Commonhold

The APPG met in November and took evidence on the progress of Commonhold (Strata Title) in Australia with a submission from Rhys Bollen, the Executive Director of Policy, the NSW Department of Finance, Services and Information. The group noted the positive experience in Australia and the fact that that state has just completed its latest passage of legislation dealing with matters such as end of the strata title and developer bonds.

At the Parliamentary round table on commonhold organised by LKP in the summer of 2014, input was received from a number of experts in the sector which suggested that many of the problems following on from the 2002 Commonhold and Leasehold Reform Act were the result of drafting deficiencies. It was also explained that some of the problems arose because the Commonhold element of the Commonhold and Leasehold Reform act was overseen by what is now the Ministry of Justice rather than what is now DCLG while the Leasehold element of the Act sat within DCLG. Submissions were given by two leading QCs in the field who also pointed to deficiencies in the legislation.

The general view taken was that governments' previous assumption that commonhold had failed simply as a result of a lack of demand was flawed.

Following that meeting officials from both Departments agreed to put papers to their Ministers on the potential of bringing the Act together in the Housing Department. The No. 10 housing policy unit also encouraged the transfer of the legislation to DCLG so that it might be reviewed. No. 10 policy team made the same request for this change in the first part of the current administration.

The Round table considered the matter again in 2015 with input from a leading academic from Australia.

These observations follow from the evidence provided by the sector to the two Parliamentary round table meetings and to the APPG:

- That difficulties have arisen because the Ministry of Justice has never been tasked. with promoting commonhold as a tenure type nor has it had a budget to develop the legislation.
- That the Housing Department had not considered commonhold as part of its housing strategy.
- That the Housing Department has not used the housing budget that it controls via the social sector to help develop commonhold.
- That Ministry of Justice was aware by at least 2008 that the legislation was fundamentally flawed. They had produced a draft report in 2009 perhaps entitled "Commonhold: improving the legislation and promoting take up"[2]. This report did not go forward.
- That as the result of the failure to promote commonhold the sector suffered considerable financial detriment having developed products which were not taken up by the consumer.
- That there has been ongoing debate by officials since the summer of 2014 about if and how the responsibility for primary or secondary commonhold legislation might be moved to DCLG.
- That there has been limited expertise within DCLG and MoJ on this form of tenure.
- That since 2002 the awareness in the sector of how this form of tenure works in other parts of the work has growing considerably. It is noted that the British Property Federation recorded a considerable shift of position in the 2014 debate and now accept that for commonhold to work there would need to be some form of sunset clause on new leasehold once the commonhold legislation shown to work.
- That the sector is cautious that, government having failed once to bring forward effective legislation in 2002, errors may be made again if the legislation was not put right properly.
- The sector is concerned they might be asked to adopt this form of tenure without the relevant market support to ensure consumer acceptance.

[2] This document was never published and is now seen as containing omissions on issues such as redress and forced sales. Copies are held by DCLG and MoJ and the APPG

- Some developers support a review of commonhold while others do not believe it will address the problems the sector faces.
- Because consumers in flats have been treated as tenants over many decades there. will need a level of general education to understand that commonhold requires the flat owners to take joint responsibility for their asset.

It is noted that although consideration of a review has been ongoing from 2014—2017, that formal review has still not commenced. The recent Housing White Paper proposes further consultation.

The APPG thanks the experts from around the world and notes their input and advice to the APPG on why the adoption of commonhold in other countries appears to result in a more efficient housing market with less need for dispute and costly litigation.

The APPG notes and supports the Department's Housing White Paper **"Fixing our broken housing market"**[3]**.**

We welcome the statement **"We will consider further reforms through the consultation to improve consumer choice and fairness in leasehold, and whether and how to reinvigorate Commonhold. We will also work with the Law Commission to identify opportunities to incorporate additional leasehold reforms as part of their 13th Programme of Law Reform, and will take account of the work of the All-Party Parliamentary Group on Leasehold and Commonhold"**

It should be noted that it has now taken nearly of a decade since the government and officials became aware of the fundamental flaws in the legislation without moving forward to rectify the know deficiencies. If there is still a debate to be had, it should be whether to reform the old legislation or to replace it. It had been assumed commonhold in place of leasehold would become the standard form of tenure for new build.

Recommendations for Commonhold

1. That government quickly moves to a position of deciding if it should reform or abandon the defective existing commonhold legislation.
2. That commonhold be seen as a housing matter, not just as a third form of land tenure, and that responsibility be moved to the housing department without delay.
3. We ask the government to develop the work already undertaken by the APPG on this issue. We would encourage the Minister to support the proposal that the APPG, supported by its secretariat, impartially oversee a sector wide initiative to review a range of commonhold options for consideration by the Department leading to future change in the law.

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3 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

Leasehold Houses

The current government has accepted the sale of new build leasehold houses is a key area in need of urgent reform. The Prime Minister, the Secretary of State and the Housing Minster have each argued strongly that there is no legitimate reason for the sale of leasehold houses unless for the exceptional circumstance where the developer cannot own the freehold.

The APPG notes the practice of freehold of land being sold on to a third party companies shortly before development begins and does not consider this a legitimate reason for selling leasehold houses.

This issue has come to the fore principally as the result of the work of the charity Leasehold Knowledge Partnership who act as Secretariat for the APPG. The APPG notes this is not a new problem. The data gathered in a survey completed in March 2017 of 430 leasehold house owners facing potentially onerous lease terms suggests the practice began over a decade ago.

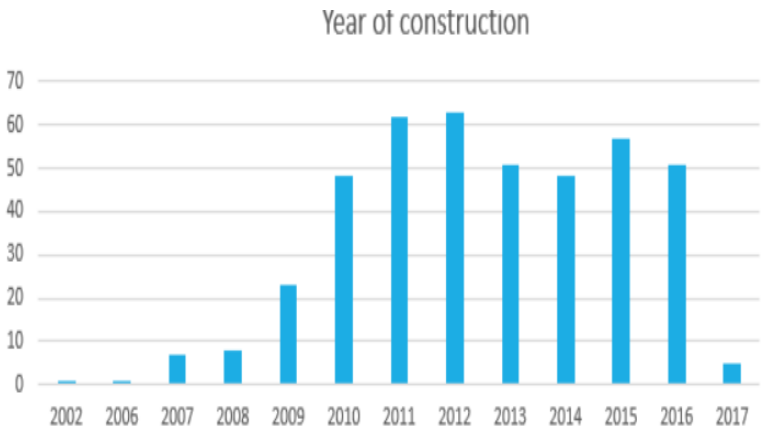

Figure 1: Year of Build for those responding to the LKP survey leasehold houses with onerous terms

There is an awareness the problems have also been reported to previous Ministers and officials.

The APPG makes the criticism that this practice has been allowed to grow without action being taken. Developers have been socially irresponsible.

The data suggests the number of leasehold houses has grown over the years. In 2010 there were 3420 leasehold houses sold in England and Wales at a total cost of £616 million. By 2015 the number of new build leasehold houses had grown to 8,775 with a total value of £1.97 billion[4] (thus far the Land registry has recorded 8230 sales in 2016 but this figure is expected to grow as final 2016 registrations are recorded).

There is shocking evidence that the freehold reversions for these sites are being sold on. The costs for landlord's permissions markedly increased in addition to facing the leaseholders with the prospect of additional legal costs.[5] The prices asked for enfranchisement, when the

[4] http://www.leaseholdknowledge.com/surge-new-build-leasehold-houses-1-9-billion-sold-last-year
[5] Leasehold and Commonhold Reform APPG meeting 19th April 2017

leaseholder buying their own freehold, are too often multiplied. One example was from under £5,000 to over £40,000. In plain language, some leaseholders have been ripped off.

There is evidence that providers in the market are not explaining to consumers when the developer is selling on the freehold within the two year period before the leaseholder has the legal right to buy the freehold. Consumers are not aware there is no statutory obligation to offer the leaseholders the right of first refusal. That right exists for flats; it shoul be the same for houses.

The APPG also notes the practice of the freehold reversionary owners seeking to reach "informal" agreements in the sale of freeholds as a means of imposing onerous covenants. The APPG heard evidence from one solicitor who advised that leaseholder may be persuaded to enter into freehold terms more onerous terms than their leasehold.

Developers have suggested that there is a need to sell leasehold houses as a means of keeping prices down. Analysis by LKP of the 2016 land registry database suggests there is no clear evidence for this claim. There is some evidence that developers may now even be seeking to sell leasehold houses at a premium over their freehold equivalent. Of the top ten areas where leasehold houses were built in 2016, five had an average leasehold house price higher than the freehold average while five had a price below that of their freehold equivalent. Looking at the top five areas, four had higher average leasehold house prices. There will be other factors which may impact prices but the fact that the average price differential shows no consistent discount for selling leasehold calls into question the argument used to justify this form of building.

AREA	FREEHOLD HOUSES BUILT	AVERAGE PRICE	LEASEHOLD HOUSES BUILT	AVERAGE PRICE	LEASEHOLD PREMIUM
MANCHESTER	110	£140,805	414	£211,781	50.4%
LIVERPOOL	82	£142,002	236	£233,319	64.3%
PRESTON	70	£270,967	147	£245,983	-9.2%
NORTHWICH	51	£220,841	145	£252,612	14.4%
BIRMINGHAM	273	£251,691	141	£275,418	9.4%
NEWCASTLE UPON TYNE	180	£216,242	127	£179,506	-17.0%
WARRINGTON	23	£296,682	102	£253,885	-14.4%
CHORLEY	25	£234,088	101	£219,981	-6.0%
SHEFFIELD	119	£218,751	83	£205,991	-5.8%
CHESTER	126	£230,540	79	£289,747	25.7%

Figure 2: Price differential on new build house sales 2016

The claim that leasehold houses are regionally specific is also called into account. Analysis by LKP of the first 9 months of 2016 new build house registration shows that although

leasehold house construction was focused in the North West and East, it has now spread across the country.

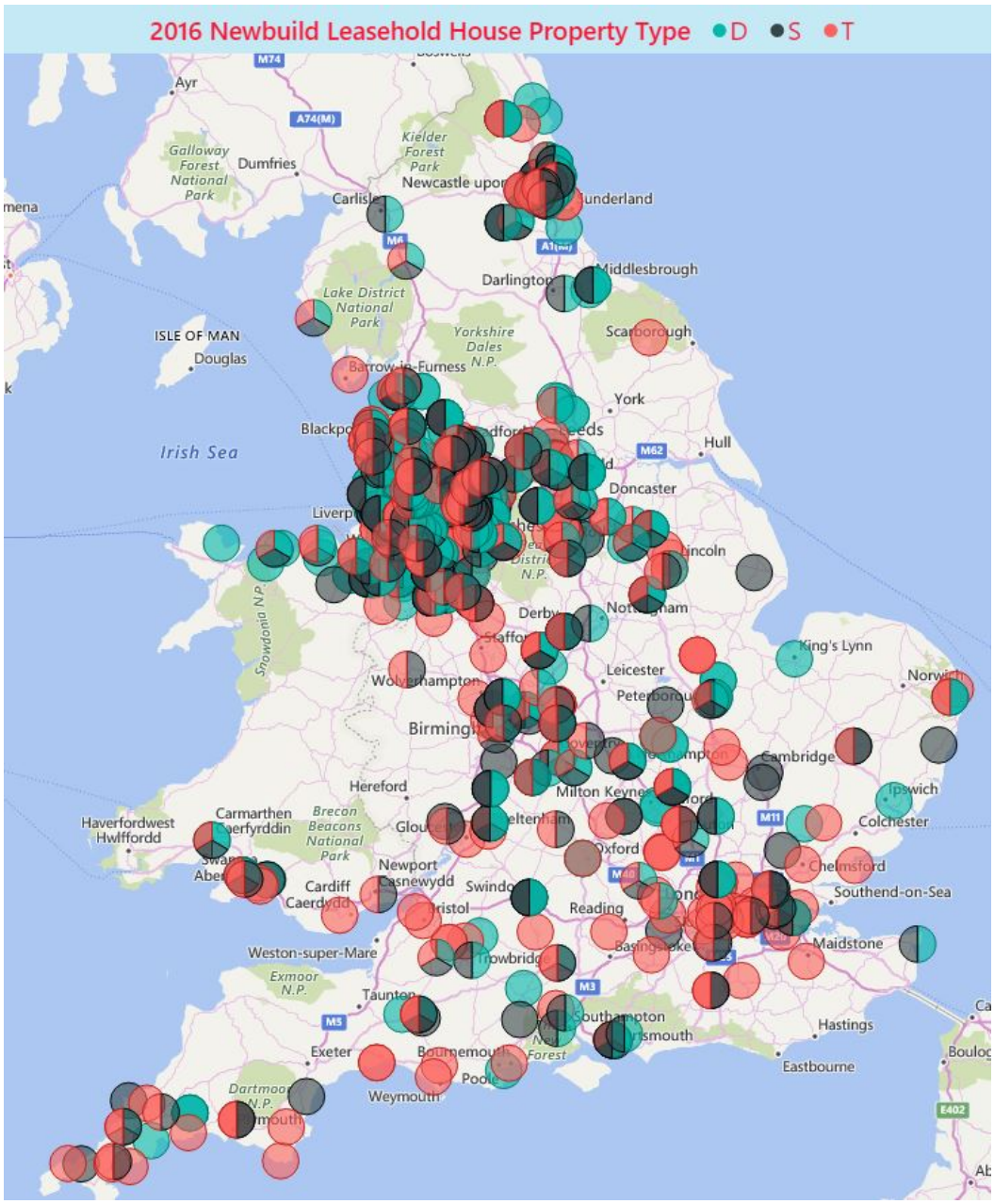

Figure 3: New Build House construction 2016
KEY D= DETACHED S= SEMI DETACHED T=TERRACED

Recommendations: leasehold houses

1) The APPG supports the proposal to ban the sale of new build houses unless there is a legitimate reason why the land can only be owned under a leasehold.
2) That the government brings forward the Law Commission recommendations on "Making Land Work: Easements, Covenants and Profits à Prendre"[6] to allow the effective management of estates with freehold houses.
3) To limit onerous terms on existing leasehold homes. There seems no reason why the current size of the ground rent should represent any higher price than the original ground rent term as defined at the start of the lease, perhaps adjusted for an accepted index of inflation.
4) The government supports a super complaint to challenge the terms of a lease such that: a) It might be established that such terms can be legitimately challenged under consumer legislation for leasehold homes built both before and after 2015 Act came into force, and b) That the general types of terms within a lease that might be subject to such a challenge can be established.
5) It is accepted that many issues concerning lease terms apply to both flats and houses and that caution is taken in creating unforeseen consequences if government seeks to differentiate between the rules that apply to house and flats lease terms.
6) That for those existing leasehold houses the current two year moratorium on the leaseholders right to buy their freehold be removed.
7) That the government urgently looks to ways to reduce the legal costs and to remove incentives for landlords to impose onerous terms in selling the leaseholder the freehold to their house on an informal basis.
8) That the costs of a formal purchase be limited.

Transfer fees

The Law Commission (LC) report was sponsored in 2014 by the DCLG Secretary of State who sought to consider how consumer detriment might be avoided.

The LC report[7] sets out at 2.3 that its work follows on from the work of CARLEX (part of the LKP Charity and the work of AgeUK which gave rise to the original OFT investigation[8] into exit fees.

The LC concludes the OFT key findings were that:

[6] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/229064/1067.pdf
[7] http://www.lawcom.gov.uk/wp-content/uploads/2017/03/LC-373.pdf
[8] http://webarchive.nationalarchives.gov.uk/20140402142426/http:/www.oft.gov.uk/shared_oft/consumer-enforcement/retirement-homes/oft1476.pdf

1) They may apply in unexpected circumstances, such as sub-letting, when a loan is secured against the property or when the resident's spouse or carer moves into the property. The fees may also be higher than anticipated.

(2) The fees may not be linked to any service provided.

(3) The terms are not always transparent to consumers and the financial consequences may not be given prominence in the sales materials.

(4) The terms may exploit consumers' "behavioural biases", which means that consumers may not take the terms into account in their decision-making.

The APPG welcomes the LC recommendations that such fees should be made more transparent. A statement which reflects the OFT findings that:

"We expect landlords and their managing agents to use their best endeavours to bring the transfer fee term (in addition to other material information about the retirement home property) to the attention of prospective tenants"9.

Of more concern is that the proposed code for this transparent easy to use code of conduct appears to take 65 pages of the LC report. Given that there is clear evidence in the residential sector that consumers can be persuaded to agree to matters which are to their economic disadvantage we are worried that those in the retirement sector will not gain benefit from simply having a code of conduct.

There is particular concern that the Law Commission report asserts at 1.11 "event fees may have some advantages for older residents who, typically, have more capital than income". This section in turn refers to s2.11 (Why not abolish event fees) and 2.24 l (event fees can make specialist housing affordable to consumers). At 2.24 the document then references 4.7910 of the LC earlier consultation paper which in term derives as its source a non-specific reference to the views of the APPG on Housing and Care: it states they considered that deferred payments may have a role to play in offsetting both the initial purchase price and service charges.

At 2.22 the report points to the Demos report "The affordability of retirement housing"[11] where the LC stated Demos considered that "deferred payments may have a role in offsetting service charges". This is correct where the matter is considered at page 47. What is not stated is that DEMOS reports sets this out among a range of alternatives including shared ownership and lifetime mortgages (equity release).

What the LC report appears not to consider is any counter evidence or all the other circumstances where transfer fees are not needed or the risks caused by the lack of transparency. The Intergeneration Commissions report[12] at page 25 Figure 11 states "typical pensioner incomes are now above working age ones", suggesting that in many

[9] Para 8.9 of the OFT report
[10] http://www.lawcom.gov.uk/wp-content/uploads/2015/10/cp226_residential_leases.pdf
[11] https://www.demos.co.uk/files/Demos_APPG_REPORT.pdf?1415895320
[12] http://www.intergencommission.org/wp-content/uploads/2017/02/IC-intra-gen.pdf

circumstances the LC assumptions about pensioners being asset rich and cash poor no longer applies.

The move back to non-transparent transfer fees for no service seems to run entirely against the OFT findings. There seems some danger that the return to these fees will encourage the behaviour that caused the OFT investigation to be initiated and that an asset class similar to that available in the ground rent market may develop.

Providers with experience in the ground rent and income generation market already appear to have been flagging the potential income streams last September[13] setting out that "An owner/operator of retirement housing will expect to earn and receive event fees over a period of many years. An operator may also wish to monetise the value of its right to future event fees, for example by selling the rights to an investor, possibly to hold as a portfolio in a similar way to a ground rent portfolio."

There seems little in the LC report to show that for most consumers there is no need or no benefit for these fees. The whole report seems predicated on one main assertion in their main web page[14] where they state:

"The recommended reforms are also intended to reduce the uncertainty currently surrounding the legal status of event fee terms. With these reforms stakeholders have told us that private investment of £3.2bn is likely to be forthcoming over the next decade, and the supply of specialist retirement housing expanded significantly."

This claim is based on 2.63 of the report which in turn states at footnote 74

"We have received letters from the following providers and groups: ARCO, Audley Retirement, Carterwood, Enterprise Retirement Living, Jones Lang LaSalle Ltd, K&L Gates LLP, LifeCare Residences, Places for People, Renaissance Villages, Retirement Villages Group Ltd, Savills, The ExtraCare Charitable Trust, TLT LLP and Trowers & Hamlins LLP"

It appears that the basis for asserting these fees may be needed is based on nothing more that the assertion that if they are allowed more construction will occur.

This seems not to consider other evidence which already suggests the market will grow at a higher rate than the £320 million per year forecast over the next decade.

This doubtful justification from developers for any needed for these fees was not included in the draft report and appears not yet to have been subject to challenge or validation

The APPG is concerned that the proposed event fee system may have many disadvantages and produce serious continuing consumer disadvantage.

Recommendations: transfer fees

[13] https://www.bdo.co.uk/en-gb/insights/industries/real-estate/the-future-of-event-fees-in-retirement-housing

[14] http://www.lawcom.gov.uk/project/event-fees-in-retirement-properties/

1) For DCLG to work with DWP, the APPG on Care for Older People and other stakeholders such as AgeUK, ARHM, ARCO and CARLEX to consider the wider needs of older peoples' housing and the need for wider regulation of this part of the housing market.
2) For the Department to consider the alternative funding models for retirement living as set out in Older Persons Housing APPG report, the Demos report and elsewhere.
3) That if transfer fees are to be retained there must always be an option of not deferring charges such that they always remain challengeable under s27A of the Landlord and Tenant Act; and that this right to challenge applies to those paying in full and to those deferring an element of their charges.
4) That any element of a fee allocated for helping to sell the flat to a subsequent buyer and any evaluation charge for assessing the suitability of a prospective must remain subject to challenge under s27A as must any sublet fees.
5) No element of a fee should be allowed unless it contributes to the service costs or leaseholders' share of the sinking fund for longer term building maintenance.
6) That fees should not be based on an actuarial gamble by the pensioner and should either be a single fee charged regardless of occupancy period or a fee which rises with each year of occupancy.
7) A sublet fee should be charged on the basis of it being a reasonable free challengeable at the tribunal rather than being linked to the level of transfer fee at the end of the tenancy.
8) That a model be created such that commercial firms letting individual retirement properties be charged at a rate that ensures they pay no more and no less per year than that the contributions that might be expected by an average pensioner living at that site.

Forfeiture

The APPG knows there is considerable injustice as the result of the use of forfeiture in the residential leasehold sector. The government has no specific data on the matter. We note that both the government Leasehold Advisory Service and commercial firms of lawyers[15] run courses with information on how to forfeit and how to avoid forfeiture run courses on this matter. Its application is clearly not insignificant.

Recommendations: forfeiture

[15] http://www.tanfieldchambers.co.uk/resources/events/past-events/forfeiture-masterclass

1) The APPG recommends that the government move forward with adopting the Law Commission report on replacing residential forfeiture entitled "Termination of tenancies for tenant default"[16].
2) That in bringing forward the Law Commision report the government considers how the use of the forced sale applies in commonhold regimes around the world and looks to consider if the LC wording might be adopted to any future review of commonhold in England.

Lease extensions

The APPG notes that several issues arise around the costs associated with lease extensions.

The APPG understands the implications of the Mundy case are that it raises leaseholder's costs still further. It is aware that the current legislation gives rise for many opportunities for landlords to delay and to increase the costs and payments.

Recommendations: lease extensions

1) To move the cost of enfranchisement and leasehold extensions to a formulaic model that does not require mediation by the tribunals.
2) That the right to extent no longer requires ownership of the lease for a period of 2 years.
3) That the landlord be prevented from introducing terms into the lease any more onerous that the current lease.

RTM and enfranchisement

It now appears to be accepted by government that the Right to Manage legislation is burdened with many deficiencies that add to the costs for the leaseholder. The sector is also fully aware of a range of mechanisms by which the provisions to allow enfranchisement via the right of first refusal for flats may be circumvented

Recommendations: RTM and enfranchisement

[16] http://www.lawcom.gov.uk/wp-content/uploads/2015/03/lc303_Termination_of_Tenancies_for_Tenant_Default.pdf

1) That the technical deficiencies in the legislation be reviewed and consideration given to ending the ability of landlords to delay and add costs to the process.
2) To review the legislation such that it works for multi-site blocks and those sites with freehold and leasehold houses.
3) That consideration is given to why the commercial element has relevance to the RTM. Since the commercial element is excluded from the RTM's role, the 25% limit seems to serve no purpose.
4) That the right to enfranchise has the two year moratorium removed.

Simplification of the Law

It is accepted that leasehold law is among the most complex on the statute book. It is believed there are at least 22 Acts of Primary Legislation, Statutory Instruments, Statutory approved codes of conduct and sector codes that the consumer and provider need to understand.

Recommendations: simplification of the law

1) That the Law Commission be tasked with simplifying and consolidating the existing primary legislation under a single Act as an alternative to seeking to amend the numerous elements of a range of statutes.
2) Standardised leases: at present the sector is burdened with entirely nonstandard lease written by the landlord's lawyer for their clients' advantage. There would be considerable consumer benefit by moving to a standard model of lease with appendices where relevant to meet the specific needs of the site.

Court and Tribunal costs

The APPG considers there is often an imbalance in the cost regime and resources available to landlords and many tenants. At the moment most leases entitle only the landlord to costs in the event of a dispute. The Tribunals are deemed a no cost environment where there is no right of a leaseholder to recover their costs if they win unless the landlord's actions go so far as to justify the Tribunal issuing a wasted costs order. Their only protection from costs comes with s20C and s131 of the Housing and Planning Bill 2016. However, these powers only seek to limit the landlord's ability to pass on costs if the Tribunal consider such limitation relevant. Neither power entitles the leaseholder to costs.

An inevitable consequence of this regime is to encourage the landlord to defend their position. We now see costs awards to landlords in the lower tribunal which on occasions amounts to hundreds of thousands of pounds. These may be extreme cases but they grow in number each year.

The costs imbalance limits the proportion of leaseholders able or likely to defend their position. The knowledge of this limit to this risk of challenge encourages some landlords to overcharge.

The further consequence of the costs regime is that leaseholders have less and less ability to defend their position as cases rise through the higher courts. Conversely landlords with multiple properties under their control have every incentive to defend a case on one site so as to protect their position on other sites.

Recommendations: court costs

1) Consideration should be given to how the cost balance might be changed such that a landlord faces the same prospect of the leaseholder's costs as the leaseholder might face against the landlord were it not for the cost advantage given to the landlord via the terms of the lease.
2) That the landlord also faces the deterrent risk of some form of penalty for repeat offences.
3) That a system be considered where a standard set of costs might be set on matters such as sublet fees.

Contributors and Thanks

The APPG offers thanks to the witnesses who have given oral and written evidence during the initial period of the group's operations. We also thank the delegates and officials who have attended the groups meetings and provided their input.

A more detailed report will be produced later this year where those who have generously given their time to contribute to our work will be detailed.

We thank Martin Boyd and Sebastian O'Kelly, trustees of the charity the Leasehold Knowledge Partnership, who acted as volunteer secretariat to the group and provided their experience, input and data to the group.

We are grateful for the hard work and help given by Katherine O'Riordan and Richard Mitchell in organising the meetings for the group.

CONCLUSION

To all who have read this far, we offer plain English declarations:

Government and parliament can act and have to act.

Developers have to rectify the impact of their past behaviour on innocent leaseholders.

Owners of the freeholds of residential leaseholders have to end exploitation.

Unfair leasehold terms should be declared void.

Residential flat and house leaseholders deserve fair treatment.