

REQUEST FOR DIRECTOR DECISION – DD2765

Title: Mayor's Care and Support Specialised Housing Programme 2022-28

Executive Summary:

Since 2013-14, the GLA has been administering the capital's share of the Department of Health and Social Care's (DHSC's) Care and Support Specialised Housing (CASSH) fund to develop homes for older and disabled Londoners. All CASSH schemes started on site by March 2024. The programme is running up to March 2028.

Approval is sought to receive and allocate London's capital allocation from the DHSC to meet the GLA's outstanding funding commitments for allocated schemes for the period 2025-28. This will fund interim milestone and completion payments for schemes which started on site before 2024-25. The GLA's confirmed capital allocation for 2025-26 is up to £15m. The indicative allocation for funding commitments beyond 2025-26 is £6.973m and will be agreed with DHSC in due course. In addition, approval is sought to receive from the DHSC and expend revenue administration funding of up to £150,000 per year to facilitate the ongoing delivery of the programme.

Changes to funding allocations for existing schemes, including top-up payments, will be approved in line with decision-making processes for the affordable housing programmes.

Decision:

That the Executive Director of Housing and Land approves:

1. the receipt and expenditure of the confirmed 2025-26 Care and Support Specialised Housing (CASSH) allocation from the DHSC, which includes up to £15m capital funding to meet funding commitments for allocated CASSH schemes and £150k revenue grant funding to administer the programme in London.
2. the receipt and expenditure of further funding from the DHSC beyond 2025-26, as required to meet outstanding GLA funding commitments under the CASSH programme up to the programme longstop of 31 March 2028; including capital funding from the DHSC's national CASSH programme to fund interim and completion milestone payments for CASSH schemes which started on site by March 2024 and up to £150,000 revenue grant funding each year to administer the programme in London.

AUTHORISING DIRECTOR

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Tim Steer

Position: Executive Director Housing and Land

Signature: 

Date: 6 October 2025

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. Since 2013-4, the GLA has administered London's share of the DHSC's CASSH programme to deliver homes for older and disabled Londoners (approved by MD1073, MD1476, MD2256, MD2672, MD2877 and MD3027).
- 1.2. The CASSH programme closed to bidding in 2023-24, with funding committed to schemes that started on site by March 2024. All capital funding available through the programme must be disbursed by 31 March 2028.
- 1.3. As of April 2025, there are ten CASSH schemes with outstanding interim or practical completion milestone payments forecast during the period 2025-28.
- 1.4. London's confirmed 2025-26 allocation comprises of:
 - up to £15m capital grant funding to meet funding commitments for approved schemes. This includes funding attached to interim and practical completion milestone payments in 2025-26, as well as a safeguarding envelope to cover top-up payments as agreed via existing decision-making processes for affordable homes programmes
 - up to £150,000 revenue grant funding for GLA staffing and other administration costs, to deliver the programme.
- 1.5. The GLA and the DHSC plan to enter into an annual Memorandum of Understanding (MoU) that sets out the terms of the 2025-26 funding allocation and the responsibilities of each party. The MoU also sets out the DHSC's intention for the GLA to receive a further capital allocation beyond 2025-26 to cover outstanding capital commitments up to March 2028. An indicative allocation of £6.792m beyond 2025-26 has been provided, but the exact level and profile of capital funding will be confirmed in future year's MoUs. The MoU also specifies up to £150,000 of revenue funding to administer the programme in 2025-26, with further revenue funding anticipated for this purpose for the remaining years of the programme. All capital and revenue will be received in arrears.
- 1.6. In August 2025, MD3378 delegated authority to the Executive Director of Housing and Land to approve the receipt of additional funding from central government to expand or extend certain existing schemes contained in the Building More Homes delivery plan, including through CASSH where the parameters of the scheme remain the same or similar, and after consulting with legal advisors and the GLA's Chief Finance Officer and subsequently having secured agreement from the Mayoral Delivery Board. For the purposes of considering whether the parameters are similar as originally agreed with government, the Executive Director of Housing and Land should have regard to whether the outcomes to be delivered have changed significantly or there is a significant change to the attendant risks of the original programme. All outstanding CASSH delivery is attached to schemes which have been approved and started on site by March 2024 and that would meet the prescribed CASSH programme outcomes set out in Section 2 below. On this basis it is considered that the parameters of the programme remain the same or similar. The GLA's legal advisors and Chief Finance Officer have been consulted regarding the proposed additional funding and the Mayoral Delivery Board's agreement has been secured in respect of the same. The Executive Director of Housing and Land therefore has delegated authority under MD3378 to make the decisions sought in this paper.
- 1.7. In accordance with the existing governance processes associated with the CASSH programme, changes to existing funding allocations, including top-up payments, will be reviewed and approved in line with decision-making processes for the affordable homes programmes. Officers will assess any project and funding changes for existing schemes, and following peer review, make recommendations to the

Executive Director of Housing and Land for approval. All funding changes will also need to be approved by DHSC and fall within the confirmed capital funding envelope for the programme.

2. Objectives and expected outcomes

- 2.1. This funding is required to meet existing delivery commitments for schemes allocated funding via the Mayor's CASH programme. The programme aims to boost the delivery of a range of specialist affordable housing provision for older and disabled persons in London. This includes extra care; assisted living; dementia care; retirement housing; supported housing for disabled adults and people with mental health problems; wheelchair-adapted homes; and housing specifically designed for people with learning disabilities and autism.
- 2.2. Benefits of the housing types delivered through this programme include:
- peace of mind, safety and security for vulnerable older and disabled Londoners
 - support to maintain independence
 - improved physical and mental health
 - delays and reductions in the need for primary care and social care interventions, including admission to long-term care settings
 - prevention of hospital admissions
 - lower care costs
 - maintenance and development of links with the community
 - maximisation of incomes and reduced fuel poverty
 - freeing up of family housing for the wider community.

3. Equality comments

- 3.1. Under Section 149 of the Equality Act 2010, public authorities – of which the Mayor is one – are subject to a public sector equality duty, and must have 'due regard' to the need to:
- eliminate unlawful discrimination, harassment and victimisation
 - advance equality of opportunity between people who share a relevant protected characteristic and those who do not
 - foster good relations between people who share a relevant protected characteristic and those who do not.
- 3.2. Protected characteristics under section 149 of the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation, and marriage or civil partnership status (all except the last being "relevant" protected characteristics).
- 3.3. Figures published by the Trust for London show that a greater proportion of older Londoners (those aged 65 and older) are living in poverty after housing costs than those in the rest of England¹.

¹ Poverty before and after housing costs by age, 2023/24. Trust for London. June 2025.

- 3.4. A considerable proportion of households that are assessed as being owed a homelessness duty in London have one or more support needs. As of Q4 of 2024/25, 8,110 households (out of a total of 16,330) that were owed a duty had one or more support needs².
- 3.5. The programme is specifically designed to address the housing pressures and challenges faced by older and disabled Londoners, in particular seeking to boost the supply of specialised housing options that better meet the needs of the target cohort.

4. Other considerations

- 4.1. The key risks are set out in the table below.

Risk description	Risk rating	Mitigating action
The annual MoU setting process with DHSC does not enable sufficient flexibility to operate the programme effectively	Medium	The 2025-26 MoU includes an indicative commitment for capital funding beyond 2025-26. Discussions are underway to explore a multi-year MoU for the remainder of the programme.
Providers request additional funding to cover cost overruns for existing schemes	Medium	There is ongoing engagement with providers and DHSC to understand and assess funding gaps. A safeguarding envelope has been agreed within the 2025-26 capital allocation and will be negotiated for future years.
Delivery conditions result in scheme slippage within and out of the programme timelines	Low	Officers continue to work with providers to identify and mitigate potential delivery risks, with onwads reporting processes to DHSC in place.

- 4.2. Policy 5.2 of the London Housing Strategy includes the following proposals that are relevant to the CASSH programme:

- *Policy 5.2A: The Mayor will work with councils, housing associations, government and others to ensure that London's homes and neighbourhoods support London's diverse housing needs. This will include:*
 - *Ensuring more of London's new and existing homes are accessible and appropriate for disabled Londoners, older Londoners and families with children, including requiring councils to provide guidance on the size mix of low-cost rented homes*
 - *Increasing opportunities for older homeowners to move to accommodation more suitable for their needs, including benchmarks for older person's housing requirements in the draft London Plan*
- *Policy 5.2B: The Mayor will work with councils, housing associations, government and others to ensure that Londoners who need it are provided with support so that they can live independently. This will include:*
 - *Investing at least £100m in supported housing for older and disabled Londoners*

² Initial assessments of statutory homelessness duties owed England, London, January to March 2025. Statutory homelessness: Detailed local authority-level tables. January to March 2025. MHCLG.

- *Making the case to government that the new funding arrangements should meet the support and housing costs of supported housing in London.*

4.3. Policy H13 of the London Plan states:

Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of:

- *Local housing needs information including data on the local type and tenure of demand, and the indicative benchmarks set out in Table 4.3*
- *The need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport.*
- *The increasing need for accommodation suitable for people with dementia.*

4.4. Table 4.3 of the London Plan sets out annual borough benchmarks for the delivery of specialist older persons' housing.

4.5. Strategic objective 4 of the Mayor's Equality, Diversity and Inclusion Strategy is:

- *To work with councils, housing associations, government and communities to help improve the supply of homes available to meet Londoners' diverse housing needs, including for accessible and adapted housing, specialist and supported accommodation, and Gypsy and Traveller sites.*

Impact assessments and consultations

4.6. The London Housing Strategy and the London Plan set the strategic framework underpinning the Mayor's CASSH Programme. Both were subject to impact assessments. A new draft London Plan is anticipated for publication in Spring 2026. A recent consultation on 'Towards a New London Plan' – a document that set a direction of travel for the next London Plan – closed in June 2026. The next plan will be subject to numerous impact assessments as part of the policy and statutory framework that is embedded into the planning system.

4.7. The delivery of the Mayor's CASSH programme since 2013-14 has involved extensive consultation with registered provider (including local authority) partners across the sector. It is not considered necessary or appropriate to consult with any other persons or bodies, including those specified in section 32 (1) of the Greater London Authority Act 1999 (GLA Act), for the purposes of this report.

Conflicts of Interest

4.8. There are no known conflicts of interest to declare for those involved in the drafting or clearance of this decision.

5. Financial comments

5.1. The decision is seeking approval from the Executive Director of Housing and Land to receive grants and incur expenditure of up to £15m capital grant to fund interim and practical completion milestone payments as well as safeguarding costs on the CASSH programme for 2025-26; and up to £150,000 revenue grant to fund administrative costs associated with delivering the programme. The funds will be received from DHSC, and the GLA will enter a MoU with DHSC, which sets out the terms and conditions for the 2025-26 funding. The MoU also sets out an indicative allocation of £6.79m for the GLA to meet capital commitments in future years up to March 2028.

- 5.2. There is a risk of cost overruns for the existing schemes. To manage this risk, a safeguarding allocation has been agreed for 2025-26 within the MoU, and will be negotiated for future years.

6. Legal comments

- 6.1. Under section 30(1) of the Greater London Authority Act 1999 (as amended) (GLA Act), the GLA has the power to receive and distribute the funding as set out above, provided it considers that doing so will further one or more of its principal purposes of:
- promoting economic development and wealth creation in Greater London
 - promoting social development in Greater London
 - promoting the improvement of the environment in Greater London.
- 6.2. As set out above, the funding will aid delivery of homes for older and disabled Londoners. It is open to the GLA to take the view that the funding will promote both social and economic development and is therefore within its powers contained in section 30(1) of the GLA Act.
- 6.3. In determining whether or how to exercise the power conferred by section 30(1) of the GLA Act, the GLA must:
- have regard to the effect that these decisions will have on the health of persons in Greater London, health inequalities between persons living in Greater London, the achievement of sustainable development in the UK and climate change and its consequences (sections 30(3-5) of the GLA Act); and
 - pay due regard to the principle that there should be equality of opportunity for all people (section 33 of the GLA Act).
- 6.4. In taking the decisions requested, the Mayor must also have due regard to the Public Sector Equality Duty – namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010; and to advance equality of opportunity, and foster good relations, between persons who share a relevant protected characteristic (race, disability, sex, age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment) and persons who do not (section 149 of the Equality Act 2010). These matters will also need to be taken into account when assessing specific bids for any further top-up funding.
- 6.5. In respect of paragraphs 6.3 and 6.4, the Mayor should have regard to section 3, above.
- 6.6. In addition to the above, where the GLA is proposing to use the power conferred in section 30(1) of the GLA Act, it must consider consulting in accordance with section 32 of the GLA Act (see paragraph 4.7, above).
- 6.7. The GLA is subject to the overarching duties of fairness and transparency. Officers must ensure that the funding is distributed fairly, transparently, in accordance with the GLA's equalities duties and in a manner that affords value for money in accordance with the GLA's Contracts and Funding Code.
- 6.8. The proposals in this report include an extension of the end date for the Mayor's Care and Support Specialised Housing Programme subsidy scheme from 31 March 2025 to 31 March 2028. Certain modifications, defined as 'permitted modifications' under the Subsidy Control Act 2022, may be made to a subsidy scheme without the public authority being required to carry out a further assessment against the subsidy control principles. 'Permitted modifications' include providing for an extension of a subsidy scheme of up to six years. The extension of the subsidy scheme proposed in this paper falls within the definition of a 'permitted modification'; therefore, a fresh assessment against the subsidy control principles is not required.

7. Planned delivery approach and next steps

- 7.1. The timelines for progressing outstanding CASSH delivery up to the end of the programme (March 2028) are set out below:

Activity	Timeline
Sign 2025-26 CASSH MoU	By end of Q2 2024-25
Agree future year MoUs	2026-27 onwards
Process capital milestone payments attached to outstanding CASSH delivery (subject to relevant MoUs)	From Q2 25-26 – Q4 27-28
CASSH programme ends	31 March 2028

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral

Is the publication of Part 1 of this approval to be deferred? NO

If YES, for what reason:

Until what date: (a date is required if deferring)

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Laura Parry-Billings has drafted this report in accordance with GLA procedures and confirms the following:

✓

Assistant Director/Head of Service:

Ellen Storrar has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.

✓

Financial and Legal advice:

The Finance and Legal teams have commented on this proposal, and this decision reflects their comments.

✓

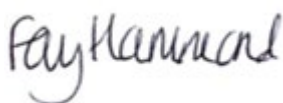
Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 6 October 2025.

✓

CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.



Date: 27 October 2025

Signature: