

# **Intermediate housing**

Consolidated Equality Impact Assessment of GLA proposed policy responses in the GLA's Part 1 Consultation Response Report and Part 2 Consultation Response Report

---

## **COPYRIGHT**

**Greater London Authority  
March 2021**

Published by  
Greater London Authority  
City Hall  
The Queen's Walk  
More London  
London SE1 2AA

enquiries 020 7983 4000  
minicom 020 7983 4458

Copies of this report are available  
from [www.london.gov.uk](http://www.london.gov.uk)

---

## CONTENTS

<b>1. Introduction and background</b>	<b>4</b>
Background	4
Public Sector Equality Duty	4
Equality Impact Assessment	5
<b>2. General housing baseline data</b>	<b>6</b>
Supply and affordability	6
Housing tenure	8
Housing need	9
Occupants of intermediate housing in London	10
Key workers	12
<b>3. Analysis of equality impacts of proposed policy interventions</b>	<b>14</b>
Delivery of intermediate housing	14
Affordability of intermediate housing	18
Eligibility, prioritisation and allocation	21
Supporting London's key workers	24
Improving data on intermediate housing	26
<b>4. Summary of impacts of policy proposals by protected characteristic</b>	<b>28</b>

# 1. Introduction and background

## Background

- 1.1. This Consolidated Equality Impact Assessment (EqIA) reviews the potential impacts of policy changes which are recommended for implementation following the GLA's consultation on intermediate housing which ran from August to October 2020 ("the consultation")<sup>1</sup>. This EqIA brings together the assessment of the policy changes which are recommended for implementation in the Part 1 Consultation Response Report (Part 1 CRR) and the Part 2 Consultation Response Report (Part 2 CRR)<sup>2</sup>.
- 1.2. The Part 1 CRR focuses on consultation questions which relate most directly to the Homes for Londoners: Affordable Homes Programme 2021-2026 (the new AHP) and recommends policy responses that primarily (although not exclusively) focus on the new AHP. The Part 2 CRR relates to the analysis of the questions not addressed within the Part 1 CRR and recommends policy responses that will primarily be implemented through the Affordable Housing and Viability London Plan Guidance (AHVLP), and through the GLA's revised Affordable Housing Capital Funding Guide. The questions considered in the Part 1 CRR and the Part 2 CRR are outlined in Appendix 1 of the respective reports.
- 1.3. This EqIA assesses the likely impacts of the proposed policy responses set out in the Part 1 CRR and the Part 2 CRR.

## Public Sector Equality Duty

- 1.4. Functions of the Greater London Authority (GLA) exercisable by the Mayor are subject to the "public sector equality duty" set out in section 149 of the Equality Act 2010. In exercising these functions, the Mayor, like all public bodies, must have "due regard" to the need to:
  - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
  - advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and
  - foster good relations between persons who share a protected characteristic and persons who do not share it.

---

<sup>1</sup> GLA, [Consultation on Intermediate Housing](#), August 2020

<sup>2</sup> GLA, [Intermediate Housing: Part 1 Consultation Response Report](#), November 2020

- 1.5. The GLA policy responses identified in the Part 1 CRR and Part 2 CRR are designed to help the Mayor further meet his policy objectives in relation to the delivery of genuinely affordable homes, with a specific focus on intermediate housing. These objectives, which are outlined in the [2018 London Housing Strategy](#), were also shaped with due regard to the public sector equality duty.

## Equality Impact Assessment

- 1.6. [Section Two](#) of this assessment outlines the baseline data that has been used to conduct the assessment and this is followed in [Section Three](#) by an analysis of the potential equality impacts related to the proposed policy responses. Questions 23a and 23b in the consultation invited feedback on the data sources available to assess the equality impacts of the proposals, and relevant feedback provided in response to these questions has been taken into account when undertaking the assessment of equality impacts.
- 1.7. The Mayor's approach to intermediate housing forms one part of his overall approach to housing in the capital and this assessment should be read in conjunction with the equalities section of the 2018 London Housing Strategy Impact Assessment (LHSIA)<sup>3</sup>.
- 1.8. The LHSIA notes that the balance of affordable housing tenures represents a balance between meeting different forms of need and maximising the overall delivery of affordable homes, within the context of national policy and available funding. It also identifies the mitigations that have been put in place through the Mayor's wider housing policies against any potential negative impacts of the balance of affordable housing tenures on those who share particular protected characteristics, and relations between those who share characteristics and those who do not. The housing challenges in London that the London Housing Strategy seeks to address and the impacts of that strategy which the LHSIA assesses remain salient and relevant. The policy proposals put forward through the Part 1 and Part 2 CRR aim to further mitigate against any potential negative impacts of the balance of affordable housing tenures, within the context of national policy and available funding.

---

<sup>3</sup> GLA, [London Housing Strategy: Impact Assessment](#), May 2018

## 2. General housing baseline data

- 2.1. This baseline data draws on the data contained in the LHSIA, including some updates to the data where they are available, as well as data included in the GLA *Housing Research Note 5: Intermediate housing: The evidence base*<sup>4</sup> which accompanied the consultation.

### Supply and affordability

- 2.2. The affordability pressures<sup>5</sup> that result from a long-term undersupply of homes of all tenures, and particularly affordable homes, in London (see chapter two of the London Housing Strategy) are one important respect in which housing impacts a range of those with particular protected characteristics and the relations between different groups.
- 2.3. Groups of Londoners who share some particular protected characteristics are more likely to experience poverty, which is both a cause and a symptom of them struggling with the cost of housing. Specifically:
- Londoners from Black, Asian and Minority Ethnic (BAME) backgrounds are more likely to live in poverty than those from a White background: 39 per cent of BAME Londoners live in poverty after housing costs, compared to 21 per cent of White Londoners<sup>6</sup>.
  - Insofar as those with some religious affiliations – Buddhists, Hindus, Sikhs, and particularly Muslims<sup>7</sup> – are more heavily represented among London's BAME population, they too may be more likely to live in poverty.
  - Deaf and disabled residents are also more likely to be living in poverty: 36 per cent of Londoners who live in families where someone is disabled are living in poverty after housing costs, compared to 26 per cent of those in families where no-one is disabled<sup>8</sup>.

---

<sup>4</sup> GLA, [Housing Research Note: Intermediate housing: The evidence base](#), August 2020

<sup>5</sup> After accounting for housing costs, 2.4 million Londoners live in relative poverty (with a household income below 60 per cent of the national median). This is equivalent to 28 per cent of the population, compared with 21 per cent in the rest of England. A third of Inner London residents live in poverty. Housing is a significant cause of these high rates of poverty in London; poverty rates almost double after housing costs are considered. GLA, [London Plan: Integrated Impact Assessment: Consultation Document](#), November 2017. Property wealth in London is extremely unequally distributed, with around half of households owning nothing. Meanwhile, the wealthiest 10 per cent each own property worth an average value of around £1 million. Greater London Authority analysis of Households Below Average Income data (End User dataset)

<sup>6</sup> GLA analysis of Households Below Average Income data (End User dataset)

<sup>7</sup> GLA analysis of Office for National Statistics (ONS) 2011 Census

<sup>8</sup> GLA analysis of Households Below Average Income data (End User dataset)

- Young people are more likely to be unemployed: the unemployment rate for London young adults is 2.7 times higher than for adults aged 25-64<sup>9</sup>. Young Londoners also face higher housing costs than older groups (partly because the latter are less likely to be renters): those aged 16-29 or 30-49 spend an average of 29 per cent of their net income on housing costs, compared to 24 per cent for 50-64 year olds and 17 per cent for those aged 65 or more.<sup>10</sup>
- Although the overall poverty rate for working-age men and women in London is similar (26 per cent for women compared to 25 per cent for men)<sup>11</sup>, women are disproportionately likely to be economically inactive<sup>12</sup>, low paid<sup>13</sup>, and/or subject to the poverty that affects single parent families<sup>14</sup>. 54 per cent of all London's single parent families (of whom the vast majority are single mother families) live in poverty, compared to 31 per cent of couples with children<sup>15</sup>.
- Although specific data on housing affordability is not available for those who are pregnant, on maternity leave, or have given birth within the last 26 weeks (the pregnancy and maternity characteristic), this group may be more likely to disproportionately experience economic inactivity, low pay and/or poverty as many women are forced to leave their jobs because of harassment and discrimination during pregnancy, maternity leave and on their return to work. Issues include being turned down for flexible working, missing out on a promotion and being put under pressure to hand in their notice<sup>16</sup>. These issues are likely to contribute to affordability problems in areas of high housing costs such as London.

2.4. The Centre for London recently reported that LGBT+ Londoners are more socioeconomically polarised than other Londoners, as they are more likely to report both being financially comfortable and in poverty<sup>17</sup>. There is also evidence that those who are LGBTQ+ are more likely to experience discrimination when seeking to rent or buy a home<sup>18</sup>. Although not specifically related to the affordability of housing, this does suggest that those who are LGBTQ+ can be at a disadvantage in a competitive housing market.

---

<sup>9</sup> GLA analysis of Office for National Statistics (ONS) Annual Population Survey for 2019

<sup>10</sup> Resolution Foundation, [Intergenerational audit for the UK: Data dashboard](#), 2020

<sup>11</sup> GLA analysis of Households Below Average Income data (End User dataset)

<sup>12</sup> Although they form a minority (46 per cent) of Londoners who are unemployed, worklessness rates for women in London are 11 percentage points higher than for men. New Policy Institute, [London's Poverty Profile 2015](#), October 2015

<sup>13</sup> 58 per cent of low paid jobs in London are carried out by women. The biggest group among the low paid in London is female part-time employees, who account for 31 per cent of all low paid Londoners. Ibid.

<sup>14</sup> 53 per cent of all London's single parent families live in poverty, and 97 per cent of those parents are female. Ibid.

<sup>15</sup> GLA analysis of Households Below Average Income data (End User dataset)

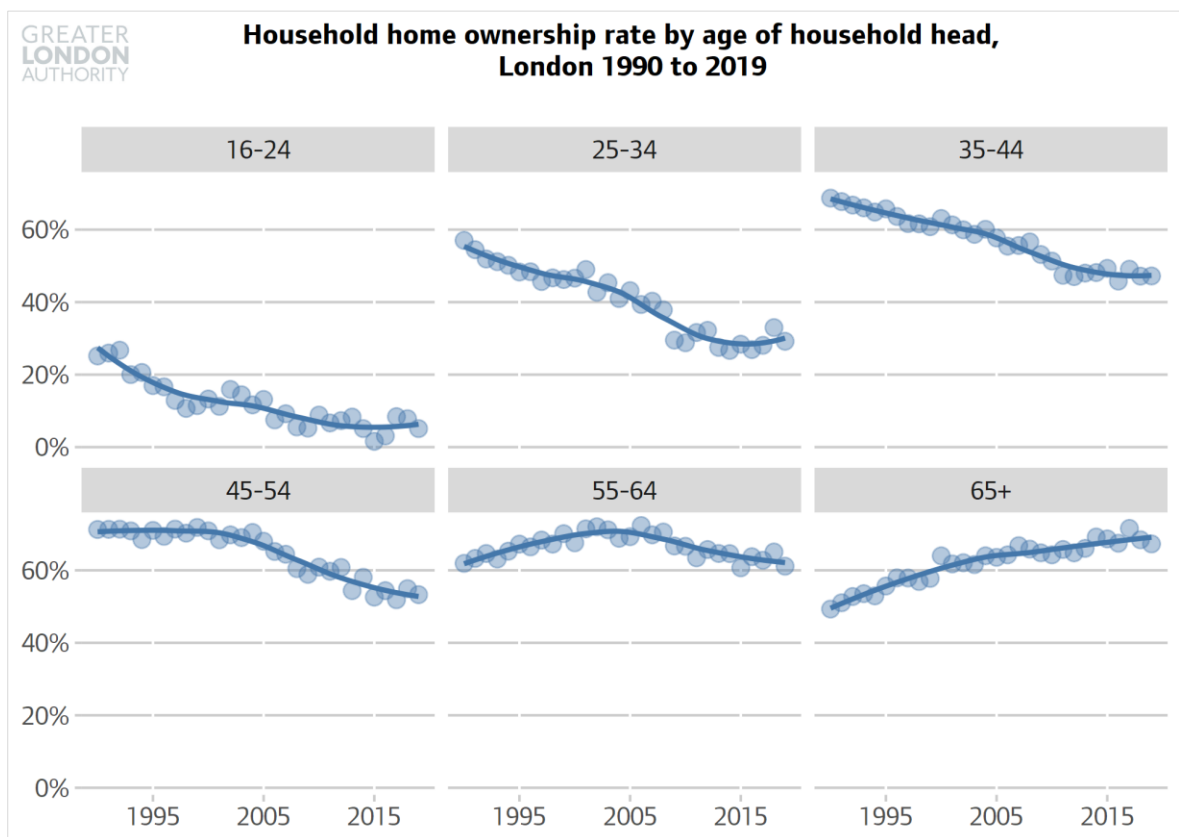
<sup>16</sup> EHRC, [Pregnancy and Maternity – Related Discrimination and Disadvantage](#), December 2015

<sup>17</sup> Centre for London, [How do LGBT+ people experience life in the capital?](#), July 2020

<sup>18</sup> Stonewall, [LGBT in Britain: Hate Crime and Discrimination](#), September 2017

## Housing tenure

- 2.5. The disproportionate extent to which those with some protected characteristics struggle to afford housing is one factor in their uneven distribution across housing tenures – and consequently the extent to which they access or experience particular problems associated with different tenures. Home ownership and social housing are the most secure tenures, but there are significant barriers to accessing each of them – high buying costs in the case of home ownership and the rationing of scarce lettings to the households most in need in the case of social housing. The rapidly growing private rented sector is the least secure and the least affordable of the main tenures. These shifts in tenure have had particular impacts on certain groups.
- 2.6. For example, as illustrated in the chart below, the fall in home ownership among Londoners in recent decades has been most acute among younger Londoners. In 1990, 25 per cent of households in London headed by someone aged 16-24 and 57 per cent of those headed by someone aged 25-34 were homeowners. But by 2019, these figures had fallen to 5 per cent and 29 per cent respectively. There were less dramatic falls in the 35-44 and 45-54 age groups (69 per cent to 47 per cent and 71 per cent to 53 per cent respectively), while ownership rates were relatively stable for those aged 55-64 (going from 62 per cent in 1990 to 61 per cent in 2019) and increased for those aged 65 or more from 49 per cent to 67 per cent<sup>19</sup>.



<sup>19</sup> GLA, [Housing in London 2020](#), October 2020



2.7. There are also clear differences in tenure patterns between Londoners of different ethnicities. 39 per cent of households where the household reference person is someone of BAME ethnicity own their own home, compared to 58 per cent of households where the household reference person is someone of White ethnicity<sup>20</sup>. 35 per cent of BAME-headed households live in social housing, compared to 17 per cent of White-headed households<sup>21</sup>. 26 per cent of both BAME and White households live in the private rented sector, but 53 per cent of privately renting BAME individuals are in relative poverty after housing costs, compared to 23 per cent of privately renting White individuals<sup>22</sup>.

## Housing need

- 2.8. The patterns of affordability and housing tenure set out above contribute to stark differences in housing need between different groups of Londoners. Among the clearest differences are those between Londoners of different ethnicity: for example, households with a Black or Asian household head are 80 per cent more likely to be overcrowded than the London average, while households with a Black household head are around 150 per cent more likely to be owed a homelessness duty<sup>23</sup>.
- 2.9. There are also significant differences in some aspects of housing need by age: for example, an estimated 19 per cent of families in London headed by someone aged 16-29 are overcrowded, compared to 13 per cent of those headed by someone aged 30-49 and 8 per cent of those headed by someone aged 50-64<sup>24</sup>.
- 2.10. Female-headed households in London are more likely to be homeless: single mother families accounted for 25 per cent of all homeless households assessed as owed a prevention or relief duty in London in 2019/20, and single female households another 24 per cent<sup>25</sup>.
- 2.11. Nearly one in five LGBT Londoners, including 25 per cent of trans people and 28 per cent of LGBT disabled people, have experienced homelessness at some point in their lives; and 24 per cent of young people facing or experiencing homelessness identify as LGBTQ+<sup>26</sup>. In addition, only half of lesbian, gay and bi people (46 per cent) and trans people (47 per cent) in Britain feel able to be open about their sexual orientation or gender identity to everyone in their family; and more than one

---

<sup>20</sup> The household reference person is the household member named in statistical returns; however, the protected characteristics of the household reference person might not always be representative of other household members. For ease of reference, within this report, the household reference person is referred to as the household head.

<sup>21</sup> GLA analysis of Office for National Statistics (ONS) Annual Population Survey for 2019

<sup>22</sup> GLA analysis of Households Below Average Income data (End User dataset)

<sup>23</sup> GLA, [Housing in London 2020](#), October 2020

<sup>24</sup> Resolution Foundation, [Intergenerational audit for the UK: Data dashboard](#), 2020

<sup>25</sup> MHCLG, [Statutory Homelessness Annual Report, 2019-20, England](#), October 2020

<sup>26</sup> The London LGBTIQ+ Housing Campaign, [A Manifesto for London LGBTIQ+ Community Housing: Mayoral Election 2020 Campaign](#), February 2020

in ten LGBT people (11 per cent) in Britain have faced domestic abuse from a partner in the last year – increasing to 17 percent of Black, Asian and minority ethnic LGBT people in Britain<sup>27</sup>. These experiences suggest that LGBTQ+ Londoners may be more likely to face discrimination in their existing home and be more likely to form a new household with a distinct housing need.

- 2.12. More broadly, a common theme is that low income households are more likely to find themselves in housing need, and the same therefore goes for those groups with typical incomes below the London average.

### **Occupants of intermediate housing in London<sup>28</sup>**

- 2.13. Data on the characteristics of households who currently move into intermediate housing is collected through the Ministry of Housing, Communities and Local Government Continuous Recording of social housing lettings and sales (CORE) dataset. CORE data only provides information on those purchasing shared ownership homes. Information on other intermediate products such as intermediate rent is not included. CORE records information on household composition, age, sex, ethnicity, nationality and disabilities. Unless stated otherwise, the figures stated below include imputation in the case of missing or unreported data on ethnicity.
- 2.14. Only four per cent of those accessing shared ownership moved into their homes from other forms of affordable housing<sup>29</sup>, while over half (56 per cent) of those purchasing shared ownership homes were previously living in private rented sector housing and a further quarter (25 per cent) were previously living with family or friends.
- 2.15. For the purpose of the baseline data below, comparisons are made between those households purchasing shared ownership homes, and those households living in the private rented sector in London earning between £30,000 and £90,000<sup>30</sup>. This is because those earning between £30,000 and £90,000 are identified in the GLA

---

<sup>27</sup> Stonewall, [LGBT in Britain: Homes and Communities](#), June 2018

<sup>28</sup> This section summarises the findings and analysis set out in the GLA [Housing Research Note: Intermediate housing: The evidence base](#), August 2020

<sup>29</sup> This category includes shared ownership purchasers who previously lived in homes owned by a Registered Provider, Local Authority or who were in temporary accommodation.

<sup>30</sup> This data is drawn from the Households Below Average Income dataset. Due to small sample sizes, this data is pooled from four years (2015/16 to 2018/19). The CORE data on shared ownership is drawn from CORE data from 2017/18, as published in the GLA Housing Research Note. It should be noted that for certain characteristics where numbers of households with this characteristic are small (such as disability for instance) there may be some volatility in the data which means that comparisons with other years could affect results.

Housing Research Note as being most likely to be in some form of intermediate housing need or aspiration<sup>31</sup>. This group is referred to below as the 'target market'.

2.16. Concealed households living with friends and family and earning between £30,000 and £90,000 are also likely to be in some form of intermediate housing need or aspiration, however no comparative data was available for these households. Data on those in homes at social rent levels or owner-occupied homes are not included in the comparison as these households are assumed to be having their housing needs met.

- 28 per cent of households in the target market were headed by a person aged between 25 and 34, and a further 28 per cent were headed by someone between 35 and 44. In comparison, 59 per cent of households purchasing shared ownership in 2017/18 were headed by a person aged between 25 and 34, and 27 per cent were headed by someone aged between 35 and 44. While 13 per cent of households in the target market were aged over 55, only 2.1 per cent of households moving into shared ownership in London were headed by a person aged over 55. This suggests that shared ownership purchasers are more likely to be aged between 25-44 and less likely to be aged over 55, when compared to the target market.
- 41 per cent of households in the target market were headed by women, and 59 per cent headed by men. In comparison, an equal share of households purchasing shared ownership in London in 2017/18 were headed by each sex. This suggests that shared ownership purchasers are more likely to be female-headed households when compared to the target market.
- 66 per cent of households in the target market were headed by someone of White ethnicity, and 34 per cent were headed by someone of BAME ethnicity. In comparison, 71 per cent of shared ownership purchasers in 2017/18 were headed by a person of White ethnicity, while less than a third (29 per cent) of households were headed by a person of BAME ethnicity. Among first time buyers on the open market, 66 per cent of first-time buyers between 2013/14 and 2016/17 were of White ethnicity<sup>32</sup>. This suggests that shared ownership purchasers are more likely to be headed by a person of White ethnicity and less likely to be headed by someone of BAME ethnicity when compared to the target market. It

---

<sup>31</sup> While the GLA Housing Research Note analysis suggests that households earning between £28,500 and £80,000 are most likely to be in some form of intermediate housing need or aspiration, it also notes that households earning between £80,000 and £90,000 might still be in intermediate housing need, where they are buying larger homes in more expensive areas or where they do not have the deposit to access the open market. As such, households earning up to £90,000 have been included in the analysis undertaken for this EqIA. The lower threshold of £28,500 has been rounded to £30,000.

<sup>32</sup> GLA analysis of English Housing Survey data on first-time buyer households in London, pooled 2013/14 to 2016/17 datasets. Four years of data have been used to increase the sample size.

should be noted that White ethnicity in this context also includes people from non-British backgrounds, including many European nationals (further detail on non-UK nationals is provided below).

- 13 per cent of households in the target market included someone with disability in the household, while only 1.1 per cent of households purchasing shared ownership housing in 2017/18 included a household member considered to have a disability. This suggests that shared ownership purchasers are less likely to include households including someone who is disabled when compared to the target market (although the difference may also be partly explained by differences of definition).
- 33 per cent of households in the target market were single adults, 32 per cent of households were two adults with no children, 35 per cent were households with children, and 6 per cent were single adults with children. In comparison, 59 per cent of households purchasing shared ownership housing in 2017/18 were single adults, and 33 per cent were households with two adults with no children. A total of 7.5 per cent of households moving into shared ownership in London in 2017/18 had children and 1.8 per cent were single adult households with children. This suggests that shared ownership purchasers are more likely to be single adult households, but less likely to be households with children when compared to the target market.
- The majority of households (78 per cent) moving into shared ownership housing in London in 2017/18 were UK nationals residing in the UK. A further 21 per cent were nationals of European countries and just 0.8 per cent of those moving into shared ownership housing in London were nationals of countries outside Europe. In this case, the figures do not include imputation in the case of missing or unreported data on nationality. No comparative data is available for the target market.

## Key workers

2.17. The consultation includes a chapter which considers how intermediate housing can better support the housing needs of key workers. While analysis on the protected characteristics of key workers is constrained by both limited data and a lack of consensus on definitions, some analysis by the GLA based on the recent Government definition of key workers during Covid-19 is available to inform the assessment:

- 30 per cent of employed Londoners with a work-limiting disability are employed in a key worker role, and key workers in London are slightly more likely to have a disability as defined under the Equality Act than other workers<sup>33</sup>

---

<sup>33</sup> GLA, [Briefing: Covid-19 socio-economic risk factors in London](#), June 2020

- Some ethnic groups, particularly Black and Indian Londoners, are more likely to work in a key worker job than White Londoners<sup>34</sup>;
- 34 per cent of women in London work in key worker roles, compared to 25 per cent of men<sup>35</sup>
- Londoners aged 35-49 and 50-59 are the most likely to work in a key worker role, with 30 per cent of those within these age ranges employed in a key worker role<sup>36</sup>;
- 36 per cent of key workers in London are Hindu, 31 per cent Muslim and 29 per cent Christian. 27 per cent of key workers belong to another religion, while a further 27 per cent report having no religion<sup>37</sup>.

2.18. GLA analysis of Labour Force Survey data, using the Institute for Fiscal Studies definition of key workers (which is also based on that adopted by the Government during the Covid-19 pandemic) suggests that 19 per cent of key workers (including those working in both the private and public sector) live in social rented homes. In comparison, 11 per cent of other workers live in social rented homes. 40 per cent of key workers own a home with a mortgage, compared to 44 per cent of other workers.

---

<sup>34</sup> Ibid

<sup>35</sup> Ibid

<sup>36</sup> Ibid

<sup>37</sup> Ibid

### 3. Analysis of equality impacts of proposed policy interventions

#### Delivery of intermediate housing

- 3.1. The London Housing Strategy<sup>38</sup> sets out the Mayor's ambition to increase the overall supply of genuinely affordable homes. While his priority is increasing the number of homes at social rent levels, the 2017 Strategic Housing Market Assessment (SHMA)<sup>39</sup> also identifies a need for intermediate homes.
- 3.2. While the proposed policy responses to the GLA's 2020 consultation on intermediate housing are largely focused on improving the affordability and accessibility of the tenure rather than on increasing delivery, improvements in these areas could help to ensure continued demand, and thereby lead to current supply levels being maintained, or potentially increased. This could have a wider impact on overall affordable housing supply, as some forms of intermediate housing such as shared ownership also provide cross-subsidy (both within a development and/or across a portfolio of developments) which can be used to support the delivery of low cost rent homes.
- 3.3. In addition, following the report of the Housing Delivery Taskforce in July 2020, the consultation sought further views on what role intermediate housing should play in supporting the housing market as part of the recovery from the impacts of the Covid-19 pandemic. It also asked some specific questions on what more the Mayor could do to support the delivery of some specific types of intermediate housing, such as London Living Rent and Discount Market Sale (DMS); and to minimise the risks to affordable housing delivery arising from new Government policies on First Homes and the Right to Shared Ownership.

#### GLA proposed policy response outlined in Part 1 and Part 2 CRR

- The GLA will use the new AHP to promote London Living Rent and shared ownership - options for intermediate housing that aim to meet the needs of Londoners, while at the same time meeting the requirements set by the Government.

<sup>38</sup> GLA, [London Housing Strategy](#), May 2018

<sup>39</sup> GLA, [Strategic Housing Market Assessment](#), November 2017

- The new AHP will operate on a competitive bidding rather than a fixed grant rate basis and so will be able to better reflect the costs of the delivery of different affordable housing tenures, including London Living Rent.
- The GLA expects investment partners to support LLR tenants into home ownership within ten years. The GLA will seek to maximise the number of LLR homes that can be delivered through the programme. Partners are encouraged to inform us of any interventions they may require in this regard when bidding for funding through the new AHP.
- Do-it-yourself (DIY) shared ownership schemes will be eligible for funding through the new AHP (providing they meet the wider requirements of the programme).
- The GLA will support the delivery of DMS homes where they are delivered on schemes that align with wider strategic housing policy objectives, such as community-led schemes and/or schemes that provide homes to groups of people who share a protected characteristic.
- The GLA will continue to raise concerns with Government over the First Homes policy, on the basis of London's priority for low cost rent, which is London's most critical type of housing need.

*Potential positive impacts:*

- As set out above, improving the affordability and accessibility of intermediate housing could help to ensure continued demand, and thereby help to maintain or increase intermediate housing supply. This could benefit some groups who are in intermediate housing need whose protected characteristics may mean that they are more likely to struggle with housing costs in the private rented sector. For instance, although data suggests that women are more likely to be living in poverty, analysis set out in this EqIA shows that shared ownership purchasers are more likely to be female-headed households when compared to the target market. This suggests that intermediate housing could already be helping some women whose housing needs can be met appropriately by intermediate housing.
- For households who are disadvantaged due to protected characteristics who would be unlikely to afford intermediate housing, and would be more suited to homes at social rent levels, maintaining and potentially increasing intermediate housing supply could indirectly benefit them as it also helps to ensure continued delivery of homes at social rent levels via cross-subsidy. This is likely to benefit households headed by someone with a BAME ethnicity background. This is because 42 per cent of BAME-headed households living in the private rented sector have a household income of below £30,000 (and would therefore be unlikely to afford intermediate homes). In comparison, only 30 per cent of households in the private rented

sector with a household income below £30,000 are headed by someone of a White ethnicity background<sup>40</sup>.

- The proposed GLA policy response to support intermediate housing delivery as part of recovery from the impacts of Covid-19 should have a broadly positive impact on those who share particular protected characteristics and are more likely to struggle with housing costs – this includes those from a BAME background, women, those living with a disability and young Londoners. This is because these proposals seek to maintain the supply of genuinely affordable homes through the new AHP.
- More broadly, increasing the overall supply of homes should help to ease the problems of overcrowding and homelessness, problems that result in part from the inadequate supply of homes and disproportionately affect those who share some protected characteristics. This includes Black-, Asian-, and female-headed households, and LGBTQ+ Londoners.
- The GLA proposes a number of policy responses to support the delivery of London Living Rent, including a move away from fixed grant rates to a competitive bidding process which should (in the context of an enhanced settlement from central Government) better reflect the cost of delivering these homes, as well as providing some additional clarity on how LLR works as a Rent-to-Buy product. These homes provide a more affordable option for those who are struggling to pay market rents, as well as an opportunity for households to buy their rented home on a shared ownership basis at a later date. Increasing delivery of these homes would be likely to have a positive impact on some groups in the target market who are currently less likely to be shared ownership purchasers in comparison to others in the target market, such as households headed by someone of a BAME ethnicity background.
- The GLA also proposes a number of policy responses to support the delivery of other intermediate housing tenures, including DIY shared ownership and DMS. The 2018 Letwin Review found that diversification of tenure was key to increasing build out rates<sup>41</sup>. By supporting the delivery of a diverse range of tenures, the policies could bring about the benefits of increased housing supply outlined above. In addition, by ensuring these homes are delivered on schemes that align with wider strategic housing policy objectives, the policies could advance equality of opportunity for those people who share protected characteristics that are often underrepresented in intermediate housing, including older people and people from a BAME background; and foster good relations between persons who share a protected characteristic and persons who do not

---

<sup>40</sup> GLA analysis of household by tenure, ethnicity of household head and gross household income band in London from 2015/16 to 2018/19, based on Households Below Average Income data.

<sup>41</sup> Rt Hon Sir Oliver Letwin MP, [Independent Review of Build Out: Final Report](#), October 2018



share it by encouraging community participation in engagement processes to inform the delivery of new homes and neighbourhood-level plans.

*Potential negative impacts:*

- The SHMA makes clear that the greatest housing need in London is for low cost rented homes. The delivery of intermediate homes may therefore have less of a positive impact on some groups who are disadvantaged due to particular protected characteristics, for whom low cost rent homes would be more appropriate. This is likely to include some households headed by someone with a BAME ethnicity background that, as outlined above, may be less likely to afford intermediate homes than households headed by someone of a White ethnicity background.
- The London Plan makes clear that the Mayor's preferred affordable housing tenures are homes based on social rent levels (including Social Rent and London Affordable Rent), London Living Rent and London Shared Ownership<sup>42</sup>. The London Plan outlines that other affordable housing products may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the London Housing Strategy definition of genuinely affordable housing. While the delivery of other intermediate housing tenures might diversify the supply of affordable housing, the delivery of these homes may have less of a positive impact on those groups for whom low cost rent homes would be more appropriate, including those who are more likely to experience poverty and those who are more likely to struggle with the cost of housing. Further steps to mitigate the affordability challenges of any non-preferred intermediate housing tenures are outlined in the following section.
- As highlighted in the LHSIA, the balance of affordable housing tenures delivered through the Mayor's funding programmes represent a balance between meeting different forms of need and maximising the overall delivery of affordable homes, within the context of national policy and available funding. The make-up of the new AHP reflects a similar balance of priorities and constraints, while additionally benefitting from funding to deliver social rented homes at scale.
- The Mayor continues to work to mitigate the negative impact of insufficient funding for low cost rent homes by making the case to government for a step-change in the amount of money available to London to deliver affordable homes, in particular those at social rent levels. In addition, as noted above the delivery of intermediate homes, in particular shared ownership homes, is likely to support the delivery of low cost rented homes through cross-subsidy generated within housing developments and across a portfolio of developments brought forward by GLA investment partners.

---

<sup>42</sup> GLA, [Publication London Plan](#), December 2020

## Affordability of intermediate housing

- 3.4. The GLA Housing Research Note highlights the extent to which intermediate housing meets particular types of intermediate housing need in London. However, it also outlines a number of existing challenges around the affordability of intermediate housing, in particular in relation to the open market value of and the fees and charges often associated with shared ownership homes. The consultation sought views on measures which, if implemented, may go some way to tackling these challenges. The consultation also sought views on measures which, if implemented, could help to ensure the affordability of First Homes, Discount Market Sale (DMS) and homes sold through the Right to Shared Ownership.

### GLA proposed policy response outlined in Part 1 and Part 2 CRR

- The GLA will not introduce a formal cap on the open market value of shared ownership homes funded through the new AHP, but will work over the coming months to identify any options for further strengthening existing planning guidance in this area.
- The GLA expects all investment partners in the new AHP to sign up to the existing Shared Ownership Charter for Service Charges and to commit to working with the GLA to develop a new and improved charter, reflecting the new shared ownership model and potentially extending the charter to the wider leasehold sector.
- The GLA will work with investment partners to undertake research on service charges in London, including understanding the best categories to include in any data collection on service charges and how best to analyse, present and make use of this data. The new charter could include commitments for partners to publish service charges data.
- The GLA will require all investment partners in the new AHP to:
  - publish details of additional fees and charges (other than service charges) for shared ownership homes on their websites. The new AHP funding guidance outlines the expectation that these charges should be reasonable and kept to a minimum.
  - provide a key features document to potential purchasers at the start of the marketing and sales period for all new shared ownership homes. In addition to the information already required through a key information document, as outlined in the shared ownership model lease, this key features document should also include detailed information on the tenure of a property and the length of any lease, as well as the full range of potential costs, including any expected service charges, permission fees and any other charges (including those relating to resales and lease extensions).
- The London Living Rent benchmarks for 2021/22 will be capped at £1,400 a month.

- Subject to any restrictions on the implementation of First Homes introduced by Government, the GLA will utilise its planning powers to strengthen guidance on existing market value and income caps for affordable home ownership policies, which should also be relevant to First Homes; and to introduce measures to ensure First Homes remain affordable in perpetuity.
- The GLA will utilise its planning powers to strengthen guidance on market value and income caps for DMS homes, to be consistent with existing affordable home ownership policies; and introduce measures to ensure DMS homes remain affordable in perpetuity, with income caps applicable to subsequent sales.
- The GLA will provide guidance on how DMS homes should be valued, to ensure DMS homes remain affordable in perpetuity and to seek to minimise the administrative burden placed on local authorities.
- The GLA expects that the requirement to provide a key features document to potential buyers would apply to all new shared ownership homes sold through the Right to Shared Ownership. In addition, the GLA expects all investment partners in the Affordable Homes Programme 2021-2026, including those with homes sold through the Right to Shared Ownership, to sign up to the Shared Ownership Charter for Service Charges.

*Potential positive impacts:*

- While the GLA Housing Research Note shows that the median household income of shared ownership purchasers is slightly above the median household income of working age Londoners, it also shows that shared ownership is much more accessible to Londoners than market housing and that, overall, intermediate housing helps to meet the needs of those Londoners identified in the SHMA as needing intermediate housing.
- A number of the proposed GLA policy responses to improve affordability, including strengthening planning guidance in relation to the maximum value of shared ownership and other intermediate tenure homes, freezing income eligibility caps (see next section) and improving consistency and transparency of services charges and fees should help to widen access to intermediate housing for those groups with particular protected characteristics who are more likely to struggle with housing costs, but who fall within the target market. These groups include households containing someone with a disability, or of a BAME ethnicity background, who have a household income of between £30,000 and £90,000.
- The forms of intermediate housing preferred by the Mayor (shared ownership and London Living Rent) may be more suitable for younger people, because of their emphasis on home ownership – something that may be more viable for those able to access a mortgage over an extended

period. As outlined earlier in this document, younger people are more likely to struggle with housing costs, and so may be likely to benefit from proposals to improve the affordability of intermediate housing. Analysis set out in this assessment shows that shared ownership purchasers are more likely to include households headed by someone aged between 25-34 when compared to the target market, suggesting that the tenure may already be helping this group. Proposals to improve affordability may help to maintain this effect.

- As set out above, improving the affordability of intermediate housing could help to ensure continued demand, and thereby indirectly help to maintain or increase intermediate housing supply. This could benefit some groups who are in intermediate housing need whose protected characteristics may mean that they are more likely to struggle with housing costs in the private rented sector. This includes those groups who appear to already be benefitting from intermediate homes, such as younger people and women, as well as those who could potentially benefit in future such as households including someone who is disabled, and/or households including someone of a BAME ethnicity background who have a household income of between £30,000 and £90,000.
- For households who share particular protected characteristics who would be unlikely to afford intermediate housing, and would be more suited to homes at social rent levels, maintaining and potentially increasing intermediate housing supply could indirectly benefit them as it also helps to ensure continued delivery of homes at social rent levels via cross-subsidy. This includes those from a BAME background, women, those living with a disability and young Londoners.

*Potential negative impacts:*

- Analysis published in the GLA Housing Research Note comparing shared ownership purchasers in Inner and Outer London shows that a greater proportion of shared ownership purchasers in Inner London could not afford private rents (likely as a result of rents being higher in these areas). Proposed policy responses to improve the affordability of shared ownership homes across London, principally considering options to strengthen existing planning guidance around the value of shared ownership homes, may mean that fewer shared ownership homes are delivered in more expensive areas of London where the need for intermediate housing is greater. While some households may be able to/want to move to Outer London boroughs to access intermediate housing, some households – particularly those who need to be close to work or family – may be unable to, and therefore may be negatively impacted by lower delivery of intermediate housing in their area. These households may include key workers and so this could negatively impact on women (who are more likely to work in key worker

roles than men) and Black and ethnically Indian Londoners (who are more likely to work in key worker roles than White Londoners).

- This risk could potentially be mitigated by delivering alternative forms of intermediate housing in these areas, such as London Living Rent. The GLA is proposing a range of policy responses to support delivery of these homes, which would likely be more affordable than shared ownership for some groups who share particular protected characteristics that place them at a disadvantage and are on lower incomes in more expensive parts of London. This includes those groups who appear to already be benefitting such as younger people and women, as well as those who could potentially benefit in future such as households including someone who is disabled, and/or households including someone of a BAME ethnicity background who have a household income of between £30,000 and £90,000.
- Responses to the consultation raised concerns that other intermediate housing tenures, including DMS and First Homes, would be unaffordable to many Londoners and particularly in higher value areas. The proposed policy responses to improve the affordability of these other affordable home ownership homes across London, principally those that strengthen planning guidance on existing market value and income caps for affordable home ownership policies, will ensure that other intermediate housing tenures remain affordable to meet the needs of those Londoners identified in the SHMA as needing intermediate housing.

## Eligibility, prioritisation and allocation

- 3.5. As outlined in the consultation document, there are many Londoners who are unlikely to benefit from homes at social rent levels but who still struggle with housing costs. Intermediate housing plays an important role in meeting the housing needs and aspirations of this group. However, there is little transparency or consistency across London in how intermediate housing is allocated meaning that those who need it most might not always be aware of it, or able to access it.

### GLA proposed policy response outlined in Part 1 and Part 2 CRR

- The GLA will continue to freeze income eligibility criteria for intermediate homes (£90,000 for shared ownership/other affordable home ownership and £60,000 for London Living Rent/ other intermediate rent). This will continue to be kept under review via the London Plan Annual Monitoring Report.
- The GLA will extend eligibility for LLR homes funded through the new AHP to all those who live or work in London and who either have a formal tenancy (e.g. in the private rented sector) or who are living in an informal arrangement with family or friends as a result of struggling with housing costs. This change will also apply to the Homes for Londoners: Affordable Homes Programme 2016-23 and this will be reflected in an update to the Capital Funding Guide.

- The GLA will consider any further changes to the resales process that are put forward by the Government in its technical consultation on the new shared ownership model, including how the process could be better explained to current and potential shared owners, taking into account the need to protect affordable housing stock.
- Regardless of whether providers set additional prioritisation criteria for the first three months of marketing new intermediate homes, the GLA expects local authorities and housing providers to adopt an equitable and targeted allocation process for all intermediate housing, having regard to regional and local eligibility criteria, and the established definitions of housing need.
- Housing providers receiving grant through the Affordable Homes Programme 2021-2026 that choose to set additional prioritisation criteria for the first three months of marketing new intermediate homes will be required to publish details of the criteria on which intermediate housing applications might be prioritised, which might reflect local eligibility and/or prioritisation criteria, within their published policy statements.
- Where intermediate homes are delivered through the planning system, the GLA expects these homes to be allocated according to intermediate eligibility and/or prioritisation criteria, which can include locally defined criteria. Where a local authority has an intermediate housing waiting list, they should agree with the developer a process for providing priority access for households on the waiting list.
- The GLA will explore options to develop the existing Homes for Londoners portal as a pan-London property search tool to register housing interest and to inform allocations, as well as to market the availability of intermediate homes.

*Potential positive impacts:*

- Proposals to freeze eligibility income caps at current levels will help to ensure that a wide range of households can continue to benefit from new intermediate homes. This is likely to benefit households with protected characteristics who are in the target market but are currently less likely to purchase shared ownership homes including households with someone who is disabled, or households headed by someone from a BAME ethnicity background.
- Proposals to expand eligibility for LLR homes through the new AHP to include those who either live or work in London and who either have a formal tenancy (e.g. in the private rented sector) or who are living in an informal arrangement with family or friends as a result of struggling with housing costs should ensure that those who are experiencing acute challenges with housing costs can benefit from these homes. This could benefit some groups who are in intermediate housing need whose

protected characteristics may mean that they are more likely to struggle with housing costs in the private rented sector. This includes those groups who appear to already be benefitting from intermediate homes, such as younger people and women, as well as those who could potentially benefit in future such as households including someone who is disabled, and/or households including someone of a BAME ethnicity background who have a household income of between £30,000 and £90,000.

- Proposals to support shared owners to move to homes which are more suitable for their needs and increase understanding of the process relating to resales should help ensure that intermediate homes are accessed by those who would most benefit from them. This is also likely to benefit those groups identified in the bullet point above.
- Proposals that seek to increase the transparency and clarity of intermediate housing allocations should help to improve the accessibility of intermediate housing; while proposals that promote the adoption of an equitable and targeted allocation process will support the aim of ensuring that intermediate homes are accessed by those who would most benefit from them. Retaining an element of flexibility over the allocation of intermediate homes will allow local authorities to determine priorities for affordable housing with regard to local need, which should also mean that those people with protected characteristics that are identified as being in the greatest housing need are prioritised for intermediate homes.

*Potential negative impacts:*

- Proposals to freeze eligibility income caps at current levels (rather than raise them) may mean that fewer intermediate homes are delivered in more expensive areas of London where the need for intermediate housing is greater. Analysis published in the GLA Housing Research Note comparing shared ownership purchasers in Inner and Outer London shows that a greater proportion of shared ownership purchasers in Inner London could not afford private rents (likely as a result of rents being higher in these areas). While some households may be able to/want to move to Outer London boroughs to access intermediate housing, some households – particularly those who need to be close to work or family – may be unable to, and therefore may be negatively impacted by lower delivery of intermediate housing in their area. This includes those groups who appear to already be benefitting from intermediate housing such as younger people and women, as well as those who could potentially benefit in future such as households including someone who is disabled, and/or households including someone of a BAME ethnicity background who have a household income of between £30,000 and £90,000.
- The absence of guidance on the allocation of intermediate housing and intermediate waiting lists may mean there is still inconsistency between

local authorities and housing providers in the process for applying for an intermediate home. To mitigate these potential negative impacts, the GLA has proposed policy responses that seek to increase the transparency and clarity of intermediate housing allocation processes, such as a requirement for housing providers to publish details of the criteria on which intermediate housing applications might be prioritised.

## Supporting London's key workers

- 3.6. The consultation sought views on options for how key workers could be defined and prioritised for intermediate homes, as well as how the Mayor might support improvements in the quality of existing key worker accommodation. It also sought views on how the Mayor can encourage delivery of affordable housing, which could be prioritised for key workers, on public sector land.

### GLA proposed policy response outlined in Part 1 and Part 2 CRR

- The GLA will define a core list of key worker occupations. Local authorities will be encouraged to adopt this core list of key workers and can add to the list at a local level, as they consider appropriate.
- The GLA will define a core list of key workers based on the following parameters:
  - occupations that are considered essential to the functioning of London in normal times;
  - occupations where there is a requirement for an employee to be anchored at their workplace in London to carry out their role; and
  - regard to income, with incomes below the income caps defined for intermediate housing within the London Plan.
- The GLA will strengthen planning guidance to enforce the expectation that key workers should be prioritised, with regard to local need, if local authorities and housing providers choose to set additional prioritisation criteria for the first three months of marketing new intermediate homes.
- The GLA expects local authorities and housing providers to use their discretion to consider whether it is appropriate for local key workers to be prioritised on certain sites near a key worker institution, with regard to local need and site-specific circumstances.
- The GLA will work with existing partners, including public sector bodies and the One Public Estate, to ensure that public sector bodies are briefed on the Mayor's existing affordable housing investment and planning policies.
- The GLA is open to discussing with partners options for funding the conversion of shared key worker accommodation to intermediate homes through the new AHP where it will result in net additional affordable homes and there is evidence of demand.



*Potential positive impacts:*

- Improving the quality of existing key worker accommodation could provide those with protected characteristics who are more likely to live in poor quality or overcrowded accommodation with a higher quality, more secure, home. In particular, this could benefit women (who are more likely to work in key worker roles than men) and Black and ethnically Indian Londoners (who are more likely to work in key worker roles than White Londoners).
- Defining a core list of key worker occupations and strengthening planning guidance to enforce the expectation that key workers should be prioritised for intermediate housing could improve the accessibility of these types of homes to those in key worker professions. This will particularly benefit women and Black and ethnically Indian Londoners who, as outlined above, are more likely to work in key worker roles than men and White Londoners.
- Supporting the delivery of intermediate homes for key workers on certain sites near a key worker institution, and supporting the delivery of public sector land, could increase the availability and quality of intermediate homes for key workers. This will particularly benefit women and Black and ethnically Indian Londoners who, as outlined above, are more likely to work in key worker roles than men and White Londoners.
- Improving the access of those in certain key worker professions to high quality affordable housing is likely to help address the recruitment and retention challenges facing key public services. Having well-resourced public services could indirectly benefit those with protected characteristics who are more likely to experience ill health, be a victim of crime or experience lower educational attainment<sup>43</sup>. This includes LGBT+ Londoners, women, older people, disabled people and those from some BAME backgrounds.

*Potential negative impacts:*

- Providing funding that focuses on investment in homes exclusively for key workers could potentially reduce the resource available to deliver intermediate housing for households who may be in greater need of intermediate housing but who do not fit the definition of key workers. For instance, most key workers in London are aged between 35 and 60, however those Londoners between the age of 25-34 are most likely to need support to access affordable home ownership products. This could result in younger people having reduced access to intermediate homes.
- Prioritising intermediate homes for key workers could potentially reduce the accessibility of intermediate housing for households who may be in greater need of intermediate housing but who do not fit the definition of key

---

<sup>43</sup> GLA, [Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy](#), May 2018

workers, as outlined above. However, the GLA expects local authorities to prioritise key workers with regard to local need, having regard to the relative prioritisation of all those identified as being in housing need through the local Strategic Housing Market Assessment (SHMA). In addition, by ensuring any key worker definition has regard to income, with incomes below the income caps defined for intermediate housing within the London Plan, the GLA will ensure that intermediate homes are only accessed by those key workers who are in intermediate housing need.

- Some people in occupations which could be defined as key workers may be more suited to homes at social rent levels (and data shows that those in key worker roles are more likely than those in other roles to live in social rented homes already). As such, these households may not benefit from delivery of, and improvement to, intermediate housing.

### Improving data on intermediate housing

- 3.7. The consultation sought views on options for how the data collected on intermediate housing could be improved to better demonstrate how intermediate housing is performing to inform evidence-based policy development. The consultation sought views on what data is currently collected outside of centralised systems such as MHCLG's Continuous Recording of Social Housing Lettings and Sales (CORE) dataset, as well as what data is collected by local authorities and housing providers for their own monitoring purposes. It also sought views on the benefits of improving data on intermediate housing and any barriers to collecting the data.

#### GLA proposed policy response outlined in Part 1 and Part 2 CRR

- The GLA will work with Government to improve the collection of data via CORE on homes across all intermediate tenures, including shared ownership, shared equity, discount market sale, discount market rent, London Living Rent, and other intermediate rent; and the characteristics of those to whom intermediate homes are sold or let, including their occupation and additional protected characteristics.
- The GLA will work with investment partners to build on existing data collection processes for staircasing transactions and identify any opportunities for data sharing to improve understanding in this area.
- The GLA will work with Government to improve collection of data on the stock of intermediate homes owned by local authorities and on shared ownership staircasing transactions.
- Recognising the challenges of collecting data on the tenure that shared owners move into if they leave their shared ownership property, and the assessment of London's housing needs over time provided by the London Housing Strategy, the GLA will not, at this stage, seek to increase collection of

data on the tenure that shared owners move into if they leave their shared ownership property.

*Potential positive impacts:*

- Improving the collection of data on homes across all intermediate tenures and on the characteristics of those accessing intermediate homes could help to inform future policy making, including strategies to target intermediate housing to meet housing needs. Evidence-based strategies to increase the delivery of intermediate housing could benefit those Londoners identified in the SHMA as needing intermediate housing, including younger people and women. Evidence-based strategies to increase the affordability of intermediate housing could help to widen access to intermediate housing for those groups with particular protected characteristics who are more likely to struggle with housing costs, including households containing someone with a disability, or of a BAME ethnicity background, who have a household income of between £30,000 and £90,000.

*Potential negative impacts:*

- The reliability of data on protected characteristics is dependent on residents voluntarily providing personal information. There is a risk that the evidence base could be skewed if those groups who are more likely to be affected by digital exclusion – including women, older people, deaf and disabled people, and those who are economically inactive<sup>44</sup> – are not proportionately represented in the evidence base. To mitigate this risk, the GLA will work with Government to improve the collection of data via CORE, which is input into by housing providers as opposed to residents.

---

<sup>44</sup> ONS, [Exploring the UK's digital divide](#), March 2019

## 4. Summary of impacts of policy proposals by protected characteristic

4.1. The table below summarises the likely impacts of the proposed policy responses set out in the Part 1 CRR and Part 2 CRR by protected characteristic. Mitigations of the potential negative equality impacts of the proposed policy responses are identified in [Section Three](#) above.

**Table 1: Summary of equality impacts by protected characteristics**

Protected characteristic
<b>Age</b>
<i>Children</i>
<ul style="list-style-type: none"> <li>• Certain groups of children, including those from BAME backgrounds, disabled children and those for whom one or more parents is not in employment, are at higher risk of living in poverty. While this means that low cost rent homes may be more appropriate than intermediate homes in meeting the needs of these households, proposals which help to maintain or increase the supply of intermediate homes and therefore increase overall affordable supply including of homes at social rent levels (via cross-subsidy) - could benefit these households and help to reduce this inequality.</li> </ul>
<i>Younger people</i>
<ul style="list-style-type: none"> <li>• Shared ownership purchasers are more likely to be young people aged between 25 and 34 when compared to those in this age group within the target market. It is likely that the benefit to this age group would be increased by improving the delivery, affordability and quality of intermediate housing options.</li> <li>• Investing in conversions of shared accommodation to intermediate homes for key workers where there is evidence of need may have a negative impact on this group, as most key workers in London are aged between 35 and 60.</li> </ul>
<i>Older people</i>
<ul style="list-style-type: none"> <li>• Older people are less likely to benefit from investment in affordable housing aimed at encouraging home ownership, and shared ownership purchasers are less likely to</li> </ul>

### Protected characteristic

include households headed by someone aged over 55, when compared to the target market. Supporting the delivery of other intermediate housing tenures could lead to increased supply of other tenures which may be more accessible to this age group, for example Discount Market Sale (DMS) may be more accessible for older people with relatively large deposits.

- Londoners aged 35-49 and 50-59 are the most likely to work in a key worker occupation, with 30 per cent of employed Londoners in these age brackets employed in a key worker role<sup>45</sup> and so could benefit from efforts to convert shared accommodation to intermediate homes for key workers, and to prioritise intermediate homes for key workers, where there is evidence of this need.

### Disability

- Households containing people with disabilities are more likely to experience poverty. While this means that low cost rent homes may be more appropriate than intermediate homes in meeting the needs of these households, proposals which help to maintain or increase the supply of intermediate homes may benefit people with disabilities as the cross-subsidy generated by intermediate housing that can be invested in accessible homes at social rent levels.
- In addition, households within the target market including someone who is disabled are less likely to be shared ownership purchasers, so the proposals to improve the affordability of this product (for instance, by freezing the income cap and by requiring investment partners to sign up to the Shared Ownership Charter for Service Charges) may help to widen access to this group.
- 30 per cent of employed Londoners with a work-limiting disability are employed in a key worker role<sup>46</sup> and so could benefit from efforts to convert shared accommodation to intermediate homes for key workers, and to prioritise intermediate homes for key workers, where there is evidence of this need. However, given that households containing people with disabilities are more likely to experience poverty, they may be negatively impacted if such conversions entail an increase in housing costs.

### Gender reassignment

- The very limited availability of data makes it difficult to reliably assess potential impacts of potential policy interventions on those who are proposing to undergo, undergoing or have undergone a process (or part of a process) for the purpose of reassigning their sex. To the extent that trans Londoners are captured within the data on LGBTQ+ people set out in Section Two of this EqIA, they are likely to experience impacts identified below for LGBTQ+ Londoners.

<sup>45</sup> GLA, [Briefing: Covid-19 socio-economic risk factors in London](#), June 2020

<sup>46</sup> Ibid

Protected characteristic
<p><b>Pregnancy and maternity</b></p> <ul style="list-style-type: none"> <li>The limited availability of specific data on this group makes it hard to identify impacts, beyond those that affect households including children.</li> </ul>
<p><b>Race</b></p> <ul style="list-style-type: none"> <li>Black, Asian and minority ethnic (BAME) groups are more likely to experience poverty and are disproportionately affected by overcrowding.</li> <li>While this means that low cost rent homes may be more appropriate than intermediate homes in meeting the needs of these households, proposals which help to maintain or increase the supply of intermediate homes may benefit this group as the cross-subsidy generated by intermediate housing that can be invested in homes at social rent levels. This is likely to benefit some households headed by someone with a BAME ethnicity background. This is because 42 per cent of BAME-headed households living in the private rented sector have a household income below £30,000 (and would therefore be unlikely to afford intermediate homes). In comparison, only 30 per cent of households in the private rented sector with a household income below £30,000 are headed by someone of a White ethnic background<sup>47</sup>.</li> <li>In addition, BAME ethnicity households within the target market are less likely to be shared ownership purchasers, so the proposals to improve the affordability of this product (for instance, by freezing the income cap and by requiring investment partners to sign up to the Shared Ownership Charter for Service Charges), and the proposals to increase the transparency and clarity of intermediate housing allocations, may help to widen access to this group.</li> <li>Some ethnic groups, particularly Black and ethnically Indian Londoners, are more likely to work in a key worker job than White Londoners and so may be more likely to benefit the conversion of shared accommodation to intermediate homes for key workers, and policies to prioritise intermediate homes for key workers, where there is evidence of this need. However, given that Black, Asian and minority ethnic (BAME) groups are more likely to experience poverty, they may be negatively impacted if such conversions entail an increase in housing costs.</li> </ul>
<p><b>Religion or belief</b></p> <ul style="list-style-type: none"> <li>The limited availability of data on the extent to which those who hold a particular religion or belief, including no religion or belief, are subject to particular housing problems, makes it difficult to reliably identify potential impacts. However, to the</li> </ul>

<sup>47</sup> GLA analysis of household by tenure, ethnicity of household head and gross household income band in London from 2015/16 to 2018/19, based on Households Below Average Income data.

<b>Protected characteristic</b>
<p>extent that households with some religious beliefs – including Buddhists, Hindus, Sikhs and Muslims – are more heavily represented among London’s BAME population, they are likely to experience impacts identified for those from BAME backgrounds above.</p>
<p><b>Sex</b></p> <ul style="list-style-type: none"> <li>• Women stand to benefit from efforts to improve the affordability of intermediate homes, because there are a number of indications that they are more likely to experience poverty. Data suggests that shared ownership purchasers are more likely to be female-headed households in comparison to the target market, suggesting that this group is already benefiting from intermediate homes.</li> <li>• However, some women may experience less of a positive impact of intermediate housing delivery, as low cost rent homes might be more appropriate for their needs. However, they may benefit from the cross-subsidy generated by intermediate housing that can be invested in homes at social rent levels. They may also benefit from any proposals to try and mitigate the impacts of Government policy initiatives on the supply of existing and new affordable homes, in particular homes at social rent levels.</li> <li>• Employed female Londoners (34 per cent) are much more likely to work in a key worker occupation than employed male Londoners (25 per cent)<sup>48</sup> and so may be more likely to benefit from efforts to convert shared accommodation to intermediate homes for key workers, and policies to prioritise intermediate homes for key workers, where there is evidence of this need. However, given that women are more likely to experience poverty, they may be negatively impacted if such conversions entail an increase in housing costs.</li> </ul>
<p><b>Sexual orientation</b></p> <ul style="list-style-type: none"> <li>• There is an absence of data on the extent to which those who identify as LGBTQ+ experience difficulties covering housing costs or occupy particular types of housing. However, there is evidence that those who are LGBTQ+ may experience discrimination when seeking to rent or buy a home. In addition, LGBT Londoners are more likely to have experienced homelessness than non-LGBT Londoners, and are more likely to face discrimination and/or domestic abuse, which may mean that they are likely to form a new household with a distinct housing need.</li> <li>• Proposals which help to maintain or increase the supply of intermediate homes and therefore increase overall affordable supply (via cross-subsidy) could benefit these households and help to reduce this inequality.</li> </ul>

<sup>48</sup> GLA, [Briefing: Covid-19 socio-economic risk factors in London](#), June 2020

## Other formats and languages

For a large print, Braille, disc, sign language video or audio-tape version of this document, please contact us at the address below:

Greater London Authority  
City Hall  
The Queen's Walk  
More London  
London SE1 2AA

Telephone **020 7983 4000**  
**[www.london.gov.uk](http://www.london.gov.uk)**

You will need to supply your name, your postal address and state the format and title of the publication you require.

If you would like a summary of this document in your language, please phone the number or contact us at the address above.