

**Homes for Londoners:
Affordable Homes
Programme 2021-2026**

Equality Impact Assessment

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1. Introduction and background

Background

- 1.1 The Mayor is committed to creating a fairer, more equal and more integrated city where all people feel welcome and able to fulfil their potential. [Inclusive London](#), the Mayor's strategy for equality, diversity and inclusion, sets out how he will help address the inequalities, barriers and discrimination experienced by different groups in London.
- 1.2 A key part of developing the Affordable Homes Programme 2021-2026 has been to undertake an Equality Impact Assessment (EqIA). The EqIA is an information gathering tool used to assess the potential impacts of policies on people with the characteristics that are protected by the Equality Act 2010.

Public Sector Equality Duty

- 1.3 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.
- 1.4 The GLA policies and funding conditions introduced through the Affordable Homes Programme 2021-2026, and identified in [Section Four](#) of this EqIA, are designed to help the Mayor further meet his policy objectives in relation to the delivery of genuinely affordable homes. These objectives, which are outlined in the [2018 London Housing Strategy](#), were also shaped with due regard to the Public Sector Equality Duty.¹

¹ GLA, [London Housing Strategy: Impact Assessment](#), May 2018

Equality Impact Assessment

- 1.5 This document sets out an assessment of potential equality impacts related to the policies and funding conditions contained within the Affordable Homes Programme 2021-2026. The aim of this document will be to assess: *what would the impact of the Affordable Homes Programme 2021-2026 be on people with the characteristics that are protected by the Equality Act 2010: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation?*
- 1.6 The equality impacts of the programme are assessed by policy and characteristic. [Section Two](#) of this assessment outlines the general housing baseline data that has been used to conduct the assessment. This is followed in [Section Three](#) and [Section Four](#) by an analysis of the equality impacts related to the policy proposals and funding conditions introduced by Government and by the GLA, respectively, through the Affordable Homes Programme 2021-2026. [Section Five](#) summarises the equality impacts of policies and funding conditions introduced within the programme by protected characteristics.
- 1.7 The assessment notes that the totality of policies within the Affordable Homes Programme 2021-2026 represents a balance between meeting different forms of housing need and maximising the overall delivery of affordable homes, within the context of national policy requirements and available funding. It also identifies the mitigations that will be put in place through the programme to alleviate any potential negative impacts on those who share particular protected characteristics, and on relations between different groups who share characteristics and those groups who do not.

2. General housing baseline data

Housing affordability

- 2.1 After accounting for housing costs, 2.4 million Londoners live in relative poverty (with a household income below 60% of the national median). This is equivalent to 28% of the population, compared with 21% in the rest of England.² A third of Inner London residents live in poverty. Housing costs are a significant cause of these high rates of poverty in London; poverty rates almost double after housing costs are considered.³ Property wealth in London is extremely unequally distributed, with around half of households owning nothing. Meanwhile, the wealthiest 10% each own property worth an average of around £1 million.⁴
- 2.2 The affordability pressures that result from a long-term undersupply of homes of all tenures in London, and particularly affordable homes, are one important respect in which housing impacts 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:
- Londoners from Black, Asian and Minority Ethnic (BAME) backgrounds are more likely to live in poverty than those from a White background: 39% of BAME Londoners live in relative poverty after housing costs, compared to 21% of White Londoners.⁵
 - Insofar as those with some religious beliefs – Buddhists, Hindus, Sikhs, and particularly Muslims – are more heavily represented among London’s BAME population⁶, they too may be more likely to live in poverty.
 - Deaf and disabled residents are also more likely to be living in poverty: 36% of Londoners who live in families where someone is disabled are living in poverty after housing costs, compared to 26% of those in families where no-one is disabled.⁷
 - Younger people are more likely to be unemployed: the unemployment rate for younger adults in London is 2.7 times higher than for adults aged 25-

² GLA analysis of Households Below Average Income data (End User dataset)

³ GLA, [London Plan: Integrated Impact Assessment: Consultation Document](#), November 2017

⁴ GLA analysis of Office for National Statistics (ONS) Wealth and Assets Survey 2010-2012

⁵ GLA analysis of Households Below Average Income data (End User dataset)

⁶ GLA analysis of Office for National Statistics (ONS) 2011 Census

⁷ GLA analysis of Households Below Average Income data (End User dataset)

64.⁸ Younger 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% of their net income on housing costs, compared to 24% for 50-64 year olds and 17% for those aged 65 or more.⁹

- Although the overall poverty rate for working-age men and women in London is similar (26% for women compared to 25% for men)¹⁰, women are disproportionately likely to be economically inactive¹¹, low paid¹², and/or subject to the poverty that affects single parent families. 54% of all London's single parent families (of whom the vast majority are single mother families) live in poverty, compared to 31% of couples with children.¹³
- Although specific data on housing affordability is not available for those who are pregnant or have given birth within the last 24 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.¹⁴ 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 LGBTQ+ Londoners are more socioeconomically polarised than other Londoners, as they are more likely to report both being financially comfortable and in poverty.¹⁵ There is evidence that those who are LGBTQ+ are more likely to experience discrimination when seeking to rent or buy a home.¹⁶ There is also evidence of unmet demand from older LGBTQ+ people for specialist provision care and retirement housing.¹⁷ Although not related to the affordability of housing, this does suggest that those who are LGBTQ+ can be at a disadvantage in a competitive housing market.

Housing tenure

⁸ GLA analysis of Office for National Statistics (ONS) Annual Population Survey for 2019

⁹ Resolution Foundation, [Intergenerational audit for the UK: Data dashboard](#), 2020

¹⁰ GLA analysis of Households Below Average Income data (End User dataset)

¹¹ Although they form a minority (46%) of Londoners who are unemployed, worklessness rates for women in London are 11% higher than for men. New Policy Institute, [London's Poverty Profile 2015](#), October 2015

¹² 58% of low paid jobs in London are carried out by women. Moreover, the biggest group among the low paid in London is female part-time employees, who account for 31% of all low paid Londoners. Ibid.

¹³ GLA analysis of Households Below Average Income data (End User dataset)

¹⁴ EHRC, [Pregnancy and Maternity – Related Discrimination and Disadvantage](#), December 2015

¹⁵ Centre for London, [How do LGBT+ people experience life in the capital?](#), July 2020

¹⁶ Stonewall, [LGBT in Britain: Hate Crime and Discrimination](#), September 2017

¹⁷ Tonic, [Building Safe Choices 2020: Our voices: LGBT+ later life housing demand in London](#), June 2020

- 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 experience the advantages and disadvantages 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 tenures. These shifts in tenure have had particular impacts on certain groups.
- 2.6 For example, the fall in home ownership among Londoners in recent decades has been most acute among younger Londoners. In 1990, 25% of households in London headed by someone aged 16-24 and 57% of those headed by someone aged 25-34 were homeowners. But by 2019, these figures had fallen to 5% and 29% respectively. There were less dramatic falls in the 35-44 and 45-54 age groups (69% to 47% and 71% to 53% respectively), while ownership rates were relatively stable for those aged 55-64 (going from 62% in 1990 to 61% in 2019) and increased for those aged 65 or more from 49% to 67%.¹⁸
- 2.7 There are clear differences in tenure patterns between Londoners of different ethnicities. 39% of households headed by someone of BAME ethnicity own their own home, compared to 58% of households headed by someone of White ethnicity. 35% of BAME-headed households live in social housing, compared to 17% of White-headed households.¹⁹ 26% of both BAME and White households live in the private rented sector, but 53% of privately renting BAME individuals are in poverty after housing costs, compared to 23% of privately renting White individuals.²⁰

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% more likely to be overcrowded than the London average, while households with a Black household head are around 150% more likely to be owed a homelessness duty.²¹
 - There are significant differences in some aspects of housing need by age: for example, an estimated 19% of families in London headed by someone

¹⁸ GLA, [Housing in London 2020](#), October 2020

¹⁹ GLA analysis of Office for National Statistics (ONS) Annual Population Survey for 2019

²⁰ GLA analysis of Households Below Average Income data (End User dataset)

²¹ GLA, [Housing in London 2020](#), October 2020

aged 16-29 are overcrowded, compared to 13% of those headed by someone aged 30-49 and 8% of those headed by someone aged 50-64.²²

- Female-headed households in London are more likely to be homeless: single mother families accounted for 25% of all homeless households assessed as being owed a prevention or relief duty in London in 2019/20, and single female households accounted for another 24% (the remainder were couple households or those with three or more adults).²³
- LGBTQ+ younger people are more likely to find themselves homeless than their non LGBTQ+ peers, comprising up to 24% of the youth homeless population in the UK.²⁴

2.9 More broadly, a common theme is that low income households are more likely to find themselves in housing need. Housing need is, therefore, likely to be greater for those people who share protected characteristics who live in poverty.

Households moving into affordable housing

2.10 Information about households who move into affordable housing serves as a useful indicator of differences in need (since social housing in particular is prioritised according to need) but also of how affordable housing policies contribute to addressing those differences. This section analyses MHCLG's Continuous Recording of social lettings and sales (CORE) data, which records information about households moving into affordable housing on a range of characteristics including household composition, age, sex, ethnicity, nationality and disabilities. It does not provide information on gender, sexual orientation, religion or belief.

Households moving into general needs social housing

2.11 From analysis of CORE data, we can summarise the demographic characteristics of households moving into general needs social housing (i.e. excluding supported housing and intermediate housing) in London in 2018/19 as follows:²⁵

- Younger adults (below the age of 25) were the largest group moving into general needs affordable housing and comprised a significantly larger proportion of those moving into general needs housing than of all individuals in London.
- The majority of households moving into social housing comprised either single adults, or single adults with one or more children (which together comprised around 37% of all households in London²⁶).

²² Resolution Foundation, [Intergenerational audit for the UK: Data dashboard](#), 2020

²³ MHCLG, [Statutory Homelessness Annual Report, 2019-20, England](#), October 2020

²⁴ Albert Kennedy Trust, [LGBT Youth Homelessness: UK national scoping](#), April 2015

²⁵ MHCLG, Continuous Recording of social housing lettings and sales, 2018/19

²⁶ Office for National Statistics, Families and Households in the UK, 2019

- 62% of households moving into social housing were headed by females, compared to around a quarter of all households in London.
- 40% of households were headed by a person of White ethnicity and 60% of households were headed by a person of BAME ethnicity. Across the London population as a whole, around two-thirds of households were headed by someone of White ethnicity and a third by someone of BAME ethnicity.²⁷
- 1.5% of households moving into social housing needed fully wheelchair accessible homes, 0.6% needed wheelchair access to essential rooms, 3.5% needed level access, and 7.5% had other (unspecified) disability requirements.

Households moving into supported and specialist housing

2.12 From analysis of MHCLG's CORE data, we can discern the following demographic indicators of households moving into supported housing in London in 2018/19:²⁸

- Younger adults (below the age of 25) and older people (above the age of 55) were the largest groups moving into supported housing.
- Over 80% of households moving were made up of single adults, far above their share of the overall London population.
- 53% of households were headed by a person identifying as male, below the London average of around three quarters.
- 51% of households were headed by a person of White ethnicity and 49% of households were headed by a person of BAME ethnicity. As set out above, across the London population as a whole around two-thirds of households were headed by someone of White ethnicity and a third by someone of BAME ethnicity.

Households moving into intermediate housing

2.13 The demographic characteristics of households moving into intermediate housing in London in 2017/18 can be summarised as follows:²⁹

- Most households moving into Shared Ownership housing in London in 2017/18 were headed by a person aged between 25 and 34 (59%) or 35 and 44 (27%). By contrast, a much larger share of households in the overall London population were headed by older people.

²⁷ GLA analysis of Office for National Statistics (ONS) Annual Population Survey for 2019

²⁸ MHCLG, Continuous Recording of social housing lettings and sales, 2018/19

²⁹ MHCLG, Continuous Recording of social housing lettings and sales, 2017/18

- Most households were either single adults (59%) or two adults with no children (33%). Less than 10% had children, compared to 35% of the overall London population³⁰.
- An equal share of households was headed by a person identifying as male as by a person identifying as female.
- 71% of households were headed by a person of White ethnicity (slightly above the London average, as set out above) and 29% of households were headed by a person of BAME ethnicity.
- 1.3% of households moving into Shared Ownership housing in London in 2017/18 included a household member considered to have a disability, and 0.9% included a household member who uses a wheelchair.

³⁰ Office for National Statistics, Families and Households in the UK, 2019

3. Equality impacts of funding conditions imposed by the Government

- 3.1 This section outlines conditions imposed by the Government as a condition of London receiving funding for the Affordable Homes Programme 2021-2026.

Changes to affordable housing tenure mix

- 3.2 The Mayor and Government have agreed that 47% of the programme will support households into home ownership, through the delivery of Shared Ownership or London Living Rent homes. The remainder of homes within the programme will be at Social Rent – where we know there is the greatest need in London. The programme also includes provision for supported and specialist housing.
- 3.3 The programme will support the provision of affordable housing, across a range of affordability levels. This will help to create mixed use and inclusive communities, and ensure London's housing market is meeting a diverse range of needs, in particular for those groups disproportionately impacted by poverty.

Social Rent

- 3.4 The greatest housing need in London is for low cost rented homes to help low income households, typically nominated by councils, who are unable to secure or sustain housing on the open market. The Mayor has long argued for the need for the Government to provide adequate funding to deliver homes at Social Rent and welcomes the opportunity to do so at scale through this programme.
- 3.5 Social Rent is a low cost rent tenure that can help make housing costs more affordable. The prioritisation of Social Rent homes will, therefore, benefit those who are more likely to be negatively impacted by poverty and high housing costs, including people from BAME backgrounds, those who have religious beliefs, deaf and disabled Londoners, and younger Londoners. However, it is important to note that residents of Social Rent homes are still disproportionately affected by poverty when in social housing, and making housing more affordable will not, in isolation, resolve this inequality.
- 3.6 The GLA has expressed a strong preference for lifetime tenancies for Social Rent homes delivered through the programme, which would give added tenure security to residents of low cost rent housing. Housing issues – particularly housing

affordability and insecure tenancy – are a common cause of poor mental health, with low-income households and the BAME community disproportionately affected.³¹ Providing greater tenure security through lifetime tenancies is, therefore, likely to have a particularly beneficial impact on these groups.

- 3.7 The Government is also requiring that all Social Rent homes delivered through the programme must be made eligible for the Right to Shared Ownership, with some specific exemptions, including for council housing. The Right to Shared Ownership is entirely voluntary, and households can choose to remain social residents if it is a more affordable option. The Right to Shared Ownership could make home ownership more accessible to households living in Social Rent homes, including younger people and those of BAME ethnicity, who are disproportionately less likely to be homeowners. However, the sale of a Social Rent home under the Right to Shared Ownership will result in the loss of that Social Rent home, meaning it cannot be let to someone in housing need in future. In addition, as set out below, there are some concerns with Shared Ownership affordability, which the GLA will seek to mitigate via policy changes recommended for implementation following the GLA's [Consultation on Intermediate Housing](#).

London Living Rent

- 3.8 The GLA is promoting London Living Rent (LLR) as a rent-to-buy product that supports access to homeownership, to help mitigate potential affordability challenges around homeownership products.
- 3.9 The GLA publishes ward-specific benchmark rent levels for London Living Rent homes on an annual basis. These are based on one-third of the estimated median gross household income for the local borough, varied by up to 20% in line with ward-level house prices. The benchmark rents also vary based on the number of bedrooms within the home.
- 3.10 LLR is available for those on household incomes below £60,000 per annum, who can afford to pay more than Social Rent but cannot afford to rent or buy open market housing.³² The availability of LLR homes will benefit those who are more likely to be negatively impacted by poverty and high housing costs, but are unable to access Social Rent due to prioritisation of those in greater housing need and are also currently unable to access Shared Ownership housing due to not having access to a sufficient deposit. LLR homes will, therefore, bridge a gap between households in low cost rent need and those in intermediate ownership need, and provide homes for a different demographic of households whose housing needs might not otherwise be met.

³¹ Shelter, [The Impact of housing problems on mental health](#), April 2017

³² GLA, [Housing Research Note: Intermediate housing: The evidence base](#), August 2020

- 3.11 In response to feedback received through the GLA's Consultation on Intermediate Housing, it is proposed that London Living Rent is capped at £1,400 per calendar month, to reflect the maximum amount a household eligible for LLR could afford. In addition, the GLA proposes to extend eligibility for LLR homes to all those who live or work in London, including those who have a formal tenancy and those who are living in an informal arrangement with family or friends as a result of struggling with housing costs. Capping the cost of LLR homes and extending the eligibility of LLR homes could benefit households who struggle with housing costs, but who are unlikely to access a Social Rent home and who cannot currently afford to purchase a Shared Ownership home. This is likely to include younger people and women, as well as households of a BAME background.

Shared Ownership

- 3.12 The majority of homes funded for home ownership should be for Shared Ownership, and the Government is requiring all new Shared Ownership homes to be based on the new model for Shared Ownership. The Government is still finalising the terms of the new Shared Ownership model; however, it is proposed that the new Shared Ownership model sets the minimum share for purchase at 10%, enables staircasing in 1% increments, and requires landlords to cover the cost of any repairs and maintenance for new Shared Ownership homes for an initial 10-year period.
- 3.13 Low cost home ownership models, including Shared Ownership, support the transition into home ownership and can make a significant contribution to reducing inequalities, thereby improving overall life chances. Shared Ownership housing can provide housing for those in intermediate ownership need, and the lower minimum share for purchase could extend this option to a wider pool of Londoners.
- 3.14 However, the housing baseline data demonstrates that people who share protected characteristics, including older people and people from a BAME background, are often underrepresented in intermediate housing. In addition, there are concerns about the affordability of Shared Ownership, as the median household income of Shared Ownership purchasers in London is slightly higher than the median income of working age households in London.³³ The lower minimum share for purchase could improve the affordability of Shared Ownership, helping to address these concerns; however, the affordability impact of a 10% share with rent paid on 90% unowned equity is still untested.
- 3.15 An equality impact assessment has been undertaken separately on the policy changes which are recommended for implementation in Part 1 of the GLA's Consultation Response Report, following its Consultation on Intermediate Housing which ran from August to October 2020. To mitigate the affordability challenges of Shared Ownership, the GLA expects investment partners to sign up to the existing

³³ GLA, [Housing Research Note: Intermediate housing: The evidence base](#), August 2020

[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. In addition, investment partners are required to publish details of additional fees and charges (other than service charges) for Shared Ownership homes on their websites, as well as provide a 'key features' document to potential purchasers which should include detailed information on the tenure of the property and the length of any lease, as well as the full range of potential costs associated with the Shared Ownership home.

Supported and specialist housing

- 3.16 The Mayor is committed to delivering homes to meet the diverse needs of Londoners, including by maximising the number of homes delivered through this programme that are defined as supported and specialist housing.
- 3.17 The programme will encourage investment partners to bring forward schemes that provide housing for groups who share protected characteristics, including older people, deaf and disabled people, Gypsies and Travellers, and other vulnerable groups with support needs. The programme will also encourage investment partners to bring forward schemes to support homeless people and those at risk of homelessness, who are disproportionately likely to be unemployed or lower income, Black households or female-headed households.³⁴
- 3.18 Increasing the supply of supported housing will help ensure Londoners are able to access the specialist accommodation and support they need. This will be particularly of benefit to those groups with protected characteristics noted above, because their needs are most often not otherwise met by the private market. The provision of supported and specialist accommodation is also likely to support a reduction in poverty and exclusion, and promote a culture of equality.

³⁴ MHCLG, [Statutory Homelessness Annual Report, 2019-20, England](#), October 2020

4. Equality impacts of funding conditions introduced by the GLA

4.1 This section outlines the policies and programme processes being introduced by the GLA as part of the Affordable Homes Programme 2021-2026.

Building safety standards

4.2 To be eligible for grant funding through the programme, investment partners must meet five mandatory building safety requirements when building new homes.

Potential positive impacts:

- The policy will improve resident experience across a range of tenures by giving residents the assurance that their homes are built to high building safety standards, addressing safety concerns and reducing resident stress. This benefit can be attributed to residents of both rented and intermediate tenures, within which a range of protected characteristics are represented.
- The benefits of the policy are expected to particularly affect those who are older or less mobile, including those with disabilities, as it will afford greater protections for those most vulnerable in a fire.

Potential negative impacts:

- The policy is not anticipated to have a material impact on housing delivery, provided viability risks are appropriately managed in consultation with stakeholders, including the Deputy Mayor for Fire and Resilience and the Grenfell Response Steering Group.
- It is possible that maintenance of additional building functionality (such as sprinklers) could have an impact on resident service charges and subsequently affordability. The initial assumption is that the impact will be minimal. An increase in service charges is also more likely to affect leaseholders and shared owners than Social Rent residents.
- The building safety standards require investment partners to register any in-built electrical products such as white goods, and encourages residents to register white goods with manufacturers. The intended objectives of this policy might not be achieved in instances where households receive gifted or second hand white goods. Poverty may make it more likely that households will receive gifted or second hand white goods, which fall

outside of registration, and there is a strong correlation between poverty and some groups who share protected characteristics.

Design standards

- 4.3 To be eligible for grant funding through the programme, investment partners must meet nine mandatory design criteria when building new homes. The introduction of design criteria, combined with operational management pilots, provides an effective way to ensure that all affordable homes funded by the Mayor are high quality and improve resident (and the wider public's) experience.

Potential positive impacts:

- Poor quality housing causes health problems including physical injury, poor mental health, and illness related to cold and damp. These issues disproportionately affect lower income families with children and particularly those from BAME backgrounds.³⁵ Standards aimed at achieving high quality design are, therefore, likely to have a particularly beneficial impact on these groups.
- Standards aimed at ensuring households meet minimum internal space standards and levels of private outdoor amenity space, based on the number of occupants, will go some way in addressing issues with overcrowding, as defined by the space standard. Overcrowding disproportionately affects the BAME community, low-income households and renters.³⁶ Minimum space standards are, therefore, expected to have a particularly beneficial impact on these groups.
- The design standards cover the provision of play space for children and younger people within housing developments, which will be of direct benefit to children and younger people.
- The design standards also cover the provision of 'accessible and adaptable buildings' and wheelchair user accommodation, which would help to meet specialist needs. There are 1.3 million deaf or disabled adults in London, comprising 13% of the working age population and 28% of people aged 65 or over.³⁷ Encouraging the provision of these homes will be particularly of benefit to deaf and disabled people, who are currently underrepresented in general needs social housing and intermediate housing.

Potential negative impacts:

- High design standards can increase build costs, potentially leading to a trade-off in the delivery of new homes and affordable homes. This would

³⁵ GLA, [The London Health Inequalities Strategy](#), September 2018

³⁶ GLA, [London Housing Strategy](#), May 2018

³⁷ GLA, [Equality, diversity and inclusion evidence base for London](#), June 2019

adversely impact groups who share protected characteristics who are most likely to benefit from these homes, including low-income households and BAME households. It is worth noting that the impact of design policies on costs and service charges has previously been assessed in the development of the new London Plan, and the policies deemed to be positive on balance. Any risk can be further mitigated through the introduction of waivers in limited exceptional circumstances where delivery is challenged.

Sustainability standards

- 4.4 To be eligible for grant funding through the programme, investment partners must adhere to six new sustainability standards when building new homes. As well as ensuring new homes are environmentally sustainable and meet zero-carbon targets, the new standards will advance equality of opportunity by helping to mitigate fuel poverty and improving the physical and mental health of residents.

Potential positive impacts:

- Standards promoting thermal efficiency and energy efficient homes will lead to lower running costs, enabling households to save on heating and cooling costs. This will be of particular benefit to households moving from energy inefficient homes (particularly those in the private rented sector) to new affordable homes; BAME households (which are twice as likely to be fuel-poor as white households); older people and younger children, who are most likely to suffer from fuel poverty.³⁸ Well insulated homes are also more resilient to climate change, dealing better with extreme heat. This will have healthcare benefits, and will be of particular benefit to elderly people who are more vulnerable to spikes in temperature.³⁹
- Standards promoting Urban Greening will have significant wellbeing benefits. In 2017, the positive impact of green space on Londoners' health was estimated to have avoided healthcare costs of £952 million per year, comprising £370m per year saved on mental health costs and £582m physical health savings.⁴⁰ Standards promoting Urban Greening will be of particular benefit to low income Londoners and those from a BAME background who more frequently live in areas with deficiency in access to nature and open space. Issues with unequal access to green space, particularly in poorer areas, were highlighted through the Covid-19 pandemic. ONS found that black people in England are four times less likely than white people to have no outdoor space at home; and people in semi-skilled and unskilled manual occupations, casual workers and those

³⁸ GLA, [London Fuel Poverty Action Plan](#), June 2018

³⁹ Committee on Climate Change, [UK housing: fit for the future?](#), February 2019

⁴⁰ Vivid Economics, [Natural capital accounts for public green space in London](#), October 2017

who are unemployed are almost three times as likely as those in managerial, administrative, professional occupations to be without a garden.⁴¹ In addition, increasing the provision of Urban Greening within housing developments will benefit people spending longer periods at home, and this could include older people, some deaf and disabled people, pregnant women and those with primary childcare responsibilities (who are eight times more likely to be women than men⁴²). It is also possible that well designed Urban Greening, such as planting trees, could enhance people's feelings towards their local area, potentially improving social cohesion.

- Air quality standards will support the improvement of London's air quality. Long term exposure to poor air quality can have a number of negative health impacts and these health impacts fall disproportionately on older residents, younger children, pregnant women, and those with existing respiratory conditions.⁴³ Low income people are also more likely to live in areas of poor air quality, or high levels of construction, so may be more exposed to temporary or long term poor air quality.⁴⁴ Issues with poor air quality, particularly in poorer areas, were highlighted through the Covid-19 pandemic. Tackling air quality will reduce the public health inequalities associated with air pollution in London.

Potential negative impacts:

- High sustainability standards can increase build costs, potentially leading to a trade-off in the delivery of new homes and affordable homes. This would adversely impact groups who share protected characteristics who are most likely to benefit from these homes, including low-income households and BAME households. It is worth noting that the impact of sustainability policies on costs and services charges has previously been assessed in the development of the new London Plan, and the policies deemed to be positive on balance. Any risk can be further mitigated through the introduction of waivers in limited exceptional circumstances where delivery is challenged.

Equality, diversity and inclusion

- 4.5 To be eligible for grant funding through the programme, investment partners must commit to helping the Mayor improve equality, diversity and inclusion (EDI) in London. All investment partners receiving funding through this programme will be required to meet minimum standards outlined in the Mayor's Good Work Standard

⁴¹ ONS, [One in eight British households has no garden](#), May 2020

⁴² The Prince's Responsible Business Network, [Equal Lives: Parenthood and Caring In The Workplace](#), October 2019

⁴³ GLA, [London Environment Strategy](#), May 2018

⁴⁴ Aether, [Analysing Air Pollution Exposure in London](#), September 2013

diversity and recruitment pillar. Investment partners receiving funding will be required to develop, publish and implement an EDI action plan which includes at least one action from each of the following three themes: organisational equality, diversity and fairness; sustainable and diverse supply chains; and working together with Londoners.

- 4.6 Investment partners receiving funding will be expected to ensure that their employees and workers are paid the London Living Wage, and should endeavour to ensure that consultants, contractors and sub-contractor employees similarly meet this requirement. This will be a contractual obligation of funding. In addition, the Mayor expects investment providers to have regard to London's diverse cultural history when naming new buildings and estates funded through this programme.
- 4.7 These requirements are intended to promote increased diversity in the built environment sector and create a more equal, diverse and inclusive London by meaningfully enhancing organisational practices, procurement methods and engagement with communities.

Potential positive impacts:

- Inclusive London, the Mayor's strategy for EDI, aims to tackle inequalities in overcrowding, poor quality housing and insecure tenancies. Further embedding EDI within the Mayor's funding requirements will, therefore, positively impact those groups who disproportionately experience housing issues, including the BAME community and low-income households.
- Despite its profile and influence on our everyday lives, many of those who share protected characteristics are underrepresented in built environment professions, particularly in senior positions. Within the housing association sector, the average male chief executive is paid 11% more than their female counterpart.⁴⁵ In architecture, women identify a culture of sexism and exclusion at work, especially in decision-making and networking opportunities; BAME architects experience discrimination; and LGBTQ+ architects report experiencing homophobic and transphobic slurs. In addition, the sector is less diverse in terms of ethnic and faith backgrounds than most other industries; too few deaf and disabled architecture students are successfully progressing into practice; and people from lower-income backgrounds struggle to access education and professional opportunities.⁴⁶
- The Mayor's Good Work Standard and focus on organisational EDI seeks to increase training for staff, broaden recruitment channels, and encourage reporting on gender and ethnicity pay gaps. This will have a positive impact on individual employees who share protected characteristics. In addition, there is increasing evidence that more diverse organisations outperform

⁴⁵ Inside Housing, [Inside Housing salary survey](#), October 2020

⁴⁶ GLA, [Handbook: Supporting Diversity: Good Growth by Design](#), June 2019

less diverse competitors – companies with women on their boards outperform those without by 25%, and those with increased racial diversity at board level bring in 15 times more sales revenue on average.⁴⁷ Good and inclusive growth can provide economic benefits to all. Furthermore, having more diverse groups involved in the work of these organisations may help decisions get made that benefit a more diverse group of people.

- A focus on environmental sustainability and ethical sourcing will advance equality of opportunity by helping to mitigate fuel poverty and improving the physical and mental health of residents, as set out above. A focus on diverse supply chains will also be of benefit to individual employees who share protected characteristics, businesses and the economy, and the residents of homes funded through the programme, as set out above.
- A focus on working together with Londoners will encourage investment partners to engage with a diverse range of Londoners. Research has identified that people from BAME backgrounds, younger people and lower income households are less integrated within community engagement processes.⁴⁸ Though London has a smaller percentage of internet non-users than other UK regions, digital exclusion – which is more likely to affect women, elderly people, deaf and disabled people, and those who are economically inactive – creates a barrier to engaging in consultations that are predominantly run online.⁴⁹ Positively and effectively engaging with a diverse group of Londoners will aid the delivery of homes that better meet housing need, while helping to focus on design quality, drive innovation, instil a long-term interest in the operation of the new homes and facilities, and strengthen the skills and capacity of the community.⁵⁰ This could improve the experience of those living in affordable housing, and empower and integrate people from different backgrounds, which will be particularly of benefit to those people who share protected characteristics and are currently less heard within the community engagement process.

Potential negative impacts:

- There is a risk that excessive requirements placed upon investment partners could negatively impact on the delivery of new homes and affordable homes, which would adversely impact groups most likely to benefit from these homes, including those groups with protected characteristics that are over-represented in affordable housing.

⁴⁷ RICS, [Why Diversity and Inclusion is crucial in the built environment sector](#), April 2020

⁴⁸ Demos, [People Powered Planning: How to better involve people in planning](#), September 2019

⁴⁹ ONS, [Exploring the UK's digital divide](#), March 2019

⁵⁰ Future of London, [Foundations for community-led housing](#), November 2019

5. Summary of equality impacts by protected characteristics

5.1 The table below summarises the equality impacts of policies and funding conditions introduced within the Affordable Homes Programme 2021-2026 by protected characteristic. Possible mitigations of potential negative equality impacts of the programme are identified in [Section Three](#) and [Section Four](#) above.

Table 1: Summary of equality impacts by protected characteristics

Protected characteristic
Age
<i>Children</i>
<ul style="list-style-type: none"> • Certain groups of children are at higher risk of living in poverty, including those from BAME backgrounds, deaf and disabled children and those from single parent families. Proposals which increase the number of affordable homes being built and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality. • Design and sustainability standards are likely to benefit children by reducing the physical and mental health issues related to poor quality housing, such as cold and damp and poor air quality. In addition, increasing the provision of play space within housing developments will be of direct benefit to children and younger people.
<i>Younger people</i>
<ul style="list-style-type: none"> • Younger people are more likely to be unemployed than adults aged between 25 and 64 and are more likely to face higher housing costs, relative to income. Proposals which increase the number of affordable homes being built and the affordability of those homes could benefit these households and help to reduce this inequality. • The fall in home ownership among Londoners in recent decades has been most acute among younger Londoners. Shared Ownership purchasers are more likely to be young people aged between 25 and 34, when compared to the overall London population. Improving the delivery, affordability and allocation of intermediate housing options is, therefore, likely to benefit young adults. • Younger people, and especially those from BAME backgrounds, are more likely to be excluded from education and professional opportunities and community engagement

Protected characteristic
<p>processes. EDI proposals to promote inclusion of a more diverse group of people could, therefore, help to reduce this inequality.</p>
<p><i>Older people</i></p>
<ul style="list-style-type: none"> • Older people are more likely to have specialist needs, including the need for supported housing. Proposals to encourage the provision of supported and specialist housing, and to increase the provision of accessible and adaptable affordable homes, will help to meet those needs and help to reduce housing costs for this group. • Design and sustainability standards are likely to benefit older people by reducing the physical and mental health issues related to poor quality housing, such as cold and damp and poor air quality. Increasing the provision of Urban Greening within housing developments will benefit people spending longer periods at home, and this could include older people. In addition, proposals to enhance building safety will be particularly of benefit to older people who are more vulnerable in a fire. • Older people, and especially those from BAME backgrounds, are more likely to be excluded from education and professional opportunities and community engagement processes. EDI proposals to promote inclusion of a more diverse group of people could, therefore, help to reduce this inequality. • 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 include households headed by someone aged over 55, when compared to the target market.
<p>Deaf and disabled people</p>
<ul style="list-style-type: none"> • Households containing people with disabilities are more likely to experience poverty. Proposals which increase the number of affordable homes being built and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality. • Deaf and disabled people are more likely to have specialist needs, including the need for supported housing. Proposals to encourage the provision of supported and specialist housing, and increase the provision of accessible and adaptable affordable homes, will help to meet those needs and help to reduce housing costs for this group. • Design and sustainability standards are likely to benefit deaf and disabled people by reducing the physical and mental health issues related to poor quality housing, such as cold and damp and poor air quality. Increasing the provision of Urban Greening within housing developments will benefit people spending longer periods at home, and this could include some deaf and disabled people. In addition, proposals to enhance building safety will be particularly of benefit to deaf and disabled people who are more vulnerable in a fire.

Protected characteristic
<ul style="list-style-type: none"> Deaf and disabled people, and especially those from BAME backgrounds, are more likely to experience digital exclusion and be excluded from community engagement processes. EDI proposals to promote inclusion of a more diverse group of people could, therefore, help to reduce this inequality.
Gender reassignment
<ul style="list-style-type: none"> 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, are undergoing, or have undergone a process (or part of a process) for the purpose of reassigning their sex.
Pregnancy and maternity
<ul style="list-style-type: none"> The limited availability of specific data on this group makes it hard to identify impacts, beyond those that affect households including children. Design and sustainability standards are likely to benefit pregnant women by reducing the physical and mental health issues related to poor quality housing, such as cold and damp and poor air quality. In addition, increasing the provision of Urban Greening within housing developments will benefit people spending longer periods at home, and this could include pregnant women and those with primary childcare responsibilities.
Race
<ul style="list-style-type: none"> Black, Asian and minority ethnic (BAME) groups are more likely to experience poverty, are less likely to own their own home and are disproportionately affected by overcrowding. Proposals which increase the number of affordable homes being built and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality. Proposals to make Shared Ownership more affordable will also improve access to home ownership for this group. Design and sustainability standards are likely to benefit people from a BAME background by reducing the physical and mental health issues related to poor quality housing, such as cold and damp and deficiency in access to nature and open space. New arrivals to the UK, most often from BAME backgrounds, are more likely to be excluded from education and professional opportunities and community engagement processes. BAME employees in the built environment also report experiencing discrimination at work. EDI proposals to promote inclusion of a more diverse group of people in the built environment could, therefore, help to reduce this inequality.

Protected characteristic
Religion or belief
<ul style="list-style-type: none">• 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 extent that households with some religious beliefs belong disproportionately to BAME groups, they are likely to experience similar impacts identified for those from BAME backgrounds above.
Sex
<ul style="list-style-type: none">• Women are more likely to be economically inactive, low paid, and/or subject to the poverty that affects single parent families. Female-headed households are also more vulnerable to statutory homelessness. Proposals which increase the number of affordable homes being built and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality.• Female employees in the built environment also report experiencing discrimination at work. EDI proposals to promote inclusion of a more diverse group of people could, therefore, help to reduce this inequality.
Sexual orientation
<ul style="list-style-type: none">• 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.• There is evidence that those who are LGBTQ+ may experience discrimination when seeking to rent or buy a home. Younger LGBTQ+ people are also more vulnerable to homelessness. There is also evidence of demand from older LGBTQ+ people for specialist provision care and retirement housing. The provision of more affordable housing, and specialist housing in particular, may therefore benefit this group.• LGBTQ+ employees in the built environment also report experiencing discrimination at work. EDI proposals to promote inclusion of a more diverse group of people in the built environment could, therefore, help to reduce this inequality.

6. Conclusions

- 6.1 The assessment finds that the totality of policies and funding conditions introduced within the Affordable Homes Programme 2021-2026 represent a balance between meeting different forms of housing need and maximising the overall delivery of affordable homes, within the context of national policy requirements and available funding.
- 6.2 The assessment also identifies the mitigations that will be put in place through the programme to alleviate the potential negative impacts on those who share particular protected characteristics, and on relations between different groups who share characteristics and those groups who do not.

Increasing housing delivery

- 6.3 The allocation of grant will help support the delivery of housing. Protecting the delivery of new homes in London, despite the potential serious risk to delivery posed by the economic downturn, would have a positive impact on the groups of Londoners who are most adversely affected by the shortage of good quality, affordable housing and secure tenancies.
- 6.4 In designing the programme, a careful balance has been struck between promoting high standards of provision and maintaining the delivery of much-needed affordable homes. Where new requirements have been introduced, these have been assessed on balance to be positive for equality, diversity and inclusion.

Improving affordability

- 6.5 The prioritisation of Social Rent homes will help make housing more affordable for a greater number of people and, therefore, benefit those who are more likely to be negatively impacted by poverty and high housing costs.
- 6.6 Funding for Shared Ownership and London Living Rent homes will support access to homeownership, which will be particularly of benefit to those groups with protected characteristics whose needs are not met by the private market and who are disproportionately unlikely to own their own home. Changes to the Shared Ownership model proposed by the GLA in response to the [Consultation on Intermediate Housing](#) will help to ensure Shared Ownership remains affordable.

Improving resident experience

- 6.7 The GLA has expressed a strong preference for lifetime tenancies for Social Rent homes delivered through the programme, which would give added tenure security to residents of low cost rent housing. Intervention that helps affordability and combats insecurity will have a secondary impact of improving mental health.
- 6.8 The programme will also introduce a range of funding to tackle building safety; design and sustainability standards; and equality, diversity and inclusion. These policies and funding conditions will address a range of inequalities including vulnerability in a fire; physical and mental health issues; and unequal access to education and professional opportunities.

Meeting specialist needs

- 6.9 The programme will encourage investment partners to bring forward supported and specialist housing schemes that provide housing for groups who share protected characteristics. This will ensure the delivery of homes to meet the diverse needs of Londoners.

Overall assessment of equality impacts

- 6.10 The EqlA addresses the Mayor's legal duties to carry out a comprehensive assessment of the Affordable Homes Programme 2021-2026 and its proposed policies. The EqlA has helped shape the preparation of the programme, ensuring that these key issues have been taken into account throughout the development process.
- 6.11 The totality of policies and funding conditions introduced within the Affordable Homes Programme 2021-2026 is considered positive, on balance; and is expected to help eliminate discrimination, advance equality of opportunity, and foster good relations between those who share a protected characteristic and those who do not.
- 6.12 While the totality of policies and funding conditions introduced within the Affordable Homes Programme 2021-2026 is considered positive, on balance, it should be recognised that the ability of the programme to combat some of the inequalities highlighted throughout this EqlA is limited. The Affordable Homes Programme 2021-2026 will go some way towards reducing the inequalities that exist within London, but housing is just one of the action areas identified within Inclusive London, the Mayor's strategy for equality, diversity and inclusion.

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