

MAYOR OF LONDON

Equality Impact Assessment for London Plan Guidance

Support for housebuilding

Equality Impact Assessment for Support for housebuilding draft London Plan Guidance

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1. Background

Legislative and policy context

- 1.1 This Equality Impact Assessment (EqIA) evaluates the potential effects of the proposed Support for Housebuilding LPG (SHLPG) and records the ongoing analysis to fulfil the requirements of the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010. This requires the Mayor to pay due regard to the need to:
- eliminate discrimination, harassment and victimisation and any other conduct prohibited by the Act
 - advance equality of opportunity between people who share a relevant protected characteristic and those who do not
 - foster good relations between people who share a relevant protected characteristic and those who do not.
- 1.2 The protected characteristics which should be considered are:
- age
 - disability
 - sex
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race
 - religion or belief
 - sexual orientation.
- 1.3 This EqIA also addresses the Mayor's legal equality duties set out in the Greater London Authority Act 1999, including the duty to promote equality of opportunity and eliminate unlawful discrimination in all GLA strategies and guidance. It examines whether the LPG may create differential or disproportionate impacts and identifies opportunities to advance equality and foster good relations between communities.

London Plan 2021

- 1.4 To satisfy the legal duties detailed above, the 2021 London Plan was subject to an Equalities Impact Assessment (EqIA) throughout the course of its preparation which assessed the likely impacts of the Plan on protected characteristics. This was to ensure the promotion of positive impacts and to, ideally, mitigate any potential negative impacts of policies.
- 1.5 Regard has been had to the EqIA for the 2021 London Plan when preparing this EqIA.

2. Support for Housebuilding LPG Proposals

- 2.1 In October 2025 the government and Mayor announced a series of measures to support housebuilding in London, designed to kick-start housebuilding across the capital. These measures respond to significant challenges for housebuilding over recent years - including the impact of the Covid-19 pandemic, high interest rates, spiralling construction costs, regulatory blockers and wider economic conditions.
- 2.2 The draft SHLPG that is the subject of this EqlA proposes time-limited changes to cycle parking requirements, a new time-limited planning route for the delivery of affordable housing as well as changes to three housing design standards contained within the existing Housing Design Standards LPG.
- 2.3 The government is separately consulting on a time-limited approach to Community Infrastructure Levy (CIL) relief and introducing additional planning powers for the Mayor.
- 2.4 The purpose of these measures, alongside stronger planning powers for the GLA and investment in the City Hall Developer Investment Fund, is to accelerate housebuilding, unlock stalled sites and ensure more affordable homes are being built across the capital at a time where significant challenges to housebuilding exist.
- 2.5 A summary of the draft SHLPG proposals (headed with an ID code) is set out below:

SH1

- 2.6 Time-limited reduction in the minimum long-stay cycle parking requirements for dwellings, purpose-built student accommodation and large-scale purpose-built shared living set out in Table 10.2 of the London Plan 2021 until 31 March 2028 or publication of a revised London Plan, as follows:
- setting different requirements in different areas of London, with boroughs grouped into three bands, rather than one London-wide requirement
 - removing separate requirements for studio or one-person, one-bedroom dwellings and two-person, one-bedroom dwellings
 - introducing a requirement for three-or-more-bedroom dwellings separate to that for two-bedroom dwellings
 - reducing the requirements from London Plan policy, as per Table 1: Minimum Long-stay Cycle Parking (below)
 - introducing guidance on flexibility in meeting the long-stay cycle parking requirements, including what types and locations of cycle parking would be acceptable.

SH2

- 2.7 Time-limited removal of the recommended benchmark for cycle storage of 0.75 per person set out in Table 3.2 of the Large-scale purpose-built shared living LPG to be replaced by the relevant standards detailed in SH1, until 31 March 2028 or the publication of a revised London Plan.

Table 1: Minimum Long-stay Cycle Parking

Use	Current	Proposed band 1	Proposed band 2	Proposed band 3
Dwelling: Studio or one person, one bedroom	1	1	0.9	0.7
Dwelling: Two person, one bedroom	1.5	1	0.9	0.7
Dwelling: Two bedroom	2	1.5	1.3	1.2
Dwelling: Three or more bedroom	2	1.9	1.6	1.5
Large-scale purpose-built shared living room	1	0.7	0.6	0.5
Purpose-built student accommodation bedroom	0.75	0.7	0.6	0.5

SH3

2.8 Revocation of the following standards set out in the Housing Design LPG:

- C4.1 requiring new homes to be dual aspect unless exceptional circumstances make it impractical or undesirable.
- B2.5 requiring the maximum number of homes accessed by a core to be no more than eight per floor
- B3.1 repeating cycle parking requirements of the London Plan which are altered by SH1 above.

SH4

2.9 New time-limited planning route for the delivery of affordable housing until 31 March 2028 or the publication of a revised London Plan:

- enabling planning applications on private land, industrial land (where re-providing industrial floorspace capacity) and on utilities sites with evidence of substantial decontamination, to proceed through the planning system without an upfront viability assessment when providing 20 per cent affordable housing, reduced from the London Plan position of 35 per cent
- allowing schemes on public land and industrial not re-providing industrial floorspace capacity to access the time-limited planning route at 35 per cent
- requiring a tenure split of 60 per cent social rent to 40 per cent intermediate homes
- requiring a review of scheme viability if the first floor of building is not built by 31 March 2030 to determine if additional affordable housing contributions can be provided. For phased schemes, reviews will be required where the first floor of buildings, which together provide at least 200 residential units, have been built. The GLA is also consulting on whether there are circumstances in which an alternative review milestone

may be necessary and justified in a way that continues to incentivise fast build out; and whether there should be discretion to agree forward dates and milestones for future phases if it would support the faster build out of the scheme, which if met mean that no review is required for that phase

- allowing residential schemes meeting the threshold to access grant funding on all units above the first 10 per cent
 - proposals in the Green/Grey Belt, for purpose-built student accommodation (PBSA) or large-scale purpose-built shared living (LSPBSL) or demolition of existing affordable housing are excluded. For mixed tenure schemes the residential component may benefit from the new thresholds where the PBSA and LSPBSL floorspace (combined) comprises less than 50 per cent of residential GIA, and where the relevant London Plan PBSA threshold and LSPBSL requirements are met.
- 2.10 The proposed changes to the Housing Design Standards (SH2) affect the layout of a development and the number of units that can be provided on a site. However, the London Plan contains a policy requirement for providing dual aspect dwellings and this continues to apply.
- 2.11 The new time-limited planning route for affordable housing (SH4) allows developers to secure permission more quickly if they commit to delivering at least 20 per cent affordable housing and 35 per cent on public and industrial land, without needing a full viability assessment. It is designed as a two-year emergency measure (until the 31 March 2028 or the publication of a revised London Plan) to unlock stalled schemes in London.
- 2.12 The change in affordable housing thresholds has direct relevance to the Public Sector Equality Duty under the Equality Act 2010 and to the treatment of those people with protected characteristics because housing affordability and access could disproportionately impact groups with protected characteristics.
- 2.13 Measures are being introduced as a response to significant changes to market conditions to encourage schemes to come forward, and existing schemes to progress, in the near-term, while providing a higher level of affordable housing and more timely build out than may otherwise have been the case. This is a departure from Policy H4 Part A, Policy H5 and Policy H6 of the London Plan and has been introduced as an emergency measure to help address the current significant downturn in housing delivery in London.
- 2.14 With the threshold change, the intention is to ensure some affordable housing is delivered quickly, alongside market homes, thereby meeting equality duties by expanding housing choice for disadvantaged groups, preventing worsening inequalities and supporting inclusive, mixed communities.

3. Evidence

- 3.1 The evidence used to develop the impact analysis and which has provided understanding of likely impacts on service users focuses on, the high need for social rent and intermediate tenures in London; affordability pressure for low-

income and minority households; and viability pressures from construction cost inflation, financing costs and lower sales rates.

- 3.2 A recent EqIA has been published for the London Social and Affordable Homes Programme 2026-36 which can be downloaded from this webpage [London Social and Affordable Homes Programme 2026-36 | London City Hall](#). The findings and evidence outlined in that document have informed this assessment.
- 3.3 The EqIA was undertaken for the Housing Design Standards LPG which can be downloaded from this page [Housing Design Standards LPG | London City Hall](#). The evidence outlined in that document has further informed this assessment. The EqIA for the Housing Design Standards LPG did not identify any positive or negative impacts for those with any protected characteristic in relation to the standards that are being proposed to be withdrawn by the SHLPG (these are standards C4.1, B2.5 and B3.1).

4. Assessment

- 4.1 The purpose of this EqIA is to assess the impact of the proposed SHLPG under the Mayor's legal equalities duties set out above.
- 4.2 For any negative impacts, mitigating actions to minimise or eliminate impacts are identified, along with any action plan. If negative impacts cannot be mitigated, an objective justification is provided. For positive impacts, consideration is given to how these could be maximised.
- 4.3 An assessment of the measures in the SHLPG and how this affects those with protected characteristics is set out at Appendix 1.

5. Conclusions

Cycle Parking Standards

- 5.1 Reduced cycle parking provision may negatively impact some groups: those that rely on cycling, and those that would be more affected by the potential increase in road traffic, road danger and air pollution. These groups include children, people aged 16–30, people aged over 65, disabled people, men, women, Black people and people on low incomes. For other groups with protected characteristics, impacts are expected to be broadly neutral. Any negative impacts are expected to be limited as the proposed cycle parking standards are designed to generally accommodate existing demand along with some capacity for future growth. They are also expected to be limited in the medium and long term given the time-limited nature of the proposals within the SHLPG, and given the positive benefits from the potential increase in housing delivery.

Changes to the Housing Design Standards LPG

- 5.2 It is anticipated that the proposed change to the Housing Design Standards LPG for standards C4.1 and B2.5 will have a neutral impact on older people, young children and people with a disability. For all other groups with a

protected characteristic no impacts are anticipated. The impacts of changes to cycle parking requirements which standard B3.1 repeats are assessed in detail under SH1 in appendix 1.

Changes to the Housing Design Standards LPG

- 5.3 In the context of the downturn in affordable housing starts, the introduction of a time-limited planning route aimed at supporting timely build out of new affordable housing could have a positive effect for groups with protected characteristics. The anticipated impacts of new time-limited planning route are assessed in detail under SH4 in appendix 1.

6. Monitoring

- 6.1 Monitoring of the SHLPG will take place through the London Plan Annual Monitoring Report (AMR) alongside wider monitoring of the Mayor's other strategies.

Consultation question: Do you consider that any of the proposed changes set out within the SHLPG could result in additional positive or negative impacts on those with protected characteristics to those already identified? If yes, please specify which change would have the impact and which group may be affected? Resulting from the draft guidance that could affect those with protected characteristics.

Do you have any additional comments on this EqlA that accompanies the SHLPG draft guidance?

Appendix

1. Assessment of measures set out within the LPG

SH1 and SH2

LPG Proposal	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups
Age (all age groups)	No	Yes	No	Children under the age of 16 cannot drive: their independence and mobility is contingent on having safe and accessible cycle parking. Road danger particularly affects young adults between 16 and 30 in terms of rate of deaths and serious injuries. Any deterioration in air quality resulting from increased car use is expected to have a disproportionate impact on children and over-65s. Over-65s are less likely to benefit directly from minimum standards for cycle parking than other age groups.
Disability (Physical, learning difficulties, mental health and medical conditions)	No	Yes	No	People with disabilities are less likely to cycle, although some people with a physical disability may use or rely on cycles or larger cycles, including as a mobility aid. Increased levels of car use would potentially increase road danger for people with a disability, who are potentially more likely to be injured by motor vehicles than non-disabled people.
Sex	No	Yes	No	Men are disproportionally affected by road danger and compared with women, more likely to cycle than women. Women may benefit less than men from minimum standards of cycle parking, but provision of safe cycle parking may remove one of the barriers to women's cycle ownership and use.
Gender reassignment	No	No	Yes	No impacts identified.

LPG Proposal	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups
Marriage and civil partnership	No	No	Yes	No impacts identified.
Religion or belief	No	No	Yes	To the extent that religion or belief may be correlated with particular ethnic groups, some of the potential impacts noted against 'Race' will apply. Some people may choose not to cycle because of their religion or beliefs, and do not benefit from minimum standards for cycle parking.
Race	No	Yes	No	Increased levels of car use and road danger would particularly impact Black people, who are more likely to be killed or seriously injured on London's roads than White people. Some ethnic groups have lower-than-average cycle ownership and so will benefit less from minimum standards of cycle parking. However, provision of cycle parking may remove one of the barriers to cycle ownership and use for people from ethnic groups on lower-than-average incomes.
Sexual orientation	No	No	Yes	No impacts identified.
Pregnancy and maternity	No	No	Yes	Women who are pregnant or on maternity leave may be less likely to choose to cycle, and therefore cycle parking would be less important.
Socio-economic	No	Yes	No	People on low incomes may be more likely to live in smaller dwellings, without, for example, garden space that could be used as informal cycle parking. Minimum standards of cycle parking, which can be more efficiently provided in communal rather than individual stores, remove one of the barriers to cycling for people on low incomes as a lower-cost alternative to other transport modes, including car use. Increased levels of car use would increase road danger, which particularly affects people living in the most deprived areas of London, in terms of the rate of deaths or serious injuries.

LPG Proposal	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups
Parents/carers	No	No	Yes	Parents with very young children may be less likely to choose to cycle, and therefore cycle parking would be less important. Conversely, some parents with very young children might rely on cargo bikes to transport their children, particularly if they do not have access to a car.
People with different Gender Identities e.g. Gender fluid, Non-Binary	No	No	Yes	No impacts identified.

SH3

LPG Proposal	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups
Age (all age groups)	No	No	Yes	<p>The removal of the standard limiting the number of dwellings off a core per floor could lead to longer distances from front doors to exit cores. This could disproportionately affect older people who are more likely to have mobility difficulties. However, there will be many other design considerations and site constraints which will determine the building layout and length of corridors. In addition, the distance from a front door to exit core is limited by the building regulations for fire safety and thus it is not anticipated that the removal of this standard will significantly affect distances from front doors to exit cores.</p> <p>The removal of the standard for dual aspect dwellings may lead to more single aspect dwellings, which are more susceptible to overheating. Older and young children are more at risk from the effect of overheating. However, the draft guidance makes clear that where single aspect dwellings are proposed, it should be demonstrated by the applicant that they will have adequate passive ventilation, daylight and privacy, and avoid overheating. Therefore, it is considered that the proposed change will not change the risk of new dwellings overheating.</p>
Disability (Physical, learning difficulties, mental health and medical conditions)	No	No	Yes	<p>The removal of the standard limiting the number of dwellings off a core per floor could lead to longer distances from front doors to exit cores which could affect disabled people who are more likely to have mobility difficulties. However, there will be many other design considerations and site constraints which will determine the building layout and length of corridors. In addition, the distance from a front door to exit core is limited by the building regulations for fire safety and thus it is not anticipated that the removal of this standard will significantly affect distances from front doors to exit cores</p>

LPG Proposal	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups
Sex	No	No	No	No anticipated impacts
Gender reassignment	No	No	No	No anticipated impacts
Marriage and civil partnership	No	No	No	No anticipated impacts
Religion or belief	No	No	No	No anticipated impacts
Race	No	No	No	No anticipated impacts
Sexual orientation	No	No	No	No anticipated impacts
Pregnancy and maternity	No	No	No	No anticipated impacts
Socio-economic	No	No	No	No anticipated impacts
Parents/carers	No	No	No	No anticipated impacts
People with different Gender Identities e.g. Gender fluid, Non-Binary	No	No	No	No anticipated impacts

SH4

LPG Proposal	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups
Age (all age groups)	Yes	No	No	<p>People of all age groups will benefit from improved access to good quality affordable housing. The measures set out in the new time-limited planning route of allowing planning applications to proceed through the planning system without an upfront viability assessment at lower affordable housing thresholds has the potential to have a negative effect on people of all age groups. However, in the context of the highly challenging housing delivery climate, and reductions in the level of affordable housing in schemes following the Viability Tested Route, the introduction of the new time-limited planning route, has the potential to have a positive effect on people of all age groups by securing higher levels of affordable housing (supported by grant funding) than might otherwise have achieved. To follow the time-limited planning route, affordable housing must be provided at a tenure split of 60 per cent social rent to 40 per cent intermediate housing, ensuring that the provision of homes for households in greatest housing need is prioritised. In addition, the incorporation of delivery milestones and requirement for late reviews if these are not met helps to incentivise early delivery and enables additional affordable housing contributions to be secured if viability improves and the agreed level of target profit is exceeded. In the context of the downturn in affordable housing starts, by supporting timely build out of new affordable housing, the new time-limited planning route could have a positive effect for people of all age groups.</p>

LPG Proposal	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups
Disability (Physical, learning difficulties, mental health and medical conditions)	Yes	No	No	People with disabilities are amongst the population most impacted by poverty and high housing costs, and thus more vulnerable to homelessness. In the context of the downturn in affordable housing starts, by supporting timely build out of new affordable housing, the new time-limited planning route could have a positive effect for people with disabilities.
Sex	Yes	No	No	Women are amongst the population most impacted by poverty and high housing costs due to higher likelihood of being economically inactive, low paid, and/or subject to the poverty that affects single parent families. In the context of the downturn in affordable housing starts, by supporting timely build out of new affordable housing, the new time-limited planning route could have a positive effect for women. The new time-limited planning route also sets out benchmark grant rates of £140,000 per home to support the provision of Key Worker Living Rent homes, which would have a positive impact on women, who are overrepresented as key workers.
Gender reassignment	Yes	No	No	London has the highest percentage of people within England who reported that their gender identity was different from their sex at birth. Trans and non-binary people can experience discrimination when seeking housing. Younger Trans people are more vulnerable to homelessness due to rejection by their families. Homelessness is also experienced by many Trans people at some point in their lives. In the context of the downturn in affordable housing starts, by supporting timely build out of new affordable housing, the new time-limited planning route could have a positive effect for people who reported that their gender identity was different from their sex at birth.
Marriage and civil partnership	No	No	No	No anticipated impacts.

LPG Proposal	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups
Religion or belief	Yes	No	No	To the extent that religion may be correlated to particular ethnic backgrounds, some of the potential impacts identified in 'Race' may apply.
Race	Yes	No	No	Londoners from Black, Asian and Minority Ethnic (BAME) backgrounds are more likely to experience worse housing conditions, less tenure security, higher rates of housing need, worse affordability and lower wealth than White Londoners. As a result, BAME people are amongst the population most impacted by poverty and high housing costs, some of which are overrepresented as homeless. Gypsies, Travellers and Roma people are also highly dependent on social rented homes, and experience high levels of over-crowding. In the context of the downturn in affordable housing starts, by supporting timely build out of new affordable housing, the new time-limited planning route could have a positive effect for Londoners from Black, Asian and Minority Ethnic (BAME) backgrounds.
Sexual orientation	Yes	No	No	LGBTQ+ people can experience discrimination when seeking housing. Younger LGBTQ+ people are more vulnerable to homelessness due to rejection by their families, and family attitudes may continue to affect the housing choices of some beyond this point. Homelessness is also experienced by many LGBTQ+ people at some point in their lives. In the context of the downturn in affordable housing starts, by supporting timely build out of new affordable housing, the new time-limited planning route could have a positive effect for LGBTQ+ people.
Pregnancy and maternity	No	No	No	No anticipated impacts.

LPG Proposal	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups
Socio-economic	Yes	No	No	Affordable housing is essential to support those on lower incomes, reduce poverty and social exclusion and foster mixed and balanced communities. In the context of the downturn in affordable housing starts, by supporting timely build out of new affordable housing, the new time-limited planning route could have a positive effect for lower income households. Where the measures result in increased construction activity this can have a positive impact upon job creation in the construction sector, new job prospects where commercial floorspace is delivered in mixed-use developments, and contribute to wider economic growth. Where the measures lead to increased market and affordable housing delivery, this can also result in improved access to local job markets.
Parents/carers	Yes	No	No	Insofar as parents and carers are more likely to fall into low-income brackets or experience difficulties with housing costs, they would be more vulnerable to homelessness. Affordable housing is essential to foster a culture of equality, and a reduction in poverty and social exclusion and foster mixed and balanced communities. In the context of the downturn in affordable housing starts, by supporting timely build out of new affordable housing, the new time-limited planning route could have a positive effect for parents and carers.
People with different Gender Identities e.g. Gender fluid, Non-Binary	Yes	No	No	People with different Gender Identities can experience discrimination when seeking housing and many have experienced homelessness at some point in their lives. Younger people with different Gender Identities are more vulnerable to homelessness due to rejection by their families. In the context of the downturn in affordable housing starts, by supporting timely build out of new affordable housing, the new time-limited planning route could have a positive effect for people with different identities.

