

MD3471 – Appendix 1 – CHDIF project selection and assessment criteria

Approach to project selection

City Hall Developer Investment Fund interventions may be proposed via two routes:

- **Route one: continuous market engagement (CME) proposals**

The GLA will consider and assess external partners’ proposals, submitted via the expression of interest process, on their own individual merit, using the below criteria.

The criteria will be used in conjunction with the GLA’s CHDIF investment strategy and management framework. The framework’s overarching objective is to increase housing supply. It also aims to deploy funding in a fiscally sustainable way; and ensure risks at project and portfolio levels are acceptable, by creating a balanced prioritised pipeline of projects.

- **Route two: GLA-led strategic proposals**

The GLA may directly develop a proposal, acting strategically where place-based priorities, transformational impacts, and the scale and complexity of the project necessitates public sector investment.

In keeping with the Building More Homes delivery plan, and the Mayor’s response to the Kerslake Review of GLA Group Housing Delivery, strategic investment via CHDIF will prioritise supporting interventions on sites controlled by the GLA and the GLA Group. This includes GLAP projects and sites where direct acquisition by the GLA Group, or joint ventures with external partners, are the most effective route to delivering homes. This could include interventions to address viability challenges in such projects. Strategic proposals may also extend to interventions supporting housing delivery on wider-public-sector land holdings.

Assessment criteria

The GLA will assess both CME and GLA-led strategic proposals against common assessment criteria.

Project selection will also depend on available sources of funding.

The GLA may publish amended assessment criteria for CHDIF from time to time.

Strategic fit – 30 per cent of overall score	
Areas of consideration and weighting	Information requirements
Project location and policy context (15 per cent)	<ul style="list-style-type: none"> • Project alignment with growth locations in the London Plan, Local Plans and policies. • Details if development is on public-sector land, including projects linked to or dependent on any other public-sector project or activity – especially where the GLA or the GLA family may exercise control, and where investment will address viability challenges. • Evidence if proposal will support small and medium-sized enterprises and innovative delivery models.
Project contributes to increasing new social and affordable housing (10)	<ul style="list-style-type: none"> • Evidence of tenure breakdown. • Evidence project complies with local affordable housing planning policy requirements; and, where possible,

per cent)	<p>demonstrates how this has been maximised through GLA intervention.</p> <ul style="list-style-type: none"> • Details if the proposal is assisting an estate-regeneration project (and is supported by residents in a ballot).
Maximising private-sector investment (5 per cent)	<ul style="list-style-type: none"> • Evidence of how private investment opportunities, including institutional investment, have been maximised to support growth and housing delivery.

Deliverability – 40 per cent of overall score	
Areas of consideration and weighting	Information requirements
Project delivery by summer 2029 or earlier (20 per cent)	<ul style="list-style-type: none"> • Using the information requirements submitted and assessed as part of the deliverability component (status of land and delivery strategy), projects deemed able to deliver by summer 2029 at the latest will automatically receive 20 per cent of the total marks available for deliverability.
Status of land (10 per cent)	<ul style="list-style-type: none"> • Confirmation of who owns the land/evidence that the applicant has control of the land (e.g., title report, development agreement etc.), with priority to projects where the GLA Group controls the land. • If land assembly is required – timescales to complete. • Evidence of planning status (or when planning will be determined), and any outstanding conditions. • Details of any high-risk buildings in the project; and if any, the current building safety gateway status. • Statement from the applicant confirming project deliverability, identifying any key constraints and how these will be overcome
Delivery strategy (10 per cent)	<ul style="list-style-type: none"> • Confirmation of delivery partner and evidence of arrangement. • Confirmation of exit strategy, with identified income streams (e.g. registered provider, build-to-rent disposal), including status of contractual arrangements to underpin the proposed exit route. • Programme for signing legal agreements. • Status of contractor procurement and programme for procurement and appointment of contractor. • Development programme (showing start-on-site date, works on site, and housing-delivery dates). • Evidence of capability, resources, skills and experience (track record) to deliver the project.

Value for money (VfM) – 30 per cent of overall score	
Areas of consideration and weighting	Information requirements
Funding Strategy (7.5 per cent)	<ul style="list-style-type: none"> • Evidence of the status of other funding required for the project’s delivery; and, if not substantially progressed, whether the funding strategy assumptions are clear and credible. • Confirmation that those seeking to deliver affordable housing have discussed, with the GLA, the project, and the London Social and Affordable Homes Programme 2026-36 funding requirements.
VfM – intervention rate (7.5 per cent)	<ul style="list-style-type: none"> • Number of homes considered against GLA funding requirement. • Projects within (or close to) the intervention-rate range necessary to achieve programme targets will receive the highest score.
VfM – additionality (7.5 per cent)	<ul style="list-style-type: none"> • Evidence that homes would not come forward without GLA support: <ul style="list-style-type: none"> ○ What would have happened if the GLA had not intervened? ○ Would the project have gone ahead? ○ Would the project have happened at a slower pace? ○ Would the project be delivered on a smaller scale? • A clearly defined baseline (counterfactual) to analyse and assess how GLA support provides additionality, rather than being deadweight – that is, what would have happened anyway. • Evidence of a clear market failure. • Projects demonstrating the greatest additionality will receive the highest score. • Failure to demonstrate any additionality as a result of GLA support will result in a bidder receiving a FAIL. Their submission will be deemed non-compliant.
VfM – repayment (7.5 per cent)	<ul style="list-style-type: none"> • Projects that repay in full will receive the highest score. Projects with a low percentage of funding repayment will receive the lowest score.

Appendix 2 – City Hall Developer Investment Fund

EQUALITY IMPACT ASSESSMENT

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1. Introduction

- 1.1. This document is the Greater London Authority's (GLA) Equality Impact Assessment (EqIA) for the City Hall Developer Investment Fund (CHDIF). It forms part of the GLA's work to comply with the Public Sector Equality Duty in respect of that programme, by assessing the equality impacts of the proposed policies and funding conditions of the CHDIF. The Public Sector Equality Duty, as set out in the Equality Act 2010 (the Equality Act), requires the Mayor and GLA to have due regard to the need to:
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
 - 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.
- 1.2. This EqIA will also be used to help the Mayor continue to monitor and review the impacts of the GLA's policy and funding conditions regarding delivery of homes and wider infrastructure funded through the CHDIF as they come forward. This monitoring and review activity includes approving relevant investments via Director or Mayoral Decision and making any adjustments to CHDIF over the course of its programme duration.
- 1.3. The characteristics protected by the Equality Act are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex and sexual orientation. This EqIA also considers the impact of CHDIF on people with low incomes. Although this is not a protected characteristic under the Equality Act, the socio-economic inequality it reflects is important to the Mayor as part of his efforts to address wider issues of inequality. It's important to consider that discrimination, or the potential for discrimination, can be compounded for people who share multiple protected characteristics.
- 1.4. The structure of this EqIA is as follows:
 - objectives of CHDIF (section 1)
 - evidence about housing need and affordability for Londoners with shared protected characteristics (section 2)
 - evidence on workforce diversity in the built environment sector (section 3)
 - evidence on the impact of new supply (section 4)
 - expected equality impacts of CHDIF (section five)

- conclusions (section six).

2. City Hall Developer Investment Fund objectives

- 2.1. The initial objective of CHDIF is to support proposals that unlock and accelerate housing by targeting funding at stalled projects capable of delivering 100 or more housing completions by summer 2029 or earlier. Where possible, funding will be returned to the GLA to recycle into future projects.
- 2.2. The other strategic objectives, which are integrated into the assessment criteria for proposals, are:
 - increasing new social and affordable housing
 - maximising private sector investment
 - supporting Small and Medium Enterprises (SMEs) and innovation.
- 2.3. CHDIF will be used flexibly to unlock and/or accelerate housing delivery. Interventions and eligible expenditure includes, but is not limited to funding for: land acquisition and enabling works; site remediation; on and off-site infrastructure that unlocks housing; capitalised fees and construction costs required to deliver the project; and viability gap funding (potentially in addition to affordable housing grant under the Social and Affordable Homes Programme or another Affordable Homes Programme, subject to the requirements of those programmes and with regard to subsidy compliance).
- 2.4. Increasing the delivery of housing of all tenures is a key Mayoral priority, which CHDIF will contribute to. This is set out in the Building More Homes delivery plan. CHDIF will also support the Mayoral objectives 'improving London's housing stock' and 'reducing inequalities' via the funding conditions on building safety and EDI inclusion, as detailed in section 5.
- 2.5. CHDIF will also contribute to the national Government objective to build 1.5 million high-quality homes nationally by 2029.

3. Evidence about housing need and affordability in London

- 3.1. This section sets out a wide range of evidence about the protected characteristics of Londoners in housing need and Londoners who struggle to afford a home that meets their needs. As CHDIF aims to increase housing supply to meet housing need, with a strategic objective to increase social and affordable housing, the evidence in this section is of relevance when considering the equality impact of CHDIF.
- 3.2. There is no single indicator or metric of housing need or housing affordability. As such, evidence on housing need outlined in this section includes data on homelessness; temporary accommodation; overcrowding; and accessibility. These factors all act as proxy indicators of housing need. Evidence on housing affordability outlined in this section covers Londoners' financial and employment circumstances, such as income; poverty; housing costs; and employment. Considering these different indicators together builds a picture of which groups of Londoners with shared protected characteristics are disproportionately in need of affordable housing.
- 3.3. Housing need is more acute in London compared with other parts of England, in particular for social rented homes. Evidence suggests that 76 per cent of affordable housing need in London is for social rent, compared with 19 per cent for the Midlands, and 42 per cent for the wider South of England.¹ There are more households in temporary accommodation in London than in the rest of England combined.² Housing is also unaffordable for Londoners who are in less acute need. Private renters in London spend an average of 46 per cent of their income on rent, compared to 30 per cent in the rest of England.³ London is the only region of England where house purchases are unaffordable (more than five times income) to people across the whole income spectrum.⁴

Housing affordability: Poverty in London

- 3.4. There are a range of ways to measure poverty. The leading definition is relative low income; this is defined as having an income below 60 per cent of median net household income.⁵ Poverty is both a symptom and a cause of those struggling with the cost of housing. Before housing costs are accounted for, 1.4m Londoners live in poverty – this is around 15 per cent of Londoners. However, after accounting for housing costs, 2.4m Londoners live in poverty – this equates to 26 per cent of Londoners.⁶
- 3.5. Some Londoners who share protected characteristics are more likely to experience poverty (after housing costs). The Households Below Average Income report shows that:⁷

¹ Savills' 'Beyond a one size fits all housing policy' 2024 is available [here](#)

² GLA analysis of MHCLG homelessness live tables, 2024-2025

³ English Housing Survey 2023-2024: experiences of the 'housing crisis' is available [here](#)

⁴ ONS' Housing Purchase Affordability, UK: 2024 is available [here](#)

⁵ Joseph Rowntree Foundation, [UK Poverty 2025: The essential guide to understanding poverty in the UK](#), 29 January 2025

⁶ GLA analysis of Households Below Average Income, 2021-24

⁷ GLA analysis of Households Below Average Income, 2021-24

- Young Londoners (under 24) are more likely to be in poverty than other Londoners (32 per cent versus 22 per cent).
- Women are more likely to be in poverty than men (28 per cent versus 24 per cent).
- Disabled people are more likely to be in poverty than non-disabled people (30 per cent versus 25 per cent). People living in a household where someone is disabled are also more likely to be in poverty than those living in a household where no-one is disabled (31 per cent versus 24 per cent).
- People from Black, Asian and minority ethnic backgrounds are more likely to be in poverty than White Londoners.⁸ Eighteen per cent of White Londoners are in poverty, compared with 38 per cent of Asian Londoners; 36 per cent of Black Londoners; 28 per cent of Mixed ethnicity Londoners; and 43 per cent of Londoners from an Other ethnic group.

Londoners with more than one of the above protected characteristics may be even more likely to experience poverty.

- 3.6. LGBTQ+ Londoners are more socioeconomically polarised than other Londoners. This is because, across this group, the likelihoods of being financially comfortable, and of living in poverty, are both greater than for other Londoners.⁹

Housing affordability: Unemployment in London

- 3.7. Almost five per cent of Londoners aged 16 or over are unemployed (defined as not working and actively looking for work). Some Londoners who share protected characteristics are more likely to be unemployed, reflecting structural barriers in the labour market. This is likely to have a negative impact on their ability to afford housing that meets their needs. The ONS Annual Population Survey 2024 sets out that:¹⁰

- Young Londoners are much more likely to be unemployed: this status is seen among 31 per cent of 16-19-year-olds; 16 per cent of 16-24-year-olds; and 13 per cent of 20-24-year-olds.
- Disabled Londoners are twice as likely to be unemployed as non-disabled Londoners (8 per cent versus 4 per cent).
- Londoners from some Black, Asian and minority ethnic backgrounds are more likely to be unemployed. Nine per cent of Pakistani and Bangladeshi Londoners are unemployed; 7 per cent of Black Londoners; 10 per cent of Mixed ethnicity Londoners; and 9 per cent of Londoners from an Other ethnic background. Three per cent of White Londoners are unemployed.

⁸ The Households Below Average Income report classifies individual ethnicities according to the ethnic group of the household reference person (usually the highest earner in the household). This means that information about households of multiple ethnicities is lost.

⁹ Centre for London, [How do LGBTQ+ people experience life in the capital?](#), 3 July 2020

¹⁰ GLA analysis of ONS Annual Population Survey, 2024

- Compared to all Londoners, unemployment is more likely among Londoners from Muslim backgrounds (9 per cent are unemployed); Hindu backgrounds (6 per cent); or any Other religious background (7 per cent).

Housing affordability: Economic inactivity in London

3.8. Londoners who are economically inactive are not working, and not actively looking for work. Common reasons are: being a student; caring for children or family; or being unable to work due to ill health. Across London, 21 per cent of working-age people are economically inactive. Some Londoners who share protected characteristics are more likely to be economically inactive, reflecting structural barriers in the labour market. This is likely to have a negative impact on their ability to afford housing that meets their needs. The ONS Annual Population Survey 2024 sets out the following findings:¹¹

- Disabled Londoners are twice as likely to be economically inactive as non-disabled Londoners (37 per cent versus 16 per cent).
- Londoners from some Black, Asian and minority ethnic backgrounds are more likely to be economically inactive than working-age Londoners overall. This group includes Black Londoners (26 per cent); Pakistani/Bangladeshi Londoners (33 per cent); Londoners from a Mixed ethnic background (27 per cent); and Londoners from any Other ethnic background (26 per cent).
- Compared to all Londoners, economic inactivity is more likely among Muslim Londoners (34 per cent economically inactive); Jewish Londoners (24 per cent); and Christian Londoners (22 per cent).
- Women are more likely to be economically inactive than men (25 per cent versus 16 per cent).

Housing affordability: Housing tenure

3.9. The uneven distribution of Londoners with different shared protected characteristics across tenures has wide-ranging impacts. Tenures vary hugely in terms of affordability, security, quality and accessibility. Private renting is insecure, with high monthly rents; social housing is more affordable and very secure, but in short supply; and home-owning in London is secure, but difficult to access in terms of needing a large deposit. Overall, around half (53 per cent) of Londoners are owner-occupiers; 29 per cent rent privately; and 18 per cent live in a social rented home. Some of the differences in tenure patterns for Londoners with different shared protected characteristics are set out below:¹²

- Younger Londoners are more likely to live in the private rented sector (PRS), and less likely to own their own home than older Londoners: 46 per cent of those aged 16-34 live in the PRS, compared with 5 per cent of people aged over 65.

¹¹ GLA analysis of ONS Annual Population Survey, 2024

¹² GLA analysis of Households Below Average Income, 2021-24

- Disabled Londoners are more likely to live in social housing than non-disabled Londoners (31 versus 15 per cent); and less likely to live in the PRS (19 versus 31 per cent).
- Londoners from some Black, Asian and minority ethnic backgrounds are more likely to live in the PRS (47 per cent of Londoners from an Other ethnic group; 38 per cent of Asian Londoners; and 35 per cent of Londoners from a mixed ethnic background).^{13,14} Overall 29 per cent of Londoners live in the PRS.
- Black Londoners and Londoners from an Other ethnic group are least likely to own their own home (27 per cent), compared with 53 per cent of Londoners overall.
- Londoners from most Black, Asian and minority ethnic backgrounds are more likely to live in a social rented home than among all Londoners (45 per cent of Black Londoners; 25 per cent of Londoners from an Other ethnic background; and 22 per cent of Londoners with a mixed ethnicity). Overall, 18 per cent of Londoners live in a social rented home.

Housing affordability: Housing costs in London

3.10. On average (median), Londoners spend 28 per cent of their income on housing costs. This varies significantly by tenure. Londoners living in the PRS spend a median average of 34 per cent of their income on housing costs, compared with 28 per cent for Londoners living in social rented homes and 18 per cent for owner-occupiers. The differences in how much income is spent on housing costs among Londoners with shared protected characteristics. These differences partly reflect different distribution across housing tenures and partly reflect their different incomes. The English Housing Survey data sets out the following:¹⁵

- Women spend a higher median proportion of their income on housing costs (28 per cent) than men (25 per cent).
- Disabled people spend a higher median proportion of their income on housing costs (29 per cent) than non-disabled people (25 per cent).
- Londoners from Black, Asian and minority ethnic backgrounds spend a higher median proportion of their income on housing costs than White Londoners (32 per cent for Mixed ethnicity Londoners; 30 per cent for Londoners from an Other ethnic background; 29 per cent for Black Londoners; 27 per cent for Asian Londoners; 26 per cent for White Londoners).

¹³ The ethnic groups were Asian, Black, White, Mixed ethnic groups or Other ethnic groups.

¹⁴ The Households Below Average Income report classifies individual ethnicities according to the ethnic group of the HRP (usually the highest earner in the household) which means that information about households of multiple ethnicities is lost.

¹⁵ GLA analysis of English Housing Survey (2020-23)

- Older Londoners spend a higher median proportion of their income on housing costs than younger Londoners: spend is 31 per cent for Londoners aged 65 and over; and 25 per cent for those aged 25-34.

3.11. An ONS survey found that 53 per cent of disabled Londoners find it difficult to afford their housing costs, compared with 44 per cent of non-disabled Londoners.¹⁶ Most Deaf and disabled Londoners who responded to a survey by Inclusion London said they struggle to afford housing costs. A third said they had to cut back on food or other essentials to afford housing costs.¹⁷

Housing need: Homelessness

3.12. There is no set definition of housing need. However, proxy evidence includes data on overcrowding, homelessness, temporary accommodation and accessibility. The impacts of the affordability and housing tenure patterns set out above create significant differences in housing need between different groups of Londoners with shared protected characteristics. When considering the evidence on homelessness set out below, it's important to consider that some groups of Londoners with shared protected characteristics are more likely to experience hidden homelessness, where they are experiencing homelessness or housing difficulties, but are not counted in official statistics. The available evidence suggests that experiencing hidden homelessness is more likely among women; young people; people from some Black, Asian and minority ethnic backgrounds; and LGBTQ+ people.¹⁸

3.13. In 2024-25, 70,000 London households (almost 2 per cent of all London households) were assessed as being owed a homelessness duty (prevention or relief) by a local authority.¹⁹ In the same period, some groups of Londoners with shared protected characteristics were more likely to be owed a homelessness duty.²⁰

3.14. Younger Londoners were disproportionately more likely to be owed a homelessness duty. Among London households owed a homelessness duty, 42 per cent had a lead applicant under 35. Among all London households, only 20 per cent of household reference persons (HRPs) were under 35.²¹

3.15. According to the data, 18 per cent of households owed a homelessness duty had support needs due to physical ill health or disability; 18 per cent had a history of mental health problems; and 4 per cent had a learning disability. Households could register multiple support needs – so these groups may

¹⁶ GLA, [Housing in London annual report: 2024](#), November 2024

¹⁷ Inclusion London, [Barriers at Home: Housing crisis for Deaf and Disabled Londoners](#), 4 February 2025

¹⁸ ONS, ["Hidden" homelessness in the UK: evidence review](#), 29 March 2023

¹⁹ GLA analysis of MHCLG homelessness live tables, 2024-25

²⁰ Throughout this section on homelessness, data on Londoners owed a homelessness duty is from GLA analysis of MHCLG homelessness live tables 2024-25 (unless otherwise specified); comparator data for all Londoners is from GLA analysis of the 2021 Census.

²¹ In the 2021 Census, the HRP is the person who serves as a reference point, mainly based on economic activity, to characterise a whole household.

overlap. Among all London households, 27 per cent included someone disabled under the Equality Act definition.

- 3.16. Black Londoners, and Londoners from any other ethnic background²² were disproportionately more likely to be owed a homelessness duty. Of all London households owed a homelessness duty, 30 per cent were headed by a Black Londoner; and 12 per cent by a Londoner from any Other ethnic background. However, of London households overall, only 13 per cent have a Black HRP; and only 6 per cent have an HRP from any Other ethnic background.²³
- 3.17. Single-parent households were disproportionately more likely to be owed a homelessness relief duty (18 per cent of those owed a homelessness relief duty were single-mother households; but only 12 per cent of overall households in London are single-mother households). There are much fewer single-father households owed a homelessness relief duty, but they were also overrepresented (two per cent of those owed a homelessness relief duty were single fathers; but only one per cent of overall households in London are single-father households).
- 3.18. Single-person households, particularly single men, were disproportionately more likely to be owed a homelessness relief duty. Single men accounted for 42 per cent of those owed a homelessness relief duty, but only 14 per cent of overall households in London are single men. Similarly, single women accounted for 22 per cent of those owed a homelessness relief duty, but only 16 per cent of overall households in London are single women.
- 3.19. According to the data, eight per cent of lead applicants of households owed a homelessness duty have a gender identity different from their sex registered at birth, but only one per cent of Londoners overall have a gender identity different from their sex registered at birth. Although data relating to households and individuals is not directly comparable, this suggests that trans people may be disproportionately more likely to be owed a homelessness duty. There was a large amount of missing data on the gender-reassignment status of people owed a homelessness duty – it was only available for 20 per cent of people.
- 3.20. The MHCLG data, cited above, did not find that any sexual orientations were overrepresented or underrepresented among people owed a homelessness relief duty. However, across the UK, LGBTQ+ people are twice as likely to experience hidden homelessness, such as sofa surfing or squatting, than non-LGBTQ+ people.²⁴ The data shows that 26 per cent of LGBTQ+ young people, and 33 per cent of trans young people, are understood to have experienced hidden homelessness.

²² Londoners from any Other ethnic background are not from a White, Black, Asian or Mixed ethnic background.

²³ In the 2021 Census, the HRP is the person who serves as a reference point, mainly based on economic activity, to characterise a whole household.

²⁴ akt, [There's no place like home: The reality of LGBTQ+ youth homelessness](#), March 2025

- 3.21. According to ONS analysis of homeless people living in hostels or shelters in 2021, 44 per cent were disabled, compared with 18 per cent of people across England and Wales.²⁵
- 3.22. During 2024-25, more than 13,000 Londoners were seen sleeping rough; 83 per cent of these were male. However, women are typically underrepresented in traditional rough sleeping statistics – this is due to the ways women sleep rough, which are often less visible compared to those seen among men. The 2024 Women’s Rough Sleeping Census, which uses a gender-informed approach to data collection, found significantly higher levels of rough sleeping in London among women. It recorded 371 women sleeping rough during the census period, compared to 184 women recorded during the Rough Sleeping Snapshot in autumn 2024.^{26,27} The 2024 Women’s Rough Sleeping Census highlighted that Black women were disproportionately affected by homelessness, making up 25 per cent of respondents.
- 3.23. Around half (47 per cent) of Londoners seen sleeping rough in 2024-25 were UK nationals. The second largest group of rough sleepers were from Europe (22 per cent), followed by those from Africa (17 per cent).²⁸
- 3.24. In 2024-25, four per cent of Londoners seen rough sleeping identified as White-Gypsy/Irish Traveller, White- Roma, or Gypsy/Romany/Irish Traveller. In contrast, 2021 Census data estimates that approximately 0.5 per cent of Londoners identified as Gypsy or Irish Traveller, or Roma. While a proportion of London’s Gypsy, Roma and Traveller communities have a preference for bricks and mortar accommodation, the provision of Gypsy and Traveller sites in London falls considerably short of demand, and much of this need is for social rented pitches.
- 3.25. The GLA’s needs assessment for accommodation-based support for victims/survivors of domestic abuse noted a 15 per cent increase, since 2020-21, in the number of London households owed a prevention or relief duty from homelessness, as a result of domestic abuse. Over the past three years, the London-wide increase in households seeking homelessness relief has outpaced the increase in those seeking homelessness prevention. This suggests that the needs of those requesting housing support due to domestic abuse are increasingly acute by the time they come to the attention of local authorities. Demand for housing support among victims/survivors that are sleeping rough has also risen since the COVID-19 pandemic. The GLA’s needs assessment identifies areas of unmet need.²⁹

Housing need: Temporary accommodation

²⁵ ONS, [People experiencing homelessness, England and Wales: Census 2021](#), 9 December 2023

²⁶ Solace, [Women’s Rough Sleeping Census, 2024](#)

²⁷ Department for Levelling Up, [Housing and Communities, Rough sleeping snapshot in England: autumn 2024](#), updated 15 July 2025

²⁸ GLA, [Combined Homelessness and Information Network \(CHAIN\) annual report: Greater London, April 2024 – March 2025](#), July 2025

²⁹ GLA, [Domestic Abuse Safe Accommodation-Based Support for Victims/Survivors of Domestic Abuse: the needs assessment for London 2024](#), March 2025

- 3.26. On 31 March 2025, there were 73,300 London households in temporary accommodation (including 94,700 children).³⁰ This number has increased by more than 20 per cent since 2020. Households living in temporary accommodation are more likely to include children than London households overall. Of all households living in temporary accommodation, 66 per cent included children, but only 28 per cent of London households overall include children. In 2024, London Councils estimated that at least one in 50 Londoners, including one in 21 children, live in temporary accommodation.³¹
- 3.27. Single-mother households were overrepresented among people in temporary accommodation in London: 35 per cent of those in temporary accommodation were single-mother households, but only 12 per cent of London households are single-mother households. There are much fewer single-father households in temporary accommodation, but they were also overrepresented (3 per cent of those in temporary accommodation were single fathers, but only 1 per cent of London households are single-father households).

Housing need: Overcrowding

- 3.28. The English Housing Survey reports on overcrowding as defined by the bedroom standard. This considers the difference in the number of bedrooms needed by the household, and the number of bedrooms available to the household. Temporary household changes due to the pandemic continue to impact English Housing Survey data, and data on overcrowding is likely to be underestimated, especially in the PRS.³² According to the English Housing Survey, seven per cent of households in London are overcrowded overall, but this varies for Londoners with different protected characteristics:
- Households headed by Pakistani or Bangladeshi Londoners, Black Londoners or Londoners from a Mixed ethnic background are most likely to be overcrowded (26 per cent, 14 per cent and 14 per cent respectively). Households headed by White Londoners and Chinese Londoners are least likely to be overcrowded (three per cent).
 - Households including a disabled person were more likely to be overcrowded (10 per cent) than households that didn't include a disabled person (six per cent).
 - Households headed by someone aged 35-54 are most likely to be overcrowded (11 per cent). Younger and older households are less likely to be overcrowded; households headed by someone aged 65 and over are least likely to be overcrowded (one per cent).
 - Households with dependent children were more likely to be overcrowded (19 per cent) than households without dependent children (1 per cent).

Housing need: Accessibility

³⁰ GLA analysis of MHCLG homelessness live tables, 2024-25

³¹ London Councils, [London's homelessness emergency](#), 24 October 2024

³² GLA, [Housing in London annual report: 2024](#), November 2024

- 3.29. In London, 17 per cent of homes have all four basic accessibility features necessary to make them ‘visitable’ by someone with mobility difficulties.^{33,34} However, less than one per cent are ‘visitable’, while also having the accessible bathrooms, kitchens and lift access that a disabled household might need.³⁵
- 3.30. In London, 11 per cent of households with at least one disabled member say they do not feel safe at home because they fear a fire might break out. This is compared to around eight per cent of households with no disabled members.³⁶
- 3.31. One in four Deaf and/or disabled Londoners who responded to an Inclusion London survey said their home is completely inaccessible. This means that they cannot safely or easily use basic facilities such as kitchens, bathrooms and entryways.³⁷

Housing need: Demographics of Londoners moving into affordable housing

- 3.32. Demographic information about the people moving into different types of affordable housing indicates the shared protected characteristics of those who will likely benefit from affordable housing supplied through CHDIF.^{38,39}
- 3.33. Social rented homes are low-cost rental homes. They are allocated to low-income households, usually via their local authority housing register. The protected characteristics of households moving into general needs social rented homes differ from Londoners overall in the following ways:
- People moving into general-needs social rented homes are more likely to be younger than Londoners overall (40 per cent of households starting a new social rent tenancy had a lead tenant under 35; but only 20 per cent of Census HRPs were under 35).
 - Households moving into social rented homes were more likely to have a lead tenant who is Black (33 per cent versus 13 per cent of all Census HRPs); Mixed ethnicity (eight per cent versus four per cent); or from an Other ethnic group (eight per cent versus six per cent).

³³

These features are defined in the English Housing Survey as level access, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level.

³⁴GLA Housing and Land, [HRN12 Housing for disabled Londoners: An analysis of secondary data](#), February 2026

³⁵ GLA Housing and Land, [HRN12 Housing for disabled Londoners: An analysis of secondary data](#), February 2026

³⁶ GLA Housing and Land, [HRN12 Housing for disabled Londoners: An analysis of secondary data](#), February 2026

³⁷ Inclusion London, [Barriers at Home: Housing crisis for Deaf and Disabled Londoners](#), 4 February 2025

³⁸ CORE data is collected at a household level, but most demographic information is at the level of an individual (e.g., age). Demographic information relates to the “lead tenant” – this is the person in the household who does the most paid work. If several people do the same amount of paid work, it’s the oldest household member.

³⁹ GLA analysis of MHCLG social housing letting and sales data (CORE), various years, 2021-24

- Households moving into social rented homes were less likely than Londoners overall to have a lead tenant who is White (37 per cent, versus 60 per cent overall) or Asian (14 per cent versus 17 per cent).
- The data shows that one per cent of people moving into social rent homes are pregnant.
- Households moving into social rented homes were more likely to be headed by a woman: 63 per cent of social rent lead tenants are female, compared with 45 per cent of Census HRPs.
- Single women make up 45 per cent of households moving into general-needs social rent homes (26 per cent with children, and 19 per cent without children). Single men make up 26 per cent (24 per cent without children and two per cent with children).
- The data shows that 30 per cent of households moving into general-needs social rent homes include someone with a long-term health condition or illness. Although not directly comparable, the Census shows that 27 per cent of households include someone with a disability according to the Equality Act definition.
- The data also shows that 50 per cent of households moving into a general needs social rent home have a household income of less than £300 per week. The average weekly household income in London is £680 per week.⁴⁰

3.34. Intermediate rented homes are let at below market rents, for people who are unlikely to secure social housing, or are struggling to cover the costs of a market rent home and those for whom home ownership is not an affordable or desirable option. For the purposes of this EqIA, London Living Rent (LLR) has been considered as an intermediate rent product, although it is a Rent to Buy product. The protected characteristics of households moving into intermediate rented homes differ from Londoners overall, in the following ways:

- Younger households are overrepresented among households starting a new intermediate rented tenancy, and older households are underrepresented. Of all households starting a new intermediate rented tenancy, 58 per cent of lead tenants are under 35, and only five per cent are over 55. But only 20 per cent of all Londoners are under 35, and 37 per cent are over 55.
- Of all London households, 28 per cent include children but of all households starting a new intermediate rented tenancy, only 18 per cent include children.
- Women are slightly overrepresented among households starting a new intermediate rented tenancy: 53 per cent of people in these households

⁴⁰ ONS, [Gross disposable household income by UK constituent country and region](#), 10 September 2025

are female, and 47 per cent are male. By comparison, 51 per cent of all Londoners are female and 49 per cent are male.

- Of all households starting a new intermediate rented tenancy, three per cent have a long-term health condition or illness; and four per cent include a wheelchair user. Among all Londoners, 27 per cent of households include someone disabled under the Equality Act definition. This difference will be due in part to the younger age profile of households starting a new intermediate rented tenancy, because younger people are less likely to be disabled.⁴¹
- Of all households starting a new intermediate rented tenancy, 67 per cent have a lead tenant from a Black, Asian or minority ethnic background, compared with 40 per cent of HRPs among all London households. Households with a Black lead tenant are particularly overrepresented among those starting a new intermediate rented tenancy (30 per cent of lead tenants are Black, versus only 13 per cent of HRPs among all Londoners).
- Of all lead tenants starting a new intermediate rented tenancy, 67 per cent were British; 13 per cent were from European Economic Area (EEA) countries; and 19 per cent were from any other country.

3.35. Shared ownership homes are a type of intermediate housing whereby households can purchase a proportion of their home, and pay below market rent on the remaining unsold share. The protected characteristics of households moving into shared ownership homes differ from Londoners overall as follows:

- Currently, 80 per cent of households purchasing a shared ownership home had a lead buyer aged 25-44. Only three per cent are over 55. Among all Londoners, 40 per cent of Census HRPs are aged 25-44, and 37 per cent are over 55.
- Among all London households, 28 per cent include children; but only six per cent of households purchasing a shared ownership home include children.
- Of all households purchasing a shared ownership home, 50 per cent have a female lead tenant.
- Only three per cent of households purchasing a shared ownership home include a disabled person. Less than one per cent of households purchasing a shared ownership home include a wheelchair user. Among all Londoners, 27 per cent of households include someone disabled under the Equality Act definition. This difference will be due in part to the younger age profile of households purchasing a shared ownership home, because younger people are less likely to be disabled.⁴²

⁴¹ ONS, [Disability by age, sex and deprivation, England and Wales: Census 2021](#), 8 February 2023

⁴² ONS, [Disability by age, sex and deprivation, England and Wales: Census 2021](#), 8 February 2023

- The majority of households (64 per cent) purchasing a shared ownership home had a White lead buyer; 60 per cent of Census HRPs are White. Households with a lead buyer from a Black or Other ethnic background were underrepresented among those purchasing a shared ownership home. This suggests that not having a deposit may be a barrier to buyers from a Black or Other ethnic background; this is consistent with wider evidence on wealth and ethnicity.⁴³
- Census data shows that 40 per cent of households living in shared ownership homes are Christian; and 35 per cent have no religion. Other religious beliefs and combinations of beliefs make up the remainder. Among all Londoners, the same proportion of households were Christian (40 per cent), but fewer had no religion (26 per cent).

4. Evidence on workforce diversity in the built environment sector

4.1. Workforce diversity within organisations employing Londoners to deliver housing is of interest to the Mayor in considering equality outcomes, given the diverse demographics of Londoners. In support of Mayoral equality objectives, CHDIF will require partners in receipt of CHDIF funding to meet Equality, Diversity and Inclusion standards (see section 7 for details). Women, people from Black, Asian and minority ethnic backgrounds, and young people are all underrepresented in the built environment sector workforce:

- Women are underrepresented in the built environment sector workforce; across the UK, 25 per cent of this workforce is female.⁴⁴ In the British engineering and construction industry workforce, only 17 per cent of workers are female.⁴⁵
- People from Black, Asian and minority ethnic backgrounds are also underrepresented in the built environment sector. Across the UK, 15 per cent of the workforce is from a Black, Asian or minority ethnic background, compared with 20 per cent of the working-age population.⁴⁶ In London, only 21 per cent of construction jobs are held by people from Black, Asian and minority ethnic backgrounds (compared to 33 per cent across all other industries).⁴⁷
- Young people are also underrepresented in the built environment sector. Across the UK, seven per cent of the workforce is under 25, compared

⁴³ Eleni Karagiannaki at the LSE International Inequalities Institute, [The scale and drivers of ethnic wealth gaps across the wealth distribution in the UK: evidence from Understanding Society](#), July 2023

⁴⁴ Supply Chain Sustainability School, [2024 Diversity Survey](#), 2 April 2025

⁴⁵ ECITB, [2024 Workforce Census: Overview of the Engineering Construction Industry](#), January 2025

⁴⁶ Supply Chain Sustainability School, [2024 Diversity Survey](#), 2 April 2025

⁴⁷ GLA Economics, [Local Skills Improvement Plan: Evidence Base](#), May 2023

with 13 per cent of the working-age population.⁴⁸ In the engineering and construction industry in Britain, 17 per cent of the workforce is under 30, compared with 22 per cent of the British population.⁴⁹ The construction sector in London is ageing: 29 per cent of the workforce in 2021 was over 50, compared to 23 per cent in 2010.⁵⁰

4.2. In London's housing association workforce, some groups of Londoners with shared protected characteristics are underrepresented:⁵¹

- Women are underrepresented in leadership positions: 56 per cent of the workforce are female but only 43 per cent of executives are female.
- Londoners from Black, Asian and minority ethnic backgrounds are underrepresented in leadership positions: 20 per cent of the workforce is Black, but only 6 per cent of executives are Black.
- Disabled Londoners are underrepresented in all workforce groups: 21 per cent of the population are disabled, but only 9 per cent of the workforce are disabled, and only 4 per cent of executives are disabled.
- Muslims are underrepresented in the workforce; and Christians are underrepresented at board level.
- There is some evidence that LGBTQ+ people (trans and bisexual people) are underrepresented in leadership positions.

There is no workforce data available about the demographics of local authority housing teams.

5. Evidence on the impacts of new supply

5.1. This section sets out evidence on the impacts of new supply on Londoners with shared protected characteristics.

5.2. A GLA research note from 2023 summarises the findings of several novel economic research papers, which consider how new housing supply impacts on housing affordability, and situates these findings in the existing research context.⁵²

5.3. Although the research note does not identify impacts of new supply on people with different protected characteristics explicitly, it does identify impacts on affordability, and the evidence set out in Section 4 shows that some Londoners

⁴⁸ Supply Chain Sustainability School, [2024 Diversity Survey](#), 2 April 2025

⁴⁹ ECITB, [2024 Workforce Census: Overview of the Engineering Construction Industry](#), January 2025

⁵⁰ GLA Economics, [Local Skills Improvement Plan: Evidence Base](#), May 2023

⁵¹ National Housing Federation, [How diverse is the housing association workforce in London?](#), September 2023

⁵² GLA Housing and Land, [Housing Research Note 10 – The affordability impacts of new housing supply: A summary of recent research](#), August 2023

with shared protected characteristics are more likely to struggle to afford a home that meets their needs. The research note does identify impacts of new supply on people with low incomes.

5.4. Key, relevant findings of the research note are:

- New homes deliver improved choice and affordability for households, beyond the households moving into the new homes.
- There is evidence to show that building new market-rate homes can make housing more affordable. The key mechanism is “moving chains”, whereby new market housing creates chains of vacancies across an area, reducing rents and improving availability, including for low-income households.
- However, there is also evidence that, in some circumstances, new market-rate homes don’t improve affordability. This can happen if the new homes lead to substantial improvements in local amenities, which increases demand in the area, and outweigh the price reduction impact of new supply outlined above.
- Beyond improving affordability, new homes can set off chains of moves that enable many households to move to better-quality homes or homes that better match their preferences.
- The location of new market-rate homes has an impact on how these homes impact affordability. If new market-rate homes are only built in low-income areas, they can potentially increase gentrification pressures. However, if new market-rate homes are built in high-income areas, this can reduce gentrification pressures elsewhere.
- Building new social housing has the most immediate and direct benefits for low-income households, but all new housing improves housing availability for people across the income distribution.

6. Overall equality impacts of City Hall Developer Investment Fund

6.1. CHDIF intends to unlock and accelerate housing delivery. It will initially focus on funding stalled projects capable of delivering 100 or more housing completions by summer 2029 or earlier. Where resources allow, it will also focus on supporting delivery on sites controlled by the GLA and GLA Group and those on wider public sector land holdings. Other strategic objectives of CHDIF are increasing new social and affordable housing, maximising private sector investment into London, and supporting Small and Medium Enterprises (SMEs) and innovation. CHDIF will also support the Mayoral objectives ‘improving London’s housing stock’ and ‘reducing inequalities’ via the funding conditions on building safety and EDI inclusion, as detailed in section 5. This section outlines the expected equalities impact that new housing of all tenures will have in London, which we expect to be enabled or accelerated through

CHDIF funding. The CHDIF could directly or indirectly support the creation of new infrastructure, which could also have equalities impacts. These indirect impacts are not explored in this EqlA.

- 6.2. The delivery of social rented homes enabled through CHDIF funding will benefit Londoners who currently struggle to afford a home that meets their needs, and other Londoners in housing need. As set out in section two, this group includes Londoners with low incomes; Londoners from Black, Asian and ethnic minority backgrounds; disabled Londoners; young Londoners; families with children (particularly single parents); women; and LGBTQ+ people. Although the low rents and security of tenure offered by social housing will help to support Londoners moving into social rented homes out of poverty, the evidence also shows that many people living in social rented homes still live in poverty. While accelerating housing delivery and attracting investment into social and affordable housing will not on its own resolve inequalities in London, it is likely to have a positive impact on the lives of many Londoners.
- 6.3. Delivering and enabling the delivery of social rented homes is likely to have a positive impact on groups of Londoners with protected characteristics (including those who share protected characteristics), who are more likely to move into social rented homes. People moving into social rented homes are more likely, compared to Londoners overall, to be younger; from some Black, Asian or minority ethnic backgrounds; female; single parents; or disabled. These groups of Londoners are also less likely to be able to afford a home that meets their needs on the open market.
- 6.4. CHDIF will also fund and enable other affordable tenures, such as intermediate housing. Londoners moving into intermediate housing are more likely to be younger, and less likely to be disabled or have children, than Londoners overall. Londoners moving into an intermediate rented home are more likely to be from a Black, Asian or minority ethnic background, compared with Londoners overall. This demographic data suggests the following:
 - Funding intermediate housing should have a positive impact on some groups who cannot afford a home that meet their needs, such as younger Londoners, and Londoners from Black, Asian or minority ethnic backgrounds.
 - Disabled Londoners and families with children are underrepresented in this tenure and are also more likely to struggle to afford a home that meet their needs. Disabled Londoners and families with children may therefore be less positively impacted by funding intermediate homes. However, intermediate housing will still have a positive impact on the disabled Londoners and families with children who do move into an intermediate home.
 - The delivery split between intermediate rent and shared ownership may have an impact on the ethnicity of Londoners who benefit from intermediate housing. Londoners from some Black, Asian or minority ethnic backgrounds, who are more likely to struggle to afford a home that meets their needs, are more likely to move into an intermediate rented

home, and less likely to buy a shared ownership home. Therefore, Londoners from some Black, Asian or minority ethnic backgrounds may be more likely to benefit from intermediate rented homes rather than shared ownership homes.

- 6.5. CHDIF will also unlock market housing, including mixed schemes that include a range of tenures. There is evidence that the delivery of market housing can also improve affordability for households beyond those moving into the new homes, including low income households.⁵³ Improvements in affordability will help Londoners who are more likely to struggle to afford a home that meets their needs, including Londoners from Black, Asian and ethnic minority backgrounds; disabled Londoners; young Londoners; families with children (particularly single parents); women; and LGBTQ+ people.
- 6.6. There is also evidence that market housing can have a negative impact on affordability in some circumstances, where it is accompanied by significant improvements in local amenities, which may have a negative impact on groups of Londoners who are more likely to struggle to afford a home that meets their needs.⁵⁴ This includes Londoners with low incomes; Londoners from Black, Asian and ethnic minority backgrounds; disabled Londoners; young Londoners; families with children (particularly single parents); women; and LGBTQ+ people. However, planning requirements mean that affordable housing will be delivered alongside market housing which will mitigate this affect.
- 6.7. Overall, CHDIF is likely to have a significant positive impact for Londoners, including those with protected characteristics. With a strategic objective of delivering social and affordable homes, CHDIF will enable and deliver new, low-cost social rent homes to Londoners who are in the most pressing housing need. It will also enable and deliver secure, affordable housing to Londoners on average incomes via intermediate housing, including supporting Londoners into home ownership via shared ownership. The delivery of market housing may also improve affordability for households beyond those moving into new homes.
- 6.8. Housing funded by CHDIF will be expected to include accessible housing for disabled Londoners, as required by the current London Plan 2021 (although it should be noted that development of a London Plan is currently under way).

7. City Hall Developer Investment Fund funding conditions

- 7.1. The Mayor of London requires certain conditions to be met as a requirement when accessing GLA funding programmes, to advance Mayoral policy objectives and equalities outcomes. The CHDIF introduces funding requirements that the Mayor has implemented through his LSAHP. The funding

⁵³ GLA Housing and Land, [Housing Research Note 10 – The affordability impacts of new housing supply: A summary of recent research](#), August 2023

⁵⁴ GLA Housing and Land, [Housing Research Note 10 – The affordability impacts of new housing supply: A summary of recent research](#), August 2023

conditions covered in this EqIA relate to building safety and equality, diversity and inclusion (EDI), because these are the funding conditions adopted in the CHDIF. The expected equality impacts of these discretionary conditions are considered below. As these conditions are also replicated in LSAHP, the equalities impacts of these conditions can therefore expect to be cumulative across programmes.

Building safety standards

- 7.2. The national regulatory regime has been strengthened in recent years. This has included the government establishing the Building Safety Regulator; expanding requirements to install sprinklers and second staircases; and improving the competency and regulation of fire risk assessments and local authority building control.
- 7.3. Despite these improvements, the Mayor has raised concerns that the regulations covering the external walls of buildings under 18m is insufficient – as is the testing and certification regime, which does not sufficiently control for the risk of unsafe materials being used on external walls.
- 7.4. Homes directly funded via CHDIF must not have combustible materials used on the external walls of buildings of all heights. This goes further than national regulations, which only ban combustible materials in new developments over 18m, and severely restrict their use at 11-18m.
- 7.5. Homes directly funded via CHDIF must also have active fire suppression systems (AFSS) in newly developed buildings of all heights, with the exception of single units. This goes further than national regulations, which only require sprinklers in new development over 11m. This is because of the well-evidenced benefits that these systems provide, and ongoing concerns about the effectiveness of regulations covering buildings under 11m.
- 7.6. Potential positive equality impacts are as follows:
 - These requirements will make residents' homes safer by reducing fire risks. This is a positive benefit for all residents, but will particularly affect residents who have reduced mobility or would be otherwise vulnerable in a fire. This includes, for example, some disabled people, older people, pregnant people and children.⁵⁵ In the Grenfell Tower fire, a disproportionate number of disabled residents and children died.⁵⁶
 - Across England, men and older people are more likely to die due to a fire than women and younger people.⁵⁷ These building safety requirements may have a positive impact on men and older people.

⁵⁵ National Fire Chiefs Council, [response to MHCLG consultation, "Sprinklers and other fire safety measures in high-rise blocks of flats](#), 28 November 2019

⁵⁶ Disability Rights UK, [Almost half of Grenfell fire deaths were Disabled people and children \(press release\)](#), March 2021

⁵⁷ MHCLG, [Detailed analysis of fires and response times to fires attended by fire and rescue services, England, April 2024 to March 2025](#), 14 August 2025

- These requirements aim to make evacuation easier and safer. AFSS lessen the spread and heat of fires; reduce the toxicity and temperature of smoke; and allow more time for residents to safely evacuate, and for fire and rescue services to respond. This may have a positive impact on residents who could find it harder to evacuate in the event of a fire, including disabled people, older people, pregnant people and children.
- The National Fire Chiefs Council suggests that the number of people unable to descend staircases will increase over time, due to demographic trends. These trends include, for example, an ageing population, and more people choosing to receive care at home rather than in a residential care setting. This group is likely to include older people and disabled people. These requirements may help ensure that homes continue to meet the needs of these Londoners in future.
- Evidence from expert stakeholders suggests that many people with specific evacuation requirements (e.g. reduced mobility) choose to live on lower floors. While the national building safety standards on combustible materials and AFSS systems apply to buildings over a certain height, the GLA building safety requirements apply regardless of building height. This may have a positive impact on people with specific evacuation requirements who choose to live on lower floors, which is likely to include disabled people and older people.
- Living in an overcrowded home is a fire risk, and Londoners from some Black, Asian and minority ethnic backgrounds, families with children, and Londoners aged 35-54 are more likely to live in an overcrowded home. Therefore, these requirements may have a positive impact on these groups.
- Requiring non-combustible materials for homes in receipt of CHDIF funding could be market-shaping for the building material supply chain, which would have a positive impact on building safety across England, especially in combination with the London Social and Affordable Homes Programme 2026-36 (which introduces the same funding condition).

7.7. Potential negative impacts, and any justifications or mitigations, include the following:

- There is a risk that this requirement could lead to higher construction costs for projects in receipt of CHDIF funding, which could impact viability margins. This could have a negative impact on groups of Londoners with protected characteristics (including those who share protected characteristics) who are more likely to be in housing need. However, since 2020, national requirements have restricted the use of combustible materials, and required sprinklers, in buildings over 11m. The market is accordingly being encouraged to adopt these higher standards. Additional GLA requirements only substantively impact buildings under 11m; and, where they do, they are deemed to be proportionate, with minimal impacts on overall building costs.

Equality diversity and inclusion

7.8. Partners in receipt of CHDIF funding must meet the following five minimum EDI standards:

- offer EDI training for all employees
- implement a zero-tolerance approach to all forms of discrimination, harassment and bullying
- broaden recruitment channels, and encourage applications from diverse and underrepresented groups
- collect and monitor workforce data to benchmark the diversity of their workforce against the local area of their organisation
- publish their gender and ethnicity pay gaps.

7.9. Potential positive impacts are as follows:

- The EDI standards aim to improve EDI outcomes within organisations in the housing and built environment sector. Women, people from Black, Asian and minority ethnic backgrounds, and young people are all underrepresented in the built environment sector workforce. In London housing associations, disabled people are underrepresented.
- The EDI standards aim to improve the diversity of the sector's workforce, and make organisations within the sector more inclusive. This may make organisations in the built environment sector more likely to meet the needs of Londoners who are disproportionately in housing need – such as Londoners from Black, Asian and minority ethnic backgrounds; disabled Londoners; and younger Londoners. This is because a diverse workforce that represents Londoners in housing need may have a better understanding of people in housing need, leading to a more positive experience and better outcomes for clients. It may also be easier to build trust between organisations and their clients, if the workforce is representative of Londoners in housing need.

7.10. There is a small risk that these requirements could negatively impact housing delivery, due to additional costs required to meet them. This would have a negative impact on groups of Londoners with protected characteristics (including those who share protected characteristics) who are more likely to be in housing need. Officer experience from administering the London AHP 2021-26 suggests that the impact on delivery will be minimal. In addition, some overlap between partners receiving LSAHP and CHDIF funding is expected. As such, providers who are already GLA investment partners should be familiar and already compliant with these requirements; this should mitigate impacts on housing delivery.

8. Key conclusions

- 8.1. Overall, the impacts of CHDIF are considered positive for Londoners with protected characteristics (including those who share protected characteristics). Where there are potential negative impacts, they have been mitigated against where possible, or are considered justified. Some groups with shared protected characteristics may be more likely than others to experience positive impacts, but this is considered justified as these groups are more likely to be in housing need, and less likely to be able to afford a home that meets their needs.