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11 August 2020

Dear Sadiq,

As you know this Government is injecting the biggest cash investment into affordable housing in a decade – including the £9.5bn of extra funding I secured at Budget for the Affordable Homes Programme (AHP) and the £2bn for Long-term strategic partnerships.

Particularly in light of COVID-19, I would like to see the new AHP launched as soon as possible in order to deliver much needed homes as quickly as possible – supporting people whilst stimulating the market. I am mindful that many organisations will begin business planning in the Autumn and so to give developers and local authorities the time they need to gear up for delivery next year, it is crucial we make swift progress.

I have set out below my expectations for the funding and my officials stand ready to provide further detail to your team if needed.

Funding split and delivery target

I have decided to offer London £4 billion from 2021/22 to 2025/26. This is 35% of the £11.5bn of new money available. Of the £4 billion, £1 billion is 50% of the £2 billion funding we have assigned for long-term strategic partnerships.

I would like you to set out how many affordable homes you can deliver based on the budget set out above and the tenure split that follows. It should be a target that maximises supply, but is also achievable. We can then agree the delivery targets we will set as a condition of the GLA being given the funding.

I am increasing transparency in the programme so that the public can clearly see what their taxes are buying. Therefore, these targets should be for grant funded delivery only. 'Nil grant' and 'partial grant' delivery should not be included in the programme. I am also determined to maximise additionality from this programme, so acquisitions (rather than new build) need to be no more than 10% of delivery.

Tenure mix

I want to ensure that hard working families can access home ownership and so expect that almost half of the homes delivered by this AHP will be for affordable home ownership. The GLA alongside Homes England will be expected to contribute its fair share to meet that ambition.

The majority of these should be for shared ownership and I am also imposing a grant requirement that all new shared ownership homes built in the new programme will be based on the new model for shared ownership.

In order to address the challenges facing London on homelessness, temporary accommodation and struggling families, I would like to see London deliver Social Rent rather than London Affordable Rent. I therefore expect all sub-market rent delivered through the programme to be for Social Rent, with rents calculated based on the Social Rent formula. The Right to Shared Ownership will apply to all of the sub-market rental properties built through the new programme as a grant requirement, with some limited exemptions that my officials will outline to yours.

As with the current programme, I would like 10% of delivery to be for supported housing.

Long Term Strategic Partnerships

You will already be aware of the requirements that have been set out for long-term strategic partnerships. These requirements will continue into the new programme, including me reserving the right to ensure the recommendations reflect the assessment criteria and confirming that the process for awarding long-term strategic partnerships has been followed. Starts on these partnerships will need to take place from 2022/23 to 2025/26 with completions by March 2029.

Strategic Partnerships

In order to drive value for money in the programme, you will need to maximise the proportion of the programme allocated through the competitive bidding of new strategic partnerships. New strategic partnerships can have starts from 2021/22 to 2022/26 but must complete by March 2028.

Governance and Management Information (MI)

I am also altering the governance and management information arrangements in the new programme to provide further assurance on delivery. This includes moving the current quarterly London Affordable Homes Delivery Board to monthly meetings and a more extensive set of MI that can provide certainty over current and future delivery in the programme, alongside how the schemes being supported are meeting wider housing priorities such as modern methods of construction. The full details of these will be shared by officials shortly.

I hope we can work swiftly and constructively together to agree the principles I have set out in order to ensure the affordable homes this Country and Londoners need can be planned for and delivered as quickly as possible. I also hope you will mirror my ambition, and that after speedily working through the matters in this letter, you will seek to launch the GLA Affordable Homes Programme prospectus alongside my delivery agent, Homes England, as soon as possible.

I and my officials stand ready to discuss this further.

A handwritten signature in black ink that reads "Robert Jenrick". The signature is written in a cursive style with a horizontal line underneath.

RT HON ROBERT JENRICK MP

Homes for Londoners: Affordable Homes Programme 2021-2026

Funding Guidance

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Foreword

Despite significant progress over the last four years to build the homes our city needs, the reality is too many Londoners still can't afford a decent home to rent or buy. When I became Mayor, I was clear that one of my top priorities was to tackle the housing crisis, which blights people's lives and leaves too many living in overcrowded, expensive, or poor-quality accommodation.

Since 2016, City Hall has worked together with councils, housing associations and the development industry to improve the situation. And I'm pleased that we have hit every single one of the delivery targets in the current Homes for Londoners: Affordable Homes Programme 2016-2023. Last year, we started the highest number of genuinely affordable homes since Greater London Authority records began in 2003. This included more new council homes than in any year since 1983.

What we mean by 'affordable' housing matters. That's why, in my time as Mayor, I've ditched the dodgy definition used by ministers elsewhere in the country, which defines so-called 'affordable rents' as being up to 80 per cent of the market rate. Instead, we have focused on building homes that are genuinely affordable to Londoners through the creation of London Affordable Rent.

However, there remains much more to do. So I'm pleased to be setting out the terms of my Affordable Homes Programme 2021-2026. We have secured a further £4bn to support affordable homebuilding and, over the next five years, my team will be working with investment partners to start 82,000 new affordable homes across both the 2016-2023 and 2021-2026 Affordable Homes Programmes.

To be clear: the level of funding the Government has been willing to make available is simply not enough to deliver affordable homes at a scale that matches either the needs of Londoners or my ambitions for our city. However, I am determined to ensure that we use this funding not only to deliver homes, but to drive up standards in a number of key areas including design, sustainability, building safety and equality, diversity and inclusion. These new standards will ensure that we are meeting our expectations on quality, as set out in planning policy, while also contributing to my vision of a more equal, more diverse and more inclusive city.

This programme will focus on homes that are genuinely affordable: for Social Rent, London Living Rent and Shared Ownership. I have long made the case that the most acute need in London is for low-cost homes to rent so I am pleased to have agreed with the Government that more than half the programme will be for Social Rent.

The programme will also encourage council homebuilding. In 2018, I launched City Hall's first ever programme dedicated to council housing – the Building Council Homes for

Londoners programme. With support from City Hall, councils are now beginning to build again and at a scale not seen for decades. This programme will provide funding to enable councils to return to their role as major homebuilders in London, including new opportunities for councils to build homes for Social Rent.

I'm proud our programme will require investment partners to commit to improving equality, diversity and inclusion as a condition of their funding. I intend to make sure London is a place for all, where no community feels left behind or excluded and where everyone can benefit from the opportunities that a good home makes possible. High quality affordable housing is critical to achieving this and if we all pull together, I'm confident that we can build the homes that will make this a reality for many more Londoners.

The programme will also strengthen the safety of new homes. We have learned from the horrific fire at Grenfell Tower, in which 72 Londoners tragically lost their lives, how grave the consequences can be when building safety is not prioritised. So, this programme will introduce stringent new fire safety requirements to make sure that residents can have confidence in the safety of their homes.

Furthermore, the programme will prioritise good quality design and will seek to improve the sustainability of new homes as we work towards making London a net-zero city. The Covid-19 pandemic has been a reminder of the urgency of providing safe and secure homes for all. Good quality design will improve the experience of those occupying new affordable homes and sustainability requirements will ensure that we can build back from the pandemic without exacerbating the climate emergency.

There is a lot to be done, but I know that by working in partnership – and by seizing opportunities for innovation – we can provide Londoners with the good quality, highly sustainable and genuinely affordable homes they so desperately need and deserve.

Part one: Programme requirements

Overview

1. The Mayor has secured £4 billion from Government to deliver affordable homes in London under the new Homes for Londoners: Affordable Homes Programme 2021-2026. This funding is expected to support starts on site between 2021 and 2026, with completions by 2028 for most projects and some strategic sites completing in 2029. The Mayor will use this programme to maximise the number of new homes in London and is eager to ensure funding results in net additionality.
2. The Mayor and Government have agreed that over half of these starts across the new programme will be at Social Rent – where we know there is the greatest need in London. The remainder will support households into home ownership, through the delivery of London Living Rent or Shared Ownership homes. The new programme also includes provision for supported and specialist housing.
3. The Mayor will continue to deliver the Affordable Homes Programme 2016-2023 alongside this new funding settlement and overall the GLA aims to support 82,000 affordable homes between April 2021 and March 2026. This will see investment partners in London make a significant contribution to the national target of 180,000 starts by 2026.
4. Bidding will remain open for the Affordable Homes Programme 2016-2023 and partners with existing allocations in the current programme will be expected to deliver those in full. The GLA is keen to encourage bids for large scale, deliverable programmes from investment partners through both the current and new programme.

Affordable housing products

5. The Mayor is committed to delivering homes that are tailored to the different needs of Londoners. The Mayor will primarily allocate funding through the Affordable Homes Programme 2021-2026 for three affordable housing products, which are:
 - Social Rent
 - London Living Rent
 - Shared Ownership.
6. Investment partners are expected to deliver a mixture of homes for both Social Rent and home ownership (London Living Rent and Shared Ownership), subject to the detail on eligible bidders set out in paragraph 91 and additional products available for supported and specialist housing set out in paragraph 27.

Social Rent

7. The overwhelming housing need in London is for low cost rented homes to help low income households, typically nominated by councils, who are unable to secure or sustain housing on the open market. The Mayor has long argued that the Government needs to provide adequate funding to deliver homes at Social Rent and welcomes the opportunity to do so at scale through this programme.
8. Social Rents are calculated using the formula and data set out in the Ministry of Housing, Communities and Local Government's [Policy Statement on Rents for Social Housing](#) from 1 April 2020 and in the Regulator of Social Housing's [Regulatory Framework for Social Housing](#) (including the Rent Standard 2020) for local authorities and private Registered Providers. For details on the calculation of the weekly rent, investment partners should refer to these documents. The landlord of these homes must be registered with the Regulator of Social Housing.

Right to Shared Ownership

9. The Government requires Social Rent homes delivered through this programme to be eligible for the Right to Shared Ownership, with some specific exemptions. The following types of homes are exempt:
 - Council housing
 - Homes in designated protected areas and rural exception sites
 - Supported and specialist homes for older, disabled and vulnerable people
 - Almshouses
 - Homes where the landlord is a co-operative housing association
 - Homes where the landlord or freeholder is a Community Land Trust.
10. Further information about requirements and exemptions for the Right to Shared Ownership will be set out in more detail in the GLA's [Affordable Housing Capital Funding Guide](#), which will be released in due course. In the meantime, investment partners are advised to review the Government's [Right to Shared Ownership: Initial Guidance for Registered Providers](#) for further information. Investment partners submitting bids under London's Affordable Homes Programme 2021-26 are expected to self-certify circumstances where their programme includes homes that are exempt.

Lifetime tenancies

11. The GLA expects all Social Rent homes delivered through this programme to be offered on a lifetime tenancy. Probationary and introductory tenancies may be permitted if required.

London Living Rent

12. The Mayor recognises that there are many Londoners who struggle to afford private rents and want to own their own home but find it difficult to save for a deposit. London Living Rent offers Londoners a below-market rent, supporting them to save for a deposit to enable them to move into home ownership.

Setting rents

13. The GLA publishes ward-specific benchmark rent levels for London Living Rent homes on an annual basis. These rent levels are based on one-third of the estimated median gross household income for the local borough, varied by up to 20 per cent in line with ward-level house prices, and are capped to reflect the maximum amount a household eligible for London Living Rent could afford. The benchmark rents also vary based on the number of bedrooms within the home.
14. Investment partners accessing GLA grant funding for London Living Rent homes will have the flexibility to let homes at lower rents if they wish, however rent levels must not exceed the benchmarks. Rents should not be increased above the rate of CPI inflation and on re-let the rent should revert to the applicable London Living Rent level (or lower). The benchmark rents are inclusive of services charges. In contractual terms, London Living Rent will be defined as Rent to Buy grant funding within the Affordable Homes Programme 2021-2026. The landlord of these homes must be registered as a provider with the Regulator of Social Housing.

London Living Rent eligibility

15. Eligibility for London Living Rent is restricted to those who live or work in London who either have a formal tenancy (e.g. in the private rented sector) or who are living in an informal arrangement with family or friends as a result of struggling with housing costs. These homes are available to Londoners who have a maximum gross household income of £60,000 (in accordance with the new London Plan and updated in the [London Plan Annual Monitoring Report](#)), do not currently own a home and do not have sufficient savings to purchase a home in the local area. Councils may set additional eligibility criteria (e.g. lower local income thresholds or other restrictions) for the first three months of marketing¹. Any changes or updates to these criteria will be provided through the [London Plan Annual Monitoring Report](#) and/or other planning or funding guidance. London Living Rent homes should be advertised on the [Homes for Londoners property search tool](#).

London Living Rent tenancy terms and route to home ownership

16. Investment partners are expected to use London Living Rent to actively support tenants into home ownership within ten years. This will include a requirement to assess

¹ Paragraph 4.6.10 London Plan - Intend to Publish Version (2019) or any subsequent published version of the London Plan.

the ability and inclination of prospective tenants to save and offering tenants the opportunity to buy their London Living Rent home on a Shared Ownership basis during their tenancy and within ten years.

17. The GLA reserves the right to recover grant in line with rules published in the GLA's [Affordable Housing Capital Funding Guide](#), including where the sale of a London Living Rent home on a Shared Ownership basis may give rise to surplus subsidy.
18. Investment partners providing London Living Rent homes will have flexibility to manage the tenancies in the way they see fit, although the GLA generally expects London Living Rent homes to be available as rental properties for ten years and would not expect tenants to be required to move within the first three years.

Shared Ownership

19. Shared Ownership allows a buyer to purchase a share in a new home, and pay a rent on the remaining, unsold share. The Government requires that the Mayor introduces the Government's new Shared Ownership model in this programme. The Government is still finalising the terms of the new Shared Ownership model.
20. Under the Government's new model, Shared Ownership purchasers should have a household income that can support an initial purchase of between 10 per cent and 75 per cent of the value of a property, and usually a mortgage deposit of around 10 per cent of the share to be purchased. Rents for Shared Ownership properties can be no more than 2.75 per cent of the value of the unsold share and subsequent rent increases are limited. The Government's new model requires landlords to cover the cost of any repairs and maintenance for new Shared Ownership homes for an initial 10-year period.
21. All sales must be based on a form of lease containing certain fundamental clauses, which will be set out in the GLA Capital Funding Guide in due course. The GLA Capital Funding Guide will also set out more detail about the terms of the new Shared Ownership model, when available. In the meantime, investment partners are advised to review the [Government's response to its initial consultation on the new model](#) for further information about the proposed terms of the new model².

Eligibility and access to Shared Ownership homes

22. Shared Ownership homes are available to households with a maximum gross income of £90,000 (in accordance with the new London Plan and updated in the [London Plan Annual Monitoring Report](#)) who do not own their own home (other than existing shared owners) and who are unable to buy a property on the open market. Councils may set

² The new model is subject to a further technical consultation which was not yet published at the time of publication of this Funding Guidance.

additional eligibility criteria (e.g. lower local income thresholds or other restrictions) for the first three months of marketing³. Any changes or updates to these criteria will be provided through the [London Plan Annual Monitoring Report](#) and/or other relevant planning and funding guidance.

23. Investment partners should advertise their available Shared Ownership homes on the [Homes for Londoners property search tool](#).

Service charges and other fees in Shared Ownership homes

24. Where they have not already, investment partners are expected to sign up to the existing Shared Ownership Charter for Service Charges and to commit to working with the GLA to develop a new and improved Charter, reflecting the new Shared Ownership model. As part of this work, the GLA will work with investment partners to undertake research on service charge levels in London.
25. Additional fees and charges for Shared Ownership homes should be kept to a minimum and only reflect the costs to the landlord of undertaking particular tasks. Investment partners are required to publish on their website details of additional fees and charges (other than service charges) for Shared Ownership homes to ensure residents are sufficiently informed about any further costs.

Early information for potential shared owners

26. Investment partners are required to provide a 'key features' document to potential purchasers at the start of the marketing and sales period for all Shared Ownership homes. In addition to the information already required in the key information document, as outlined in the current Shared Ownership model lease, this 'key features' document should also include detailed information on the tenure of a property and the length of any lease, as well as the full range of potential costs, including any expected service charges, permission fees and any other charges (including those relating to resales and lease extensions).

Supported and specialist housing

27. The Mayor is committed to building more homes that meet the diverse needs of Londoners, including by maximising the delivery of supported and specialist housing.
28. Investment partners are therefore encouraged to bring forward specialist and supported housing schemes, including for:
- Older people

³ Paragraph 4.6.10 London Plan - Intend to Publish Version (2019) or any subsequent published version of the London Plan.

- Disabled people, including those with physical or sensory disabilities, learning disabilities, autism and mental health issues
- Homeless people, and those at risk of homelessness, including rough sleepers and victims of violence against women and girls
- Former rough sleepers moving on from homelessness hostels and other services, and people moving on from emergency accommodation such as refuges for victims of violence against women and girls
- Gypsies and Travellers
- Other groups, such as refugees, care leavers, young people at risk, offenders and people with substance misuse issues or complex and multiple needs.

29. Investment partners seeking GLA funding under this programme for supported and specialist housing schemes must ensure these homes meet the requirements set out in sections 4-24 above in relation to the three primary affordable housing products supported by the Mayor in this programme. While the Mayor's preferred rental product is Social Rent, to maximise supply the GLA will fund specialist and supported housing at Affordable Rent levels where this is essential for viability and if still genuinely affordable. Investment partners who provide supported and specialist housing at Social Rent will be exempt from providing the Right to Shared Ownership to tenants. Supported and specialist housing can be developed through new build, as well as through the repurposing or re-improvement of existing homes.
30. Further information about the types of supported and specialist housing the Mayor will fund under this programme is outlined in the supported and specialist housing further guidance, which is available on the GLA website.
31. The Mayor's current supported housing programmes will continue to operate alongside the new programme. Details of the current programmes are available on the GLA website and bidders are encouraged to use the existing routes where projects can start on site by 31 March 2023.

Council homebuilding

32. While further funding and flexibilities from central Government are ultimately necessary to support the scale of new council homebuilding that London needs, the Mayor wants to work with councils to maximise existing powers and resources to deliver new homes in London. The Mayor has made substantial levels of new resources and funding available to councils through his [Building Council Homes for Londoners](#) programme, which was launched in 2018 and aims to support 10,000 new council housing starts by 2023. The GLA will continue to support councils to increase the number of homes they can build over the course of the programme.
33. The Mayor recognises that council housing delivery and planning teams face significant skills and capacity challenges. Housing associations and private developers bidding to

the programme will be encouraged to share skills with council delivery teams through formalised collaboration and partnership. Partnerships are expected to focus on developing the skills and capacity of council delivery teams. Examples of formalised partnership arrangements could include engaging in two-way secondments or staff swaps between council staff and partner teams. Bids submitted by prospective investment partners will be considered favourably where they include an offer to share skills or provide capacity to council housing teams.

34. The Mayor's Right to Buy ringfence offer, which was introduced in 2018 under the Building Council Homes for Londoners programme, remains available as a source of additional grant funding to councils. Councils are encouraged to contact the GLA if they are interested in obtaining grant through this offer. These bids should be submitted through the existing routes.

Estate regeneration

35. The Affordable Homes Programme 2021-2026 provides funding for estate regeneration projects only where the grant is used for additional homes. Funding will not be available for units that replace homes that have been demolished. Where councils are unable to take forward estate regeneration replacement homes within their own resources, the GLA will look to provide alternative funding for replacement homes outside of this programme. Investment partners seeking to undertake estate regeneration on schemes are encouraged to submit bids for additional homes under this programme and, where necessary, discuss details of additional funding requirements for replacement homes with GLA officers.
36. The Mayor has published [Better Homes for Local People: The Mayor's Good Practice Guide to Estate Regeneration](#), which sets out his expectations for how local authorities and housing associations should engage with residents as part of all estate regeneration schemes, whether or not they include the demolition of homes. Investment partners who bid for grant to deliver estate regeneration will need to commit to these standards for their estate regeneration projects. In addition, providers will need to comply with the Resident Ballot Requirement as set out in [Chapter 8 of the Capital Funding Guide](#).

Delivering quality homes for Londoners

37. The Mayor is determined to use his powers to ensure that new affordable homes built in London are safe, sustainable and well-designed. Investment partners seeking funding under this programme will need to meet new funding requirements that support the Mayor's vision for [Good Growth by Design](#) in the capital. The standards set out below reflect current minimum expectations that investment partners must meet to qualify for funding, although investment partners are encouraged to take a more ambitious approach in meeting the objectives of these requirements.

Building safety

38. Following the tragic fire at Grenfell Tower in 2017, the Mayor wants to ensure London is at the forefront of best practice in fire safety – especially when delivering affordable homes. The fire; the subsequent discovery of widespread use of unsafe materials on high-rise buildings across the country; and the systemic failures set out in Dame Judith Hackitt's [Independent Review of Building Regulations and Fire Safety](#) have highlighted the urgent need for reform. Furthermore, several damaging fires in blocks below 18 metres have demonstrated the need to move away from arbitrary height thresholds as a way of managing safety risk.
39. Investment partners must meet five mandatory building safety standards to be eligible for grant funding through the Affordable Homes Programme 2021-2026. Investment partners will be required to self-certify compliance with these requirements in advance of receiving payments from the new programme. The GLA reserves the right to monitor compliance of these requirements through spot checks in the annual compliance audit process.

Building safety standards	
1	The following buildings must include Automatic Fire Suppression Systems, including (but not limited to) sprinklers: <ul style="list-style-type: none"> • All purpose-built blocks of flats (including conversions) of any height • All supported and specialist accommodation.
2	No combustible materials may be used in the external walls of all homes and buildings, regardless of their height ⁴ .
3	All homes must include access to water supplies for firefighting in accordance with Water UK's national guidance document .
4	For all homes, investment partners must register any in-built electrical products, such as white goods, with the manufacturers' registration service. Investment partners must also encourage residents to register white goods with manufacturers for every product where it is possible to do so.
5	For all homes, investment partners must ensure that information about product registration, product recalls and electrical safety is made available to residents.

⁴ This will only allow materials that are Class A2-s1 rated and above under the European classification system, as set out in the standard BS EN 13501-1 and as reflected in UK Building Regulations.

Design

40. The Mayor wants to ensure affordable homes exhibit high-quality design that is socially and economically inclusive and environmentally sustainable, which support Good Growth principles. The new London Plan and the Good Quality Homes for all Londoners London Plan Guidance set out clear policies and guidance on achieving high quality design and standards in housing, which partners are expected to adhere to when building new homes.
41. In line with new London Plan requirements, the GLA is including nine design standards that set minimum standards for new affordable homes in London. To qualify for funding, proposed schemes are expected to meet, or exceed, all the specified design standards set out below. The GLA reserves the right to assess that the standards have been followed through compliance audit.

Design standards	
1	All homes must meet minimum floor space standards, including storage, as outlined in Appendix 1.
2	All homes must have a minimum floor-to-ceiling height of 2.5 metres between finished floor level and finished ceiling level.
3	All homes must provide a minimum of 5 sqm of private outdoor space for one-to-two person dwellings and must provide an extra 1 sqm for each additional occupant.
4	Where 10 or more children or young people are expected to live in the affordable dwellings, these must be at least 10m ² of play space per child.
5	The number of homes accessed from a single core must not exceed 8 homes per floor.
6	All homes with three bedrooms or more must be dual aspect. Any single aspect one-bedroom or two-bedroom dwellings must not be north-facing.
7	All homes must provide for direct sunlight to enter at least one habitable room for part of the day.
8	For developments with 10+ homes, at least 10 per cent of dwellings should meet Building Regulation M4(3) requirements for wheelchair user dwellings. All other new build dwellings within the development should meet Building Regulation M4(2) requirement for accessible and adaptable dwellings. ⁵
9	All developments of 50+ residential dwellings must be subject to an independent design review as part of the planning process.

⁵ As set out in the London Plan – Intend to Publish Version (2019) or any subsequent published version of the London Plan).

42. Only in exceptional circumstances, where agreed by the GLA, will exemptions be made.
43. The Mayor recognises the importance of residents' experiences when considering the success of new developments and communities. Post-occupancy evaluation is a critical tool for assessing resident satisfaction and the Mayor cannot be assured that GLA funding is driving continuous improvement without such a 'real-world' evaluation. The Mayor also recognises the importance of design management to the delivery of Good Growth. Design management plans will support partners to bolster their processes, standards and culture, and ensure good design practices are embedded throughout the life of a project, from scoping and community participation, to procurement, design development and delivery.
44. To meet these aims, the GLA will initially pilot the use of post-occupancy evaluation and design management plans, with the potential for these to become a contractual requirement for all projects within the programme period. Further information about the Mayor's expectations in relation to design quality for affordable housing, including new pilots for post-occupancy evaluation and design management plans, will be made available on the GLA website in due course.

Sustainability and net zero-carbon homes

45. The Mayor is committed to ensuring the capital leads the way in tackling climate change by making London a net zero-carbon city by 2030. To support this goal the GLA will expect that new homes are environmentally sustainable and meet zero-carbon targets.
46. Investment partners are required to adhere to six new sustainability standards as a condition of funding. These reflect new London Plan requirements and will already be familiar to partners committed to sustainability. Adherence to these standards will mean new affordable homes funded by the Mayor go beyond building regulation requirements and will ensure sustainability is at the heart of the new affordable homes in London. By monitoring the environmental performance of completed homes, the Mayor can recognise and promote best practice within the housebuilding industry.

	Sustainability standards
1	All developments of 10+ homes must be net zero-carbon. This must include at least a 35 per cent reduction in on-site carbon dioxide emissions against Part L 2013 of the Building Regulations, of which there must be at least a 10 per cent reduction from energy efficiency measures. Any shortfall in emissions must be paid into the borough's carbon offset fund.
2	All referable development proposals ⁶ must calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
3	All developments of 10+ homes must submit data to the GLA's 'Be Seen' monitoring portal in accordance with relevant guidance.
4	All developments of 10+ homes must be at least Air Quality Neutral.
5	All developments of 10+ homes must meet relevant borough Urban Greening Factor target scores or, where none exist, the interim score of 0.4. ⁷
6	All developments of 10+ homes must demonstrate through an Energy Strategy how they will reduce the potential for internal overheating in accordance with the cooling hierarchy. ⁸

47. Only in exceptional circumstances, where agreed by the GLA, will exemptions be made. Further information about the Mayor's expectations in relation to sustainability standards is available on the GLA website.

48. Investment partners are reminded that the Mayor has launched London Power, a green energy company available exclusively to Londoners. Investment partners are encouraged to consider offering this service within their projects.

Modern Methods of Construction

49. The Mayor is committed to modernising London's construction sector and ensuring a more resilient, more sustainable and more innovative approach to homebuilding by encouraging greater uptake of Modern Methods of Construction (MMC). The Mayor expects investment partners to maximise their use of MMC systems when seeking funding under the Affordable Homes Programme 2021-2026.

⁶ Referable developments include those that meet the criteria set out in the Mayor of London Order (2008). This definition includes developments of 150 residential units or more; developments over 30 metres in height (outside of the City of London) and developments on Green Belt or Metropolitan Open Land.

⁷ As set out in the London Plan - Intend to Publish Version (2019) or any subsequent published version of the London Plan.

⁸ Ibid.

50. The Mayor adopts the Government's MMC Definitions Framework when referring to MMC systems⁹, as summarised below. Further guidance about the MMC Definitions Framework is available on the GLA website.

Category	Definition
1	Pre-Manufacturing: 3D primary structural systems.
2	Pre-Manufacturing: 2D primary structural systems.
3	Pre-Manufactured components: Non-systemised primary structure.
4	Additive Manufacturing: Structural and non-structural.
5	Pre-Manufacturing: Non-structural assemblies and sub-assemblies.
6	Traditional building product led site labour reduction/productivity improvements.
7	Site process led labour reduction/productivity/assurance improvements.

51. Investment partners will be required to identify the types of MMC systems used on projects submitted for funding in the Affordable Homes Programme 2021-2026 programme. The GLA may also request updates at other stages of the development process.

52. The Mayor recognises that MMC represents a new method of construction, and a new way of working, for many investment partners. The GLA is committed to working with investment partners to address these challenges and encourages investment partners to discuss specific requests for GLA support where these can demonstrate increased levels of MMC across a scheme or programme. The GLA particularly welcomes bids from investment partners that aim to aggregate demand for MMC systems, including those that demonstrate a clear delivery pipeline. The GLA also welcomes bids where it can be evidenced that MMC has been used to support the circular economy, including design for disassembly and promotion of re-use and recycling of materials.

Equality, diversity and inclusion

53. The Mayor is committed to creating a fairer, more equal and more integrated city where all people feel welcome and able to fulfil their potential. [Inclusive London](#), the Mayor's equality, diversity and inclusion strategy, sets out how he will help address the inequalities, barriers and discrimination experienced by different groups of people in London.

⁹ Each of the seven categories within the MMC Definition Framework fall within the GLA's definition of MMC.

54. One important way to reduce inequality is by taking action to tackle the housing crisis. The disproportionate impacts of homelessness, overcrowding and poor-quality housing that impact particular groups of Londoners, notably those from Black, Asian and Minority Ethnic backgrounds, can be tackled by building more affordable homes.

Equality, diversity and inclusion action planning

55. The Mayor is committed to supporting increased diversity in the built environment sector and expects partners to contribute to his vision of a more equal, diverse and inclusive London by meaningfully enhancing their organisational practices, procurement methods and engagement with communities.
56. All investment partners will be contractually required to meet minimum standards outlined in the table below within one year of their grant allocation being approved by the GLA. These standards seek to implement the [Mayor's Good Work Standard](#) 'diversity and recruitment' pillar and are being introduced to reflect the Mayor's commitment to ensuring London is a more equal, diverse and inclusive city for all.
57. The Mayor recognises that some organisations are already working hard to promote equality, diversity and inclusion, and hopes that the funding requirement will enhance existing initiatives, as well as embed minimum standards across the sector.

Equality, diversity and inclusion standards	
1	All investment partners must offer Diversity and Inclusion training for all employees.
2	All investment partners must implement a zero-tolerance approach to all forms of discrimination, harassment and bullying.
3	All investment partners must broaden recruitment channels and encourage applications from diverse and under-represented groups.
4	All investment partners must collect and monitor workforce data to benchmark the diversity of their workforce to the local area of the organisation. ¹⁰
5	All investment partners must publish their gender and ethnicity pay gap. ¹¹

58. In addition, the Mayor encourages all investment partners in larger organisations to work towards achieving accreditation through his [Good Work Standard](#), which brings together best employment practice and links to resources and support from across London to help employers improve their organisations.

¹⁰ Smaller organisations may be exempt from this requirement if this would risk breaching the privacy of individual employees.

¹¹ As above.

59. All investment partners are expected to develop, publish and implement an Equality, Diversity and Inclusion Action Plan for their organisation within a year of their grant allocation being approved by the GLA and must provide annual updates on implementation. This will ensure all providers build on their current achievements, and will include at least one action from each of the following three themes:

- Theme 1: Organisational equality, diversity and fairness
- Theme 2: Sustainable and diverse supply chains
- Theme 3: Working together with Londoners.

60. The GLA will produce full guidance on the type of actions that would be considered appropriate under each theme, which will be published on the GLA website in due course to assist partners when developing their action plans. Prior to the full guidance being published, an indicative overview of the three themes and examples of actions will be also provided. Partners will be able to tailor actions to their organisational needs and are encouraged to explore ambitious actions that result in meaningful change. Further information on the Mayor's approach to supporting diversity in employment can be found in the [Supporting Diversity handbook](#) and the [Good Work Standard Employer Guidance](#).

London Living Wage

61. Investment partners receiving grant through this programme will be expected to ensure that their employees and workers are paid the London Living Wage and should endeavour to ensure that consultants, contractors and sub-contractor employees similarly meet this requirement. This will be a contractual obligation of funding.

Naming developments

62. London has a diverse cultural history, and the city's streets, estates and wider developments should reflect this wherever possible. The Mayor expects investment partners to have regard to the diversity of London when naming new streets, estates and wider developments funded through this programme.

Equality Impact Assessment

63. The GLA has undertaken an Equality Impact Assessment for the Affordable Homes Programme 2021-2026. The Equality Impact Assessment is an information gathering tool used to assess the potential impacts of policies on people with the characteristics that are protected by the Equality Act 2010; and to consider how the GLA can eliminate discrimination, advance equality of opportunity, and foster good relations between different people. The Equality Impact Assessment addresses the Mayor's legal duties to carry out a comprehensive assessment of the programme and its proposed policies. The Equality Impact Assessment has helped shape the preparation of the new

programme, ensuring that these key issues have been taken into account throughout the programme development process. The GLA will use the Equality Impact Assessment as the basis for applying the Mayor of London's public sector equality duty to deployment of funding available through the Affordable Homes Programme 2021-2026.

64. The Homes for Londoners: Affordable Homes Programme 2021-2026 Equality Impact Assessment has been published alongside this funding guidance and is available on the GLA website.

Additional supporting objectives

Government strategic priorities

65. The Mayor is working with Government to deliver the Affordable Homes Programme 2021-2026, and in addition to his own priorities, has agreed with Government that the programme will promote the following four strategic objectives. Investment partners seeking funding through the Affordable Homes Programme 2021-2026 should demonstrate how their activities support these objectives. This should be set out in a supporting statement accompanying the bid submission and will form part of the assessment process.

- **Seeking to deliver homes to a realistic balance of development on Brownfield land (or remediation) sites.** Due to the profile of land in London, it is anticipated that most projects will be on previously developed land. Any unusual programmes or concerns from investment partners in relation to this requirement should be outlined to the GLA in a supporting statement accompanying the bid.
- **Actively engaging with local and small and medium sized enterprises (SMEs) in delivering new homes.** Diversifying the types of organisations that build new homes in London is a priority set out in the Mayor's London Housing Strategy and is shared by Government. Investment partners are asked to describe how they will focus their development programmes to support development by SMEs, for example, on small sites. For the purposes of assessing compliance with this objective, councils are considered a local enterprise or SME.
- **Working with smaller housing associations.** There are over 100 small or medium sized housing associations in London. For the purposes of assessing compliance with this strategic objective, the GLA defines a smaller or medium sized housing association as one that owns fewer than 7,500 homes in London and fewer than 25,000 homes nationally. For the purposes of assessment, an investment partner working with a London borough will be considered to be working with a smaller housing association. The GLA particularly encourages bids that demonstrate

partnership working with Black, Asian and Minority Ethnic housing associations in development, service delivery or staff development.

- **Support skills and partnerships working, particularly between housing associations and councils.** Investment partners bidding to the programme will be encouraged to partner with councils to upskill council delivery teams and support capacity building through formalised collaboration and partnership. Examples of formalised partnership arrangements could include engaging in two-way secondments or staff swaps between council staff and partner teams. Councils can demonstrate their activities will support this strategic objective by demonstrating a willingness to participate in formalised partnership arrangements such as two-way secondments.

Pet friendly homes

66. Londoners who live in the homes delivered through this programme are expected to benefit from flexible policies on pet ownership. The Mayor expects investment partners to manage all homes delivered through this programme in line with a presumption in favour of pet ownership for their residents.

Part two: Funding information

Sources of funding

67. The overall funding for the London Affordable Homes Programme 2021-2026 is £4 billion and the GLA expects the funding in this programme to be used as capital grant to support affordable housing delivery. The programme is sub-divided into two key funding sources and the GLA will choose which fund best applies to bids that are taken forward to allocations stage.

Funding sources and delivery timeframes	
1	The Long-Term Strategic settlement consisting of £1bn funding for projects with starts on site from 1 April 2022 to 31 March 2026 and completions to 31 March 2029.
2	The General London Affordable Housing 2021-2026 settlement of £3bn funding for projects with starts on site from 1 April 2021 to 31 March 2026 and completions to 31 March 2028.

68. Projects funded from the Long-Term Strategic settlement will be subject to additional approvals from central government, which the GLA will undertake with the Ministry of Housing, Communities and Local Government.

Negotiated grant rates

69. The GLA is introducing negotiated grant rates for all projects under this programme. Fixed grant rates will still be available to investment partners bidding and delivering homes under the Affordable Homes Programme 2016-2023.

Named sites and indicative proposals

70. The new programme is open to bids for named, known sites, as well as indicative bids for proposed sites that will be identified and acquired throughout the course of the programme. The GLA encourages bidders to submit proposals for deliverable, larger scale programmes and to use the indicative route to secure funding for longer-term pipeline development plans. Unregistered bodies will not be eligible to apply for an indicative allocation.

71. Indicative bids will be assessed on the basis of average funding per unit levels requested for homes for each tenure within the bid. Successful bidders will be expected to deliver homes approved under the indicative route at the average funding levels agreed for indicative allocation.

72. The GLA will allow drawdown of funding from indicative allocations in the Affordable Homes Programme 2021-2026 where current contracts with the GLA have been fully profiled to named sites and programme delivery is on track. Investment partners with indicative proposals approved in the new programme will be eligible to drawdown funding for the purposes of land acquisition subject to evidence that there is an agreement in place for the sale or lease of a site. This will be subject to GLA approval for drawdown.
73. Successful bids for named sites will be allocated and paid at the specific funding levels approved for each project.

Strategic partnerships

74. The Affordable Homes Programme 2021-2026 will include strategic partnerships defined as organisations offering large scale delivery within the programme parameters. Larger programmes will be determined by the GLA based on a combination of bids submitted for named sites and bids for indicative proposals. Bidders are not required to specify in the bid whether they are seeking strategic partnership status as this will be considered and offered by the GLA based on the volume of programme that is taken forward to approval.

Concurrent delivery with the Homes for Londoners: Affordable Homes Programme 2016-2023

75. The new Affordable Homes Programme 2021-2026 will operate alongside the existing Affordable Homes Programme 2016-2023. Overall, across the two programmes the GLA will work with partners to build 82,000 affordable homes. The Affordable Homes Programme 2016-2023 is open for continued bidding and further details setting out the policy requirements and bidding process are available within the funding guide [here](#).
76. Investment partners are encouraged to submit bids for the current programme where projects start on site by 31 March 2023. In some instances, the GLA may request partners to consider transferring bids proposed for the Affordable Homes Programme 2021-2026 to the Affordable Homes Programme 2016-2023, where starts on site can be achieved early.
77. Projects proposed to be funded via retained Right to Buy receipts, or projects proposed with nil grant, should submit these via the existing Affordable Homes Programme 2016-2023 route.
78. Investment partners with existing contracts with the GLA under the Affordable Homes Programme 2016-2023 will be expected to deliver those in full to 31 March 2023 and partners will not be permitted to rebid for existing allocations in the new programme.

Start on site

79. The Affordable Homes Programme 2021-2026 will include projects that deliver affordable homes in London which start on site between 1 April 2021 and 31 March 2026. A full definition of start on site is available in the GLA's [Affordable Housing Capital Funding Guide](#).

Recycled Capital Grant Funding

80. The use of the term 'grant' in this funding guidance is inclusive of Recycled Capital Grant Funding. Where Recycled Capital Grant Funding has previously been applied to a project, bidders will need to specify how much of this grant applies. Value for money assessments will be made on the basis of both Recycled Capital Grant Funding and new programme grant applied for on each project. Investment partners seeking to use significant levels of Recycled Capital Grant Funding on bids in the new programme should discuss these proposals with their GLA lead officer in advance of submitting bids for this programme.

Grant payments

81. For named sites, Registered Providers will be eligible to drawdown grant allocations of 40 per cent at land acquisition, 35 per cent at start on site and the remaining 25 per cent at completion. These payment proportions may be varied on some projects in agreement with the GLA.

82. Unregistered bodies seeking grant for Shared Ownership projects will only be able to drawdown 100 per cent of the grant allocation on a project at completion stage

83. Investment partners with indicative bids approved in the programme will be eligible for early drawdown of funds for site acquisitions agreed with the GLA.

Homes delivered without grant

84. The Affordable Homes Programme 2021-2026 will only include projects that are directly supported by grant funding. Investment partners delivering homes in a wider development programme using their own resources without GLA grant will not be required to submit bids for those projects in the new programme and should continue to submit details of nil-grant projects in the Affordable Homes Programme 2016-23.

85. Councils are not required to submit bids in the Affordable Homes Programme 2021-2026 for projects that will be funded via retained Right to Buy receipts. Details of homes built through retained Right to Buy should be submitted through the current Affordable Homes Programme 2016-23.

86. From April 2023 onwards, the GLA will require investment partners to submit information of starts on site and completions from projects delivered outside GLA programmes. This will be required on a quarterly basis and will feed into MHCLG's national statistics for affordable housing delivery.

Recoverable grant

87. The GLA is keen to explore opportunities for making recoverable grant investment available to bidders where these maximise affordable housing delivery, including proposals on mixed tenure projects or programmes to mitigate potential sales risks. Investment partners are encouraged to contact the GLA in instances where they would like to apply for recoverable grant on a project and these requests will be considered on a case-by-case basis.

Developer-led route

88. The Mayor introduced the developer-led route through the Homes for Londoners: Affordable Homes Programme 2016-2023. This provided an incentive to increase the level of affordable housing beyond that which is viable without subsidy on developer-led sites. Funding for this route is not permitted in the new programme, however the Mayor is keen to continue to maximise affordable housing on new developments and the route will remain available on the terms outlined in the [Affordable Homes Programme 2016-2023 Funding Guidance](#) until March 2023.

Acquisitions

89. The Mayor will use the Affordable Homes Programme 2021-2026 to maximise the number of new homes in London and is eager to ensure funding results in net additionality. For this reason, the GLA will only fund a limited number of acquisitions of existing homes through this programme.

Major repairs

90. Works to ensure existing homes are habitable are not generally eligible for funding in this programme. Only supported and specialist housing bids will be eligible for funding to support repurposing or re-improvement of existing homes. The GLA may award funding in exceptional circumstances, in the case of almshouses for example, where the charity is unable to cover the cost of works itself.

Branding

91. In line with previous programmes, investment partners who receive GLA grant funding will be obliged to adhere to the Mayor's communications and branding requirements. These requirements include displaying Mayor of London and/or Homes for Londoners

hoardings as specified by the GLA and relevant Government branding on all development sites funded by this programme.

Part three: How to bid

Submitting bids

92. All organisations proposing to submit bids for the London Affordable Homes 2021-2026 programme are requested to register their interest to the GLA by emailing:

AffordableHousing@london.gov.uk

93. The GLA will assign a lead GLA officer to each organisation and provide further details about the bidding process. When sending an email to register, bidders should provide the following information:

- The bidding organisation name and address
- Current Registered Provider code (if you have one)
- Current GLA OPS organisation code (if you have one)
- Name, email address and telephone number of your organisation's lead contact person to receive information regarding the Affordable Homes Programme 2021-2026 bidding process.

94. Bids for the Affordable Homes Programme 2021-2026 are expected to be submitted through the GLA's Open Project System (GLA OPS). Bidders will be provided with further information about specific GLA OPS requirements when the system is open for bidding and, in advance of this, information will be made available to assist with assembling bidding information for project proposals.

95. Organisations not currently registered to use GLA OPS are advised to request access using the details provided at the following link:

<https://ops.london.gov.uk/#/home>.

Eligible organisations

96. The programme is open for bids from organisations seeking funding to develop affordable homes in London, including housing associations, local authorities, for-profit organisations, community-led organisations, developers and others. Organisations can bid either independently or as part of a consortium and will need to own the completed affordable homes in order to be eligible for grant. The landlord of all properties funded as Social Rent, London Living Rent or Affordable Rent must be registered with the Regulator of Social Housing.

Investment partner status

97. Organisations with projects approved for funding in the new programme must qualify as a GLA Investment Partner before they can receive grant. Organisations who are not existing GLA Investment Partners will need to apply for qualification and further information about the GLA Investment Partner qualification process can be found on the GLA's website. Bidders that are not Registered Providers seeking to offer Shared Ownership will be required to undertake further due diligence in addition to the Investment Partner qualification process.

Timetable for bidding

- Bidding programme launched: 23rd November 2020
- Deadline for bid submission: close on 11th January 2021
- Allocations announced: March 2021.

Bids assessment

98. The GLA will consider the following criteria when assessing bids under the new programme. The assessment criteria will apply to bids for named sites and indicative proposals.

- Value for money
- Deliverability
- Strategic Fit.

99. Further information about each of these criteria is set out below.

(a) Value for Money

100. Bids for the new programme will be assessed on a case by case basis to consider the grant requirement on each proposal and value for money for the public purse. Bids will be considered based on costs associated with the project; contributions towards those costs; and the gap that is required from grant to make the scheme viable for the project as a whole and for the grant levels requested for each tenure. The assessment process will prioritise projects that offer the best value for money in grant terms against the costs associated with the proposal, alongside meeting requirements for deliverability and ensuring that strategic priorities are maximised.
101. Bidders will be expected to demonstrate that they have maximised the use of other sources of funding and cross-subsidy applied towards the overall costs of the projects, and that the levels of grant sought are justified for the size and complexity of the proposal. The GLA will ask bidders to submit details of total scheme costs and a breakdown of contributions towards those costs.

102. Total scheme costs will include the following and further details of these are set out in the GLA's [Affordable Housing Capital Funding Guide](#):

- Acquisition or land costs
- Development costs
- On-costs.

103. Contributions will include information related to:

- Other public subsidy
- Income from rents
- Income from shared ownership first sales
- Income from private sales
- Provider contributions
- Any other income contributing towards the total scheme costs.

104. Bidders submitting proposals for indicative allocations will be required to estimate costs and contributions for the proposed development programme and grant requirements by tenure. These will be assessed for value for money and - for successful indicative bids - monitored through the course of the programme as sites are acquired and profiled to named projects.

105. To maintain a strong focus on the management of costs throughout the programme period the GLA will require providers to work with us on an open book basis, sharing cost data on specific projects and, on a confidential basis, viability assessments for projects where those are required to clarify grant levels requested on specific bids.

(b) Deliverability

106. Only bids for projects that start on site between 1 April 2021 and 31 March 2026, and complete by 31 March 2029 will be considered under this programme. The GLA will assess certainty of delivery against forecast milestones submitted on the bid which will take into account pre-development, planning status, land ownership status, start on site and completion dates in line with the size and complexity of the project.

107. The assessment process will take into consideration a provider's affordable housing delivery track record and the volume of remaining programme still due to be achieved under existing contracts with the GLA. Providers with existing allocations with the GLA are expected to prioritise delivery of those projects to the agreed milestones.

108. Information submitted by providers will be made available to the Regulator of Social Housing. The Regulator will provide advice to the GLA on whether any proposal to award grant to a private registered provider will have an adverse impact on the Regulator's published judgement on the organisation's Governance and Financial

Viability rating. Registered providers may be asked to provide additional information to the Regulator to inform the assessment as necessary.

109. By bidding for grant through this programme, all providers are confirming their willingness for all information to be shared with relevant boroughs, the Regulator of Social Housing and the Ministry of Housing, Communities and Local Government.

(c) Strategic Fit

110. Part One of this prospectus sets out the key strategic priorities and requirement for the programme and bids will be assessed on the basis of best fit with those priorities. All bids will be assessed on an individual basis including consideration of the following areas:

- The balance of programme for rent and home ownership with an expectation that, where possible, partners' programme of bids will reflect around half for home ownership
- A programme of bids that include, where possible, some provision for specialist and supported housing
- The use of Modern Methods of Constructions on proposed bids
- Compliance with the Mayor's design criteria on proposed bids
- How the following national objectives are demonstrated by bidders:
 - Seeking to deliver homes to a realistic balance of development on Brownfield land (or remediation) sites
 - Actively engaging with local and small and medium sized enterprises (SMEs) in delivering new homes
 - Working with smaller housing associations
 - Support skills and partnerships working, particularly between housing associations and councils.

111. Finally, the GLA will require that all bidders meet the additional programme requirements set out in Part One of this document.

Part four: Contract and funding agreements

Contracts and programme management

112. Investment partners will need to enter into a standard form contract with the GLA to secure grant through this programme. Contracts may vary slightly depending on the investment partner and products being funded, but ultimately all funding agreements will retain the key provisions of the standard form contract. Template contracts for standard delivery agreements will be published on the GLA website in due course.
113. Completed contracts will include the agreed delivery milestones for the projects that the GLA has committed to fund. The GLA will monitor performance of investment partners against these delivery milestones on an ongoing basis. The GLA will be flexible when issues with programme delivery are flagged at an early stage but will reserve the right to review a provider's grant allocation where a partner cannot deliver a project or replace it with an equivalent project where indicative allocations are no longer achievable.

State Aid compliance

114. In this prospectus 'State Aid' and 'State Aid rules' mean both state aid which applies before 11 pm on 31st December 2020 and any amended or replacement rules concerning public funding or subsidies which may be introduced after the end of the transition period.
115. Investment partners need to be aware that new rules may not refer to 'State Aid' or deal with matters or laws concerning public sector fiduciary duties, proportionate subsidies or otherwise regulate how the GLA is permitted to provide public support for this programme.
116. Whilst the GLA has designed this programme to comply with the State Aid rules, which apply in 2020 investment partners also have a responsibility to ensure they are not over-compensated from the point of view of the State Aid rules.
117. As it is highly likely that the State Aid rules will change the GLA reserves the right to amend the programme (including funding requirements and reporting) to ensure that it will continue to remain legally compliant.
118. While the GLA will seek to notify investment partners of relevant changes, investment partners will also be required to keep themselves updated to ensure they remain compliant.

119. The GLA will require investment partners to make returns about the actual costs incurred for both public accountability and State Aid compliance. The GLA is designing a process that will minimise costs to it and providers. This process will include the submission (and certification) of actual costs incurred, and a process to ensure a more detailed review of costs for each grant recipient at least once during the programme. More information will be supplied about the details of this process once it has been finalised.
120. If any providers are found to have been over-compensated, they will be required to repay any over-compensation to the GLA.

Grant recovery

121. The GLA reserves the right to recover grant in line with rules published in the Recovery of Capital Grant Determination model in the GLA's [Affordable Housing Capital Funding Guide](#).

Compliance audit

122. All investment partners will be subject to the GLA's compliance audit process, which ensures that the GLA's policies, funding conditions and procedures are followed. Projects not in receipt of GLA grant, inclusive of Recycled Capital Grant Funding, will not be subject to compliance audit.

Appendix 1: Design standards – Minimum space standards for new dwellings

Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

1. * Where a one-person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.
2. The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls^[1] that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m²).
3. The nationally described space standard sets a minimum ceiling height of 2.3 metres for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

Other formats and languages

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

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Homes for Londoners: Affordable Homes Programme 2021-2026

Equality Impact Assessment

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1. Introduction and background

Background

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

Public Sector Equality Duty

- 1.3. Functions of the Greater London Authority (GLA) exercisable by the Mayor are subject to the Public Sector Equality Duty set out in section 149 of the Equality Act 2010. In exercising these functions, the Mayor, like all public bodies, must have "due regard" to the need to:
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
 - advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and
 - foster good relations between persons who share a protected characteristic and persons who do not share it.
- 1.4. The GLA policies and funding conditions introduced through the Affordable Homes Programme 2021-2026, and identified in [Section Four](#) of this EqIA, are designed to help the Mayor further meet his policy objectives in relation to the delivery of genuinely affordable homes. These objectives, which are outlined in the [2018 London Housing Strategy](#), were also shaped with due regard to the Public Sector Equality Duty.

Equality Impact Assessment

- 1.5. This document sets out an assessment of potential equality impacts related to the policies and funding conditions contained within the Affordable Homes Programme

2021-2026. The aim of this document will be to assess: *what would the impact of the Affordable Homes Programme 2021-2026 be on people with the characteristics that are protected by the Equality Act 2010: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation?*

- 1.6. The equality impacts of the programme are assessed by policy and characteristic. [Section Two](#) of this assessment outlines the general housing baseline data that has been used to conduct the assessment. This is followed in [Section Three](#) and [Section Four](#) by an analysis of the equality impacts related to the policy proposals and funding conditions introduced by Government and by the GLA, respectively, through the Affordable Homes Programme 2021-2026. [Section Five](#) summarises the equality impacts of policies and funding conditions introduced within the programme by protected characteristics.
- 1.7. The assessment notes that the totality of policies within the Affordable Homes Programme 2021-2026 represents a balance between meeting different forms of housing need and maximising the overall delivery of affordable homes, within the context of national policy requirements and available funding. It also identifies the mitigations that will be put in place through the programme to alleviate any potential negative impacts on those who share particular protected characteristics, and on relations between different groups who share characteristics and those groups who do not.

2. General housing baseline data

Housing affordability

- 2.1. After accounting for housing costs, 2.4 million Londoners live in relative poverty (with a household income below 60% of the national median). This is equivalent to 28% of the population, compared with 21% in the rest of England.¹ A third of Inner London residents live in poverty. Housing costs are a significant cause of these high rates of poverty in London; poverty rates almost double after housing costs are considered.² Property wealth in London is extremely unequally distributed, with around half of households owning nothing. Meanwhile, the wealthiest 10% each own property worth an average of around £1 million.³
- 2.2. The affordability pressures that result from a long-term undersupply of homes of all tenures in London, and particularly affordable homes, are one important respect in which housing impacts those with particular protected characteristics and the relations between different groups.
- 2.3. Groups of Londoners who share some particular protected characteristics are more likely to experience poverty, which is both a cause and a symptom of them struggling with the cost of housing:
- Londoners from Black, Asian and Minority Ethnic (BAME) backgrounds are more likely to live in poverty than those from a White background: 39% of BAME Londoners live in relative poverty after housing costs, compared to 21% of White Londoners.⁴
 - Insofar as those with some religious beliefs – Buddhists, Hindus, Sikhs, and particularly Muslims – are more heavily represented among London's BAME population⁵, they too may be more likely to live in poverty.
 - Deaf and disabled residents are also more likely to be living in poverty: 36% of Londoners who live in families where someone is disabled are living in poverty after housing costs, compared to 26% of those in families where no-one is disabled.⁶

¹ GLA analysis of Households Below Average Income data (End User dataset)

² GLA, [London Plan: Integrated Impact Assessment: Consultation Document](#), November 2017

³ GLA analysis of Office for National Statistics (ONS) Wealth and Assets Survey 2010-2012

⁴ GLA analysis of Households Below Average Income data (End User dataset)

⁵ GLA analysis of Office for National Statistics (ONS) 2011 Census

⁶ GLA analysis of Households Below Average Income data (End User dataset)

- Younger people are more likely to be unemployed: the unemployment rate for younger adults in London is 2.7 times higher than for adults aged 25-64.⁷ Younger Londoners also face higher housing costs than older groups (partly because the latter are less likely to be renters): those aged 16-29 or 30-49 spend an average of 29% of their net income on housing costs, compared to 24% for 50-64 year olds and 17% for those aged 65 or more.⁸
- Although the overall poverty rate for working-age men and women in London is similar (26% for women compared to 25% for men)⁹, women are disproportionately likely to be economically inactive¹⁰, low paid¹¹, and/or subject to the poverty that affects single parent families. 54% of all London's single parent families (of whom the vast majority are single mother families) live in poverty, compared to 31% of couples with children.¹²
- Although specific data on housing affordability is not available for those who are pregnant or have given birth within the last 24 weeks (the pregnancy and maternity characteristic), this group may be more likely to disproportionately experience economic inactivity, low pay and/or poverty as many women are forced to leave their jobs because of harassment and discrimination during pregnancy, maternity leave and on their return to work. Issues include being turned down for flexible working, missing out on a promotion and being put under pressure to hand in their notice.¹³ These issues are likely to contribute to affordability problems in areas of high housing costs such as London.

2.4. The Centre for London recently reported that LGBTQ+ Londoners are more socioeconomically polarised than other Londoners, as they are more likely to report both being financially comfortable and in poverty.¹⁴ There is evidence that those who are LGBTQ+ are more likely to experience discrimination when seeking to rent or buy a home.¹⁵ There is also evidence of unmet demand from older LGBTQ+ people for specialist provision care and retirement housing.¹⁶ Although not related to the affordability of housing, this does suggest that those who are LGBTQ+ can be at a disadvantage in a competitive housing market.

⁷ GLA analysis of Office for National Statistics (ONS) Annual Population Survey for 2019

⁸ Resolution Foundation, [Intergenerational audit for the UK: Data dashboard](#), 2020

⁹ GLA analysis of Households Below Average Income data (End User dataset)

¹⁰ Although they form a minority (46%) of Londoners who are unemployed, worklessness rates for women in London are 11% higher than for men. New Policy Institute, [London's Poverty Profile 2015](#), October 2015

¹¹ 58% of low paid jobs in London are carried out by women. Moreover, the biggest group among the low paid in London is female part-time employees, who account for 31% of all low paid Londoners. Ibid.

¹² GLA analysis of Households Below Average Income data (End User dataset).

¹³ EHRC, [Pregnancy and Maternity – Related Discrimination and Disadvantage](#), December 2015

¹⁴ Centre for London, [How do LGBT+ people experience life in the capital?](#), July 2020

¹⁵ Stonewall, [LGBT in Britain: Hate Crime and Discrimination](#), September 2017

¹⁶ Tonic, [Building Safe Choices 2020: Our voices: LGBT+ later life housing demand in London](#), June 2020

Housing tenure

- 2.5. The disproportionate extent to which those with some protected characteristics struggle to afford housing is one factor in their uneven distribution across housing tenures – and consequently the extent to which they experience the advantages and disadvantages associated with different tenures. Home ownership and social housing are the most secure tenures, but there are significant barriers to accessing each of them – high buying costs in the case of home ownership, and the rationing of scarce lettings to the households most in need in the case of social housing. The rapidly growing private rented sector is the least secure and the least affordable of tenures. These shifts in tenure have had particular impacts on certain groups.
- 2.6. For example, the fall in home ownership among Londoners in recent decades has been most acute among younger Londoners. In 1990, 25% of households in London headed by someone aged 16-24 and 57% of those headed by someone aged 25-34 were homeowners. But by 2019, these figures had fallen to 5% and 29% respectively. There were less dramatic falls in the 35-44 and 45-54 age groups (69% to 47% and 71% to 53% respectively), while ownership rates were relatively stable for those aged 55-64 (going from 62% in 1990 to 61% in 2019) and increased for those aged 65 or more from 49% to 67%.¹⁷
- 2.7. There are clear differences in tenure patterns between Londoners of different ethnicities. 39% of households headed by someone of BAME ethnicity own their own home, compared to 58% of households headed by someone of White ethnicity. 35% of BAME-headed households live in social housing, compared to 17% of White-headed households.¹⁸ 26% of both BAME and White households live in the private rented sector, but 53% of privately renting BAME individuals are in poverty after housing costs, compared to 23% of privately renting White individuals.¹⁹

Housing need

- 2.8. The patterns of affordability and housing tenure set out above contribute to stark differences in housing need between different groups of Londoners:
- Among the clearest differences are those between Londoners of different ethnicity: for example, households with a Black or Asian household head are 80% more likely to be overcrowded than the London average, while

¹⁷ GLA, [Housing in London 2020](#), October 2020

¹⁸ GLA analysis of Office for National Statistics (ONS) Annual Population Survey for 2019

¹⁹ GLA analysis of Households Below Average Income data (End User dataset)

households with a Black household head are around 150% more likely to be owed a homelessness duty.²⁰

- There are significant differences in some aspects of housing need by age: for example, an estimated 19% of families in London headed by someone aged 16-29 are overcrowded, compared to 13% of those headed by someone aged 30-49 and 8% of those headed by someone aged 50-64.²¹
- Female-headed households in London are more likely to be homeless: single mother families accounted for 25% of all homeless households assessed as being owed a prevention or relief duty in London in 2019/20, and single female households accounted for another 24% (the remainder were couple households or those with three or more adults).²²
- LGBTQ+ younger people are more likely to find themselves homeless than their non LGBTQ+ peers, comprising up to 24% of the youth homeless population in the UK.²³

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

Households moving into affordable housing

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

Households moving into general needs social housing

2.11. From analysis of CORE data, we can summarise the demographic characteristics of households moving into general needs social housing (i.e. excluding supported housing and intermediate housing) in London in 2018/19 as follows:²⁴

- Younger adults (below the age of 25) were the largest group moving into general needs affordable housing and comprised a significantly larger

²⁰ GLA, [Housing in London 2020](#), October 2020

²¹ Resolution Foundation, [Intergenerational audit for the UK: Data dashboard](#), 2020

²² MHCLG, [Statutory Homelessness Annual Report, 2019-20, England](#), October 2020

²³ Albert Kennedy Trust, [LGBT Youth Homelessness: UK national scoping](#), April 2015

²⁴ MHCLG, Continuous Recording of social housing lettings and sales, 2018/19

proportion of those moving into general needs housing than of all individuals in London.

- The majority of households moving into social housing comprised either single adults, or single adults with one or more children (which together comprised around 37% of all households in London²⁵).
- 62% of households moving into social housing were headed by females, compared to around a quarter of all households in London.
- 40% of households were headed by a person of White ethnicity and 60% of households were headed by a person of BAME ethnicity. Across the London population as a whole, around two-thirds of households were headed by someone of White ethnicity and a third by someone of BAME ethnicity.²⁶
- 1.5% of households moving into social housing needed fully wheelchair accessible homes, 0.6% needed wheelchair access to essential rooms, 3.5% needed level access, and 7.5% had other (unspecified) disability requirements.

Households moving into supported and specialist housing

2.12. From analysis of MHCLG's CORE data, we can discern the following demographic indicators of households moving into supported housing in London in 2018/19:²⁷

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

Households moving into intermediate housing

2.13. The demographic characteristics of households moving into intermediate housing in London in 2017/18 can be summarised as follows:²⁸

²⁵ Office for National Statistics, Families and Households in the UK, 2019

²⁶ GLA analysis of Office for National Statistics (ONS) Annual Population Survey for 2019

²⁷ MHCLG, Continuous Recording of social housing lettings and sales, 2018/19

²⁸ MHCLG, Continuous Recording of social housing lettings and sales, 2017/18

- Most households moving into Shared Ownership housing in London in 2017/18 were headed by a person aged between 25 and 34 (59%) or 35 and 44 (27%). By contrast, a much larger share of households in the overall London population were headed by older people.
- Most households were either single adults (59%) or two adults with no children (33%). Less than 10% had children, compared to 35% of the overall London population²⁹.
- An equal share of households was headed by a person identifying as male as by a person identifying as female.
- 71% of households were headed by a person of White ethnicity (slightly above the London average, as set out above) and 29% of households were headed by a person of BAME ethnicity.
- 1.3% of households moving into Shared Ownership housing in London in 2017/18 included a household member considered to have a disability, and 0.9% included a household member who uses a wheelchair.

²⁹ Office for National Statistics, Families and Households in the UK, 2019

3. Equality impacts of funding conditions imposed by the Government

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

Changes to affordable housing tenure mix

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

Social Rent

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

affordability and insecure tenancy – are a common cause of poor mental health, with low-income households and the BAME community disproportionately affected.³⁰ Providing greater tenure security through lifetime tenancies is, therefore, likely to have a particularly beneficial impact on these groups.

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

London Living Rent

- 3.8. The GLA is promoting London Living Rent (LLR) as a rent-to-buy product that supports access to homeownership, to help mitigate potential affordability challenges around homeownership products.
- 3.9. The GLA publishes ward-specific benchmark rent levels for London Living Rent homes on an annual basis. These are based on one-third of the estimated median gross household income for the local borough, varied by up to 20% in line with ward-level house prices. The benchmark rents also vary based on the number of bedrooms within the home.
- 3.10. LLR is available for those on household incomes below £60,000 per annum, who can afford to pay more than Social Rent but cannot afford to rent or buy open market housing.³¹ The availability of LLR homes will benefit those who are more likely to be negatively impacted by poverty and high housing costs, but are unable to access Social Rent due to prioritisation of those in greater housing need and are also currently unable to access Shared Ownership housing due to not having access to a sufficient deposit. LLR homes will, therefore, bridge a gap between households in low cost rent need and those in intermediate ownership need, and provide homes for a different demographic of households whose housing needs might not otherwise be met.

³⁰ Shelter, [The Impact of housing problems on mental health](#), April 2017

³¹ GLA, [Housing Research Note: Intermediate housing: The evidence base](#), August 2020

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

Shared Ownership

- 3.12. The majority of homes funded for home ownership should be for Shared Ownership, and the Government is requiring all new Shared Ownership homes to be based on the new model for Shared Ownership. The Government is still finalising the terms of the new Shared Ownership model; however, it is proposed that the new Shared Ownership model sets the minimum share for purchase at 10%, enables staircasing in 1% increments, and places the repair and maintenance liability with the landlord for a 10-year period after the first sale of the home.
- 3.13. Low cost home ownership models, including Shared Ownership, support the transition into home ownership and can make a significant contribution to reducing inequalities, thereby improving overall life chances. Shared Ownership housing can provide housing for those in intermediate ownership need, and the lower minimum share for purchase could extend this option to a wider pool of Londoners.
- 3.14. However, the housing baseline data demonstrates that people who share protected characteristics, including older people and people from a BAME background, are often underrepresented in intermediate housing. In addition, there are concerns about the affordability of Shared Ownership, as the median household income of Shared Ownership purchasers in London is slightly higher than the median income of working age households in London.³² The lower minimum share for purchase could improve the affordability of Shared Ownership, helping to address these concerns; however, the affordability impact of a 10% share with rent paid on 90% unowned equity is still untested.
- 3.15. An equality impact assessment has been undertaken separately on the policy changes which are recommended for implementation in Part 1 of the GLA's Consultation Response Report, following its [Consultation on Intermediate Housing](#) which ran from August to October 2020. To mitigate the affordability challenges of Shared Ownership, the GLA expects investment partners to sign up to the existing

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

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

Supported and specialist housing

- 3.16. The Mayor is committed to delivering homes to meet the diverse needs of Londoners, including by maximising the number of homes delivered through this programme that are defined as supported and specialist housing.
- 3.17. The programme will encourage investment partners to bring forward schemes that provide housing for groups who share protected characteristics, including older people, deaf and disabled people, Gypsies and Travellers, and other vulnerable groups with support needs. The programme will also encourage investment partners to bring forward schemes to support homeless people and those at risk of homelessness, who are disproportionately likely to be unemployed or lower income, Black households or female-headed households.³³
- 3.18. Increasing the supply of supported housing will help ensure Londoners are able to access the specialist accommodation and support they need. This will be particularly of benefit to those groups with protected characteristics noted above, because their needs are most often not otherwise met by the private market. The provision of supported and specialist accommodation is also likely to support a reduction in poverty and exclusion, and promote a culture of equality.

³³ MHCLG, [Statutory Homelessness Annual Report, 2019-20, England](#), October 2020

4. Equality impacts of funding conditions introduced by the GLA

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

Building safety standards

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

Potential positive impacts:

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

Potential negative impacts:

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

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

Design standards

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

Potential positive impacts:

- Poor quality housing causes health problems including physical injury, poor mental health, and illness related to cold and damp. These issues disproportionately affect lower income families with children and particularly those from BAME backgrounds.³⁴ Standards aimed at achieving high quality design are, therefore, likely to have a particularly beneficial impact on these groups.
- Standards aimed at ensuring households meet minimum internal space standards and levels of private outdoor amenity space, based on the number of occupants, will go some way in addressing issues with overcrowding, as defined by the space standard. Overcrowding disproportionately affects the BAME community, low-income households and renters.³⁵ Minimum space standards are, therefore, expected to have a particularly beneficial impact on these groups.
- The design standards cover the provision of play space for children and younger people within housing developments, which will be of direct benefit to children and younger people.
- The design standards also cover the provision of 'accessible and adaptable buildings' and wheelchair user accommodation, which would help to meet specialist needs. There are 1.3 million deaf or disabled adults in London, comprising 13% of the working age population and 28% of people aged 65 or over.³⁶ Encouraging the provision of these homes will be particularly of benefit to deaf and disabled people, who are currently underrepresented in general needs social housing and intermediate housing.

Potential negative impacts:

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

³⁴ GLA, [The London Health Inequalities Strategy](#), September 2018

³⁵ GLA, [London Housing Strategy](#), May 2018

³⁶ GLA, [Equality, diversity and inclusion evidence base for London](#), June 2019

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

Sustainability standards

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

Potential positive impacts:

- Standards promoting thermal efficiency and energy efficient homes will lead to lower running costs, enabling households to save on heating and cooling costs. This will be of particular benefit to households moving from energy inefficient homes (particularly those in the private rented sector) to new affordable homes; BAME households (which are twice as likely to be fuel-poor as white households); older people and younger children, who are most likely to suffer from fuel poverty.³⁷ Well insulated homes are also more resilient to climate change, dealing better with extreme heat. This will have healthcare benefits, and will be of particular benefit to elderly people who are more vulnerable to spikes in temperature.³⁸
- Standards promoting Urban Greening will have significant wellbeing benefits. In 2017, the positive impact of green space on Londoners' health was estimated to have avoided healthcare costs of £952 million per year, comprising £370m per year saved on mental health costs and £582m physical health savings.³⁹ Standards promoting Urban Greening will be of particular benefit to low income Londoners and those from a BAME background who more frequently live in areas with deficiency in access to nature and open space. Issues with unequal access to green space, particularly in poorer areas, were highlighted through the Covid-19 pandemic. ONS found that black people in England are four times less likely than white people to have no outdoor space at home; and people in

³⁷ GLA, [London Fuel Poverty Action Plan](#), June 2018

³⁸ Committee on Climate Change, [UK housing: fit for the future?](#), February 2019

³⁹ Vivid Economics, [Natural capital accounts for public green space in London](#), October 2017

semi-skilled and unskilled manual occupations, casual workers and those who are unemployed are almost three times as likely as those in managerial, administrative, professional occupations to be without a garden.⁴⁰ In addition, increasing the provision of Urban Greening within housing developments will benefit people spending longer periods at home, and this could include older people, some deaf and disabled people, pregnant women and those with primary childcare responsibilities (who are eight times more likely to be women than men⁴¹). It is also possible that well designed Urban Greening, such as planting trees, could enhance people's feelings towards their local area, potentially improving social cohesion.

- Air quality standards will support the improvement of London's air quality. Long term exposure to poor air quality can have a number of negative health impacts and these health impacts fall disproportionately on older residents, younger children, pregnant women, and those with existing respiratory conditions.⁴² Low income people are also more likely to live in areas of poor air quality, or high levels of construction, so may be more exposed to temporary or long term poor air quality.⁴³ Issues with poor air quality, particularly in poorer areas, were highlighted through the Covid-19 pandemic. Tackling air quality will reduce the public health inequalities associated with air pollution in London.

Potential negative impacts:

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

Equality, diversity and inclusion

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

⁴⁰ ONS, [One in eight British households has no garden](#), May 2020

⁴¹ The Prince's Responsible Business Network, [Equal Lives: Parenthood and Caring In The Workplace](#), October 2019

⁴² GLA, [London Environment Strategy](#), May 2018

⁴³ Aether, [Analysing Air Pollution Exposure in London](#), September 2013

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

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

Potential positive impacts:

- Inclusive London, the Mayor's strategy for EDI, aims to tackle inequalities in overcrowding, poor quality housing and insecure tenancies. Further embedding EDI within the Mayor's funding requirements will, therefore, positively impact those groups who disproportionately experience housing issues, including the BAME community and low-income households.
- Despite its profile and influence on our everyday lives, many of those who share protected characteristics are underrepresented in built environment professions, particularly in senior positions. Within the housing association sector, the average male chief executive is paid 11% more than their female counterpart.⁴⁴ In architecture, women identify a culture of sexism and exclusion at work, especially in decision-making and networking opportunities; BAME architects experience discrimination; and LGBTQ+ architects report experiencing homophobic and transphobic slurs. In addition, the sector is less diverse in terms of ethnic and faith backgrounds than most other industries; too few deaf and disabled architecture students are successfully progressing into practice; and people from lower-income backgrounds struggle to access education and professional opportunities.⁴⁵
- The Mayor's Good Work Standard and focus on organisational EDI seeks to increase training for staff, broaden recruitment channels, and encourage reporting on gender and ethnicity pay gaps. This will have a positive impact on individual employees who share protected characteristics. In addition, there is increasing evidence that more diverse organisations outperform

⁴⁴ Inside Housing, [Inside Housing salary survey](#), October 2020

⁴⁵ GLA, [Handbook: Supporting Diversity: Good Growth by Design](#), June 2019

less diverse competitors – companies with women on their boards outperform those without by 25%, and those with increased racial diversity at board level bring in 15 times more sales revenue on average.⁴⁶ Good and inclusive growth can provide economic benefits to all. Furthermore, having more diverse groups involved in the work of these organisations may help decisions get made that benefit a more diverse group of people.

- A focus on environmental sustainability and ethical sourcing will advance equality of opportunity by helping to mitigate fuel poverty and improving the physical and mental health of residents, as set out above. A focus on diverse supply chains will also be of benefit to individual employees who share protected characteristics, businesses and the economy, and the residents of homes funded through the programme, as set out above.
- A focus on working together with Londoners will encourage investment partners to engage with a diverse range of Londoners. Research has identified that people from BAME backgrounds, younger people and lower income households are less integrated within community engagement processes.⁴⁷ Though London has a smaller percentage of internet non-users than other UK regions, digital exclusion – which is more likely to affect women, elderly people, deaf and disabled people, and those who are economically inactive – creates a barrier to engaging in consultations that are predominantly run online.⁴⁸ Positively and effectively engaging with a diverse group of Londoners will aid the delivery of homes that better meet housing need, while helping to focus on design quality, drive innovation, instil a long-term interest in the operation of the new homes and facilities, and strengthen the skills and capacity of the community.⁴⁹ This could improve the experience of those living in affordable housing, and empower and integrate people from different backgrounds, which will be particularly of benefit to those people who share protected characteristics and are currently less heard within the community engagement process.

Potential negative impacts:

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

⁴⁶ RICS, [Why Diversity and Inclusion is crucial in the built environment sector](#), April 2020

⁴⁷ Demos, [People Powered Planning: How to better involve people in planning](#), September 2019

⁴⁸ ONS, [Exploring the UK's digital divide](#), March 2019

⁴⁹ Future of London, [Foundations for community-led housing](#), November 2019

5. Summary of equality impacts by protected characteristics

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

Table 1: Summary of equality impacts by protected characteristics

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

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

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

Protected characteristic
Religion or belief
<ul style="list-style-type: none"> • The limited availability of data on the extent to which those who hold a particular religion or belief (including no religion or belief) are subject to particular housing problems, makes it difficult to reliably identify potential impacts. However, to the extent that households with some religious beliefs belong disproportionately to BAME groups, they are likely to experience similar impacts identified for those from BAME backgrounds above.
Sex
<ul style="list-style-type: none"> • Women are more likely to be economically inactive, low paid, and/or subject to the poverty that affects single parent families. Female-headed households are also more vulnerable to statutory homelessness. Proposals which increase the number of affordable homes being built and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality. • Female employees in the built environment also report experiencing discrimination at work. EDI proposals to promote inclusion of a more diverse group of people could, therefore, help to reduce this inequality.
Sexual orientation
<ul style="list-style-type: none"> • There is an absence of data on the extent to which those who identify as LGBTQ+ experience difficulties covering housing costs or occupy particular types of housing. • There is evidence that those who are LGBTQ+ may experience discrimination when seeking to rent or buy a home. Younger LGBTQ+ people are also more vulnerable to homelessness. There is also evidence of demand from older LGBTQ+ people for specialist provision care and retirement housing. The provision of more affordable housing, and specialist housing in particular, may therefore benefit this group. • LGBTQ+ employees in the built environment also report experiencing discrimination at work. EDI proposals to promote inclusion of a more diverse group of people in the built environment could, therefore, help to reduce this inequality.

6. Conclusions

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

Increasing housing delivery

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

Improving affordability

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

Improving resident experience

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

Meeting specialist needs

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

Overall assessment of equality impacts

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

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Appendix 4: Amendments to the Mayoral Decision-Making in the GLA to support the governance of the Affordable Homes Programmes

Amended Section 19

19. Rules concerning the Affordable Homes Programme

19.1 The Affordable Homes Programmes 2016 to 2022 (extended to 2023) and 2021 to 2026 aim to increase the supply of new, genuinely affordable homes, drawing on Government funding. Due to the scale of the funding and the number of Financial Commitments entered into, different decision-making criteria apply:

- the overall programmes are approved through an MD
- any decisions within the funding envelopes and scope of the overarching MDs are delegated to the Interim Deputy Executive Director Housing and Land, or the Executive Director, Housing and Land. Further Decision Forms are not required unless:
 - the decision is NCR, in which case an MD is required as normal
 - the decision involves a complex Financial Commitment, involves the giving of a loan for or the direct purchase of land, or relates to a bespoke agreement (Formal Document) – in which case a DD is required
- any decisions taken under this delegation not requiring a Decision Form must be documented via a Record in Writing in the normal way and should be reported publicly quarterly

Responsibility for identifying complex and bespoke schemes rests in the first instance with the Interim Deputy Executive Director, Housing and Land, or the Executive Director, Housing and Land. Advice should, however, be sought from the GLA's Legal Advisors and/or the Governance Team if there is any doubt.

Amended list of Corporate Directors

GLA staff classified as Corporate Directors for the purposes of this Scheme.

- Chief of Staff *
- Chief Officer (incorporating roles as Head of Paid Service and GLRO)
- Executive Director of Communities and Skills
- Executive Director of Resources
- Executive Director of Housing and Land
- Interim Deputy Executive Director of Housing and Land
- Executive Director of Good Growth
- Executive Director of Strategy and Communications
- Executive Director of Assembly Secretariat