

Meeting: Extraordinary Cabinet & Council

Date: 11 & 12 September 2024

Wards affected: All; and specifically Tormohun

Report Title: Implementation of the Accommodation Re-purposing Project (“Hotels to Homes”) and acquisition of Scheme 1.

When does the decision need to be implemented? 13 September 2024

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1. Purpose of Report

- 1.1. To approve an uplift to the Capital Programme of £3.000m, funded by external grant provided by MHCLG, to enable delivery of the first scheme.
- 1.2. To endorse the principle of Scheme 1, being the turnkey acquisition of 14 homes from a regional developer as outlined in Exempt Appendix 1.
- 1.3. To provide the necessary officer delegations to secure delivery of the first project, and to agree the principle of bringing a further report in due course to outline the mechanism for growing the pilot project into a long-term, sustainable delivery programme.
- 1.4. To provide a framework for the creation of the associated governance procedures necessary for the delivery of this programme.

2. Reason for Proposal and its benefits

- 2.1. In the early 2000s, the Torbay area regularly delivered an average of 100-180 new affordable homes per annum, reaching a peak in 2013/14 of 273 new affordable homes. Since then, delivery has dropped significantly; average annual delivery over the last 4 years has been just 36 homes (data extracted from [MHCLG Live Table 1008C](#)). This is against a backdrop of high (and growing) need for homes by local households registered with Devon Home Choice.
- 2.2. In light of this, the Council is focussed on increasing the affordable housing supply. A Housing Delivery Plan has been created to bring forward opportunities over the next five years, both for direct council delivery and delivery through partners. One of the direct interventions identified is the innovative Accommodation Re-purposing Project (ARP), also

now known as 'Hotels to Homes'. This is designed to respond to Torbay's characteristics of having large numbers of small urban brownfield sites in the form of unviable leisure and holiday accommodation such as former hotels, bed & breakfasts, and guest houses. Through this initiative, such properties will be purchased by the Council and converted into new homes.

- 2.3. The Council is not the only organisation exploring the re-use of such sites for housing. However, when brought forward by private sector developers, they typically provide few – if any – affordable homes. This is because such sites are normally capable of delivering fewer than 15 dwellings, which is below the Local Plan's threshold for requiring affordable housing. The schemes can also be expensive to build and, due to specific scheme risks, often mean that they are typically not viable to deliver affordable housing.
- 2.4. Conversely, the Council's intervention is specifically designed to use these same sites to deliver 100% affordable housing, to provide homes for local households. The project will utilise grant funding already provided, to directly acquire and convert old hotels etc. into new, high-quality housing for social rent. An increase in supply is a highly beneficial outcome, but the additional benefit is that it can help prevent such sites entering a state of dereliction, as well as helping to prevent anti-social behaviour, and avoiding the plethora of public health issues associated with such sites. The Council's ambition is to prove that the delivery model can be a viable vehicle to increase the level of affordable housing and stimulate neighbourhood renewal and regeneration. Long-term, there is also an aspiration to stimulate the private and Registered Provider sectors to move into this space by demonstrating the positive outcomes that can be achieved. With Torbay's average delivery currently so low, every hotel converted has potential to be disproportionately valuable: Scheme 1 would represent a 40% increase in affordable housing supply on its own.
- 2.5. The Council has bid for, and secured, £3m of capital grant to use for this purpose, alongside a revenue allocation of £0.250m. In accordance with the Council's constitution and governance procedures, it is necessary to:
 - a) Increase the size of the Capital Programme by £3.000m, funded by the grant received;
 - b) Formally commence delivery of the project, and secure the necessary delegations to acquire the scheme described in Exempt Appendix 1; and,
- 2.6. The aspiration is that through delivery of the scheme described in Exempt Appendix 1, that we will demonstrate success and bring forward a model which sees the creation of a cyclical, self-sustaining programme that enhances delivery, but minimises Council-borrowing. The mechanics of the longer-term model are still being worked through and it is not currently possible to present a long-term business case as there are still variables that need to be clarified. However, progress is both positive and rapid, and officers expect to be in a position to bring a proposal back to Cabinet and Council towards the end of the year. .
- 2.7. The reason for bringing the first scheme forward now, ahead of the wider, long-term programme is that the first opportunity identified, is predicated upon an exchange of

contracts by November 2024, which is before it will be possible to present the full programme.

3. Recommendation(s) / Proposed Decision

3.1. That Cabinet recommend to Council:

3.1.1. That the Capital Programme be uplifted by £3m, wholly funded by capital grant received from MHCLG, to commence delivery of the Accommodation Repurposing Project (also known as 'Hotels to Homes');

3.2. That subject to 3.1.1 above, Cabinet:

3.2.1. Approve the turnkey acquisition of Scheme 1 for use as social housing, in accordance with business case provided at Exempt Appendix 1 (and funded by the MHCLG grant award);

3.3. That subject to 3.1.1 and 3.2.1 above:

3.3.1. Delegation be provided to the Director of Pride in Place, in consultation with the Cabinet Member for Housing and Finance and Director of Finance, to agree final terms to purchase Scheme 1, and following satisfactory completion of all necessary due diligence, proceed to acquire the scheme as set out at Exempt Appendix 1.

3.3.2. The Head of Strategic Housing & Delivery present a report to Cabinet at the appropriate time, to outline and recommend the financial and delivery arrangements necessary to move from a single scheme to a long-term, (largely) self-sustaining programme utilising all grants and external funding available.

Appendices

- (Exempt) Appendix 1 – Housing Business Case
- (Exempt) Appendix 2 – Valuation
- (Exempt) Appendix 3 – Site risk register

Background Documents

- Torbay Housing Delivery Plan

4. Introduction

4.1. Torbay currently has very low levels of new housing supply. With the majority of affordable homes provided through s106 by private sector developers, issues that affect private sector development have a direct implication on the proportion of new affordable homes provided.

4.2. Many Registered Providers are scaling back their delivery programmes, with financial capacity further affected by the significant regulatory issues faced by the sector at present. The cumulative impact of these factors being house price increases; a decline in the quality of private rental stock (as there is little financial incentive to strive for best quality);

diminished supply; and ultimately, a reduced ability for the Council to provide housing options for those in need.

- 4.3. The Council is focussed on increasing the amount of affordable housing delivered in Torbay. This has started with the creation of a new Strategic Housing Service, recruitment of specialist resources to support delivery and the production of a Plan that outlines routes to enhanced performance. One of the delivery streams planned is the Hotels to Homes programme. This seeks to increase new social housing through the acquisition and conversion of former hotel-type buildings into new, high-quality homes. The Council has been awarded a capital grant of £3.000m to commence delivery of the first project (“Scheme 1”), with conditions to demonstrate substantial delivery progress by March 2025. Whilst the new homes created by this scheme will be let through Devon Home Choice to eligible households with a local connection to Torbay, there is an intention to make these sites attractive to households where at least one adult works in a key industry (what has historically been called “keyworkers”). This is to seek to specially address the chronic recruitment issues faced by parts of the public sector such as the NHS, where a lack of good quality housing that is affordable is having a direct impact on recruitment and retention, creating a major implication for the health service and ultimately the health outcomes of Torbay residents. Providing homes for local workers is essential to ensure the long-term sustainability and health of our population.
- 4.4. The anticipated long-term proposal is to develop a self-sustaining, cyclical investment fund that is capable of using the initial grant funding to purchase and redevelop sites, occupy as affordable housing in the medium-term, and then facilitate an onward disposal to a partner Registered Provider (once a portfolio of homes has been completed), generating a capital receipt for reinvestment into the next project ad infinitum.
- 4.5. The long-term proposal may require an allocation of Council capital; but there are also additional grants that officers expect to be able to secure to provide further financial headroom and limit the need for council-borrowing. However, the longer-term model is still being worked up and cannot be confirmed until we have greater clarity about the extent of further grant allocations; as such the proposal in this paper is to accept the £3m grant into the capital programme and to seek authority to proceed with Scheme 1, with the longer-term programme to be considered at a later date.
- 4.6. The deadline set by MHCLG for implementation and use of the initial grant award is very tight. The grant was not confirmed until the start of May 2024; but we are obligated to achieve substantial progress by March 2025. It has not been possible to identify a development opportunity in the traditional way; instead, the proposal has been worked up to partner with a private sector developer for the first project via a turnkey acquisition. Such acquisitions are the commercial purchase of an entire, complete scheme from the developer, based upon a purchase at market value (less discount to reflect the developer’s reduced risk).
- 4.7. The limitation of this approach is that the Council is only able to purchase what is commercially available. This means we cannot specify the detailed fit out of the homes as it must remain an ‘off the shelf’ acquisition (i.e. similar to a private purchaser buying a home on the market). However, the considerable benefit is that this is an efficient way to deliver new homes quickly and such purchases are a well-trodden path for both Registered

Providers and Local Authorities. Furthermore, they open-up an opportunity to work with a wider part of the market and offer a low risk profile as the Council will not take ownership the property until completion, with 'stakeholder' deposit payments held until completion is achieved and certified.

- 4.8. In this instance, officers have identified an opportunity to purchase homes from a respected local developer that has a positive track record in respect of their delivery performance, and who has already agreed terms to purchase a former hotel for residential conversion in Torquay. The commercial details of the acquisition, along with the financial performance of the project is outlined in Exempt Appendix 1. The subject property is at an advanced stage of acquisition and has an existing consent. The developer will need to obtain a variation to the planning consent to allow full, unfettered residential use (and ownership); but as a turnkey acquisition, the Council's completion of purchase will be conditional upon the developer resolving this at their risk and cost.
- 4.9. The scheme will provide 14 homes with a range of 1-bedroom flats (with larger and smaller properties suitable for couples and single people respectively), along with 2-bedroom flats that are suited to small families. All homes will be built to modern standards, meeting at least EPC C, with low carbon heating. Some will also include sea views, making the scheme an attractive social housing scheme for working-age people.
- 4.10. The developer expects to exchange contracts for their purchase in September, taking full ownership once vacant possession has been achieved. They will commence construction once full ownership has been achieved and address the necessary planning variation. Officers are currently targeting exchange of contracts in early November, assuming satisfactory completion of all due diligence, by which time main works should be underway. Based on the developer's anticipated completion programme, it is expected that the Council would complete its purchase at the end of August 2025. Occupation will take place immediately thereafter. As outlined above, officers hope to encourage local "keyworkers" to bid for such properties when they come available; but it should be noted that we cannot specifically restrict allocations to this cohort, as this would be a conflict with current Homes England grant funding criteria (which is an essential consideration, in respect of being able to convert the pilot project into a long-term programme). However, we will work with local key employment industries to encourage applications from eligible local workers on the housing register, where we can.
- 4.11. As a turnkey project, the developer will be wholly responsible for the design and build of the scheme, with the Council only taking ownership (and paying the agreed full price) at completion. We will, however, be legally bound to proceed with the acquisition once we have exchanged – in the same way as any normal house-purchaser would be as long as the homes are completed to the agreed standard and signed off by building control etc. This arrangement ensures both parties have the necessary protections and surety of delivery and payment.
- 4.12. As a turnkey acquisition, the Council is only able to purchase what is commercially available. In this instance, it is within the proposals to include an additional sum for the installation of a fire suppression system (to BS9251:2021), to improve the long-term safety of our tenants in the event of a fire in one of the flats, or any of the communal spaces. This is becoming a more common approach for flatted blocks by social landlords.

5. Options under consideration

- 5.1. The Council is now at the stage where it must add the £3m grant into its capital plan.
- 5.2. In respect of the first scheme's delivery, **Option 1** is to acquire the scheme as set out in Exempt Appendix 1 on a turnkey basis with stakeholder deposit and completion payment in the normal way. This is a relatively low risk way to deliver new homes and will ensure that the Council's investment is protected throughout the build as completion funds will only be released once assurance has been provided that the scheme has been completed appropriately and the contract terms met. Turnkey purchases are a common route for social housing providers to deliver homes; success relies upon the strength and transparency of the relationship created. In this instance, we have identified an amenable developer, and we are developing a co-operative working relationship to maximise chances of a successful outcome. A further grant bid will be made to Homes England in due course; however, in the event that a bid is not supported (for any reason), the acquisition will proceed but will just be funded solely by the allocation of MHCLG funding.
- 5.3. The proposed acquisition received unanimous support from the Council's Capital & Growth Board in August 2024. Furthermore, the acquisition is supported by a Red Book Valuation provided by a local RICS registered agency, attached at Exempt Appendix 2. The Council has secured the principle of a discount against open market value, in line with industry norms for this type of project.
- 5.4. **Option 2** would be to withdraw from the current opportunity and attempt to identify a hotel ourselves that already has a suitable planning consent, and to directly commission construction by March 2025. However, this would require us to take a considerable degree of commercial risk in respect of both commissioning construction of an inherited design and planning consent. The expectation is that this would also cost more than an equivalent turnkey option and would significantly delay delivery; whilst it is hoped that a degree of flexibility could be negotiated with MHCLG, this would put us in direct conflict with our grant award terms. This is a potential option but is not considered as advantageous as a turnkey acquisition for the first project.
- 5.5. **Option 3** would be to hand back the grant and decline to proceed any further. This would be detrimental to our relationship with MHCLG (and the new government). This may also cause wider implications for other Council delivery programmes and funding streams, too. Ultimately and very importantly, this would also mean that the additional affordable housing supply we urgently need, would not materialise.
- 5.6. For the reasons outlined above, combined with the simplicity of the deal structure proposed, the recommendation is to proceed with **Option 1**, to purchase the first site on a turnkey basis, as outlined in Exempt Appendix 1. In the long-term, subject to appropriate decision making, this would be followed by further sites upon which a decision would be made as to whether we commission ourselves.

6. Financial Opportunities and Implications

- 6.1. This proposal seeks to increase Torbay Council's capital programme by £3m. In this instance however, this is 100% funded by external grant that has already been received. There are not considered to be any financial implications associated with increasing the capital programme in this way.
- 6.2. In respect of the scheme, a detailed business case has been presented to Capital & Growth Board, who provided unanimous endorsement for the project. A comprehensive financial appraisal was also presented, which was scrutinised by the S151 Officer, Director of Pride in Place, and other senior officers within the Council. This is attached at Exempt Appendix 1. Feedback was positive and the financial position of the scheme was endorsed.
- 6.3. The financial benefits and disbenefits of the acquisition are considered below:
- 6.4. Advantages:
 - 6.4.1. As funded by the MHCLG grant, the acquisition will not require council borrowing. As such, there will be no net impact to tax payers, or our overall borrowing headroom position.
 - 6.4.2. The acquisition makes good use of the grant funding, for its intended purpose and in accordance with our obligations.
 - 6.4.3. MHCLG representatives have endorsed the proposal as set out.
 - 6.4.4. The project generates rental income as described in Exempt Appendix 1, which can be used to fund other affordable housing projects, or future borrowing.
 - 6.4.5. An allocation is made from the gross rental income to pay for costs associated with management, maintenance, long-term refurbishment and to cover void risk etc. Service charges will also be levied on top of the gross rent to cover aspects such as communal maintenance/management and fire suppression servicing etc.
 - 6.4.6. The scheme has potential to secure additional Homes England grant (subject to assessment and approval) once the government have confirmed the nature of the next Affordable Homes Programme. This will be essential for the conversion of the pilot scheme into a long-term self-funding model. However, the acquisition will proceed regardless of whether the additional grant can be secured.
 - 6.4.7. Conversion of this hotel to additional homes generates additional Council Tax income for the Authority.
 - 6.4.8. In the event of any major structural defect arising within the first 10 years of completion, the Council's investment will be protected by a Build Zone Warranty.
- 6.5. Disadvantages:
 - 6.5.1. The Council will be taking the commercial risk of an acquisition. This will include committing to the purchase of the asset, and operation of the homes upon completion (including committing to mandatory compliance standards to ensure homes are safe in perpetuity). In this instance however, the purchase is not

predicated upon borrowing; we have an in-house management team with capacity to operate the stock, and the business case includes allocations from the rental income to fund the repairs and maintenance of the properties in the long-term.

- 6.5.2. The Council will be required to provide a comprehensive management service to its tenants, in line with the standards set by the Regulator for Social Housing, and ensure it provides homes that are safe and compliant at all times.
- 6.5.3. The Council has an aspiration to enable a medium-term sale of any housing stock it purchases to a partner Registered Provider. It is possible that the Council may not be able to find a partner that is able to commercially acquire stock from us, in the future. In this circumstance, the Council will need to retain (and manage) its housing stock indefinitely.
- 6.5.4. If officers are unable to secure additional funding (including grant) to convert the pilot into a long-term self-financed model, the Council will be in ownership of a single scheme of this type, which would be inefficient in terms of management.
- 6.5.5. It is theoretically possible that the Council cannot identify suitable households to live in the new homes. However, this is unlikely, considering the extend of housing need on Devon HomeChoice with a local connection.

7. Legal Implications

- 7.1. The Council will be entering into a legal contract to purchase an asset from a developer. External lawyers have been appointed to undertake the conveyance and the transaction will not proceed unless and until the relevant due diligence has been undertaken to a satisfactory conclusion. However, once we have exchanged contracts, the Council will not be able to withdraw from the purchase without considerable penalty.
- 7.2. It is important that the Council (as buyer) and the developer (as seller) are clear on their respective obligations, and that a good, positive, and co-operative relationship is developed to ensure successful delivery. As a turnkey acquisition, the purchase terms have been agreed in the form of a traditional conveyance with a deposit and completion payment, and arrangements for a retention period to ensure defects are rectified within the first 12 months.

8. Engagement and Consultation

- 8.1. In this instance, the principle of conversion has already been set through the planning consent already granted. As part of the normal planning process, nearby residents and neighbours will have been given chance to comment on proposals; similarly, affected local people will have the normal right to comment on the revision to the planning consent to allow unrestricted residential use, which will be submitted by the developer in due course.
- 8.2. The Senior Responsible Officer (SRO) has engaged extensively with the Portfolio Holder for Housing and Finance, who is supportive of the proposal. Cabinet are also aware of the

scheme through information sharing sessions, and through the development of the Housing Delivery Plan.

- 8.3. The SRO will provide a briefing to the elected members that represent the ward, prior to the cabinet meeting.
- 8.4. The SRO has engaged with senior council officers through the Capital & Growth Board process and has received unanimous support.
- 8.5. The SRO has liaised with the Council's in-house housing management team, who have confirmed support for the scheme. These officers will be a fundamental part of the project team for the site, going forward.
- 8.6. The SRO will liaise with the Housing Options service ahead of Cabinet.
- 8.7. The SRO has engaged with both Homes England in developing this proposal. Homes England are broadly supportive but cannot confirm a scheme is grant eligible until a bid has been submitted. It should also be noted that new bids have been suspended nationally at present, pending consideration and definition of the next capital Affordable Homes Programme by the new Secretary of State and Chancellor. It is possible that the emphasis and eligibility for such bids to the next programme may be different to the newly suspended programme; as such, it should be explicitly noted that the acquisition will proceed regardless of whether Homes England grant can be secured.
- 8.8. MHCLG have provided written endorsement of the proposal.
- 8.9. The SRO has liaised with Planning colleagues to ensure no fundamental conflict between the scheme proposed and established planning policy.
- 8.10. The SRO is in the process of liaising with the accommodation lead for the NHS; to establish opportunities for local healthcare workers in need of homes to secure one of the new properties, should they meet the relevant eligibility terms for social housing.

9. Procurement Implications

- 9.1. The acquisition of built homes falls outside of the Contract Procedures Rules; such transactions do not constitute a procurement.
- 9.2. The Council is commissioning the installation of a fire suppression system. In the circumstances, the only reasonable way to secure this is to work with the developer to ensure that the structural warranty is preserved, and to prevent having to separately commission an installer to make major alternations to the building, post-completion (delaying occupation, and impacting upon the quality of accommodation provided).
- 9.3. The Council has appointed an external commercial advisor to support this project, and the scheme has been sourced through this route. The Council's Head of Commercial Services has supported this procurement exercise.
- 9.4. The Council has appointed external legal representation for the conveyance, through the Council's Legal Service. In this instance, industry expert social housing specialists have

been procured to provide the conveyance support, to ensure no future issues in the event that the Council is able to sell batches of stock to a partner RP at some point in the future.

9.5. A clerk of works will need to be appointed in due course.

10. Protecting our naturally inspiring Bay and tackling Climate Change

10.1. The acquisition of a turnkey product, on brownfield land helps prevent greenfield sites being required to deliver housing growth. It also helps make better use of land, and in this instance (as the main structure is being retained) prevents the demolition of an architecturally impressive building, and therefore prevents the disposal to landfill of many tonnes of perfectly usable construction materials.

10.2. The new homes will be heated by electricity only, meaning that fossil fuels will not be required to provide space or water heating.

11. Associated Risks

11.1. There are risks associated with any commercial activity. The risk profile for Scheme 1 is attached at Exempt Appendix 3.

12. Equality Impact Assessment

| Protected characteristics under the Equality Act and groups with increased vulnerability | Data and insight | Equality considerations (including any adverse impacts) | Mitigation activities | Responsible department and timeframe for implementing mitigation activities |
|--|--|--|---|---|
| Age | <p>18% of Torbay residents are under 18 years old.</p> <p>55% of Torbay residents are aged between 18 to 64 years old.</p> <p>27% of Torbay residents are aged 65 and older.</p> | <p>Due to the client group to be targeted, this project is likely to provide a benefit to younger households.</p> <p>The flats would be let to occupants who are suitable to sustain a tenancy in the property. Considerations would be paid to accessibility requirements, support needs and suitability of location.</p> | <p>The project is aimed at local people working in key industries and it is therefore reasonable to anticipate that older people are less likely to secure a home in these schemes.</p> <p>Older households will not be excluded, however, through the lettings process if they are otherwise the most suitable candidates to secure one of the homes provided.</p> | Lettings and Housing Management |
| Carers | <p>At the time of the 2021 census there were 14,900 unpaid carers in Torbay. 5,185 of these provided 50 hours or more of care.</p> | <p>Lettings would not discriminate against the caring responsibilities of future tenants</p> | | Housing Management and Lettings |
| Disability | <p>In the 2021 Census, 23.8% of Torbay residents answered</p> | <p>Due to the nature of converting existing buildings, it will not</p> | <p>Consider accessibility and mental health needs in designs of conversions</p> | Strategic Housing |

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| | that their day-to-day activities were limited a little or a lot by a physical or mental health condition or illness. | always be possible to create flats that are suitable for occupants with a physical disability. Any support needs would be assessed at the time of letting the flats | | |
| Gender reassignment | In the 2021 Census, 0.4% of Torbay's community answered that their gender identity was not the same as their sex registered at birth. This proportion is similar to the Southwest and is lower than England. | We would not discriminate against gender on general needs rented properties unless there was a specific requirement to have same sex accommodation, for example in the case of a women's refuge. | N/A | ALL |
| Marriage and civil partnership | Of those Torbay residents aged 16 and over at the time of 2021 Census, 44.2% of people were married or in a registered civil partnership. | The marital status of occupants should not influence the suitability of the flats. No adverse impact expected. | NA | ALL |
| Pregnancy and maternity | Over the period 2010 to 2021, the rate of live births (as a proportion of females aged 15 to 44) has been slightly but significantly higher in Torbay (average of 63.7 per 1,000) than England (60.2) and the South West (58.4). There has been a notable fall in the numbers of | Only flats with 2 or more bedrooms would be considered suitable for families. | NA | Lettings and Housing Management |

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| | live births since the middle of the last decade across all geographical areas. | | | |
| Race | In the 2021 Census, 96.1% of Torbay residents described their ethnicity as white. This is a higher proportion than the South West and England. Black, Asian and minority ethnic individuals are more likely to live in areas of Torbay classified as being amongst the 20% most deprived areas in England. | No adverse impact expected as we would not discriminate on the lettings of flats based on ethnicity | NA | Lettings and Housing Management |
| Religion and belief | 64.8% of Torbay residents stated that they have a religion in the 2021 census. | No adverse impact expected as religion would not be a consideration in the lettings process | NA | Lettings and Housing Management |
| Sex | 51.3% of Torbay's population are female and 48.7% are male | No adverse impact expected as general needs lettings does not discriminate on gender | NA | Lettings and Housing Management |
| Sexual orientation | In the 2021 Census, 3.4% of those in Torbay aged over 16 identified their sexuality as either Lesbian, Gay, Bisexual or, used another term to describe their sexual orientation. | No adverse impact expected as sexual orientation is not discriminated against | NA | Lettings and Housing Management |

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| Veterans | In 2021, 3.8% of residents in England reported that they had previously served in the UK armed forces. In Torbay, 5.9 per cent of the population have previously served in the UK armed forces. | Theoretically, affordable housing is more likely to be available to former service personnel and their families, as there is a degree of preference awarded to such households when they join the housing register. | Consider needs during the lettings process | Lettings and Housing Management |
| Additional considerations | | | | |
| Socio-economic impacts (Including impacts on child poverty and deprivation) | | No negative impact expected. Affordable housing supports those in need of a safe and warm home, facilitating the improvement of socio-economic prosperity | NA | NA |
| Public Health impacts (Including impacts on the general health of the population of Torbay) | | By providing suitable, safe, and warm affordable housing we can lower public health impacts and improve the health of occupants. Removing dilapidated hotels from the market, and preventing them being converted into poor quality HMO-style housing has a positive public health benefit in terms of living conditions, and the impact on local services and infrastructure etc. | NA | NA |

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| Human Rights impacts | | No negative impact expected | NA | NA |
| Child Friendly | Torbay Council is a Child Friendly Council, and all staff and Councillors are Corporate Parents and have a responsibility towards cared for and care experienced children and young people. | No negative impact expected as the flats will not discriminate against children. Only flats that have more than one bedroom will be suitable for children | NA | Lettings and Housing Management |

13. Cumulative Council Impact

- 13.1. An increase to the Council's portfolio of social housing, which requires ongoing management etc. However, this is fully accounted for in the financial case for the project and programme, with suitable allowances made to ensure the long-term, appropriate management and maintenance of our housing stock.

14. Cumulative Community Impacts

- 14.1. An increase in the provision of affordable housing, accessible to local people, providing a considerable benefit.
- 14.2. Improvement in recruitment and retention opportunities for key public services, through the prioritisation of relevant key worker households for occupation of new homes.