

Flats 1 – 23, 15 Drew Street, Brixham, Devon, TQ5 9JU

Effective from September 2026



Landlord	Torbay Council
Proposing Officer	Alex Rehaag, Affordable Housing Manager
Scheme name	(Former) St Kilda's Care Home
Development name (address)	Flats 1-23, 15 Drew Street, Brixham, Devon, TQ5 9JU
Duration of LLP application	ONGOING

Purpose	The Council has created a direct development programme, focusing on brownfield sites to specifically intervene in the market to increase the available housing options for households with a Local Connection to Torbay. St Kilda's is progressing and will be completed in the Summer of 2026. It is necessary to develop and agree a site-specific Local Lettings Plan prior to allocating the new homes. The Local lettings Plan will be used to ensure the project meets the original objectives, meet the conditions of the planning consent and transparently outline the allocation criteria that will be used to prioritise new tenants that are over the age of 55. Focussing on this demographic will assist current tenants who wish to move from larger designated Affordable Housing within Registered Provider's stock, and those who need accommodation to continue to live independently with a package of practical support.
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Scheme context	The redevelopment of St. Kilda’s offers an opportunity for the Council to deliver homes for social rent on a brownfield site near to the town centre. The scheme was granted planning permission on 11th March 2025 under reference P/2024/0738. The scheme approves the conversion of the building from C2 Residential Care Home use to self-contained C3 residential accommodation. The Council has secured grant funding from Homes England’s Affordable Homes Programme to re-develop this site to create self-contained, social rented homes in perpetuity. All properties will be for local households.																																																																																																
Description of scheme and summary of the properties bound by this this LLP	The scheme will provide 15 x 1 bedroom self-contained apartments and 8 x 2 bedroom self-contained apartments. A lift is provided to all floors within the scheme The schedule of accommodation which is provided is: <table><tr><th>Unit No.</th><th>No. of Beds</th><th>SQMT</th><th>Floor Level</th></tr><tr><td>1</td><td>2</td><td>M4(2) 61</td><td>Ground Floor</td></tr><tr><td>2</td><td>1</td><td>54</td><td>Ground Floor</td></tr><tr><td>3</td><td>1</td><td>50</td><td>Ground Floor</td></tr><tr><td>4</td><td>2</td><td>65</td><td>Ground Floor</td></tr><tr><td>5</td><td>1</td><td>50</td><td>Ground Floor</td></tr><tr><td>6</td><td>1</td><td>50</td><td>Ground Floor</td></tr><tr><td>7</td><td>2</td><td>65</td><td>Ground Floor</td></tr><tr><td>8</td><td>1</td><td>50</td><td>First Floor</td></tr><tr><td>9</td><td>2</td><td>M4(2) 50</td><td>First Floor</td></tr><tr><td>10</td><td>1</td><td>65</td><td>First Floor</td></tr><tr><td>11</td><td>1</td><td>50</td><td>First Floor</td></tr><tr><td>12</td><td>2</td><td>61</td><td>First Floor</td></tr><tr><td>13</td><td>1</td><td>54</td><td>First Floor</td></tr><tr><td>14</td><td>1</td><td>50</td><td>First Floor</td></tr><tr><td>15</td><td>2</td><td>65</td><td>First Floor</td></tr><tr><td>16</td><td>1</td><td>M4(2) 54</td><td>Second Floor</td></tr><tr><td>17</td><td>1</td><td>56</td><td>Second Floor</td></tr><tr><td>18</td><td>1</td><td>51</td><td>Second Floor</td></tr><tr><td>19</td><td>1</td><td>50</td><td>Second Floor</td></tr><tr><td>20</td><td>2</td><td>65</td><td>Second Floor</td></tr><tr><td>21</td><td>1</td><td>50</td><td>Second Floor</td></tr><tr><td>22</td><td>1</td><td>50</td><td>Second Floor</td></tr><tr><td>23</td><td>2</td><td>65</td><td>Second Floor</td></tr></table> Homes are expected to meet EPC B, and feature compliance with modern Building Regulations. Homes are being built by a Southwest development company and are contracted by Torbay Council to deliver the scheme. Homes will have access to 4 on-site parking spaces one of which is designated as a disabled parking space. None of the parking spaces are designated to a particular apartment. Other parking is available on street within the area. The site is within close proximity to Brixham town centre and is in a sustainable location.	Unit No.	No. of Beds	SQMT	Floor Level	1	2	M4(2) 61	Ground Floor	2	1	54	Ground Floor	3	1	50	Ground Floor	4	2	65	Ground Floor	5	1	50	Ground Floor	6	1	50	Ground Floor	7	2	65	Ground Floor	8	1	50	First Floor	9	2	M4(2) 50	First Floor	10	1	65	First Floor	11	1	50	First Floor	12	2	61	First Floor	13	1	54	First Floor	14	1	50	First Floor	15	2	65	First Floor	16	1	M4(2) 54	Second Floor	17	1	56	Second Floor	18	1	51	Second Floor	19	1	50	Second Floor	20	2	65	Second Floor	21	1	50	Second Floor	22	1	50	Second Floor	23	2	65	Second Floor
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Management arrangements	The new homes delivered on site at the former care home will be owned and managed by Torbay Council. Torbay Council's Housing Manager will be responsible for implementing this LLP, and for the long-term management and maintenance of the homes. Practical support related to tenancy management will be provided by the council. Any specific requirements for social care, including regular support and assistance outside of tenancy management will be procured by the tenant or Adult Social Care.
Justification for adopting scheme-specific	Torbay has a pressing need to provide Affordable Housing designated for older people. The recent Census showed that 27.8% of the households living in Torbay are in this age demographic. This exceeds the England average of 20.7%. There is a predicted increase of this demographic where 34% of the population living in Torbay will be over 65 by 2043. Having an older population will result in additional pressures on the Health and Social Care sector. There are limited options in the Affordable Housing stock for independent living opportunities designated for older people. The rising need for this type of accommodation could impact the Council's ability to meet the needs of older people. This can place additional strain on Adult Social Care and NHS services Age designated Affordable Housing provides an opportunity for the Council to 'right size' residents in current Affordable Housing stock. The Council can direct match applicants on the Devon Home Choice register. This is an opportunity to move people into more appropriate accommodation. This will ensure that General Needs accommodation is made available to working age single and family households, thus taking the pressure off of the housing register and reducing the use of Temporary Accommodation.
Evidence of need to provide housing options for this specific cohort	Key information from the Census projections 2023: • 27.7% of households living in Torbay are over the age of 65. • People over the age of 65 in Torbay is expected to rise to 34% by 2043 • There are 1,535 households on the Devon Home Choice register as at May 2026 • There are 800 age designated properties, owned by Registered Providers within Torbay • Brixham does Care currently assists xxx people per week/month Work is ongoing to gain a wider understanding of these needs by Torbay Council and Devon Home Choice.
Description of the eligibility / lettings criteria that would normally be applied	Applicants must be registered on Devon Home Choice Applicants may also be referred by the adult Social Care team at Torbay Council where an applicant will be assisted with completing the Devon Home Choice application and their eligibility for the scheme will be assessed. All applicants registered for downsizing from their current social home will be awarded a Band B on Devon Home Choice. Those moving from a General Needs 'like for like' property – i.e., 1 bed General Needs property to 1 bed age designated property will be eligible through a Welfare and Medical assessment.
Description of the eligibility requirements to be able to bid	Applicants must be registered on Devon Home Choice and therefore meet standard requirements in respect of income thresholds, banding, and household composition to bid on a property at St Kildas.

	Applicants with high needs and without support to live independently may be refused an allocation and support will be provided to ensure that more appropriate accommodation is sought.
Description of the Allocation Preference Cascade to be used through the shortlisting process.	The Local Lettings cascade is designed to ensure that residents with a Local Connection to Brixham are given first priority for tenancies at St Kilda's, in line with policy BH2 of the adopted Brixham Neighbourhood Plan. Definition of Local Connection A Local Connection is established if either: a) The applicant has lived in the Peninsula for at least 5 of the last 10 years, in permanent and continuous residence, and currently lives in the Peninsula; - or b) The applicant previously lived in the Peninsula for at least 5 years and has parents or children who currently live in the Peninsula with a minimum of 10 years' continuous residence. If there are not enough applicants with a Local Connection to Brixham, the cascade will widen to include applicants with a Local Connection to Torbay. Allocations at St Kilda's will also give priority to existing Housing Association or Council tenants. This helps maximise opportunities for people wishing to downsize to a home that better meets their needs. All homes will be allocated through Devon Home Choice using the Local Connection criteria above. Priority will be given to households in Bands A–D in the following order: First Priority Applicants who meet the Local Connection criteria and: a) Have at least one household member aged 55 or over. Existing Council/Housing Association tenants will be prioritised. OR b) Have been referred or direct matched by Torbay Adult Services. Second Priority If no eligible applicants meet First Priority, the property may be allocated to any applicant registered with Devon Home Choice. Relationship with Devon Home Choice Banding This priority system works alongside the standard Devon Home Choice banding to ensure that households with the greatest housing need are still prioritised. For example, if multiple applicants qualify under First Priority, the offer will be made to the household with the highest band and earliest banding date. Worked Example When Flat 1 is advertised on Devon Home Choice and receives 50 bids, a shortlist is created by: - First Priority (ordered by band and date) - Second Priority (band and date) The property will be offered to the highest-ranked eligible household. If they decline, the next household on the shortlist will be approached, and so on.

	If no eligible household bids, the property will be offered to the highest-banded applicant aged over 55. Local Connection will always take precedence—first to Brixham, then to Torbay.
Advertising protocol	Torbay Council will advertise all vacant homes at St Kilda's (at both initial and subsequent re-let stages) through Devon Home Choice, as this is a transparent, fair and equitable process for advertising and allocating accommodation. The Allocation Preference Cascade outlined above will form part of the advert, along with details of the properties in question. Adverts for initial lettings will aim to be published a minimum of 6 weeks prior to the Council accepting handover from the developer. In light of the specific nature of this proposed Allocation Preference Cascade, Torbay Council will hold pre-advert engagement events in Brixham. This will highlight the availability of these properties and describe the nature of the preference restriction that will be used. The engagement events will provide an opportunity to raise awareness of practical support that may be available to help people who may be downsizing from their current accommodation.
Exception circumstances	It is acknowledged that Local Lettings Plans reduce the choice and ability to apply for some applicants. It is also recognised that this is a highly specialised LLP and has been drafted in this way as a trial scheme, to understand how this works in practice and gain particular insights on the demand for this type of product. To ensure the best use of stock and to relieve the pressure on support services provided by Torbay Council, it is possible that the Council may, as a result of unforeseen circumstances, be required to make a reasonable interpretation to consider eligibility requirements in operating this LLP. Consequently, in agreeing this procedure, it should also be noted that the Affordable Housing Manager and Head of Housing Needs will have specific discretion to jointly vary, interpret or apply flexibility to the allocation of the homes on this scheme, in the event that unexpected circumstances arise during the allocation process.
Reviews and Decisions	Applicants have a right to appeal an offer of accommodation. The procedure included within the Devon Home Choice** should be followed. An appeal against an offer of accommodation will be brought to the attention of the Head of Housing Options for a review to be undertaken. Any appeal should be made within 7 days of an offer being made or withheld.
Does this LLP require any specialist interventions, or routes to market?	Yes – to ensure the eligible cohort are aware of this scheme, and the priority they will have for allocations, engagement events will be held prior to the bidding cycle commencing. Interested applicants will be able to meet with Torbay Council to discuss the scheme, the lettings procedure, and the Devon Home Choice application process.
Tenancy terms	Accommodation will be let at Social Rents, using the maximum calculation of Target Rent that is achievable in this location. The Housing Delivery Team will confirm the rent that must be charged to the first tenants, to ensure the rents match the approved Homes England grant bid.

Details of consultation undertaken in agreeing this LLP	Torbay Council has secured grant funding to support the delivery of this project. It is therefore necessary to put this LLP in place to ensure we meet the terms of our grant obligations. Specific consultation has been undertaken with the Housing Options Team, Devon Home Choice, Housing Management and Torbay Council Cabinet.
Monitoring arrangements for this LLP	A review of allocations will be undertaken 6 months following the first letting of these units, to understand the effectiveness and success of this policy. A further review may be undertaken annually, if required by Cabinet.

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 Team
Age	18% of Torbay residents are under 18 years old. 55% of Torbay residents are aged between 18 to 64 years old. 27% of Torbay residents are aged 65 and older.	Due to the client group to be targeted, this project is likely to provide a benefit to households who are over the age of 55. 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.	The project is aimed at local people over the age of 55. It is therefore anticipated that older people will secure a home in these schemes. Due to the specific nature of the Local Allocations Policy, younger people will be excluded from living in the scheme. To mitigate this, it is expected that general needs accommodation may become available through the downsizing of current Affordable Housing properties. All vacancies that arise will be advertised and let through the Devon Home Choice process.	Lettings and Housing Management
Carers	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.	Lettings would not discriminate against the caring responsibilities of future tenants	Carers are eligible for an allocation if they meet the Local Connection and age specification.	Housing Management and Lettings
Disability	In the 2021 Census, 23.8% of Torbay residents answered that their day-to-day activities were limited a little or a lot by a physical or mental health condition or illness.	Due to the nature of converting existing buildings, it will not 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	Consider accessibility and mental health needs in designs of conversions. Key contact numbers are provided at the tenancy sign up.	Strategic Housing
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	We would not discriminate against gender on general needs rented properties unless there was a specific requirement to have same sex	N/A	ALL

	similar to the Southwest and is lower than England.	accommodation, for example in the case of a women's refuge.		
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 live births since the middle of the last decade across all geographical areas.	Only flats with 2 or more bedrooms would be considered suitable for families.	NA	Lettings and Housing Management
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 age specific 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
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. Key contact numbers are provided at Signing of the tenancy agreement	Lettings and Housing Management
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.	Providing designated older persons accommodation, may improve the quality of life for those residents. The home may be more manageable and enable people to live independently for longer. Removing disused unsuitable Care Homes from the market, prevents them being converted into poor quality HMO-style housing. This conversion has a positive public health benefit in terms of living conditions, and the impact on local services and infrastructure etc.	NA
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.	Children are prevented from residing in the properties as it is an age designated scheme for those over the age of 55.	Children will be able to visit the scheme but are not allowed to reside in the properties on a permanent basis.	Lettings and Housing Management
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