

## RECORD OF EXECUTIVE DECISION TAKEN BY AN EXECUTIVE MEMBER

This form **MUST** be used to record any decision taken by the Elected Mayor or an individual Executive Member (Portfolio Holder).

The form must be completed and passed to the Chief Officer responsible for Legal and Democratic Services no later than NOON on the second working day after the day on which the decision is taken. No action may be taken to implement the decision(s) recorded on this form until 7 working days have passed and the Chief Officer responsible for Legal and Democratic Services has confirmed the decision has not been called in.

## 1. Description of decision

- (1) That the allocation of £8.56 million investment from the Temporary Accommodation (TA) capital programme be approved to develop modular homes to ensure the long-term financial sustainability of temporary accommodation, as outlined in the attached report prepared to accompany the decision.
- (2) That the direct appointment of a third-party specialist supplier, through the appropriate procurement route, be approved to construct 46 new homes with support hub, office space, infrastructure and relevant access roads at London Road and Old Ford End Road, with the contract covering both supply, construction, contingency and professional fees.

## 2. Date of decision

31 October 2025

## 3. Reasons for decision

Approval of the proposal would assist in **tackling demand for emergency accommodation** which remains high with the current snapshot being 869 TA placements (September 2025), of which 90% are placed in high-cost private nightly rate settings on the open market. There is a national rising demand trend, up 12% compared to previous year, with the latest Government data stating "...the number of households in temporary accommodation on the 31 March 2025 is at record levels following continuing increases, including increases in families placed into B&B or hotel settings..."

Approval of the proposal would assist in delivering direct TA revenue **cost avoidance (savings) across a range £1.69 million to £2.42 million (gross, without borrowing cost included) or £487,000 to £1.22 million (net, with capital borrowing cost) per annum**, as opposed to using private sector nightly rate or hotel accommodation, thereby reducing TA revenue overspend, the latest forecast being £1.7m overspend. The investment will also include an annual reduction of housing benefit subsidy pressure of c.135,000 as well as further cost avoidance (saving) to Children's services of c£60,000 for units used flexibly to include family placements for those with recourse to public funds.

Approval of the proposal would strategically **reduce reliance on the open market to improve long term financial sustainability** as set out:

- Housing Diagnostic Review (January 2024)
- The Homelessness and Rough Sleeping Strategy (June 2024)
- The Housing Transformation Programme (June 2024)
- CIPFA Resilience Review (September 2025)

To provide **good quality, better managed accommodation** and mitigate health and safety risks as identified in a recent temporary accommodation audit, housing committee and overview and scrutiny committee meetings, the local press and through the corporate complaints process.

**To create a 'families first' supported temporary accommodation setting.** This aligns to corporate strategic aims and policy priorities to support individuals and families with a particular focus on health and wellbeing. The proposals include provision of a hub location for increased engagement with key support service partners to co-locate to assist through tenancy sustainment and budgeting skills, housing officer support to find permanent settled housing, family liaison, health visitors, education and employment opportunities and mental health support. This 'wrap around' holistic support for families will assist in securing better all-round outcomes and opportunities as well as preventing or reducing reoccurrence of crisis. The design of the development as a supported setting will drive indirect reductions in cost in children's, adult's social and customer hub services.

On balance and having considered the financial return of the project, in conjunction with the overarching benefits that this type of housing provision will provide to some of the most vulnerable members of our communities, progressing with such an acquisition project will **enhance the level of control** the Council will have in terms of **good quality, better managed TA**, as well as **reducing the level of risk exposure** to the Council through the open market/nightly rate provision in the longer term. Given that this proposal is on basis of an 'invest to save' principle whereby the payback period can be subject to variation, the proposal still qualifies as an **invest to save** scheme, therefore officers recommend that this acquisition project is approved and taken forward as outlined in the business case.

#### 4. Alternatives considered and rejected

Do nothing – Without further investment into providing new temporary accommodation the Borough will continue to rely on hotels and nightly rate provision which will further increase the TA revenue budget pressure.

Construction through traditional means – This option has been reviewed however the timescales associated with the scale of the project would increase by approximately 18-24 months, with a significantly increased build cost associated to a bricks and mortar scheme. Similarly, any increase in groundworks and foundations, especially at London Road, would increase the likelihood of encountering subterranean land contamination and remediation matters.

Purchasing housing direct – This option is more costly than the construction of modular housing developments, plus modular construction lends itself to these sites due to their bespoke nature. There is a short fall in housing supply which means alternative methods such as modular housing should be considered where appropriate.

#### 5. How decision is to be funded

Investment in modular homes will deliver direct TA revenue cost avoidance (savings) across a range of £1.69 million to £2.42 million (gross, without borrowing cost included) or £487,000 to £1.22 million (net, with capital borrowing cost) per annum. This is calculated as a comparator to the cost of using private sector nightly rate or hotel accommodation using the rates on a range when accounting for the number of placements for 365 nights, including an annual reduction of housing benefit subsidy pressure of c.135,000 as well as further cost avoidance (saving) to Children's services of c£60k for units.

Special consideration should be given to capital investment of this kind, TA directly impacts significant demand-led revenue expenditure, as such investment in this proposal is designed to create an early cashable revenue saving, as opposed to the more straightforward ROI for smaller defined capital schemes of investment

**6. Conflicts of interest**

Name of all Executive members who were consulted AND declared a conflict of interest.	Nature of interest	Did Standards Committee give a dispensation for that conflict of interest? (If yes, give details and date of dispensation)	Did the Chief Executive give a dispensation for that conflict of interest? (If yes, give details and the date of the dispensation).

The Mayor has been consulted on this decision

Not Applicable

Signed:  .....

Date: **31 October 2025**

Name of Decision Taker: **Mayor Tom Wootton**

**This is a public document. A copy of it must be given to the Chief Officer responsible for Legal and Democratic Services as soon as it is completed.**

Date decision published: .....3November2025.....

Date decision can be implemented if not called in: ...11November2025.....

(Decision to be made exempt from call in.....NO.....)

**Bedford Borough Council – Report to Mayor of Bedford**

**Date of Report: 31 October 2025**

**Report by: Service Director Regulation, Housing & Customer Contact and Head of Housing, Homelessness & Customer Services**

**Subject: MODULAR HOUSING PROGRAMME**

**1. EXECUTIVE SUMMARY**

- 1.1 This report seeks approval to allocate **£8.56m investment from the Temporary Accommodation (TA) capital programme** to develop modular homes to ensure the long-term financial sustainability of temporary accommodation within Bedford Borough. TA spend remains a strategic risk for the Council due to a rising demand locally and nationally, notable there has been a 12% increase nationally across the TA sector over 12 months<sup>1</sup>, this demand coupled with Bedford Borough's high dependence for placements in commercial accommodation, which is subject to market rate volatility and fluctuation places the Council under intense pressure as a non-housing stock holding Council.
- 1.2 The modular program will deliver **good quality homes** with a 10-year guarantee comparable to traditional new build properties, along with a 60-year guarantee on the modular structure, giving an expected lifespan of 80 years plus as follows:
- 24 two-bedroom modular homes at London Road on the existing depot site for families
  - 22 one- and two-bedroom modular homes at Old Ford End Road, Enterprise House site, currently used by Youth Services
- 1.3 The development of these sites will increase supply of **good quality, cost effective, well managed accommodation** that will allow the Borough to provide a family first approach in combatting homelessness. The new developments will include an office / support hub to facilitate casework and help tenants with other support requirements. This includes help to access housing benefit where eligible, tenancy sustainment support, housing options advice, family liaison, education, budgeting, job support, digital assistance and mental health services.

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<sup>1</sup> <https://www.gov.uk/government/statistics/statutory-homelessness-in-england-january-to-march-2025/statutory-homelessness-in-england-january-to-march-2025>  
“On 31 March 2025 131,140 households were in temporary accommodation, which is an increase of 11.8% from 31 March 2024. Households with children in temporary accommodation increased by 11.6% to 83,150, whilst single households increased by 12.0% to 47,990 since 31 March 2024”.

- 1.4 Investment in modular homes will deliver direct TA revenue cost avoidance (savings) across a range of **£1.69m to £2.42m (gross, without borrowing cost included) or £487k to £1.22m (net, with capital borrowing cost)** per annum, as opposed to using private sector nightly rate or hotel accommodation. Investment in modular homes also includes an annual reduction of housing benefit subsidy pressure of c.135k as well as further cost avoidance (saving) to Children's services of c£60k, for units used flexibly to include family placements for those with recourse to public funds. Rents will be set to ensure that income recouped enables the units to be financially viable and self-sustaining, including the cost of borrowing, maintenance, repairs, staffing and 5% void churn.

## 2. **RECOMMENDATION(S)**

### 2.1 The Mayor is asked to consider and, if satisfied, to:

- a) Approve the allocation of £8.56m investment from the Temporary Accommodation (TA) capital programme to develop modular homes to ensure the long-term financial sustainability of temporary accommodation.
- b) Approve the direct appointment of a third-party specialist supplier through the appropriate procurement route to construct 46 new homes with support hub, office space, infrastructure and relevant access roads at London Rd and Old Ford End Rd, with the contract covering both supply, construction, contingency and professional fees.

## 3. **REASONS FOR RECOMMENDATION(S)**

- 3.1 Approval of the proposal would assist in **tackling demand for emergency accommodation** which remains high with the current snapshot being 869 TA placements (September 2025), of which 90% are placed in high-cost private nightly rate settings on the open market. There is a national rising demand trend, up 12% compared to previous year, with the latest Government data stating "*...the number of households in temporary accommodation on the 31 March 2025 is at record levels following continuing increases, including increases in families placed into B&B or hotel settings...*"
- 3.2 Approval of the proposal would assist in delivering direct TA revenue **cost avoidance (savings) across a range £1.69m to £2.42m (gross, without borrowing cost included) or £487k to £1.22m (net, with capital borrowing cost) per annum**, as opposed to using private sector nightly rate or hotel accommodation, thereby reducing TA revenue overspend, the latest forecast being £1.7m overspend. The investment will also include an annual reduction of housing benefit subsidy pressure of c.135k as well as further cost avoidance (saving) to Children's services of c£60k for units used flexibly to include family placements for those with recourse to public funds.
- 3.3 Approval of the proposal would strategically **reduce reliance on the open market to improve long term financial sustainability** as set out:
- Housing Diagnostic Review (January 2024)
  - The Homelessness and Rough Sleeping Strategy (June 2024)

- The Housing Transformation Programme (June 2024)
- CIPFA Resilience Review (September 2025)

- 3.4 To provide **good quality, better managed accommodation** and mitigate health and safety risks as identified in a recent temporary accommodation audit, housing committee and overview and scrutiny committee meetings, the local press and through the corporate complaints process.
- 3.5 **To create a ‘families first’ supported temporary accommodation setting.** This aligns to corporate strategic aims and policy priorities to support individuals and families with a particular focus on health and wellbeing. The proposals include provision of a hub location for increased engagement with key support service partners to co-locate to assist through tenancy sustainment and budgeting skills, housing officer support to find permanent settled housing, family liaison, health visitors, education and employment opportunities and mental health support. This ‘wrap around’ holistic support for families will assist in securing better all-round outcomes and opportunities as well as preventing or reducing reoccurrence of crisis. The design of the development as a supported setting will drive indirect reductions in cost in children’s, adult’s social and customer hub services.
- 3.6 On balance and having considered the financial return of the project, in conjunction with the overarching benefits that this type of housing provision will provide to some of the most vulnerable members of our communities, progressing with such an acquisition project will **enhance the level of control** the Council will have in terms of **good quality, better managed TA**, as well as **reducing the level of risk exposure** to the Council through the open market/nightly rate provision in the longer term. Given that this proposal is on basis of an ‘invest to save’ principle whereby the payback period can be subject to variation, the proposal still qualifies as an **invest to save** scheme, therefore officers recommend that this acquisition project is approved and taken forward as outlined in the business case.

#### 4. **THE CURRENT POSITION**

- 4.1 There is a consistently high demand for emergency accommodation with 870 current TA placements (typically 50 new placements per month). Short supply of settled accommodation results in a rising trend as shown overleaf (*TA Placement Numbers*). Through the transformation program efforts to increase homeless prevention, rehousing options and ensure robust assessments have seen TA placement numbers in Bedford Borough recently stabilise. However, this is likely to be a result of addressing legacy casework in the system and is unlikely to counter the continuing demand flow in the long term as the national trend context shows a 12% rise in TA over the last year.
- 4.2 The service has a 90% reliance on high-cost nightly rate or hotel provisions resulting in a current overspend of £1.7m per annum (latest forecast) in the present TA revenue budget, this also creates an estimated c£1.2m subsidy pressure per annum in the Housing Benefit revenue budget as a result. For nightly rate or hotel provision only 90% of the 2011 local housing allowance rate may be claimed creating a subsidy gap corporately across corporate finances.

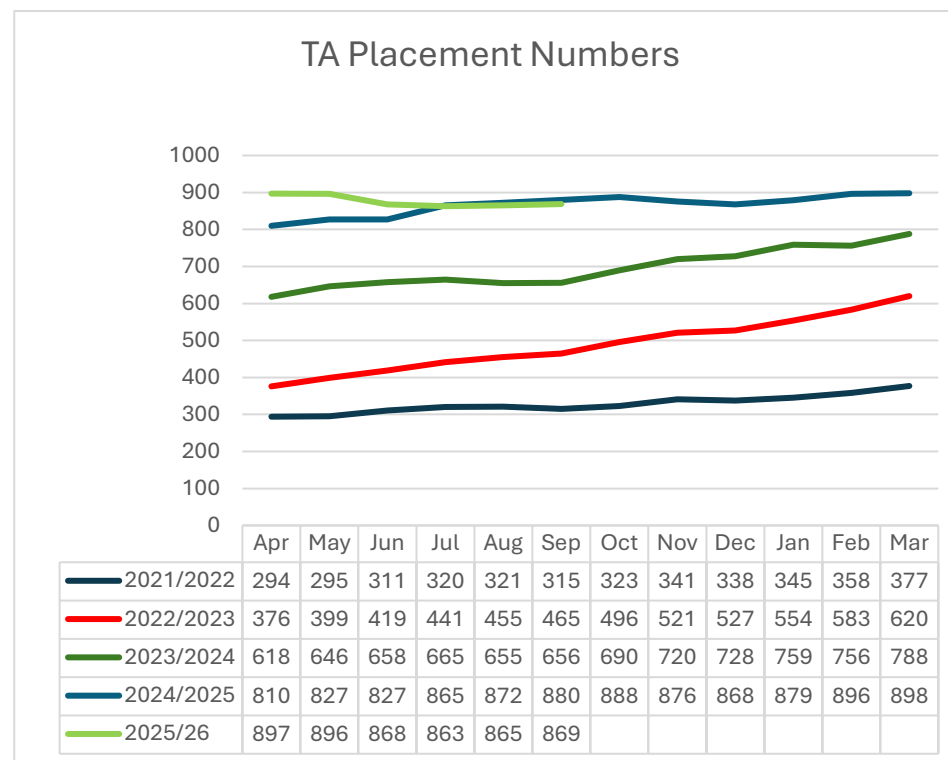
4.3 The Housing & Homelessness team has worked to better manage TA demands placed on the Council and improve the reliance on the use of high-cost hotel accommodation and to negotiate down the average rates for nightly rate accommodation have through the development of a dynamic purchasing system.

4.4 The current position and progress is not guaranteed into the future (medium to longer term) as the Council, along with other Councils locally and nationally, remain subject to the volatility, variability and fluctuation of the open market. It is anticipated that rates may rise locally year on year with a potential reduction in private sector supply associated with Renters Reform Bill and local demand in the area rising over time.

4.5 Through development of a shared accommodation protocol, the modular units proposed may be used flexibly for Children's Services where it presents an overall cost benefit to the Council for those with recourse to public funds, contributing to a corporate reduction in Children's Services revenue budget pressures. Although Children's Service family placement numbers are small in comparison to TA, the nightly rates are typically 25-30% higher. Children's Services have also highlighted the local need for town centre settings, as many of their placements are made at some distance disrupting access to education for children and incurring high home to school transport costs. This includes placements for families in a range of scenarios such as:

- No duty is owed under the Homelessness Reduction Act 2017
- Safe family accommodation for short term emergency protection or during assessment periods pending court
- Supported settings required for young parents or care leavers moving into their first independent homes

4.6 A project to improve the quality of TA and introduce and strengthen robust checks and inspections of nightly recent accommodation to protect our customers was launched in the summer of 2024. Whilst progress is being, made this remains a significant challenge due to the extremely limited supply of good quality housing in the private sector. This continued risk is evidenced by feedback received regarding some TA property standards in recent years. The matter has been raised in overview and scrutiny committee, a TA review in 2024 and in Housing Committee.



- 4.7 Due to demand outstripping supply in the market families can be at risk of being placed in unsupported or isolated placements. This can result in families that are already facing a crisis in homelessness, experiencing exacerbated issues such as disruption to children's education, reduced employment opportunities, health and welfare challenges, such vulnerabilities can be exacerbated through stress and loss of support networks and less than ideal accommodation. Whilst the Housing & Homelessness team do everything they can to mitigate such challenges through careful assessment of placement suitability but reliance on a very limited supply in the market and distance from support services remains a factor.
- 4.8 This modular proposal seeks to address such issues by creating supported settings for TA in Council owned stock to enable well managed casework and better engagement with customers on site to facilitate better overall outcomes. These new facilities will permit the team to fast-track rehousing work with placed families to reduce the length of stay in TA, which currently averages at 9 months, with some families in TA for a number of years due to the market conditions and demands placed on supply.

## **5. DETAILS**

- 5.1 To proceed with the modular homes programme, the next steps are to appoint a contractor to develop the design proposals and construct modular homes at London Road on the existing depot site and Old Ford End Road on the current Enterprise House site. In both instances the works will comprise of demolition of existing structures, construction of new homes utilising modular technology, access roads, green spaces and service facilities. This will include 24 new homes at London Rd all of which are 2 bedrooms and 22 new homes at Enterprise House which will be mixture of 1 and 2 bedrooms.
- 5.2 The project is currently at Concept Stage and the necessary resources have been identified, project documentation is in place and initial concept designs have been produced by the Council's in-house team in conjunction with an approved supplier.
- 5.3 A third-party supplier and contractor has been identified through the Procurement for Homes Framework and Emerging Disruptors Lot with appropriate soft market testing. Utilising the appropriate procurement routes would in this instance permit a direct award and would enable the Borough Council to commence engagement efficiently and reduce the programme by approximately 2 months, resulting in a further in year saving (2026/27) of between £200k-£400k. This methodology has been reviewed and confirmed as compliant by the Councils Procurement Team.
- 5.4 Initially the Borough would enter a 'Pre-Contract Service Agreement' (referred to as PCSA) where the detailed designs and Planning Applications would be produced. During the Planning Determination Period the contractor would produce detailed designs and confirmed costings that would then be submitted to enter contract for construction, all subject to Planning approval. The appointed third-party supplier would then construct the new dwellings and carry out associated under a JCT Design and Build Contract.



- 5.5 Appropriate surveys have been carried out to de-risk the project as part of the pre-contract and site investigation work, these have included asbestos surveys for existing buildings, demolition scoping, public utility enquiries to establish easements and connections for utilities, background noise testing, environmental and ecology surveys to establish any requirements for planning etc. All these surveys will assist in expediting the programme and assuring costs for the project.
- 5.6 The proposals have been based on providing a family environment at London Rd which is the larger of the two sites. This will allow the support services to focus their efforts to a more family suited basis at London Rd and for singles / couples at Old Ford End Rd.
- 5.7 It is anticipated that should a direct award be granted then the following milestone dates can be met. A more detailed programme shall be provided upon appointment of the contractor:

<b>Milestone</b>	<b>Completion Date</b>
Enter into PCSA	Dec 25
Planning Submission	Mar 26
Planning Approval	Jun 26
Start on site	Aug 26
Completion	Jan - Feb 27

## **6. ALTERNATIVES CONSIDERED AND REJECTED**

- 6.1 Do nothing – Without further investment into providing new temporary accommodation the Borough will continue to rely on hotels and nightly rate provision which will further increase the TA revenue budget pressure.
- 6.2 Construction through traditional means – This option has been reviewed however the timescales associated with the scale of the project would increase by approximately 18-24 months, with a significantly increased build cost associated to a bricks and mortar scheme. Similarly any increase in groundworks and foundations, especially at London Rd, would increase the likelihood of encountering subterranean land contamination and remediation matters.
- 6.3 Purchasing housing direct – This option is more costly than the construction of modular housing developments, plus modular construction lends itself to these sites due to their bespoke nature. There is a short fall in housing supply which means alternative methods such as modular housing should be considered where appropriate.

## 7. **KEY IMPLICATIONS**

### **Legal Issues**

- 7.1 Part 7 of the Housing Act 1996 (as amended) provides the statutory underpinning for action by the Council to prevent homelessness and provide assistance to people threatened with or actually homeless. The Homelessness Reduction Act 2017 significantly reformed England's homelessness legislation by placing duties on the Council to intervene at earlier stages to prevent homelessness in its area. It also requires the Council to provide homelessness services to all those affected, not just those who have 'priority need'. These include:
- an enhanced prevention duty extending the period a household is threatened with homelessness from 28 days to 56 days, meaning that the Council is required to work with people to prevent homelessness at an earlier stage. This means either helping them to stay in their current accommodation or helping them to find new accommodation before they become actually homeless; and
  - a new duty for those who are already homeless so that the Council will support households for 56 days to relieve their homelessness by helping them to secure accommodation.
- 7.2 There are various sections of the Housing Act 1996 that trigger a temporary accommodation duty, these include:
- s188 – the duty to provide temporary accommodation to anyone the Council has reason to believe may be eligible, homeless and in priority need
  - s190 – in the event of an adverse decision, the Council has a duty to provide temporary accommodation for a reasonable period of time in order to give clients the opportunity to make their own arrangements
  - s193 – following acceptance of the main housing duty, the Council is required to continue to provide temporary accommodation until suitable, alternative accommodation can be found.
- 7.3 The Council is subject to an ongoing duty, the 'main housing' duty, to ensure that accommodation is available to an applicant who is eligible for assistance, in priority need, and unintentionally homeless. This duty is owed by the Council unless there is a local connection referral from another local authority.
- 7.4 The Localism Act 2011 (s148 and s149) introduced provisions which enables the Council to bring its main housing duty to an end, by making an offer of a private rented sector tenancy rather than a social housing tenancy. Accommodation must always be 'suitable' and there are particular matters the Council must have regard to when determining suitability, including space and arrangement, location, property condition, and social considerations relating to the applicant and their household.
- 7.5 The Development will be carried out in accordance with current Planning and Building Regulations, as such no development shall commence until planning applications have been approved and no occupation shall take place until the Building Regulations and completion certificates have been issued.

- 7.6 The development shall meet the criteria for Decent Homes Standards, with all works shall be carried out in accordance with Health & Safety, Construction, Design and Management (CDM) regulations as appropriate.

### **Policy Issues**

- 7.7 The Bedford Borough Corporate Plan 2024/5 to 2027/28 focuses on four strategic priorities of:
- Supporting Individuals and Families
  - Protecting the Environment
  - Stimulating Economic Growth in Bedford Borough
  - Promoting Health and Wellbeing
- 7.8 This strategy contributes to delivery under all priorities, but particularly Supporting Individuals and Families and Promoting Health and Wellbeing, along with the cross-cutting themes associated to the Council's climate change priorities and zero carbon emissions by 2030.
- 7.9 The Housing Strategy 2022 to 2026 has three themes which this proposal contributes directly to:
- To understand housing need
  - Delivering homes required
  - Making best use of existing housing and meeting the housing needs of vulnerable people
- 7.10 In particular, the TA acquisition approach will focus on assisting the Council in fulfilling its statutory accommodation duties to provide accommodation for people that would otherwise be homeless. This includes for example (illustrative not exhaustive list) those homeless as victims of domestic abuse or other forms of violence or harassment, families with children that have become homeless because of no-fault evictions, families are unable to sustain tenancies in the private sector due to the cost-of-living crisis, disabled where their property is no longer suitable or adapted to their needs, and care leavers moving into independent living.
- 7.11 Homelessness and Rough Sleeping Strategy (2024 – 2029) has three themes which are to:
- Increase homeless prevention work
  - Increase accommodation supply and
  - Offer enhanced support to those experiencing homelessness. It states:
- 7.12 The Rough Sleeping Strategy states *“Our ongoing property acquisition program should consider our ambition to re-focus on prevention, reduce the high number of households in temporary accommodation, reduce the significant cost to the council of nightly let and hotel type provision and improve the conditions for individuals and families who require temporary accommodation”*.

- 7.13 There is a close relationship between this strategy and the TA acquisition approach, however the latter will focus on providing a core supply of residential units to meet the Council's statutory obligations under the Homelessness Reduction Act 2017.
- 7.14 The CIPFA resilience review noted that "The authority has implemented a Temporary Accommodation Property acquisition approach that aims to build a portfolio of Council owned properties for temporary accommodation to ensure that the authority can fulfil its statutory accommodation duties under the Homelessness Reduction Act 2017 in a financially sustainable way, whilst securing long term asset value."
- 7.15 "The Council aims to place 70% of temporary accommodation clients in Council owned properties which are revenue cost neutral to alleviate the long-term pressure on temporary accommodation budgets and move into a financially sustainable position. This will remove reliance on more expensive accommodation options such as hotels and nightly rate providers which is currently a key driver of the budget pressure."

### Resource Issues

- 7.16 Investment in modular homes will deliver direct TA revenue cost avoidance (savings) across a range of **£1.69m to £2.42m (gross, without borrowing cost included) or £487k to £1.22m (net, with capital borrowing cost) per annum**. This is calculated as a comparator to the cost of using private sector nightly rate or hotel accommodation using the rates on a range as shown below (multiplied by the number of placements for 365 nights). This calculation is then adjusted to take account of subsidy pressure, the cost of borrowing and rent chargeable. Investment will also include an annual reduction of housing benefit subsidy pressure of c.135k as well as further cost avoidance (saving) to Children's services of c£60k for units used flexibly to include family placements for those with recourse to public funds. Rents will be set to ensure that income recouped enables the units to be financially viable and self-sustaining, including the cost of borrowing, maintenance, repairs, staffing and 5% void churn.
- 7.17 The cost benefits achievable are shown below (per annum full year effect) on a range to reflect the nature of dependence on a fluctuating nightly and hotel open commercial market and rising demand. Return on investment periods should be considered with the life of the asset in mind (80 years plus).
- 7.18 Special consideration should be given to capital investment of this kind, TA directly impacts significant demand-led revenue expenditure, as such investment in this proposal is designed to create an early cashable revenue saving, as opposed to the more straightforward ROI for smaller defined capital schemes of investment. This proposal is on basis of an 'invest to save' principle whereby the payback period can be subject to variation, however it still qualifies as an invest to save scheme. See Appendix B for Capital Business Case.
- 7.19 Figures shown include the reduced subsidy pressure and an estimated additional £60k associated with flexible use of the units for Children's family placements. Please note that the cost of borrowing is built into the rental income structure to ensure financial viability of the development. The chart below shows true, direct cost avoidance.

Comparator	Note	TA Revenue Cost Avoidance	TA Revenue Cost Avoidance (Including the cost of borrowing at 6.1%)	Return on investment time period
Hotel Rate (previous peak rate locally)  <i>Reasonable worst-case scenario</i>	<ul style="list-style-type: none"> <li>If demand were to rise significantly with a high volume of placements unavoidably placed in hotels exhausting cheaper rate options, then higher rates would apply.</li> <li>Rates used for analysis are based on those used in January 2024 with inflation at 3% applied.</li> </ul>	£2,421,943	£1,685,832	5 years
Hotel Rate  <i>Current scenario</i>	<ul style="list-style-type: none"> <li>If demand were to rise significantly hotel use may be unavoidable.</li> <li>Rates used for analysis based on current (September 2025) lower rate options with 3% inflation applied.</li> </ul>	£1,678,314	£942,203	9 years
Nightly Rate (previous peak rate locally)  <i>Reasonable worst-case scenario</i>	If market rates returned to those rates September 2024 (on average)	£1,331,264	£595,154	14 years
Nightly Rate  <i>Current scenario</i>	Based on current rate with 3% inflation applied.	£1,223,443	£487,332	17 years

- 7.20 The rate comparator, cost avoidance and return on investment have been reviewed and updated a result of changes in construction and supplier costs, changes to the cost of borrowing and to reflect the current rates locally in nightly rates, however these have been compared to the reasonable worst-case scenario which reflect peak demand and peak costs, as a result of market fluctuations and conditions. The proposal still demonstrates a significant reduction in overspend against the current pressure with the return on investment within the life of the asset.
- 7.21 The project timeline shows the first full year effect will be achievable in 2027/28, however initial benefits will be delivered in the next financial year in Q4 2026/27 ranging from £122k up to £422k with a part year effect.
- 7.22 Ongoing maintenance will be required to ensure the modular units remain compliant with housing standards. These costs will be built into the annual property management budget and reviewed as part of the Service Charge (SC) review process.

- 7.23 The model includes provision for concierge services, housing management, and support staff. These roles are essential for safeguarding, tenancy sustainment and wider site safety and management.
- 7.24 The Council currently incurs significant revenue expenditure on nightly paid accommodation. The modular scheme is expected to reduce these costs over time by providing more stable, cost-effective housing where residents will pay rent, with eligible households supported through Housing Benefit or Universal Credit. This income will contribute to operational costs and long-term financial sustainability.
- 7.25 The modular units will be added to the Council's housing asset register and managed in line with corporate property policies. Sites have been selected based on proximity to services, transport links, and community infrastructure to support resident wellbeing and reduce isolation, with the buildings are designed to modern environmental standards, contributing to the Council's net zero carbon goals.
- 7.26 The proposal will reduce housing benefit subsidy pressure by an estimated c£135k per annum. In properties owned by the Council, full subsidy can be claimed by the Local Authority from central government to cover costs of housing benefit.

## **Risks**

### Strategic Risks

- 7.27 Failure to develop suitable accommodation will result in continued reliance on nightly paid placements, which are less stable, more costly which will continue to have a negative impact on the revenue budget. Non-alignment with Council priorities, including the Rough Sleeper and Homelessness Strategy, Public Health Strategy and Net Zero Carbon Strategy, could undermine wider corporate objectives and make them less likely to be delivered.

### Operational Risks

- 7.28 Delays in development will impact the availability of council owned units, leading to extended use of hotel/nightly let accommodation and increased costs. Insufficient support services within the hotel/nightly let (e.g. concierge, housing management) could result in tenancy break downs, anti-social behaviour, or safeguarding concerns.

### Financial Risks

- 7.29 Failure to approve the recommendations could result in continued high revenue expenditure on temporary accommodation, with limited ability to control costs or improve outcomes. Whilst all efforts are being made to negotiate reduced rates through an open framework and block booking arrangements, such rates are not guaranteed into the future, and the council remains subject to market fluctuation and likely longer term rising rates.

- 7.30 Special consideration should be given to capital investment of this kind, TA directly impacts significant demand-led revenue expenditure, as such investment in this proposal is designed to create an early cashable revenue saving, as opposed to the more straightforward ROI for smaller defined capital schemes of investment.

#### Reputational Risks

- 7.31 Failure to meet statutory duties under homelessness legislation could result in legal challenge or regulatory scrutiny.

#### Design and Construction Risks

- 7.32 There are unknown construction/demolition issues that may arise from existing ground works and buildings on site. To mitigate this risk surveys have been commissioned and are being reviewed throughout the project programme and a contingency has been included within the cost estimate.

### **Environmental Implications**

- 7.33 The proposals in this report support Bedford Borough Council's strategic aim to become a net zero carbon authority by 2030, as set out in the Carbon Reduction Delivery Strategy. The environmental implications are assessed across three key areas:
- **Building to Modern Standards** – The development will comply with current Building Regulations, including Part L (conservation of fuel and power), this ensures:
    - Improved energy efficiency and reduced carbon emissions
    - Compliance with EPC rating targets and future proofing against regulatory changes
    - Integration of low-carbon technologies such as LED lighting, air source heat pumps, and smart energy systems
  - **Transport and Location** – The properties are in central urban areas, reducing reliance on car travel and supporting active and sustainable transport modes, this aligns with:
    - The Council's Smart Travel Plan and modal shift goals
    - Reduced emissions from business travel and resident transport
    - Improved access to public transport, walking and cycling routes
  - **Strategic Carbon Reduction Contributions** – The proposals contribute to the Council's wider carbon reduction goals by:
    - Reducing reliance on nightly let accommodation, which is typically less energy efficient and more carbon intensive
    - Enabling on-site management and support, reducing travel and improving operational efficiency
    - Supporting green procurement and sustainable service delivery models

## **Equalities Impact**

- 7.34 Please see the attached Equality Impact Assessment at Appendix A. The proposal takes into consideration the Bedford Borough Council's public sector equality duty under the Equality Act 2010 to:
- promote equality of opportunity,
  - promote good relations, promote positive attitudes and
  - eliminate unlawful discrimination
- 7.35 Provision of good quality accommodation to prevent homelessness aims to reduce inequality and disadvantage for those in protected characteristic groups which may otherwise currently may struggle to access quality housing or experience homelessness at disproportionate rates compared to the rest of the population. For example, supply of accessible housing for those with physical disabilities fails to meet demand and women are statistically more likely to experience homelessness as a result of domestic abuse. Poor housing contributes to wider inequalities and poorer outcomes such as in relation to health, access to education or employment for such groups. The proposals in this report aim to address those inequalities through better housing provision and support.
- 7.36 All those placed in temporary accommodation are assessed fairly under the Homelessness Reduction Act 2017 in adherence to the Equality Act 2010 so that placements are awarded fairly. This is monitored through the gathering of equalities data as part of the assessment of need (on a voluntary basis).
- 7.37 In preparing this report, due consideration has been given to the Borough Council's statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010. A full equality impact assessment has been conducted and will be further reviewed following a public planning consultation and as part of the local nominations and booking agreement to ensure homes are used accordingly.

## **Impact on Families**

- 7.37.1 The modular programme is designed to provide a 'families first' approach with 2-bedroom units and support hub provision on site. This enables close partnership working to enhance opportunities to relieve homelessness. This includes rehousing support, gaining tenancy sustainment and budgeting skills, advice to raise the financial wellbeing of families. Advisers from partners such as the 'Connect to Work' project will come on board to help families find employment and improve education. The aim of this work is to uplift families out of the crisis of homelessness and into settled permanent accommodation.
- 7.38 The provision of stable temporary housing supports couples and families to form and remain together, reducing reliance on fragmented and less secure hotel, nightly let accommodation which is controlled by private for-profit organisations. Families experiencing homelessness, separation, bereavement, or health crises benefit from the stability and support offered by these properties. The proposals reduce stress during key transitions and offer access to local services and networks through on-site support/ signposting.



- 7.39 The design and location of the properties enable families to maintain routines, access education and health services, and participate in community life. On-site support helps parents; carers fulfil their roles effectively ensuring positive outcomes such as long-term successful move on options, reduced reliance on support services.
- 7.40 The accommodation model supports separated families by offering safe, neutral housing options that reduce conflict and enable continued parenting responsibilities. By reducing housing stress and providing wraparound support, the proposals help mitigate risks of relationship deterioration. The inclusion of concierge and intensive housing management services also reduces external pressures such as exploitation or anti-social behaviour.
- 7.41 Where applicable, the proposals may positively impact care-experienced family members, particularly children placed via Children's Services. The properties offer safer, more stable environments than hotel, nightly let placements, improving outcomes and reducing trauma associated with emergency housing.

### **Community Safety and Resilience**

- 7.42 The modular housing programme will enhance Community Safety and Resilience by:
- **Reducing vulnerability:** Families currently placed in poor-quality, isolated temporary accommodation face risks including mental health deterioration, disrupted education, and lack of access to services. Purpose-built modular homes will offer safe, stable environments with integrated support.
  - **Strengthening local networks:** On-site support hubs will enable direct access to tenancy sustainment, health services, education, and employment support, reducing isolation and improving outcomes.
  - **Improving placement suitability:** Modular homes allow for tailored placements, reducing overcrowding and safeguarding risks.
  - **Mitigation strategies:** Mitigation of the developments will include proactive community engagement, robust service planning, and ongoing monitoring of outcomes to ensure the developments strengthen rather than strain community resilience.

### **Impact on Health and Wellbeing**

- 7.43 The proposals outlined in this report are expected support the Bedford Borough Joint Local Health & Wellbeing Strategy 2024–2027 and will have a positive and strategic impact on health and wellbeing across Bedford Borough. By investing in high-quality, supported temporary accommodation, the Council is directly addressing several of the key themes of the strategy.
- 7.44 Stable housing improves mental and physical health outcomes, reduces stress, and enables better access to employment and education. The inclusion of on-site support services (e.g. security, housing management) also promotes improved health behaviours and mitigates harmful

ones such as substance misuse or social isolation. These developments will also ensure that we are actively trying to improve the health of the poorest and most vulnerable in our local community.

- 7.45 The proposed developments incorporate robust compliance with fire safety, building regulations, and environmental health standards, including CCTV, gated access, regular patrols and monitoring of compliance. These measures reduce exposure to environmental hazards and enhance emergency preparedness, particularly for vulnerable residents. This develop with implement a core theme of the above strategy by recognising that poor housing quality and unsafe environments are upstream contributors to health inequalities, and the proposals actively mitigate these risks.
- 7.46 The integration of housing with intensive housing management and support services facilitates better access to health and social care. This model supports early intervention, improves tenancy sustainment, and reduces demand on crisis services. It also complements the Bedfordshire, Luton and Milton Keynes Integrated Care System Joint Forward Plan, which focuses on integrated care and preventative services.

## **8. SUMMARY OF CONSULTATIONS AND OUTCOME**

8.1 The following Internal Council units, Officers and/or other organisations have been consulted in preparing this report:

- Portfolio Holder for Housing & Regulatory Services and Portfolio Holder for Finance
- Chief Executive
- Executive Director for Resources
- Deputy Chief Executive & Executive Director for Environment
- Finance Business Partner - Environment & Strategic
- Strategic Asset Group
- Temporary Accommodation Working Group Taskforce
- Property Services
- Procurement Team
- Children's Services Management
- In-house and External Building Surveyers

8.2 Please note that further formal consultation will be included as part of the planning process.

## 9. **COUNCILLOR VIEWS**

- 9.1 Presentations have been shared with the Mayor, Portfolio holder for Housing & Regulatory Services, Portfolio Holder for Finance, as well as the wider Cabinet.
- 9.2 Ward Councillors were consulted for Kinsgbrook Ward and Queens Park, including site visits and meetings, all concerns raised have been suitably considered as part of the proposals.

## 10. **CONTACTS AND REFERENCES**

Report Contact Officer:	John Molyneux, Service Director Regulation, Housing & Customer Contact <a href="mailto:John.molyneux@bedford.gov.uk">John.molyneux@bedford.gov.uk</a>  Anna Robbani, Head of Housing Homelessness and Customer Services <a href="mailto:Anna.Robbani@bedford.gov.uk">Anna.Robbani@bedford.gov.uk</a>  David Genery, Manager for Specialist Housing Provision, <a href="mailto:David.genery@bedford.gov.uk">David.genery@bedford.gov.uk</a>
Declarations of Interest by the Report Author:	N/A
File Reference:	TA_Mod_BC_25.10
Previous Relevant Minutes:	None
Background Papers:	None
Appendices:	<a href="#">Appendix A: Equality Impact Assessment</a>  <a href="#">Appendix B: Capital Business Case</a>

**Equality Analysis Report:**

<b>Title of activity</b> Temporary accommodation modular housing	
<b>Service area</b> Housing	<b>Lead officer</b> Housing Review and Quality Officer Rebecca Franklin
<b>Approved by</b> Head of Housing, Homelessness and Customer Services Anna Robbani	<b>Date of approval</b> 23/10/2025
<b>Introduction:</b>  Under the Equality Act 2010, Bedford Borough Council must have due regard to the need to: <ul style="list-style-type: none"> <li>a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by, or under the Act</li> <li>b) Advance equality of opportunity between those with a protected characteristic and those without</li> <li>c) Promote good relations between those with a protected characteristic and those without</li> </ul> The 'protected characteristics' referred to are: <ul style="list-style-type: none"> <li>• age;</li> <li>• disability;</li> <li>• gender reassignment;</li> <li>• pregnancy and maternity;</li> <li>• race;</li> <li>• religion or belief;</li> <li>• sex;</li> <li>• sexual orientation.</li> <li>• marriage and civil partnership</li> </ul>	

The equalities impact assessment set out below, considers the impact of the changes to the Allocation Policy on the protected groups and, where there is an impact, sets out the justification for continuing with the Policy change and any actions the Council will take to reduce any impact that has been identified.

This EQIA considers the proposed modular housing programme and assesses the impact on those applicants/households within the protected characteristic groups. The assessment considers whether any assessed impact is a positive, negative or neutral impact and sets out what steps Bedford Borough Council has taken or will take to reduce any impact identified.

### **Description of activity:**

Temporary accommodation demand is high (currently 870 placements), creating an urgent need for additional units.

The modular housing programme will provide high-quality homes for customers requiring temporary accommodation. This project includes:

- 24 two bedroom modular homes at London Road, designed for families
- 22 one and two bedroom modular homes at Old Ford End Road.

The development will:

- Increase the supply of affordable, well managed, high-quality housing
- Enable the Council to adopt a family-first approach to combatting homelessness.
- Feature an office support hub to provide casework and a range of tenant services, including assistance with housing benefits, tenancy sustainment, housing advice, family liaison, education, budgeting, job support, digital assistance and mental health services.

The scheme aims to:

1. Eliminate discrimination by ensuring that these Temporary Accommodation homes are allocated fairly and by assessment under the Homelessness Act 2017 which is compliant to the Equality Act 2010 to those households to whom we have a statutory duty.
2. Advance equality by increasing supply of quality homes and support which reduces the societal inequality of homelessness
3. Foster good relations by creating mixed, well managed housing communities that are located in places that enable integration into wider residential neighbourhoods in Bedford.

### **Relevance Test**

1. The outcomes of the activity directly and significantly impact on people, e.g. service users, employees, voluntary and community sector groups.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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2. The activity could / does affect one or more protected equality groups.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
3. The activity could / does affect protected equality groups differently.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4. One or more protected equality groups could be disadvantaged, adversely affected or are at risk of discrimination as a result of the activity.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
5. The activity relates to an area where there are known inequalities.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
6. The activity sets out proposals for significant changes to services, policies etc. and / or significantly affects how services are delivered.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
7. The activity relates to one or more of the three aims of the Council's equality duty.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
8. The activity relates to the Council's Corporate Plan objectives, is a significant activity and / or presents a high risk to the Council's public reputation.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
9. An equality analysis of this activity is required.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

### Scope of equality analysis

<b>Who is / will be impacted by the activity's aims and outcomes?</b>	<p>Who will be affected?</p> <ul style="list-style-type: none"> <li>Households experiencing homelessness</li> <li>Wider community through reduced homelessness and increased community stability</li> <li>Wider community in the neighbourhood living in the vicinity of the schemes</li> <li>Staff and service providers: Those working in housing support, casework, and tenant services.</li> </ul>
<b>Which particular protected equality groups are likely / will be affected?</b>	<p>Customers of temporary accommodation may have any of the nine protected characteristics and so all groups may be directly affected by the use of modular housing. However, it is recognised that certain protected characteristic groups are particularly impacted by homelessness and therefore it is anticipated that the scheme will particularly affect the following groups:</p> <ol style="list-style-type: none"> <li><b>Sex:</b> 56% of current temporary accommodation customers are women who may be more likely to experience homelessness as a result of domestic abuse or caring responsibilities as a lone parent.</li> <li><b>Pregnancy and maternity:</b> The Homelessness Act 2017 grants an automatic priority need for anyone homeless that is pregnant or with dependent children recognising the particular vulnerability.</li> </ol>

	<p>3. <b>Disability:</b> 38% of current temporary accommodation customers declared a disability (as compared to 15% of the general population – Census 2021) showing that disabled customers may be disproportionately impacted by homelessness. This may be due to low supply of accessible accommodation or financial hardship. This includes those with a disability who have a housing need (e.g. needing adaptations/ground floor access or move on from supported accommodation)</p> <ul style="list-style-type: none"> <li>- Physical or mobility</li> <li>- Mental Health</li> <li>- Learning disability including neurological diversity (e.g. move on from supported accommodation)</li> <li>- Sensory impairment (blind / deaf)</li> </ul> <p>4. <b>Age:</b> Customers of all ages require temporary accommodation but the nature of the accommodation could affect age groups in different ways. Those over 55 including the elderly (14% of those in current temporary accommodation placements) are more likely to need supportive adaptations or conversely young adults (15% of those in current temporary accommodation placements) are more likely to require additional tenancy support if inexperienced with independent living.</p>
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#### Evidence, data, information and consultation

<p><b>What evidence have you used to analyse the effects on equality?</b></p>	<p>In addition to the legislation and case law governing allocations, regard has been had to the government guidance on the allocation of housing, the Equality Act 2010 and recent case law on the operation of Section 149 of that act.</p> <p>This analysis has been developed using a wide range of data collected by officers capturing essential demographic information, assess household circumstances and housing needs as follows:</p> <ul style="list-style-type: none"> <li>• The current cohort applying as homeless, (October 2025)</li> <li>• The current cohort in temporary accommodation, (October 2025)</li> <li>• Housing register waiting list and lettings statistics locally (October 2025)</li> <li>• Census Data for 2021</li> <li>• Temporary Accommodation Review Findings conducted by the Budget and Corporate Overview and Scrutiny Committee 2024 which included resident feedback.</li> </ul> <p>It is recognised that there are limitations in the data that Bedford Borough Council currently has and that it is not a comprehensive set of data for all homeless households. This is because it is not data captured explicitly as a stand-alone equalities questionnaire but rather information gathered as part of the homeless application assessing household circumstances and need. Consequently, certain protected characteristic information are not routinely captured as part the assessment (gender reassignment, religion or belief and sexual orientation). These may be noted manually case by case. Many applicants also choose not to complete the equalities data. Therefore this should be taken as indicative only.</p> <p>It is important to note that the data reflects demographic information for the primary household member (the main homeless applicant) and represents a snapshot of the temporary accommodation situation on the specific day the report was compiled.</p> <p>In the follow up actions the Council recognises the need to introduce a stand-alone equalities questionnaire as a part of the application process providing the customer with an explanation of the purpose for gathering the data and the intent to anonymise it.</p> <p>Please see below for protected characteristic data for those customers currently in temporary accommodation.</p> <p><b><u>Sex</u></b></p> <p>Women, particularly those heading single-parent households, are more likely to be economically inactive, earn low wages, and experience poverty. Women are statistically at higher risk of domestic abuse experience which can cause homelessness. These factors increase their vulnerability to statutory homelessness. Childcare and caring</p>
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responsibilities are relevant to location. Affordability of accommodation and utilities and access to support and services is key to reducing inequality.

The current placements in temporary accommodation identify sex in the following data

Female	496	56%
Male	353	40%
Not recorded	30	3%
Other (Please specify)	2	0%
Prefer not to say	2	0%

The majority of those in temporary accommodation (56%) are women (40% are men). The remaining customers did not share this information.

National and local evidential data shows that women are disproportionately affected by domestic abuse and therefore likely to be more affected in a positive way by proposed safe and secure accommodation in this regard. Where the reason for the loss of settled accommodation is stated as being domestic abuse, the following data is relevant:

Female	117	81.82%
Male	26	18.18%
<b>Grand Total</b>	<b>143</b>	<b>100.00%</b>

Nationally over 80% (83%) of high frequency victims (more than 10 crimes) are women. (From a study of data from the Crime Survey for England and Wales, a nationally representative household survey.) (Walby & Towers, 2018) In the year ending March 2019, the majority of defendants in domestic abuse-related prosecutions were men (92%), and the majority of victims were female (75%). 16% of victims were male and in 10% of cases the sex of the victim was not recorded. (ONS, 2019).

Locally, in the period April 2018 – March 2019, Bedfordshire Police recorded 3766 Domestic Abuse Crimes and Incidents in Bedford Borough, an increase of 10.9% and an average of more than 72 per week on the previous year. The Bedford Borough MARAC holds monthly meetings where an average of 28 cases are heard every

month. During the period from April 2019 – March 2020 there were 327 cases presented to the Bedford Borough MARAC with a total of 549 children impacted by domestic abuse in those households.

Increasing supply of family sized accommodation and support services generally will help to address the inequalities women experience as a result of homelessness.

### **Age**

Younger and older people may access services differently due to a range of factors, including:

- Use of technology – Younger people may prefer or be more comfortable with digital platforms, while older individuals may require support or alternative, non-digital options.
- Caring responsibilities – Parents or carers, including young parents or older carers, may face challenges due to childcare or care for other dependants.
- Timings and flexibility – Work patterns, shift work, or retirement may influence availability to engage with services.
- Transport arrangements – Access to reliable and affordable transport may vary by age, particularly impacting older adults or young people without private transport. Economic status may be relevant to this.
- Older persons may need adaptations (such as rails to prevent falls) or parking availability for carer visits. Younger persons new to a tenancy may need additional tenancy sustainment support through the Hub.

Venue location – Proximity and accessibility of service locations are critical, especially for those with mobility issues or limited local transport options. Out of area placements may be detrimental to customers with these protected characteristics.

The current primary household members in temporary accommodation are broken down into the following age ranges:

18-24	132	14.93%
25-40	384	43.44%
41-54	249	28.17%
Over 55	119	13.46%
<b>Grand Total</b>	<b>884</b>	<b>100.00%</b>

Ages of those in temporary accommodation placements are fairly evenly spread from age 25 to 54 with only 14.93% in the younger age bracket of 18 – 24 and 13.46% in the older bracket of 55 and over. National labour market data shows that young people are more likely to be employed on zero hour contracts. This is relevant to the programme in terms of affordability. Support from the on-site hub will be positive for those who require non digital support.

Provision of additional temporary accommodation with support on site and a number of units with adaptations for the elderly will reduce inequalities experienced by this group as a result of homelessness.

There were 884 children at time of application in temporary accommodation. Children in temporary accommodation experience disadvantage particularly due to poor property standards, disrupted access to education if placements are out of area.

None	484	54.75%
1	146	16.52%
2	113	12.78%
3	63	7.13%
4	28	3.17%
5	17	1.92%
6	1	0.11%
7	1	0.11%
8	1	0.11%
Not stated	30	3.39%
<b>Grand Total</b>	<b>884</b>	<b>100.00%</b>

55% of household reported they have no dependants and there household consists of a single person or couples. 42% reported they have 1 or more dependant children. For 3% of households this data is not recorded.

For households where males are the primary household member the number with no dependents is recorded as 81%, where females are the primary household member the number with no dependents is recorded as 40%.

The proposal aims to reduce this disadvantage by providing a families first focused setting for temporary accommodation in Bedford itself.

### **Disability Data**

Of the general Bedford Borough population 15.28 % of ages 16 - 64 are in the protected disability category. (2021 Census).

Homelessness data on disability is limited. Applicants may declare and tick more than one category on the disability list. Therefore, the data is not clear how many people in total have a disability as it is not possible to eliminate the likelihood of duplication across categories. 39% of applications currently ticked yes to state they have a disability.

### **Customer considers they have a disability?**

No	410	46.4%
Yes	343	38.8%
Not stated	131	14.8%
<b>Grand Total</b>	<b>884</b>	<b>100.00%</b>

Modular housing will consider the physical needs of customers by providing accessible accommodation. Households currently placed in poor-quality, isolated temporary accommodation face risks including mental health deterioration, disrupted education, and lack of access to services. Purpose-built modular homes will offer safe, stable environments with integrated support.

### **Pregnancy and Maternity**

It is worth noting that there are reported 77 households in temporary accommodation currently that include a pregnant woman. As it is not necessarily the main or primary applicant that is pregnant (but could be a household member) the reporting data from the system is limited and thus should be taken as indicative only. Furthermore, it is difficult to capture direct correlation data on those in this group have had their child since the application as homeless was made.

At the time of application 3.71% of applicants reported that a household member was pregnant when approaching the service.

Pregnant?		
No	2048	96.29%
Yes	77	3.71%
<b>Grand Total</b>	<b>2125</b>	<b>100.00%</b>

Provision of self contained temporary accommodation located in urban areas reduces the risk of reliance on hotel style accommodation or out of Borough placements with poor support network or cooking facilities. This proposal reduces potential health and financial inequalities experienced by this group as a result of homelessness.

#### **Ethnicity and Nationality**

Any other ethnic group	11	1.2%
Any other white background	90	10.2%
Arab	6	0.7%
Asian any other	18	2.0%
Asian Bangladeshi	21	2.4%
Asian Indian	24	2.7%
Asian Pakistani	24	2.7%
Black African	68	7.7%
Black any other	4	0.5%
Black or black British Caribbean	24	2.7%
Chinese	1	0.1%
Irish	5	0.6%
Mixed Other / multiple ethnic background	11	1.2%
Mixed white & black African	5	0.6%
Mixed white & black Asian	3	0.3%

Mixed white & black Caribbean	41	4.6%
White British	332	37.6%
Not stated/refused	196	22.2%
<b>Grand Total</b>	<b>884</b>	<b>100.00%</b>

Of the general population in Bedford Borough on ethnicity: 22.95% of the population was from a black or minority ethnic community (non-White British) with 77.05% as white British in the 2021 Census.

It is worth noting that a significant proportion of applicants either refused to provide this data or it was not collected. This does affect the accuracy of the data analysis. This is contextual data only as the nomination / allocation of temporary accommodation is assessed under the Homelessness Reduction Act 2017 which is fully compliant with the Equality Act and does not discriminate on ethnic grounds.

### **Economic status**

Whilst not a protected characteristic, this is relevant to social mobility and equalities more generally and so has been included.

Homeless customers residing in temporary accommodation are disproportionately represented in terms of those on low incomes, either job seekers or unable to work due to sickness. 22.8% of homeless customers in temporary accommodation are currently recorded as in some form of employment. This compares with Census information that shows an employment rate of 57.2% of the working-age population (16 and over) in England and Wales.

The on-site hub will offer support and signposting to enable customers to maximise their chances of employment and the opportunity to improve their prospects of sustaining a tenancy in the future. The location of sites has been selected on main public transport networks in the urban centres to enhance access to education or employment.

### Employment status of primary applicant for customers currently residing in temporary accommodation

Cannot work (long term sickness or disability)	152	17.2%
Has a child under 18	15	1.7%
Full-time employment	103	11.7%
Full-time student	13	1.5%
Job seeker	233	26.4%
Not seeking work	146	16.5%
Other adult	4	0.3%
Part-time employment	81	9.2%
Retired	8	0.9%
Self-employed	10	1.1%
Zero hours contract	7	0.8%
Not stated	112	12.7%
<b>Grand Total</b>	<b>884</b>	<b>100.00%</b>

### Gender reassignment

Data on this protected characteristic is not collected in a meaningful way which enables the analysis of data to be completed. The limited availability of data regarding how gender assigned or transgender applicants experience housing-related issues makes it challenging to accurately assess potential impacts. It is recognised that this is a significant limitation in this analysis and that further research is required as a follow up action with local LGBTQT advocacy groups in Bedford Borough and that as a protected characteristic this should be included in the data capture on the form for future research on equalities.

### Sexual Orientation

There is not currently any meaningful data on sexual orientation captured as part of the application. This is included in the application however applicants may choose not to declare this information. It is recognised that this

	<p>is a significant limitation in this analysis and that further research is required as a follow up action with local LGBTQT advocacy groups in Bedford Borough and that as a protected characteristic this should be included in the data capture on the form for future research on equalities.</p> <p><b><u>Religion and belief</u></b></p> <p>The limited availability of data regarding how individuals of specific religions or beliefs (including those with no religion or belief) experience housing-related issues makes it challenging to accurately assess potential impacts.</p> <p>However, the location of both proposed housing developments are within short travel distance from a wide range of places of worship fostering good relations between communities.</p> <p><b><u>Marital Status</u></b></p> <p>Data on this protected characteristic is not collected in a meaningful way which enables the analysis of data to be completed. The limited availability of data regarding the marital status of those customers who experience housing-related issues makes it challenging to accurately assess potential impacts.</p>
<b>Consultation</b>	<p>In 2024 the Budget and Corporate Overview and Scrutiny Committee conducted a review of homelessness and temporary accommodation which can be reviewed at the link below:  <a href="https://councillorsupport.bedford.gov.uk/documents/g6323/Public%20reports%20pack%2029th-Feb-2024%2018.30%20Budget%20and%20Corporate%20Services%20Overview%20and%20Scrutiny%20Commit.pdf?T=10">https://councillorsupport.bedford.gov.uk/documents/g6323/Public%20reports%20pack%2029th-Feb-2024%2018.30%20Budget%20and%20Corporate%20Services%20Overview%20and%20Scrutiny%20Commit.pdf?T=10</a></p> <p>During the review, the Committee sought the views of several partners (local homelessness charities and supported accommodation providers). A survey of individuals living in temporary accommodation was also conducted. The issues raised undermine the advancement of equality and create disadvantages to groups affected by homelessness with a wider impact on whole communities. Implementation of the recommendations should foster good relations, build communities and advance equality.</p> <p>Key findings:</p> <ul style="list-style-type: none"> <li>• Lack of temporary accommodation provision</li> <li>• Poor property standards having an adverse impact on customers</li> <li>• Lack of support available to customers in temporary accommodation resulting in isolation</li> </ul>



	<ul style="list-style-type: none"> <li>• Poor welfare outcomes for those staying in hotel or bed and breakfast accommodation without cooking facilities adversely affecting health and financial wellbeing</li> <li>• Location of placements for those out of town or distant from amenities also results in disruption to access of education impacting young people, employment impacting those of working age and undermining social mobility or reducing access to places of worship which may have an adverse impact on equality of religious expression.</li> </ul> <p>Recommendations of the review:</p> <ul style="list-style-type: none"> <li>• Commitment to investment and acceleration in the provision of properties (such as modular housing) to increase supply</li> <li>• Improve governance and inspection to ensure suitability and quality of accommodation</li> </ul>
<b>What does this evidence tell you about the different protected groups?</b>	<p>The impact of poor property standards and lack of available quality accommodation affects all homeless customers needing temporary accommodation of all protected characteristics. However, the nature of those welfare concerns have a particularly significant hardship impact on certain protected groups. For example:</p> <ul style="list-style-type: none"> <li>• Lack of cooking facilities impacts families with children, the elderly and pregnant women</li> <li>• Isolated placements has a particularly adverse impact on those with support needs such as young people who have never experienced an independent tenancy before or those with mental health struggles in the disability protected group.</li> <li>• Out of town placements undermines good community relations which is to be advanced under the Equality Act 2010.</li> </ul>
<b>What further research or data do you need to fill any gaps in your understanding of the potential or known effects of the activity?</b>	<p>The Council will undertake further public consultation and detailed analysis as part of the planning process consultation which will follow in the event the proposal is accepted.</p> <p>The Council recognises the need for a stand-alone equalities questionnaire in addition to the data captured as part of the homelessness application process in order to improve the quality of information and analysis. More information is needed about sexuality and gender reassignment, for example and religion, belief which are protected characteristic information not currently routinely collected. Given that these are reliant on the self-disclosure of sensitive issues the comprehensive gathering of this type of data may not be achievable but the information can be improved through a proactive approach by the Council.</p>

## General Equality Duty

Which parts of the general equality duty is the activity relevant to?			
	Eliminate discrimination, harassment and victimisation	Advance equality of opportunity	Foster good relations
Age	<p>The allocation policy is aligned to the Homelessness Reduction Act and does not discriminate by age. Vulnerable groups in elderly or younger people that are care leavers for example are an automatic priority need with access to the temporary accommodation.</p> <p>Adaptations for the elderly and tenancy or children's service support on site for younger people will be available will support accessibility.</p>	<p>The proposed temporary accommodation provision will be supported by the Council's fulfilment of its statutory duties and will aim to ensure equal access to higher-quality housing for all eligible applicants.</p> <p>The proposal aims to promote balanced, inclusive and sustainable communities that benefit all.</p> <p>Providing good quality homes to individuals disproportionately affected by age, offering opportunities to promote equity for those who face barriers accessing digital services, experience isolation, or lack adequate local support. Town centre location and hub services enhance these opportunities.</p>	<p>The support hub will be a positive step forward, making advice and assistance available to older or younger customers who require additional assistance in person.</p> <p>The proposal to increase the stock of accessible, safe and affordable units is inclusive and aims to promote good relations between individuals with protected characteristics, by ensuring housing needs are met equitably across all groups.</p>
Disability	<p>Ensuring the needs of disabled people are considered</p> <p>A proportion of units will be wheel chair accessible with allocated parking space. The support hub and offices on site will also be accessible for those with physical disabilities and</p>	<p>The proposed temporary accommodation provision will be supported by the Council's fulfilment of its statutory duties and will aim to ensure equal access to higher-quality housing for all eligible applicants.</p>	<p>The proposal to increase the stock of accessible, safe and affordable units is inclusive and aims to promote good relations between individuals with protected characteristics, by ensuring housing needs are met equitably across all groups.</p>

	<p>information provided on site will include links to hearing or sight impaired additional support.</p>	<p>The proposal aims to promote balanced, inclusive and sustainable communities that benefit all.</p> <p>Modular housing will increase the supply of accessible housing, providing suitable and affordable accommodation. The support hub offers holistic support to customers experiencing physical or mental health issues.</p>	
Gender reassignment	<p>Ensuring the needs of gender reassigned people are considered</p>	<p>The proposed temporary accommodation provision will be supported by the Council's fulfilment of its statutory duties and will aim to ensure equal access to higher-quality housing for all eligible applicants.</p> <p>The proposal aims to promote balanced, inclusive and sustainable communities that benefit all.</p>	<p>The proposal to increase the stock of accessible, safe and affordable units is inclusive and aims to promote good relations between individuals with protected characteristics, by ensuring housing needs are met equitably across all groups.</p>
Pregnancy and maternity	<p>Ensuring the needs of pregnant applicants are considered. The units will be self-contained with cooking facilities.</p>	<p>The proposed temporary accommodation provision will be supported by the Council's fulfilment of its statutory duties and will aim to ensure equal access to higher-quality housing for all eligible applicants.</p> <p>The proposal aims to promote balanced, inclusive and sustainable communities that benefit all.</p>	<p>The proposal to increase the stock of accessible, safe and affordable units is inclusive and aims to promote good relations between individuals with protected characteristics, by ensuring housing needs are met equitably across all groups.</p>

		Modular housing reduces reliance on hotel accommodation, which the Homelessness Code of Guidance identifies as unsuitable for pregnant women and households with dependent children.	
Race	Ensuring the needs of applicants of all ethnicities are considered	<p>The proposed temporary accommodation provision will be supported by the Council's fulfilment of its statutory duties and will aim to ensure equal access to higher-quality housing for all eligible applicants.</p> <p>The proposal aims to promote balanced, inclusive and sustainable communities that benefit all.</p>	The proposal to increase the stock of accessible, safe and affordable units is inclusive and aims to promote good relations between individuals with protected characteristics, by ensuring housing needs are met equitably across all groups.
Religion or belief	Ensuring the needs of applicants of all religion and belief are considered	<p>The proposed temporary accommodation provision will be supported by the Council's fulfilment of its statutory duties and will aim to ensure equal access to higher-quality housing for all eligible applicants.</p> <p>The proposal aims to promote balanced, inclusive and sustainable communities that benefit all.</p> <p>The town centre location of the modular housing is a positive feature, allowing residents easier access to their places of worship.</p>	The proposal to increase the stock of accessible, safe and affordable units is inclusive and aims to promote good relations between individuals with protected characteristics, by ensuring housing needs are met equitably across all groups.

Sex	Ensuring the needs of women (in regard to domestic abuse and income) are considered.	<p>The proposed temporary accommodation provision will be supported by the Council's fulfilment of its statutory duties and will aim to ensure equal access to higher-quality housing for all eligible applicants.</p> <p>The proposal aims to promote balanced, inclusive and sustainable communities that benefit all.</p> <p>The modular accommodation provides a safe, secure, and affordable housing option, particularly for customers who have experienced domestic abuse. The on-site support hub includes a presence from children's services and offers advice to help customers sustain their tenancies effectively.</p>	The proposal to increase the stock of accessible, safe and affordable units is inclusive and aims to promote good relations between individuals with protected characteristics, by ensuring housing needs are met equitably across all groups.
Sexual orientation	Ensuring the needs of applicants of all sexual orientations are considered	<p>The proposed temporary accommodation provision will be supported by the Council's fulfilment of its statutory duties and will aim to ensure equal access to higher-quality housing for all eligible applicants.</p> <p>The proposal aims to promote balanced, inclusive and sustainable communities that benefit all.</p>	The proposal to increase the stock of accessible, safe and affordable units is inclusive and aims to promote good relations between individuals with protected characteristics, by ensuring housing needs are met equitably across all groups.
Marriage & civil partnership	Ensuring the needs of applicants of all relationship status are considered	The proposed temporary accommodation provision will be supported by the Council's fulfilment of its statutory duties and will aim to	The proposal to increase the stock of accessible, safe and affordable units is inclusive and aims to promote good relations between individuals with

		<p>ensure equal access to higher-quality housing for all eligible applicants.</p> <p>The proposal aims to promote balanced, inclusive and sustainable communities that benefit all.</p> <p>A range of units will be available to accommodate the varied household sizes.</p>	protected characteristics, by ensuring housing needs are met equitably across all groups.
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### Impact on equality groups

Based on the evidence presented what positive and negative impact will your activity have on equality?				
	Positive impact	Negative impact	No impact	Explanation
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Positive Impact: Ensuring housing design is age-friendly, with accessibility features for all age groups. Support services tailored to different age needs offered at the hub.
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Positive Impact through increased provision: The modular housing project ensures homes offered as temporary accommodation comply with accessibility standards and offer adaptations as needed. Specialised support through is provided through the on-site support hub.
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Neutral Impact. There are no sections of the programme anticipated to have any impact on gender reassignment however staff guidance and training will be provided to ensure on site team are sensitive to the needs of transgender customers.

Pregnancy and maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Positive Impact through increased provision. The on-site hub will be available to provide advice and assistance including benefits and support services available to pregnant women.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Neutral Impact. There are no sections of the programme anticipated to have any impact on race.
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Neutral Impact. There are no sections of the programme anticipated to have any impact on religion or belief.
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Positive Impact: The data demonstrates that there are significantly more women applying as homeless as men. Hub access will enable them to gain holistic support and enable those who have experienced domestic abuse to feel safe and secure in their home.
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Neutral Impact: There are no indications that the programme is anticipated to have any impact on sexual orientation.
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Neutral Impact: There are no indications that the programme is anticipated to have any impact on marriage or civil partnerships.
Other relevant groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NA

### **Commissioned services**

<b>What equality measures will be included in Contracts to help meet the three aims of the general equality duty?</b>	Design of support services and nomination processes will take into consideration the public sector equality duty. Further analysis will take place when more details on scheme are in place.
<b>What steps will be taken throughout the commissioning cycle to meet the different needs of protected equality groups?</b>	Not applicable.

## Actions

	What will be done?	By who?	By when?	What will be the outcome?
<b>Actions to lessen negative impact</b>	<ul style="list-style-type: none"> <li>• Ensure build programme accommodates the relevant accessibility requirements (e.g. units for disabled access)</li> <li>• Design nomination and support services to take public sector equality duty into account and prevent discrimination.</li> </ul>	<p>Project Lead for Modular Housing Programme</p> <p>Manager for Specialist Housing Provision</p>	Feb 27	<p>Provision meets equalities requirements</p> <p>Nomination process and support service compliant with equality duties.</p>
<b>Actions to increase positive impact</b>	<ul style="list-style-type: none"> <li>• Partnership working to design support services on site to advance equalities</li> <li>• Ensure all staff have completed training</li> </ul>	Manager for Specialist Housing Provision	Feb 27	Enhanced support services
<b>Actions to develop equality evidence, information and data</b>	More detailed analysis into demographics of customers in temporary accommodation, including former placements over a longer period of time. Data analysis of support needs to ensure services are appropriate to the needs of the customers group.	Housing Review and Quality Officer	Dec 26	Data insights to support future working practices.
<b>Actions to improve equality in procurement / commissioning</b>	Not applicable.			
<b>Other relevant actions</b>	Not applicable			



### **Recommendation**

<b>No major change required</b>	<input checked="" type="checkbox"/>	
<b>Adjustments required</b>	<input type="checkbox"/>	
<b>Justification to continue the activity</b>	<input type="checkbox"/>	
<b>Stop the activity</b>	<input type="checkbox"/>	

### **Summary of analysis**

In preparing this report, due consideration has been given to the Borough Council's statutory Equality Duty as set out in Section 149(1) of the Equality Act 2010, to have due regard to the need to;

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The equality analysis concludes that the modular housing programme holds no potential for discrimination and has positively responded to areas of disadvantage to advance equalities and foster good relations identified through service data.

### **Monitoring and review**

<b>Monitoring and review</b>	<b>Review date</b>
Modular housing to be reviewed once project completed and occupied by Head of Housing, Homelessness and Customer Services	<b>March 2027</b>

## **BUSINESS CASE FOR CAPITAL PROJECTS**

All Capital Projects need to complete this business case template for Strategic Asset Group (SAG) to review. No work can commence until the projects receive Full Council approval and subsequent sign-off by the Assistant Chief Executive (Finance).

<b>Project Title</b>	Modular Housing Programme		
<b>Directorate</b>	Environment	<b>Project Sponsor</b>	Anna Robbani
<b>Project Manager</b>	Sanjay Chambers	<b>Service area</b>	Housing
<b>Anticipated Start Date</b>	TBC	<b>Anticipated End Date</b>	TBC
<b>Estimated Capital Costs</b> (and year of estimates)	£8.56m		
<b>What is the expected life of the project?</b> (or time before further capital expenditure is required)	Once construction commences the new site is estimated to take a year to complete and it will provide a permanent capital asset for the Council with an expected lifespan of 80 years plus (60 year guarantee)		

### **Section A – Overview**

<b>1. PROJECT DESCRIPTION</b>	
What is the project? Where will the project take place?	<p><b>To develop 46 units of good quality modular homes</b> as follows:</p> <ul style="list-style-type: none"> <li>24 two-bedroom modular homes at London Road on the existing depot site for families</li> <li>22 one- and two-bedroom modular homes at Old Ford End Road, Enterprise House site, currently used by Youth Services</li> </ul>
What are the expected outcomes?  How will those outcomes be measured?	<ul style="list-style-type: none"> <li><b>To provide good quality homes</b> that are cost effective and well-managed. Measured through a property maintenance contract)</li> <li><b>To create a supported temporary accommodation setting</b> with families first support, working with partners to assist customers with rehousing options as well as access a range of holistic support. (Measured through customer casework outcome data)</li> <li><b>To ensure the long-term financial sustainability</b> of temporary accommodation within Bedford Borough. TA spend remains a strategic risk for the Council due to a rising demand locally and nationally coupled with Bedford Borough's high dependence for placements in commercial accommodation, which is subject to market rate volatility and fluctuation places the Council under intense pressure as a non-housing stock holding Council. Manage costs of running the site, support and borrowing revenue costs through income charged as rent. (Measured through regular budget monitoring cycles)</li> </ul>

## 2. JUSTIFICATION FOR PROPOSAL

How will this scheme support the Council / Service priorities or compliance with legislation?

Approval of the proposal would assist in **tackling demand for emergency accommodation** which remains high with the current snapshot being 869 TA placements (September 2025), of which 90% are placed in high-cost private nightly rate settings on the open market. There is a national rising demand trend, up 12% compared to previous year, with the latest Government data stating “...*the number of households in temporary accommodation on the 31 March 2025 is at record levels following continuing increases, including increases in families placed into B&B or hotel settings...*”

To provide **good quality, better managed accommodation** and mitigate health and safety risks as identified in a recent temporary accommodation audit, housing committee and overview and scrutiny committee meetings, the local press and through the corporate complaints process.

**To create a ‘families first’ supported temporary accommodation setting.** This aligns to corporate strategic aims and policy priorities to support individuals and families with a particular focus on health and wellbeing. The proposals include provision of a hub location for increased engagement with key support service partners to co-locate to assist through tenancy sustainment and budgeting skills, housing officer support to find permanent settled housing, family liaison, health visitors, education and employment opportunities and mental health support. This ‘wrap around’ holistic support for families will assist in securing better all-round outcomes and opportunities as well as preventing or reducing reoccurrence of crisis. The design of the development as a supported setting will drive indirect reductions in cost in children’s, adult’s social and customer hub services.

On balance and having considered the financial return of the project, in conjunction with the overarching benefits that this type of housing provision will provide to some of the most vulnerable members of our communities, progressing with such an acquisition project will **enhance the level of control** the Council will have in terms of **good quality, better managed TA**, as well as **reducing the level of risk exposure** to the Council through the open market/nightly rate provision in the longer term. Given that this proposal is on basis of an ‘invest to save’ principle whereby the payback period can be subject to variation, the proposal still qualifies as an **invest to save** scheme, therefore officers recommend that this acquisition project is approved and taken forward as outlined in the business case.

How will this scheme contribute to revenue savings or additional revenue income?	<p>Approval of the proposal would assist in delivering direct TA revenue <b>cost avoidance (savings) across a range £1.69m to £2.42m (gross, without borrowing cost included) or £487k to £1.22m (net, with capital borrowing cost) per annum</b>, as opposed to using private sector nightly rate or hotel accommodation, thereby reducing TA revenue overspend, the latest forecast being £1.7m overspend. The investment will also include an annual reduction of housing benefit subsidy pressure of c.135k as well as further cost avoidance (saving) to Children's services of c£60k for units used flexibly to include family placements for those with recourse to public funds.</p> <p>Approval of the proposal would strategically <b>reduce reliance on the open market to improve long term financial sustainability</b> as set out:</p> <ul style="list-style-type: none"> <li>• Housing Diagnostic Review (January 2024)</li> <li>• The Homelessness and Rough Sleeping Strategy (June 2024)</li> <li>• The Housing Transformation Programme (June 2024)</li> <li>• CIPFA Resilience Review (September 2025)</li> </ul>
<b>3. ALTERNATIVE OPTIONS</b>	
What alternative options have been considered and why have they been rejected in favour of this bid?	<p>Do nothing – Without further investment into providing new temporary accommodation the Borough will continue to rely on hotels and nightly rate provision which will further increase the TA revenue budget pressure.</p> <p>Construction through traditional means – This option has been reviewed however the timescales associated with the scale of the project would increase by approximately 18-24 months, with a significantly increased build cost associated to a bricks and mortar scheme. Similarly any increase in groundworks and foundations, especially at London Rd, would increase the likelihood of encountering subterranean land contamination and remediation matters.</p> <p>Purchasing housing direct – This option is more costly than the construction of modular housing developments, plus modular construction lends itself to these sites due to their bespoke nature. There is a short fall in housing supply which means alternative methods such as modular housing should be considered where appropriate.</p>
What is the effect of not doing this scheme if the funding does not become available?	Without further investment into providing new temporary accommodation the Borough will continue to rely on hotels and nightly rate provision which will further increase the TA revenue budget pressure.
<b>4. RESOURCING AND DEPENDENCIES</b>	
What are the internal staffing requirements for the project?	A project manager post working collaboratively with project sponsor and operational manager for housing and head of property services.

Will the project have an impact on internal service delivery?	Yes will support operational delivery by offering a supported temporary accommodation setting with staff on site.
What are the staffing requirements from other Bedford Borough Council services?	Support from legal and procurement teams in development of contract.  Finance and Assessment Hub colleagues  Adult's and Children's service collaboration in establishing on site support.
<b>5. COMMERCIAL CASE</b>	
Is a procurement exercise required for the proposal? If so, outline the steps taken at this stage to identify how the project will be delivered.	Yes, following a soft market testing exercise, a procurement exercise was undertaken filtering BBC's requirements for "Modular Housing" against the SHED 4 Framework, which confirmed the availability of a single supplier to meet our requirement via a direct award process as a compliant route to meet the urgent requirements.
What procurement milestones are required to deliver this project for the estimated start date?	A procurement exercise will be required to direct award a construction contractor to deliver the development.

## Section B – Financial Case

<b>FINANCIAL SUMMARY</b>	
<b>1. Invest to Save</b>	
A definition is given in Appendix B	
Is this an 'Invest to Save' bid?	Yes
<i>If yes:</i>	
What is the annual revenue saving?	Range between £487k and £1.6m (including the cost of borrowing)
What is the payback period? (years)	Range between 5 years and 17 years
Does this meet the requirement of a 6% rate of return?	N/A
<b>2. Capital Costs</b>	
On what basis have capital costs been estimated?	The estimates are based on a detailed indicative assessment of the current draft plans for the development by the project manager in collaboration with external surveyor and contractor.
What are the risks relating to how these may compare with actual costs?	There are unknown construction/ demolition issues that may arise from existing ground works and buildings on site. To mitigate this risk surveys have been commissioned and are being reviewed throughout the project programme and a contingency has been included within the cost estimate.

<b>Anticipated Gross Costs of the Project</b>						
These will determine how the capital budget is allocated within the financial system						
	<b>2025/26 £000</b>	<b>2026/27 £000</b>	<b>2027/28 £000</b>	<b>2029/30 £000</b>	<b>2030 onwards</b>	<b>TOTAL £000</b>
Land works		110				
Building works		7497				
Professional Fees		2961				
Vehicles		0				
Plant / Equipment / Furniture		0				
IT Hardware		0				
Software & Licences		0				
Capital Grant to 3 <sup>rd</sup> Parties		0				
Contingency		656				
<b>TOTAL COST</b>		<b>8,560</b>				

<b>3. Source of funding</b>						
List here the funding sources. Evidence should be attached where possible.						
1						
Specific Government Grant <i>Specify -</i>						
Developers Contribution **						
Lottery / Heritage						
Other sources (specify)						
<b>EXTERNAL FUNDING</b>						
Direct Revenue Financing						
Capital Receipts						
Borrowing *		<b>8,560</b>				
<b>INTERNAL FUNDING</b>						
<b>TOTAL FUNDING</b>		<b>8,560</b>				

\* Borrowing is the balance of funding required to fund the project

\*\* In the case of non-cash contributions (e.g. land donation), please gross up the figures in the funding table to show a cash equivalent figure (estimate) and provide a brief note in 'Other Comment

<b>4. Revenue impact of the project</b>						
List here the incremental year-on-year impact on the revenue budget						
<b>TYPE OF EXPENDITURE</b>	<b>2025/26 £000</b>	<b>2026/27 £000</b>	<b>2027/28 £000</b>	<b>2029/30 £000</b>	<b>2030 onwards</b>	<b>TOTAL £000</b>
Staffing costs (includes tenancy sustainment, support staff and security/concierge)		<b>101</b>	<b>404</b>	<b>404</b>	<b>404</b>	
Other running costs (e.g property management, maintenance, void		<b>135</b>	<b>541</b>	<b>541</b>	<b>541</b>	

cost and bad debt assumptions)						
Income through rent and service charge		(360)	(1443)	(1443)	(1443)	
<b>Net impact (excl schools)</b>		(124)	(498)	(498)	(498)	
Net impact to schools						

Investment in modular homes will deliver direct TA revenue cost avoidance (savings) across a range of £1.69m to £2.42m (gross, without borrowing cost included) or £487k to £1.22m (net, with capital borrowing cost) per annum. This is calculated as a comparator to the cost of using private sector nightly rate or hotel accommodation using the rates on a range as shown below (multiplied by the number of placements for 365 nights). This calculation is then adjusted to take account of subsidy pressure, the cost of borrowing and rent chargeable. Investment will also include an annual reduction of housing benefit subsidy pressure of c.135k as well as further cost avoidance (saving) to Children's services of c£60k for units used flexibly to include family placements for those with recourse to public funds. Rents will be set to ensure that income recouped enables the units to be financially viable and self-sustaining, including the cost of borrowing, maintenance, repairs, staffing and 5% void churn.

The cost benefits achievable are shown below (per annum full year effect) on a range to reflect the nature of dependence on a fluctuating nightly and hotel open commercial market and rising demand. Return on investment periods should be considered with the life of the asset in mind (80 years plus).

<b>5. Total Cost of the Project</b>						
List here the total cost of project (total of boxes above)						
TYPE OF EXPENDITURE	2025/26 £000	2026/27 £000	2027/28 £000	2029/30 £000	2030 onwards	TOTAL £000
Capital cost	0	8560	8560	8560	8560	8560
Revenue cost Avoidance (Lowest in range)	0	(487 up to 1685)	(487 up to 1685)	(487 up to 1685)	(487 up to 1685)	(1948)
<b>Net impact (excl schools)</b>						

<b>6. Key Milestones (Dates)</b>			
Feasibility Study:	May - Sept 2025	Start on Site	Aug 26
Business Case/ Appraisal:	Oct 2025	Completion	Jan – Feb 27
Detailed Design *:	Oct - Dec 2025	Other 3:	
Planning permission:	Mar - Jun 2026	Other 4:	
Tenders Sent:	NA	Other 5:	
Contract Approved:	Enter into PCSA Dec 25	Other 6:	
Project Start:	Jan 2024	Other 7:	
Project Complete:	Feb 2027	Other 8:	
Final Retention Payment:	N/A	Other 9:	

\* If the scheme need to be passed through Design or Engineering Services before approval, enter the date design is to be submitted.

\*\* Please add other key milestones where appropriate

## 7. Risks

List the likely risks of the scheme and an indication of the probability and impact of each risk.

Financial	<p><u>Financial Risks</u></p> <p>Failure to approve the recommendations could result in continued high revenue expenditure on temporary accommodation, with limited ability to control costs or improve outcomes. Whilst all efforts are being made to negotiate reduced rates through an open framework and block booking arrangements, such rates are <u>not guaranteed into the future</u>, and the council remains <u>subject to market fluctuation</u> and likely longer term rising rates.</p>
Political	<p><u>Strategic Risks</u></p> <p>Failure to develop suitable accommodation will result in continued reliance on nightly paid placements, which are less stable, more costly which will continue to have a negative impact on the revenue budget. Non-alignment with Council priorities, including the Rough Sleeper and Homelessness Strategy, Public Health Strategy and Net Zero Carbon Strategy, could undermine wider corporate objectives and make them less likely to be delivered.</p>
Delivery	<p><u>Operational Risks</u></p> <p>Delays in development will impact the availability of council owned units, leading to extended use of hotel/nightly let accommodation and increased costs. Insufficient support services within the hotel/nightly let (e.g. concierge, housing management) could result in tenancy break downs, anti-social behaviour, or safeguarding concerns.</p> <p><u>Design and Construction Risks</u></p> <p>There are unknown construction/demolition issues that may arise from existing ground works and buildings on site. To mitigate this risk surveys have been commissioned and are being reviewed throughout the project programme and a contingency has been included within the cost estimate.</p>
Reputational / Other	<p>Failure to meet statutory duties under homelessness legislation could result in legal challenge or regulatory scrutiny.</p>

## 8. Policy-Led Evaluation

Please refer to the guidance notes in Appendix B and enter your self-assessment in the table below.

		RAG Rating	Self-Score	(Out of maximum)
<b>A</b>	Council Priorities		10	10
<b>B</b>	Statutory Requirements		10	10
<b>C</b>	On-going Revenue Impact		10	10
<b>D</b>	Funding for Capital Scheme		8	10
<b>E</b>	Net Cost		7	10
<b>F</b>	Asset Management Plan		5	5
<b>G</b>	Sustainability		5	5
<b>H</b>	Financial Risks		2	5
<b>I</b>	Other Risks		2	5
	<b>TOTAL</b>		<b>59</b>	<b>70</b>

= Non-Compliance
  = Part-Compliance
  = Compliance



## 9. Other Comments

List any other supporting information not covered elsewhere on this form, including if an Equalities or Environmental Impact Assessment is required and/or has been undertaken.

An Equalities Impact Assessment has been completed for this activity.

## Section C - Review record

*A Finance BP should review before submission to SAG*

Review record					
Project Manager					
Name	Sanjay Chambers and David Genery	Reviewed	Yes	Date	August 25
Comments					
Finance Business Partner					
Name	Stuart Collins Georgina Luther	Reviewed	Yes	Date	Sept 25
Comments					
Chief Officer (if not Project Manager)					
Name	Anna Robbani	Reviewed	Yes	Date	Sept 25
Comments					
Director					
Name	John Molyneux	Reviewed	Yes	Date	October 25
Comments					

## Section D - Approval record

Approval record			
Strategic Assets Group			
Decision	Approved	Date	Sept 25
Comments			