



POLICY AND RESOURCES SCRUTINY COMMITTEE - 15TH APRIL 2014

SUBJECT: PRIVATE SECTOR HOUSING RENEWAL POLICY

REPORT BY: INTERIM CHIEF EXECUTIVE

1. PURPOSE OF REPORT

- 1.1 To report on a review of the Authority's Private Sector Housing Renewal Policy and to seek Members' consideration in respect of options as to amendments to existing policy.

2. SUMMARY

- 2.1 At the Cabinet meeting held on 16th October 2013 Members took the decision to introduce a moratorium on selective Home Improvement Grants whilst Officers undertook a review of the Authority's Private Sector Housing Renewal Policy. This report outlines the findings of the review and offers options to Members in respect of how assistance to homeowners and tenants with repairing obligations may be provided in future. This report should be read in conjunction with the proposed Policy document that is appended to this report.
- 2.2 The Regulatory Reform (Housing Assistance) (England & Wales) Order 2002 places a statutory obligation on local authorities to produce and implement their own Private Sector Housing Renewal Policies. The Order affords Local Authorities the flexibility to provide assistance in any form, although Authorities must be satisfied that their published Policy is deliverable. This Authority duly produced and formally implemented its original Policy in June 2003 and since then it has been the subject of 4 reviews (including this one). The Policy has operated extremely successfully to date and whilst previous reviews have seen amendments being made to policy tools, the 6 Key Priorities identified within the Policy have remained relevant and unchanged in principle. This latest review is also suggesting that the Key Priorities should remain unchanged in principle, although options for changes to policy tools and in some cases the manner in which they are administered are now being presented to Members for consideration.
- 2.3 Essentially, the report identifies all forms of assistance currently on offer together with new options for consideration. Members are being asked to consider 4 Options, of which Option 3 is the most comprehensive and seeks Members consideration to:-
- Continue to provide assistance via Discretionary Disabled Facilities Grants.
 - Continue to provide assistance via Relocation grants.
 - Continue to provide assistance via Minor Works Grants, re branded as Home Repair Grants.
 - Permanently withdraw assistance via Home Improvement Grants.
 - Introduce assistance via Home Improvement Repayment Loans.
 - Continue to provide assistance via Conversion Grants.
 - Withdraw assistance via HMO grants and replace it with assistance via an HMO Repayment Loan.

- Continue to provide assistance via Group and Block Repair and to introduce a Renewal Area grant. The provision of Renewal Area grant to continue only for as long as Renewal Area Specific Capital Grant funding remains available.
- Withdraw assistance via Property Appreciation Loans.
- To further amend the means test for discretionary grant aid.

Options 1, 2 and 4 are less comprehensive and are outlined in para. 5.31 of the main report.

3. LINKS TO STRATEGY

3.1 The Caerphilly County Borough Council Private Sector Housing Renewal Policy is the strategic document upon which this Authority's private sector housing activities are based. By providing a framework for the improvement of conditions and management within the private sector the policy links to:

- Improving Lives and Communities: Homes in Wales (Welsh Government, 2010) which sets out the national context on improving homes and communities, including the energy efficiency of new and existing homes.
- Caerphilly Delivers, Single Integrated Plan (Prosperous Caerphilly - P2) - Improve standards of housing and communities, giving appropriate access to services across the County Borough.
- Local Housing Strategy (Aim 10) - To promote the growth of a private housing sector that is healthy, vibrant and well managed.
- 2014/15 Service Improvement Plan.

4. THE REPORT

4.1 In July 2002, by way of a Regulatory Reform Order, the Government introduced significant changes in relation to Private Sector Housing Renewal by repealing much of the legislation that related to housing grants and replacing it with a wide-ranging power which allowed local authorities to provide assistance for Private Sector Renewal in any form. The Order placed a statutory obligation on Local Authorities to produce and implement a Private Sector Housing Renewal Policy, which this Authority duly produced and formally implemented on 30th June 2003.

4.2 The Policy document recognised the role of Private Sector Housing Renewal within the Authority's overall strategic ambitions and in studying the profile of the County Borough identified 6 key priorities for attention as follows:

1. **Regeneration of declining communities –**
Selected as a key priority due to the evidence of multiple deprivation in parts of the County Borough.
2. **Reduction of unfitness levels –**
Selected as a key priority due, at the time, to some 3800 of the County Borough's houses falling below the former fitness standard for human habitation. In 2006 this Key priority was subsequently re-titled to "***The Elimination of Unhealthy Housing***" following the removal of the fitness standard from statute.
3. **The return to use of long term empty private sector houses –**
Selected as a key priority due to there being, at that time, some 900 long-term empty properties within the County Borough and the wasted resource they represent.
4. **Providing adaptations for disabled persons –**
Selected as a key priority in recognition of the needs of a vulnerable sector of the community and the mandatory status of grant provision.

5. **To enable vulnerable persons to remain at home in safety and comfort –**
Selected as a key priority in recognition of the difficulties encountered by low-income householders of all ages in respect of their ability to implement essential or emergency repairs to their homes.
6. **The creation of a safe, well-managed private rented sector –**
Selected as a key priority due to this sector having the highest levels of unsatisfactory housing and recognizing the vulnerability of a significant proportion of its tenants.

4.3 The policy document outlined the assistance the Authority would make available to qualifying households within the County Borough via grant aid and also highlighted the Authority's commitment to a strong regulatory stance in dealing with Landlords within the private rented sector that choose to ignore their statutory responsibilities.

5. THE CURRENT REVIEW

5.1 The Private Sector Housing Renewal Policy has now been operating for some 10 years during which time it has had three reviews. Officers have regularly monitored progress against targets and scrutinised carefully the Policy's ability to address the needs of those persons for whom it was originally developed to assist. Generally the Policy has worked successfully and whilst circumstances that have arisen since the original drafting have necessitated certain changes to policy tools, other than for a wording change to Key Priority 2 brought about by a change of statute in 2006, the Key Priorities themselves remain as relevant today as when they were first developed in 2003.

5.2 Whilst key priority 6 remains of paramount importance officers feel that its stated aim

"The creation of a safe, well managed private rented sector"

is an unrealistic ambition for the Authority. Our efforts by providing assistance via this policy and discharging our statutory obligations in respect of enforcement do, however, enable us to effect a rise in standards within the sector. It is suggested therefore, that Key Priority 6 be re-titled

"Improving standards within the private rented sector."

This reflects the Welsh Government ambitions outlined in the current Housing Bill and Members are asked to give this proposal consideration.

5.3 To ensure the Authority's future ambitions remain both affordable and properly targeted, officers feel consideration now needs to be given to revising certain forms of assistance currently afforded in pursuit of the Key Priorities.

5.4 Current Policy affords homeowners and private sector tenants with a repairing obligation a variety of assistance, in the form of grants or loans as follows:

- Mandatory Disabled Facilities Grants
- Discretionary Disabled Facilities Grants
- Relocation Grants
- Minor Works Grants
- Home Improvement Grants
- Conversion Grants
- HMO Grants
- Group/Block Repair
- Property Appreciation Loans

5.5 Having reviewed the provision of the above forms of assistance in light of their effectiveness, affordability and mandatory status (where applicable), Members are asked to consider options

for their future use as part of the Caerphilly CBC Private Sector Housing Renewal Policy 2014.

Mandatory Disabled Facilities Grant

- 5.6 This grant, although included as a policy tool to support Key Priority 4 of this Policy, is awarded in line with the provisions of the Housing Grants, Construction and Regeneration Act 1996 and, as its title suggests, local Authorities have a statutory obligation to provide this form of assistance. This grant, therefore, takes priority when allocating the capital funding available for private sector housing and historically accounts for around £1.2m per annum in capital provision.
- 5.7 Apart from its obvious importance in respect of the assistance it provides to disabled persons, waiting times in respect of the delivery of this grant are reported annually as a National Strategic Performance Indicator. It is critical, therefore, that the level of resources devoted to this form of assistance, both in terms of funding and staff is sufficient to ensure the Authority not only meets its statutory obligations but also does so within acceptable waiting times.

Discretionary Disabled Facilities Grant

- 5.8 Although provided for the benefit of disabled persons this grant is not mandatory and is currently awarded under the provisions of the CCBC Private Sector Housing Renewal Policy. The grant is means tested, with the same eligibility criteria as the mandatory Disabled Facilities Grant but with a current maximum grant ceiling of £7,000. The grant is utilized either as a top up to a mandatory Disabled Facilities Grant or else as a dedicated grant for discretionary works considered to be essential for the purpose of making a dwelling suitable for the accommodation, welfare or employment of a disabled occupant. The grant has worked well since its introduction although Officers feel the grant maximum, which has remained the same since 2005, now needs to be raised slightly to £10,000 to reflect cost increases and changes in the nature of demand that have occurred since introduction. Funding to support the provision of this grant is provided from the same budget as Mandatory Disabled Facilities grants. Members are asked to consider retaining this grant as part of the Renewal Policy but with a revised maximum grant of £10,000.

Relocation Grants

- 5.9 The Authority currently offers assistance towards the relocation of a disabled person in appropriate circumstances i.e. where a property's adaptation costs are not reasonable or practicable, or else where adaptation of the existing property may not adequately meet the needs of the disabled person or their family/carer. Relocation Grants are subject to the same maximum as the Mandatory DFG, currently £36,000, and are utilized extremely infrequently (3 to date) but remain an essential tool in addressing the wider needs of disabled persons. Funding to support this form of assistance is provided from the same budget as Mandatory Disabled Facilities Grants and Members are asked to consider retaining this form assistance as part of the Renewal Policy and that their delivery be as outlined on Page 8 of Appendix 1.

Minor Works Grants

- 5.10 Minor Works Grants are awarded to support Key Priority 5 of the Policy to assist vulnerable persons who are owner occupiers and private sector tenants with a repairing obligation to remain at home in safety and comfort. Having operated the Private Sector Housing Renewal Policy since 2003 it is clear that, with the exception of mandatory Disabled Facilities Grants, this form of assistance is the most important and effective offered by the Authority. It specifically targets the more needy, addresses essential and emergency repairs and, in all but the most complicated cases, can be delivered quickly. Funding to provide Minor Works grant assistance comes from the Authority's capital programme and historically accounts for around £1m per annum. The overall capital programme for 2014/15 has, however, been cut by 15% and so regrettably, the maximum budget available for this type of assistance going forward would be £800,000.

Officers feel that Minor Works Grants form an integral part of the Private Sector Housing Renewal Policy and consideration should be given to their retention, rebranded as the Home Repair Grant and that they be delivered in the manner outlined on Page 9 of Appendix 1.

Home Improvement Grants

- 5.11 Home Improvement Grants are by far the most expensive form of grant aid (averaging just under £24,000 per grant) and were introduced as part of the original CCBC Private Sector Housing Renewal Policy in 2003 to support Key Priorities 1,2,3 and 6 of the Policy. At that time the Private Sector Housing allocation from the Capital programme was £4.825m, of which in excess of £3m was available to support the delivery of Home Improvement Grants alone. The availability of capital funding across the Authority has diminished substantially since 2003 and for 2014/15 Members have agreed that £2.465m should be made available from the Capital Programme for private sector housing assistance. Of this figure, however, £1.15m will need to be earmarked for Disabled Facilities Grants to ensure we meet our statutory obligations and deliver the grants within acceptable waiting times.
- 5.12 With a total available capital budget of £2.465m and some £1.950m being deployed for Disabled Facilities and the re branded Minor Works Grant, if supported, there would be only £515,000 available to support the entire remainder of the private sector housing programme.
- 5.13 In 2003 when some £3m was available for Home Improvement grants, they formed an appropriate policy tool within the Private Sector Housing Renewal Policy. Today with just £515k available they have become unaffordable and officers feel that the £515k can be better utilised in the delivery of other forms of assistance outlined later in this report. Members are being asked, therefore, to consider the permanent withdrawal of individual Home Improvement Grants in their current form. In doing so Members are reminded that Home Improvement Grants target the least vulnerable client groups (large numbers are awarded to landlords) and with the continued availability of re branded Minor Works Grants their removal would be of no threat to the most vulnerable persons/households in need of assistance. Members will recall that following a Cabinet decision taken on 16th October 2013, a moratorium on Home Improvement Grants, other than those within Renewal Areas, is already in place.
- 5.14 Members are now asked to consider whether those Home Improvement Grants registered with the Authority prior to this decision, but which are not yet approved, should be approved or cancelled.

Conversion Grants

- 5.15 Assistance by way of Conversion grants has proved extremely useful in supporting Key Priorities 1 and 6 of the Policy by producing additional units of accommodation, generally via the conversion of disused non domestic accommodation into much needed living accommodation. Assistance for landlords is in the form of 50% grant aid, whilst owner-occupiers are subject to a means test. Both tenures are subject to a maximum grant of £15,000. The Authority has nomination rights for those conversions created for the rental market. The grant works well, offers value for money from the Authority's perspective and Members are asked to consider the option whereby this form of assistance should continue and be delivered in the manner outlined on Page 5 of Appendix 1. Members are also asked to consider that in line with current practice Conversion grants be available not only within Renewal Areas but also throughout the wider County Borough. Funding to support the provision of this grant would be provided from within the £515k mentioned in para. 5.14 above.

HMO Grants

- 5.16 HMO grants are currently utilised in support of Key Priority 6 of the Policy and are grants awarded to landlords to assist with the implementation of fire precaution works within

established Houses in Multiple Occupation (HMO's). Assistance is in the form of 50% grant aid subject to a maximum of £15,000.

- 5.17 The Caerphilly county borough has relatively few HMO's in comparison with our neighbours and of the 180 or so on our database, only 11 are of the larger 3 storey/5 person type that fall under the umbrella of mandatory licensing.
- 5.18 Since the inception of this grant in 2003, to date only 20 HMO grants have been awarded and, given that recipient landlords are essentially operating what in many circumstances is an extremely lucrative business, officers are suggesting that consideration is now given to withdrawing this grant. However, recognising that fire precaution works are critical to the safe use by tenants of higher risk HMO's, rather than discontinue assistance completely, officers are suggesting that the grant be replaced with a recyclable, repayable, interest-free loan, to be delivered in the manner outlined on Page 10 of Appendix 1. Members are also asked to consider only offering assistance by way of a loan when the Landlord concerned is accredited. An accredited landlord means a landlord who has formal accreditation status from a nationally recognized landlord accreditation scheme such as those operated by the National Landlords Association and Landlord Accreditation Wales.

Funding to support the provision of this type of loan would be provided from within the £515k mentioned in para 5.14 above.

Group/Block Repair/Renewal Areas

- 5.19 Group and Block repair schemes are utilised in support of Key Priority 1 of the Policy and continue to be an extremely successful method of strategically planned housing refurbishment. The schemes have historically been used to great effect throughout the County Borough, although more recently their use has been restricted to within the Authority's declared Renewal Areas. Funding for virtually all housing related activity undertaken within Renewal Areas comes via Welsh Government Specific Capital Grant (SCG), hypothecated funding allocated to the Authority on an annual basis. Since 1996 the Authority has received £21,530,000 in SCG and Renewal Area residents have benefited hugely from not only strategic housing refurbishment but also environmental works and works to support social provision. Welsh Government have committed to supporting existing Renewal Areas by way of SCG until 2016/17 and this funding will now be deployed within the Authority's only remaining Renewal Area at Senghenydd. It is recommended, therefore, that assistance by way of Group and Block repair should continue and be delivered in the manner outlined on Page 5 of Appendix 1. At the time of writing the SCG allocation for 2014/15 has not yet been confirmed although the forward indication issued by Welsh Government is £799,000.
- 5.20 Para 5.14 above seeks Members consideration for a permanent withdrawal of Home Improvement grants for the reasons specified. However, whilst the availability of Renewal Area SCG continues, and given the strategic and operational targets agreed at the declaration of Senghenydd as a Renewal Area, it is felt that assistance similar to that of Home Improvement Grant should continue within the Renewal Area. Officers are, however, suggesting that the assistance be in the form of a dedicated "Renewal Area Grant" deployed in the manner outlined on page 5 of Appendix 1. Funding to support this type of assistance would be provided via the SCG allocation and so the use of such assistance would create no pressure on the Authority's overall private housing capital programme. Members are, therefore, asked to give consideration to the option of creating and operating a Renewal Area grant for the period whilst SCG funding remains available.

Property Appreciation Loans

- 5.21 Property Appreciation Loans (PAL) were introduced as a policy tool within the Private Sector Housing Renewal Policy in September 2006 and to date 29 loans totalling £296,000 have been given. The loans are secured against a property and utilised to undertake repairs and improvements in line with the principles of the Private Sector Housing Renewal Policy, but they are not traditional repayment loans. At the time the PAL is offered the property

concerned is first valued, and the value of the PAL is then recorded as a percentage of the property's valuation. The PAL is not repayable until the property is either disposed of, or else following the death of the loan recipient. At this time the property is re-valued and the appropriate percentage of the value represented by the PAL is reclaimed by the Authority.

- 5.22 PALs were introduced in 2006 when no alternative forms of loan were available. Experience to date in providing this form of assistance has shown that in practice they are extremely difficult to administer and the length of time taken to recycle the funds is such that realistically its use in providing a recyclable loan fund is extremely limited. (To date no loans have been repaid). Officers are suggesting, therefore, that this loan product be withdrawn as a form of assistance.

Home Improvement Repayment Loans

- 5.23 As mentioned in several places above, the Authority's ability to sustain the level of grant-aided assistance that it has previously provided is now severely compromised by a diminishing capital funding situation. Officers have indicated in para. 5.14 above that the £515k available after providing for Disabled Facilities and re branded Minor Works grants can be better utilised in forms other than simply for grant aid. An option for Members' consideration is one of recyclable, interest-free repayment loans awarded in line with the repair and refurbishment principles of the Renewal Policy. Such loans would only be awarded following the undertaking of an affordability test so as to ensure their proper and appropriate use. Loans would be available for a variety of uses such as:

- As a "top-up" to grant assistance.
- To fund a means tested contribution towards grant.
- To refurbish and bring back into use a long-term empty property.
- As assistance to those householders who fall outside the qualification criteria for grant aid.
- As match funding to support other initiatives e.g. ECO.

- 5.24 Repayment loans would be available to both owner-occupiers and landlords and in the medium term this option would relieve pressure on capital resources, as it would create a recyclable fund for future years' use. For landlords, however, Members are asked to consider only assisting by way of a loan when the Landlord concerned is accredited.

- 5.25 Consideration of this option comes at a time when Welsh Government, addressing a commitment in the current Housing Bill, are actively establishing a National Loan Scheme in Wales from which Local Authorities can receive funding to support the initiative locally. Details of this scheme will be reported to Members later this year, however, early indications suggest £20m will be made available in Wales over the next 2 financial years and so to now introduce a loan scheme as part of our Private Sector Housing Renewal Policy would see the Authority well placed to avail ourselves of substantial extra funding later this year and in years to come.

- 5.26 Officers are asking Members therefore, to consider the option of introducing a new repayment loan product to be operated in the manner outlined on Page 6 of Appendix 1.

Means Testing for Grant Aid

- 5.27 All of the grant types mentioned above are, for owner-occupiers and tenants with a repairing obligation, to some degree means tested. Mandatory Disabled Facilities grants are means tested in line with the Housing Renewal Grant Regulations 1996, as amended, and Local Authorities have no discretion in respect of both the manner in which the means test is applied or the outcome by way of notional contribution.

- 5.28 The means test in respect of all other grant aid mentioned above can, however, be administered in whatever manner the Authority determine. When the Policy was first adopted in 2003 all means testing was undertaken in line with the statutory regime that applied to Mandatory Disabled Facilities grants. Since then, the statutory test has been amended

several times and Officers consider its amendments, which were specifically introduced for the benefit of disabled persons, now render the statutory test inappropriate for the purposes of the other grant types detailed above.

Members have already taken the decision, following a previous policy review in 2008, to vary the means test utilised for discretionary assistance. Members are now asked to consider further adjustments as outlined on page 23 of Appendix 1.

Conclusion

5.29 Essentially, paragraphs 5.6 – 5.26 above include the following proposals that Members are asked to give consideration:

- To continue to provide assistance via Discretionary Disabled Facilities Grants
- To continue to provide assistance via Relocation Grants
- To continue to provide assistance via re branded Minor Works Grants
- To permanently withdraw assistance via Home Improvement Grants
- To introduce a new form of assistance via Home Improvement Repayment Loans
- To continue to provide assistance via Conversion Grants
- To withdraw assistance via HMO grants and replace it with assistance via an HMO Repayment Loan
- To continue to provide assistance via Group and Block Repair and to introduce a Renewal Area grant.
- To withdraw assistance via Property Appreciation Loans.
- To further amend the means test for discretionary grant aid.

5.30 There are, therefore, essentially 4 options for Members consideration:

1. Continue to provide assistance in line with existing Policy, including the awarding of Home Improvement grants.
2. Continue to provide assistance in line with existing Policy without awarding Home Improvement grants. (i.e. making permanent the Cabinet decision of 16th October 2013).
3. Implement a revised Policy that reflects all the amendments mentioned within para 5.30 above.
4. Implement a revised Policy that reflects some but not all of the amendments mentioned within para 5.30 above.

6. EQUALITIES IMPLICATIONS

6.1 An EIA screening has been completed in accordance with the Council's Strategic Equality Plan and supplementary guidance. No potential for unlawful discrimination and/or low level or minor negative impact has been identified, therefore a full EIA has not been carried out.

7. FINANCIAL IMPLICATIONS

7.1 The recommendations contained within this report, as well as intending to better address the needs of the County Borough, have been prepared with regard to a reducing capital allocation for private sector housing renewal (5.12 – 5.14 above). The proposals are intended to reduce the pressure on the Authority's overall capital programme going forward, by increasing strategic activity and moving towards better targeted, more affordable, smaller grants and loans.

7.2 Business Cases were submitted to Capital Strategy Group in respect of financial provision for private sector housing renewal for 2014/15 as follows:

Disabled Facilities Grants -	£1,150,000
Minor Works Grants -	£ 800,000
Other Grants/Loans -	<u>£ 515,000</u>
Total:	- <u>£2,465,000</u>

The total budget was given formal approval as part of the 3 year Capital programme at a meeting of Special Cabinet on 29th January 2014.

8. PERSONNEL IMPLICATIONS

8.1 There are no personnel implications.

9. CONSULTATIONS

9.1 Any comments made by consultees have been incorporated within the report.

10. RECOMMENDATIONS

10.1 It is recommended that Policy and Resources Committee recommend to Cabinet that a revised Private Sector Housing Renewal Policy be implemented in line with the proposals outlined in Option 3 above.

11. REASONS FOR THE RECOMMENDATIONS

11.1 The original Private Sector Housing Renewal Policy was formulated at a time when capital budgets were under significantly less pressure than today and the assistance currently on offer is becoming increasingly unaffordable. Officers no longer consider the Policy in its current form to be affordable and deliverable.

11.2 In consideration of the options outlined in paragraph 5.31 Officers consider that:

- Option 1 is neither affordable nor deliverable and does not reflect the best use of available funding resources.
- Option 2 is deliverable and affordable as long as levels of capital funding remain as they are today. Officers feel, however, this option does not reflect the best use of available funding resources.
- Option 3 is deliverable and affordable, reflects the best use of available resources and also puts the Authority in the best place to exploit the opportunities presented by the proposed National Loan Scheme.
- Option 4 will only be deliverable and affordable if Home Improvement grants are withdrawn. Thereafter the effectiveness of the Policy would depend on which of the proposed amendments Members elect to support or reject.

12. STATUTORY POWER

12.1 The Local Government and Housing Act 1989, the Housing Grants, Construction and Regeneration Act 1996. The Regulatory Reform (Housing Assistance) (England & Wales) Order 2002 places a statutory obligation on local authorities to produce and implement their own Private Sector Housing Renewal Policy. This report recommends updating the current Policy following a fourth review.

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Consultees: Cllr Gerald Jones - Deputy Leader and Cabinet Member for Housing
Stuart Rosser - Interim Chief Executive
Nicole Scammell - Acting Director of Corporate Services
Shaun Couzens - Chief Housing Officer
Cllr Hefin David - Chair, Policy and Resources Committee
Cllr Jean Summers - Vice Chair, Policy and Resources Committee
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Suzanne Cousins - Principal Housing Officer (Housing Portfolio)
Lesley Allen - Principal Accountant
Sean O'Brien - Team Manager (Occupational Therapy)
John Rogers - Principal Solicitor
Gail Williams - Monitoring Officer
All Operational Staff within the Private Sector Housing Section involved with the practical delivery of the Authority's Private Sector Housing Renewal Policy.

Appendices:

Appendix 1: The Caerphilly County Borough Council Private Sector Housing Renewal Policy 2014, as proposed.

Background Papers:

Cabinet reports proposing Policy revisions subsequently agreed on 15th February 2005, 28th October 2008 and 24th May 2011
Cabinet Report dated 16th October 2013 proposing a temporary moratorium on Home Improvement Grants pending policy review. (Subsequently agreed).