

IMPLEMENTING RENOVATION GRANTS FOR HOME IMPROVEMENT

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Introduction

The new grant system came into effect on 1 July 1990. Unlike the one it replaced¹ (Battersby. 1990, pp 1-4), the amount of grant is calculated by reference to the net income of the applicant. It is more an extension of the personal benefit system than a means of dealing with the fabric of older housing, although it is now also linked to the standard of fitness. Renovation should be seen as only one of the options available for dealing with the worst housing conditions along with closure, clearance etc. The intention was that local housing authorities would have to take a more strategic approach to dealing with sub-standard housing conditions in the private sector. Although the system is already subject to review, it is unlikely that fundamental changes will be made.

The Government's aim was to improve the general quality of decision-making, with intervention on unfit housing dependent upon the "most satisfactory course of action". It was intended that better "targeting" of grants would be achieved via an assessment of the ability of the applicant to fund the work themselves.

How effective the system will be in dealing with housing conditions depends to a large degree on the scale of public investment. As the Audit Commission has said (Audit Commission. 1991, p.2), "More action would also lead to higher local authority expenditure (even after the Government's 75% contribution to the grants). More importantly, it could have a substantial effect on housing basic credit approvals. Central government's housing expenditure plans to show a fall of nearly 30 per cent over the next three years. Were productivity to increase, authorities would, on current plans, have difficulty funding the capital consequences of their officers' actions."² The Government budget for private sector renovation in 1983/84 was £1 billion. In 1991/91 it is £450 million (specified capital grant, whilst currently, about £15 billion is spent annually in the economy as a whole on "home improvement").

The local authority associations maintain that although an overhaul of the old grant regime was required, "structural reform alone was never going to be sufficient to remedy the very serious problem of sub-standard housing which affects 15% of the housing

stock in this country, (source: 1986 English House Condition Survey). The availability of mandatory grant aid for works up to the new fitness standard is a welcome feature of the new system, but in the absence of Government guarantees to meet the demand for mandatory grant, local authorities are forced to adopt a cautious approach to committing discretionary expenditure. As a result authorities are unable to adopt the strategic approach encouraged by the Government" (Joint LAAs response on the DOE Review of the House Renovation Grant System para 2.1)³. Indeed there is some evidence to suggest that authorities are building delays into the administration of grants in order to manage their resources, even where grants are mandatory.

Introduction to the system

The use of discretionary local authority grants to assist with the improvement of older houses started in 1949. The system evolved over the next forty years to meet specific problems in the housing stock. Sometimes the grant system tended to be used by local authorities almost in isolation from other housing activities. The standards which houses had to meet both before and after the various forms of grant, were different from the other statutory standards enforced by the same local authorities. This was despite some discretionary grants becoming mandatory following the service of a statutory notice. Not all works listed on a notice served by the environmental health officer (EHO) would qualify for grant aid. Some grants did not even require that the house became fit for human habitation after completion of the relevant works.

In the early 1980s there was criticism of the grant system and its lack of impact on housing conditions (see for instance IEHO 1981)⁴. It was widely argued that a review of the whole system and its role in securing improved living conditions was required. In 1985 the Government published a Green Paper "Home Improvement - a new approach" which suggested either a system of unitary grant linked to a new fitness standard akin to the Scottish Tolerable Standard or a system of shared equity loans. This latter and impractical idea soon disappeared. Grant availability would be subject to a means test. The proposed fitness standard was also very low.

The White Paper of October 1987 (preceding what was to become the 1988 Act) and consultation paper of November that year proposed an improved standard of fitness which would form the basis of entry to the grant system. It would be a single type of means tested grant.

There would no rateable value or eligible expense limits. Eventually the Local Government and Housing Bill contained the framework for the new grant system although some significant parts of the scheme now operational were only introduced at a late stage, eg mandatory grants for landlords. The Bill itself received the Royal Assent on the last day possible in that session of Parliament.

The Local Government and Housing Act 1989⁵ contains the framework of the scheme but much of the detail and advice on implementation is contained in Regulations, Directions and Circular. The implementation of the new system was put back from 1 April 1990 because of the amount of secondary legislation and advice.

New grant regime

Renovation grants	(mandatory and discretionary, replacing improvement, intermediate and repairs grants)
HMO grants	(replaces the old special grant)
Disabled facilities grants	(mandatory and discretionary for certain home adaptations)
Common parts grants	(similar to previously, and both landlords and tenants applications can be made)
Minor works assistance	(small form of assistance - cash or materials, entirely new, particularly for elderly people plus home insulation for people on low incomes)
Group repair	(replaces block repair and enveloping)

Initial considerations

- a) the dwelling, common parts or house (or building) must be at least 10 years old at the date of application except for disabled facilities
- b) renovation grants are mandatory for owner occupiers and tenants if the dwelling house is unfit, as determined by the new standard of fitness, and renovation is the "most satisfactory course of action". Grants are discretionary for landlords (who have to provide a certificate of intended letting) even if the dwelling is unfit - unless the works are necessary to comply with notices under ss.189, 190 or 352 of the 1985 Act. All grants are subject to some form of means testing or "test of

resources".

Local housing authorities shall also, at least once in each year, consider the housing conditions in their district with a view to determining what action to take in performance of their functions, including use of the grant system (section 605 of the 1985 Act).

The authority has to make the decision on the most satisfactory course of action, having regard to the statutory code of guidance made under section 604A⁶. This will mean an appraisal of the realistic options. The guidance on whether to renovate an unfit house with grant aid or not is the same as for determining whether to serve a repairs notice under s.189 for unfit house.

Discretionary renovation grants

Approval of grants is discretionary where the works go beyond those to bring the house up to the fitness standard but are necessary to:

- a) put the dwelling in reasonable repair
- b) provide the dwelling by the conversion of a house or other building
- c) provide adequate thermal insulation
- d) provide adequate facilities for space heating
- e) provide satisfactory internal arrangement
- f) ensure that the dwelling complies with such requirements with respect to construction or physical condition as may for the time being be specified by the Secretary of State for the purposes of this section. (Currently grant may be made available where radon is at levels over 200 Bq m⁻³)

Restrictions on grant aid

Grant cannot be approved:

1. for an unfit dwelling or house and the local housing authority consider that carrying out the relevant works will not make the dwelling fit;
2. if the relevant works have been completed before the date of notice of decision on the application
3. if local housing authority propose to make a Closing or Demolition Order within three months of the date of decision on the application
4. if the local housing authority intend to declare a clearance

- area including the dwelling within twelve months of the date of decision
5. for defective dwellings designated under sections 528 or 559 of the 1985 Act and the applicant is eligible for assistance under Part XVI of that Act
 6. where a group repair scheme has been approved by the Secretary of State grant may not be approved so far as it relates to work included in group scheme
 7. if in the case of a common parts grant the works will not make the parts outside the flat "fit"
 8. in the case of an HMO grant if the works relate to means of escape from fire or other fire precautions which are required to be carried out under another enactment eg Fire Precautions Act 1971
 9. if application relates to works which have been excluded by direction of the Secretary of State.

Tests of financial resources

The amount of grant in all cases where there is not a certificate of letting, is calculated in accordance with regulations⁷ and could be 100% of estimate or nil. The test is parallel with the Housing Benefit system although the threshold (applicable amount) is somewhat higher. The test of resources for disabled facilities grants is the same but includes the disabled person as a relevant person.

For landlords (including HMO grants), the local housing authority shall determine the amount of grant by having regard to:-

- a) cost of relevant works (estimated expense)
- b) if let on statutory tenancy the amount of rent payable and of any increase which might reasonable be expected in that rent to take account of the relevant works
- c) amount of rent on open market assuming assured tenancy when work completed;

and the following matters as directed by the Secretary of State:-

- d) the amount of rent normally expected for a dwelling of similar type in the locality;
- e) the difference between the figure from d) and the amount of rent which might be expected as a result of the works;
- f) the capital sum which could be raised by a loan over a ten year repayment period at an interest rate 3% over bank

- base rate as serviced by the sum from e)
- g) the difference between the estimated expense and the figure from f)
 - h) where there is no rental increase to be expected ie e) is zero, any increase in the capital value of the dwelling which might be expected as the result of the works

Authorities have a little more discretion in giving greater weight to some factors than to others and unlike for owner occupiers the actual mechanics of the test are not prescribed^{8,9}.

For HMO grants rent is the aggregate from the lettings. The fear is that small rent increases for expensive works will mean substantial grants, and where notices have been served this will mean, substantial grants for the worst landlords, who may well be able to afford the full cost of the works anyway. Unlike the test for owner/occupiers, this is not an assessment of personal "borrowing capacity".

Where an application is for a tenants' common parts grant. The authority has to decide how much of the cost is attributable to the applicants and apportion the cost to each. The amount of grant will then be the aggregate of the individual grants which would have been payable for each applicant following the test of resources.

Unlike the previous system it is not be possible to give a potential grant applicant any idea of the amount without detailed information. Indeed most authorities are asking owner/occupiers for financial information at enquiry stage, in order to be able to provide some idea of the "notional contribution", before even inspecting the house. Thus, someone could be advised they would be expected to contribute £1,000, but until the house was inspected and some estimate of the costs of works made, it would not be possible to say whether the grant would be £20,000 (if the estimated cost was £21,000) or nil (if the estimate was £999). Whether the grant goes ahead now usually depends on whether the enquirer can find their contribution. The owner/occupiers' means test however is not a true reflection of borrowing capacity as no account is taken of housing costs, eg mortgage.

Further if the means test shows that someone is entitled to the full estimated expense as grant, eg on income support, it would indicate an inability to service a loan. However, if the local authority's estimate for the work falls below the builder's - leaving a gap between grant and bill, the applicant may not be able to afford

the grant. What work, if any, is then undertaken may be of poor quality. So, 100% grants should be just that and advice needs to be given on how to obtain more reasonable estimates, if that is the problem. The local authority may also need to reassess how estimated expense is determined. Local authorities would be wise to use standard specifications so that contractors have a sound basis on which to price (which also sets down the standard of workmanship to be expected). Consideration needs to be given to using standard priced schedules so that contractors do not submit estimates widely at variance with the authority's estimated expense.

Grant conditions

The condition attached to renovation and disabled facilities grants for owner/occupiers means that the applicant or a member of the family has to live in the property for a year after completion of the work. Although the authority, may demand all or a proportion of the grant in the event of certain disposals within three years.

Where a certificate of intended letting accompanies a grant application it is a condition that the dwelling be let for a period of five years from the certified date. In the event of a breach of the certificate of intended letting, the local housing authority may demand repayment with interest.

Where the certificate of intended letting has been given for other than a tenant's application it is a condition that where there is a relevant disposal (other than exempt) of the dwelling with vacant possession the whole grant shall be repaid. Where it is sold without vacant possession it shall be repaid, reduced by one-fifth for each complete year which has elapsed after the certified date.

Summary

In essence the new grant system which is not subject to any upper (or lower) limits, works out as follows:

Estimated Expense (as assessed by LA)

LESS

affordable loan (as determined by the appropriate test)

EQUALS

the amount of grant.

House in Multiple Occupation (HMO) grant

An HMO grant can be made available for existing HMOs, and where it is proposed to convert a house into an HMO, to make them fit for human habitation and for works to make them fit for the number of occupants.

It is only for landlords who must provide an HMO certificate, even where the works are necessary for compliance with statutory notices. It certifies ownership and that it is the intention to let or license the use of, or part of the house as a residence, similar to a landlord who has provided a certificate of availability for letting.

The eligibility of the works is wider than the old Special Grant and allows for and includes:

works to make the house fit for human habitation (as above) or to deal with substantial disrepair; and
works to make the house fit for the number of occupants as determined by the local authority and provided for in s.352 set out below:

- "(a) there are satisfactory facilities for the storage, preparation and cooking of food including an adequate number of sinks with a satisfactory supply of hot and cold water;
- (b) it has an adequate number of suitably located water-closets for the exclusive use of the occupants;
- (c) it has, for the exclusive use of the occupants, an adequate number of suitably located fixed baths or showers and wash hand basins each of which is provided with a satisfactory supply of hot and cold water;
- (d) there are adequate means of escape from fire; and
- (e) there are adequate fire precautions."^{8,10} (Circular 12/90, pp 39-41 re grants and Circular 5/90)

As there is a difference between the definition of an HMO for enforcement and grant purposes it may be that where a building contains an HMO and separate dwellings such as self-contained flats it will be necessary to deal with these parts of the building separately, for instance via a common parts grant.

Minor works assistance (MWA)

This discretionary form of assistance has been widely welcomed and is often considered the best part of the new system although many authorities do not have the size of budgets they would like to meet the needs or demand (some cannot afford to make this assistance available). It may be the only discretionary form of assistance local authorities feel able to make available. Agencies may be involved in directing or even administering a specific budget for this form of assistance.

The works included are:

- providing or improving insulation, including draught proofing (replacing the homes insulation scheme);
- repairs or improvements to properties in a clearance area (or intended clearance area within 12 months - "patch and mend");
- repairs, improvement or adaptation to a dwelling for an elderly owner or tenant ("staying put", the householder has to be 60 or over);
- adapting a dwelling where an elderly person (60 years of age or over) proposes to be resident ("elderly residents adaptation")¹¹.

There is an income threshold for applicants. Owner occupiers or private tenants (or their spouses) will have to be in receipt of Housing Benefit, Poll Tax Benefit, Income Support or Family Credit. It is available to private tenants including housing association tenants regardless of any repairing obligations. It is not available to landlords or public sector tenants. Assistance is available regardless of the type or age of dwelling.

Applications should be determined as soon as practicable and normally within six weeks of receipt. Work would be expected to be completed in three months and payment within six weeks of the claim.

The value of assistance (grant or materials) is limited to £1,000 an individual application and maximum of £3,000 in total in any three year period. Normally works would cost less than the £1,000 but assistance can be given where the maximum is exceeded. Assistance can cover the cost of materials and or labour.

Advice¹² suggests a minimum three month period between applications but this can be shorter where appropriate. This could be reduced where for instance, an elderly person had assistance approved for providing loft insulation, then it is found that minor repairs are required to the roof. In exceptional circumstances there

is no reason why there could not be simultaneous applications where the work exceeds £1,000 but still represents the most cost-effective or socially desirable course of action.

Payment of grant is conditional upon the works being executed to the satisfaction of the local authority. The Regulations require the authority to carry out such inspections as are considered necessary, or obtain suitable certification from the person carrying out the work. Inspection of the works is unlikely to be necessary in every case, and where there are satisfactory agency agreements for management and supervision of work, the need to inspect will be greatly reduced.

On 1 January 1991 the Energy Action Grants Agency introduced the Department of Energy's Home Energy Efficiency Scheme (HEES). This has been set up under s.15 of the Social Security Act 1990. It is also available to householders in receipt of the same benefits relevant to minor works applicants. The HEES is however limited to loft, tank and pipe insulation, draught-proofing and energy conservation advice. Local authorities need to be aware of HEES activity locally in order to provide advice and to make their own activities more effective. This scheme ran into financial problems six months after it started.

Disabled facilities grant (DFG)¹³

The local housing authority shall not approve an application for disabled facilities grant unless having consulted with the welfare (social services) authority (usually the occupational therapist - OT), it has been determined that the works are necessary to meet the needs of the disabled occupant, and the proposed works are reasonable and practicable having regard to the age and condition of the dwelling. They are then mandatory for:

- facilitating access to and from the dwelling, principal family room, sleeping room, to the room containing bath, shower lavatory or wash hand-basin (or providing such a room),
- facilitating preparation and cooking of food
- facilitating the use of a source of power, light or heat by altering the position of one or means of access to or control, or by providing additional means of control
- facilitating access and movement by the disabled occupant around the dwelling in order to enable him/her to care for a dependent relative.

The dwelling will also have to be fit under s.604 on completion

of the works and this can also pose a problem.

The means test can be unduly harsh, and it is unfair on disabled people to use the same test as for other grants. People with disabilities may be prejudiced by living with owners whose income is such that the test indicates they can make a contribution to the cost, when in practice that is not so. The likelihood is, that in such circumstances the adaptation will not be carried out.

Grants are discretionary for other works for making the dwelling suitable for the accommodation, welfare or employment of the disabled occupant.

Minor adaptations such as grab rails should normally be funded by the welfare authority under the Chronically Sick and Disabled Persons Act 1970 without use of the DFG. However, as for all grants at the moment, there is no maximum nor minimum amount of DFG.

Policies of local authorities

Many authorities feel that with the limitations on capital expenditure and in attempts to keep the poll tax as low as possible only mandatory renovation and disabled facilities grants can be available. Thus for landlords, grant may only be available after a notice has been served. At the same time it appears that the number of statutory notices being served has decreased from what was a low level, whether for singly or multi occupied houses. The most common discretionary assistance available is minor works assistance. A few will give discretionary renovation grants in association with mandatory grants for owner occupiers in order to bring the dwelling into reasonable repair, or improve the heating for elderly people.

Anecdotal evidence suggests that one or two authorities may have decided that as the worst conditions are generally in the private rented sector they will make discretionary grants available to landlords in order to encourage them to bring their houses up to standard. This is considered the best way of safeguarding the health and safety of the tenants, for the work is often of a better standard (and quicker) if it is done voluntarily rather than as the result of enforcement or coercion. It is in the area of grants for tenanted properties that linking the grant system to the fitness standard poses a problem. It would be preferable for grants landlords to be calculated as a percentage of cost. It is arguable whether landlords who have received notice should be eligible for grant aid at all, but a fixed percentage eg 20% as previously, would be better than the new

system.

The use of mandatory renovation grants also varies. For some authorities the intention of this grant is to secure the long term future of the property. For others the mandatory renovation grant alone is not intended as a long term measure (5-10 year life might be expected). Longer term retention would only be secured by "topping up" the mandatory grant with discretionary grant aid although this is not always possible.

Even though authorities have restrictions on capital expenditure, no dwellings are excluded on the basis of value, with no upper limits on the size of grant. This has caused further worries, for in most cases, the lack of suitable alternative accommodation makes clearance or closure unlikely as the most satisfactory course of action. Renovation is left as the only option available with the potential for large grants. Anecdotal evidence suggests that for some councils the average grant is substantially larger than under the old regime. The average mandatory renovation grant in 1990/91 was £8,100 (Audit Commission p13).

Although legislation requires determination of a grant application within six months it is common for authorities to be building some delay into the administrative process between enquiry and formal application, and increasingly are taking the full six months to approve a grant even though most of the administrative work was done before application.

Some local authorities are setting up, or assisting some form of agency service to provide more detailed advice and support. These may operate in particular areas of the district or may be directed at particular "client groups" such as elderly people. The agency may be operated by the authority or an outside organisation which will provide a service within the district with some financial support from the authority.

The impact of the new regime

It has been found in certain areas that 100% grants (with no upper limit) have become the norm because there are so many owner occupiers on low incomes. There are also applicants who are expected to make a contribution to the costs which in reality they cannot afford. It is difficult for local authorities to implement any coherent strategy when demand still exceeds authority's ability to this supply financial support. For instance in 1990/91, 74,200

enquiries led to 5,400 approvals of mandatory renovation grants (Audit Commission p.13). Yet clearance and replacement remain unacceptable to the community and almost impossible for local authorities to carry out.

Most authorities report an increase in unfit properties since the change in standard, even if this is not quantifiable. Often grant money is being spread thinly and renovation grants are being used to achieve a basic standard of fitness which does not secure the long term future of the property. Discretionary grants are relatively rare.

At the same time, the mandatory nature of grants when certain Housing Act notices have been served, and the possibly benevolent if complex resources test, results in few such notices being served. This leads to less intervention in the private rented sector where the worst housing conditions can be found.

Tables 1 and 2 set out a comparison of the number of grants paid over recent years.

Table 1: Renovations ('000s of dwellings) under the Housing Act 1985

Year	Conversion and improvement	Intermediate and special	Repairs	All
1982	54.7	20.6	29.7	104.0
1983	79.5	27.2	113.1	219.8
1984	84.0	29.0	116.1	229.1
1985	53.0	29.0	54.4	136.4
1986	47.0	24.6	41.7	113.3
1987	49.4	19.7	39.9	108.9
1988	48.2	17.1	40.0	105.3
1989	48.7	14.0	35.5	98.2
1990	50.6	12.6	25.2	88.4
1991	10.8	3.2	4.7	18.7

(provisional for first two quarters only)

Table 2: Renovations ('000s of grants) under the Local Government and Housing Act 1989

Year	Renovation		HMO		Common Parts		DFG		MWA	All	
	Man.	Disc.	Man.	Disc	Man.	Disc.	Man.	Disc		Man.	Disc
1990	0.3	0.4	0.0	-	0.0	-	0.3	0.0	6.5	0.6	6.9
1991	4.5	1.3	0.1	0	0.0	0.0	4.1	0.2	15.6	8.8	17.0

(Note: 1990 figures are for the 3rd and 4th quarters and for 1991 the provisional figures for the 1st and 2nd quarters)

- figure of zero

0.0 figure between 1 and 49 inclusive

Source: Department of the Environment Information Bulletin No. 604, 4 October 1991

It is provisionally estimated that 5,700 mandatory and 8,100 discretionary grants (almost all likely to be minor work assistance) were paid during the second quarter of 1991 compared with 3,100 and 8,900 respectively in the first quarter. Some 6,000 grants were paid under the 1985 Act in the second quarter of 1991 compared with 12,700 in the first quarter. Only 100 HMO grants were paid in the second quarter and no discretionary HMO grants, indeed no HMO grants are recorded as having been paid at all prior to this.

In the first full twelve months of the new scheme a total of 33,300 1989 Act grants of one sort or another were paid. However the number of grants given is slightly greater than the number of dwellings renovated because both a mandatory and discretionary grant can be given for a single programme of work on a dwelling. Minor works assistance represents 66% of the total. In that same period 56,800 dwellings were renovated with one or other of the 1985 Act grants. These would have been approved prior to 30 June 1990.

The apparent low level of take-up of the new mainstream grants so far may be due to a number of reasons:-

1. It is taking time for the backlog of "old" grants to work through the system and these are taking up available capital;
2. Unwillingness to divulge financial information and undertake the test of resources or inability to cope with the complex form¹⁴;
3. There is a poverty trap, so that a person not quite qualifying for 100% grant but on low income, for instance with a small occupational pension, cannot afford to borrow any "notional" contribution and therefore does not proceed with the grant, the mean contribution for mandatory renovation grants is £1,000. (A person in a similar position but with savings of less than £5,000 and no occupational pension could get 100% grant.)
4. Local authorities have been slow in implementing the new scheme in full and pre-application administration of the test of resources, including verification of the information, as well as house inspection now takes longer;
5. Local authorities are delaying administration of the enquiry to application stage in order to manage finance; and
6. Grants may be substantially larger in size than under the previous system but local authorities have less money available to spend on grants; (The mean value of mandatory renovation grants is £8,000 but there is considerable variation, with about

14% of mandatory renovation grants being over £15,000.¹⁵⁾

Conclusion

Until such time as there are sufficient resources available for local authorities to use the grant system to the full and as part of an integrated housing strategy, it will fail to secure improvements in the living conditions of those occupying the poorest housing. That would mean, for instance, making discretionary grants available in a directed way, such as to deal with substandard HMOs and improve the thermal efficiency of older forms of construction on an area basis.

It may be argued that a grant system is no longer the best way to secure renovation of older housing. Yet without a complete reform of the housing finance system, perhaps coupled with a pre-sale fitness check (the report to reflect the sale price), plus a massive programme of affordable new and replacement housing (including public housing), financial support via grant remains essential. As Thomas has argued (Thomas 1986 p.196)¹⁶⁾ the "logic of owner-occupation is that government concern for standards need not extend beyond a basic requirement for health and safety. Generous financial assistance on improvement and repair is seemingly inconsistent with policies which disregard the provision of other forms of tenure in favour of a political philosophy of home-ownership implying self reliance and freedom from state intervention". Yet such help is in accord with a longer tradition of governmental concern for "social inequality in housing" which is linked to the notion that the benefits accruing to society "cannot be rigidly defined to include only the narrow externalities of public health and nuisance", for "concerns for individual health, welfare and potential have less easily defined but demonstrable public benefits". Additionally intervention is required out of national self-interest, and via grant systems "governments have assumed that good housing is a worthwhile goal to be achieved through a subsidy related to a specific end result". However the provision of healthy housing cannot be achieved without adequate funding, and grants are currently only a small part of the jigsaw.

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