



Housing Renewal Assistance Policy 2011

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1. Introduction

The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002, as amended, gives local authorities the power to adopt housing assistance policies to improve the living conditions in their areas.

Housing assistance may be offered by Tunbridge Wells Borough Council in accordance with this Policy towards the cost of:

- the improvement, repair or adaptation of living accommodation including mobile homes, caravans and houseboats
- the acquisition of alternative living accommodation where the existing home is unsuitable for adaptation

Mandatory Disabled Facilities Grants will remain payable under the Housing Grants, Construction and Regeneration Act 1996.

The Council may specify in detail in its *Housing Renewal Assistance & Criteria* the purposes for which applications for assistance are to be invited and may specify different purposes from time to time to reflect current priorities and budgetary constraints.

The net capital budget for funding works under the Policy is set out in the Council's Capital Programme. It is anticipated that monies recovered under repayment conditions or any breach of conditions will be repaid into the capital budget thus allowing money to be "recycled".

All assistance is subject to funding availability.

2. Corporate Priorities and Strategies

The Housing Renewal Assistance Policy 2011 supports the Corporate Priorities (Green & Healthy), the Sustainable Community Strategy and the Housing Strategy by targeting assistance to:

- improve the living conditions of vulnerable people,
- increase the energy efficiency of homes (so reducing heating costs and CO2 emissions)
- reduce the number of vacant properties

3. Persons eligible to apply for housing renewal assistance

Any person who makes an application for assistance must live in the dwelling as his /her only or main residence, and

- have an owner's interest in the dwelling (applications for-Warm Front Assistance may be from an owner or a private tenant), and
- have a duty to carry out the works in question or have the owner's consent in writing to do so, and
- satisfy such test(s) of financial resources as the Council may impose from time to time, more specifically explained in the *Housing Renewal Assistance & Criteria*.

4. Form of Assistance

Assistance may be in any form including, but not restricted to, advice, grant assistance, repayable assistance and loan assistance via an intermediary organisation.

5. Applications for assistance

An application for assistance shall be in a form prescribed by the Council and shall include:

- full particulars, including, where relevant, plans and specifications of the works for which the assistance is sought ('the assisted works');
- at least two estimates from different contractors of the cost of carrying out the assisted works, unless the Council otherwise directs in any particular case;
- particulars of any professional fees and other charges which relate to the preparation for and the carrying out of the assisted works;
- proof that the applicant is an owner or a tenant of the dwelling;
- consent in writing from all owners/tenants of the dwelling to the carrying out of the assisted works;
- if the applicant is the owner of the dwelling(s), an undertaking to repay the grant in the circumstances described in sections 13 and 14 below.

6. Prior qualifying period

The Council may specify in its *Housing Renewal Assistance & Criteria* a period of time during which the applicant must have lived in the dwelling as his/her only or main residence prior to the date of application for assistance and may specify different periods for different purposes.

7. Amount of assistance

The Council may specify in its *Housing Renewal Assistance & Criteria* a maximum amount that may be paid in respect of an application for assistance and may specify different maximum sums for works of different descriptions.

8. Exclusion of works already carried out

The Council will not approve an application for assistance if the assisted works have been carried out before the application is approved, except where:

- the relevant works have begun but have not been completed (in which case, the application may be approved if the Council is satisfied that there were good reasons for beginning the works before the application was approved), or
- the Council decides to approve an application in accordance with this paragraph it may, with the consent of the applicant, treat the application as approved, or
- the Council decides to approve an application in accordance with this paragraph it may, with the consent of the applicant, treat the application as varied so that the assisted works do not include any that are completed.

9. Decision and notification

The Council will notify an applicant for assistance whether the application is approved or refused. The notification will be in writing as soon as reasonably practicable. The Council has a statutory duty to provide notification within six months in the case of Disabled Facilities Grants. However, in order to provide the best possible service to clients, the Council aims to provide notification no later than three months after the date of the application concerned.

If the application is approved, the notification will also specify the works eligible for assistance, the value of the assistance and the form that the assistance will take. The Council, by awarding funding assists the applicant with the works. The contractual agreement is between the applicant and the contractor.

If the application is refused, the Council will at the same time explain the reasons for the refusal and the procedure for appealing against the decision.

If the Council is satisfied that owing to circumstances beyond the control of the applicant the cost of the assisted works has increased or decreased, it may re-determine the amount of the assistance and notify the applicant accordingly.

10. Supervision of works

The Council does not accept any responsibility for supervision of works. This responsibility rests with the applicant, unless he/she appoints a professional advisor or agent for that purpose.

11. Payment of assistance: conditions as to carrying out of the works

The assistance will only be paid if:

- the assisted works are completed within 12 months from the date of approval, or such further period as the Council may allow,
- the assisted works are carried out in accordance with such specifications as the Council determines,
- the assisted works are carried out by one of the contractors whose estimates accompanied the application,
- the assisted works are executed to the satisfaction of the Council, and
- the Council is provided with an acceptable invoice, demand or receipt for payment for the works and any professional fees and other charges. For this purpose an invoice, demand or receipt is acceptable if it satisfies the Council and is not given by the applicant or a member of his/her family.

12. Payment of assistance

The Council will normally pay the assistance direct to the contractor, either in instalments as work proceeds or in one lump sum following completion of works. Where assistance is payable, but the assisted works have not been executed to the satisfaction of the applicant, the Council may at the applicant's request and if it considers it appropriate to do so withhold payment from the contractor. If it does so, the Council may make the payment to the applicant instead.

13. Repayment where an applicant is not entitled to assistance

If an application for assistance is approved but it subsequently appears to the Council that the applicant (or, in the case of a joint application, any of the applicants) was not, at the time of making a valid application to the Council, entitled to the assistance, no payment shall be made or, as the case may be, no further instalments shall be paid.

The Council may also demand that any payments that have already been made be repaid, together with interest from the date on which they were paid until repayment, at a reasonable rate determined by the Council.

14. Conditions for repayment of assistance

Discretionary assistance in respect of the following initiatives will be repayable in full on transference of ownership of the property to people other than a spouse, unless otherwise agreed in accordance with any exceptions policy that may be agreed from time to time by the Council:

- Relocation Assistance
- Decent Homes Assistance
- Coldbusters
- Empty Property Assistance
- Landlords Assistance

Mandatory Disabled Facilities Grants (DFGs) exceeding £5000 to owner occupiers will be repayable up to a maximum of £10,000 on the sale of the property within ten years.

15. Additional conditions

Where the Council approves an application for assistance it may impose additional conditions with the consent of the applicant. The additional conditions may include but are not restricted to:

- the applicant to make a contribution towards the assisted work,
- the right of the Council to recover specialised equipment when no longer needed,
- provision of nomination rights to the Council, for a period of five years from the certified date of completion.

Breach of any of these additional conditions will give the Council the right to demand repayment of the assistance.

16. Security for assistance

Any condition above which creates a liability to repay the assistance will be a local land charge.

The liability to repay any assistance may be discharged at any time by paying to the Council a sum equal to the amount of the assistance or such lesser sum agreed by the Council.

17. Appeals procedure

A review panel will be established to consider variations to the application of the Policy and appeals from those deemed ineligible for assistance. The recommended membership of the panel is:

- the Council's Housing Renewal Team Leader, and
- the Council's Head of Environment and Street Scene or such other officer designated by the Head of Environment and Street Scene.

18. Administration of policy

The Council may use the services of a home improvement agency or other external organisation to administer this Policy and to:

- help older, disabled and vulnerable people to remain independent in their own homes by identifying necessary repairs and improvements, finding suitable contractors and ensuring the work is properly carried out,
- help people to access public and other resources for housing renewal, including Disabled Facilities Grants.

19. Variations to the Policy

The Council retains the right at any time to introduce a mechanism for further prioritisation of assistance under this policy to reflect budgetary requirements at the time.

This policy will be reviewed every three years or as necessary to comply with changes in statute or delegated responsibility.

HRA APPENDIX I

Housing Renewal Assistance and Criteria

The proposed budget for mandatory Disabled Facilities Grants for 2011-2014 is £706,000 per annum (including an allocation of £262,000 from Tunbridge Wells Borough Council). The proposed budget allocated by the Council for all discretionary assistance for 2011-2014 is £100,000 per annum.

1. **Disabled Facilities Grants (DFGs)**

These grants are mandatory and are available for owner-occupiers and private tenants who are, or would be eligible to be, registered with Social Services as disabled. DFGs are means tested with the exception of grants which are given to children and are generally non-repayable. A grant is considered once an assessment has been carried out by an Occupational Therapist to determine any works that would be necessary and appropriate, including the following:

1.1 Facilitating access to:

- a property, or to a building in which a flat is situated
- a room which is or will be used as the principal family room
- a room used or to be used for sleeping, or providing a suitable room for the disabled occupant
- a room in which there is a toilet, bath shower or wash basin, or providing a room which has the required facilities
- amenities for preparing and cooking food
- heating, lighting and power at the property, improved heating, and the relocation of controls or power points to make them more accessible

1.2 Making the property safe for the disabled occupant

1.3 Works to enable a disabled occupant to care for another dependant person, who normally resides at the property

The applicant must either be the owner or private tenant of the relevant dwelling, park home or houseboat.

Where grant assistance of more than £5,000 is given to an owner occupied property the Local Authority may demand repayment of part or all of the grant (but may not demand in excess of £10,000) if the property is disposed of within 10 years of completion of the grant.

2 **Relocation Assistance**

In cases where homes are unsuitable for improvement, repair or adaptation and/or owners are unable to afford the maintenance and running costs even after improvement, assistance may be awarded to help an applicant to move to more suitable accommodation provided they are willing to do so. The maximum award for this purpose is £10,000 in any five-year period. This assistance is repayable.

3 **Decent Homes Assistance**

Discretionary assistance is provided, up to a maximum of £20,000, to carry out repairs and improvements which could have a positive impact on the health and safety of the occupant and/or enable them to remain in their own home.

Works that would be considered include energy efficiency measures and security works.

Applicants must be homeowners who meet the Definition of Vulnerability in Appendix II(b). **or** homeowners over 70 where state pension is more than 50% of the applicants income their and the applicant has savings less than £16,000. This Assistance is repayable.

4 Landlords Assistance

Repayable assistance of up to £2,000 maximum for improvement works to accredited properties under the Council's Private Accredited Lettings Scheme. Only works for improvements to energy efficiency or security will be eligible for this assistance.

5 Coldbusters

There are a number of grants available nationally towards the provision of energy efficiency measures in homes, e.g. Warm Front grants and the Carbon Emissions Reduction Target (CERT).

Warm Front is a central government-funded, non-repayable grant scheme to provide heating and insulation to certain vulnerable households in receipt of one of the principal income related benefits.

CERT provides free loft and cavity insulation for priority group households (ie those in receipt of one of the principal income or disability related benefits or people over 70 years of age). CERT also subsidises energy efficiency measures to those not in the priority group.

These grants/subsidies will only be available until the end of 2012 when the Energy Companies Obligation (ECO) will be introduced

Coldbusters is designed to complement these national schemes to tackle fuel poverty in the borough and enable vulnerable people to live in homes that are affordable to heat.

Coldbusters can provide funding to meet excess payments required for Warm Front works to proceed (ie when the Warm Front maximum is insufficient to cover the full cost of recommended works) or enable a comprehensive package of measures to be installed to ensure that a property is brought up to the Decent Homes Standard for thermal efficiency.

Coldbusters may also provide repayable assistance to the following vulnerable homeowners who do not meet the criteria for Warm Front:

- aged between 60 and 70 years of age and in receipt of one of the qualifying Warm Front benefits
- meet the Definition of Vulnerability in Appendix II(b)
- aged over 70 with a State Retirement pension that provides more than 50% of their income and with savings less than £16,000.

Energy efficiency measures eligible for assistance include:

- Installation of central heating systems
- Connection to a gas supply
- Replacement boilers and improved heating controls
- Insulation measures
- Wood fuel heating systems where a property is not, and cannot be, connected to the gas network.

The assistance will include relevant works, fees and VAT to a maximum of £8000. Assistance in excess of £300 is repayable.

6 Empty Property Assistance

Repayable assistance may be available in the following circumstances to help owners renovate long term empty properties and return them to use as affordable housing:

- The property has been identified as an 'empty property' (ie, vacant for at least six months) and
- There is a housing need for the identified units of accommodation in the area (determined by way of consultation with the Council's Housing Needs Team).

Consideration will be given to offering the owner of the property assistance towards the cost of bringing the property back into use, either through repair or conversion, or by providing self-contained flats within the property. The property must be brought up to the Decent Home Standard which would include any fire protection works necessary under housing legislation and in consultation with the Fire Safety Officer.

The Assistance will provide for up to 75% of the cost to a maximum of:

- 1 bed unit (flat or house) - £10,000
- 2 bed unit (flat or house) - £15,000
- 3 bed unit (flat or house) - £20,000

There will be a £100,000 limit for conversion works to any one property.

As a condition of this assistance the Council will be given nomination rights for a five-year period (from the date the Council certifies that the works are completed to a satisfactory standard) on the house or flat. The owner must sign a contract to this effect when making a valid application to the Council. The rent will be set at below market rental income levels to provide increased affordable accommodation in the borough.

Eligible works will not include decoration, carpets, curtain poles or curtains, furniture or fittings that would need to be provided by the owner prior to letting.

7 'No Use Empty Loan' Interest Payments

Assistance is available to owners of properties that have been empty for more than six months and qualify for the Kent County Council 'No Use Empty Loan' to fund the interest payments on these loans. The loan is to bring the property up to the Decent Homes Standard. This assistance is not repayable.

HRA APPENDIX II

Eligibility definitions

(a) – Possible works considered towards reducing the health and safety risk of hazards identified under the Housing Health and Safety Rating System

Hazards associated with excessive low or high indoor temperatures

- Any dampness in such a position, and sufficiently extensive and persistent as to reduce the effectiveness of the thermal insulating material and / or structure.
- Inappropriate type of heating system / Inadequate size of heating system / Poorly maintained heating system (Warm Front).
- Inadequate controlled means of ventilation such as permanently louvered windows.
- Disrepair to ventilation system such as warped and ill fitting metal windows or windows that are unable to be opened and provide poor ventilation.
- Faulty, inappropriately designed, or inadequate controls to the heating system.

Fall hazards

- The absence of stairs where access is required from one level to another.
- Very narrow tread lengths and / or high riser heights.
- Alternating tread stairs / narrow stair widths.
- Absence of any handrailing to stairs / Inappropriately positioned handrailing.
- Inadequate natural / artificial lighting to the top and foot of stairs.
- Disrepair to stairs / handrailing.
- Excessive slope / unevenness to a floor, path or yard.
- The presence of any trip steps or projecting thresholds.
- Disrepair to the structure of a floor, path or yard.
- Inadequate slip resistance to a floor, path or yard.
- Lack of safety catches to windows / disrepair to any window catches.
- Insufficient guarding to any balconies.
- Handrailing to baths insufficient or lacking.

Hazards from fire

- Insufficient and / or inappropriately sited electrical sockets.
- Defects to the electrical installation to the dwelling.
- Lack of smoke detectors.

Hazards associated with hot surfaces and materials

- Unprotected exposed surfaces to fixed appliances or pipework with surface temperatures of 70oC or more.

Hazards associated with damp and mould growth etc.

- Lack of controllable background ventilation especially for the extraction of moisture laden air during cooking / bathing.
- Inadequate damp proofing / disrepair to damp proofing.
- Disrepair to floors, walls or roofs.
- Inadequately installed and sealed facilities such as baths, showers, wash hand basins and WC basins.

Hazards from carbon monoxide etc.

- From any open flued appliances.
- Inadequate ventilation in rooms with any appliance.
- Disrepair to any ventilation in such rooms such as inability to open windows.
- Disrepair to appliances.

Hazards from electrocution

- Electrical hazards.
- Disrepair to wiring, sockets, light fittings or switches.
- Inadequate number of, and badly sited, sockets.

Hazards from noise

- Inadequate insulation and / or construction of floor / ceiling structure within a dwelling.

Hazards from lead

- Disrepair to old paint likely to contain lead.
- The presence of lead pipework for domestic water.

Hazards from asbestos and other fibrous materials

- Damage or disrepair to any fibrous material.

Hazards associated with entry by intruders

- Disrepair to doors and windows in a dwelling.
- Inadequate locks to external doors and windows.

Hazards associated with crowding and space

- N/A.

Hazards from explosions

- Inappropriate siting of LPG cylinders.
- Defects to gas installation / appliances

Hazards associated with domestic hygiene, pests etc.

- Uneven and / or cracked walls, floors and / or ceilings.
- Disrepair to drains, sewers and / or inspection chambers.

Hazards from inadequate provision for food safety

- Disrepair to any sinks, drainers or worktops.
- The absence of sufficient space for the installation of cooking facilities.

Hazards associated with inadequate provision for personal hygiene

- Lack of sufficient and / or appropriately sited baths, showers, wash hand basins.
- Disrepair to baths, showers, wash hand basins.

Hazards associated with inadequate sanitation or drainage

- Cracked or otherwise non-impervious bowl to a water closet.
- Inadequate supply of water to the flushing cistern serving a water closet.
- Defective mechanism to a flushing cistern serving a water closet.
- Defects to waste pipe serving a water using facility.
- Defects to a foul drainage system.
- Defects to the waste water drainage system.

Hazards from contaminated domestic water

- The supply of mains water of inadequate quality or inappropriate pressure.
- Defects to water pipework within the dwelling.

Hazards from structural failure

- Evidence of continuing structural movement.
- Structural cracks and / or bulges to external walls.
- Open jointed brick, stone or blockwork to external walls.
- Cracked or other disrepair to lintels or sills to opening to external walls.

- Loose or slipped roof slates or tiles.
- Loose pots to chimney stacks.
- Insecure rain water goods and / or external pipework.
- Cracked, damp and / or bulging ceilings and / or walls.

Hazards from inadequate lighting

- Inadequate means and / or inappropriate siting of artificial lighting.

Hazards from uncombusted fuel gas

- Defects to gas installation / appliances.

Entrapment and collision hazards

- Difficulty operation of door and window catches, and of doors and opening lights.
- Windows opening across pathways.

Hazards from poor ergonomics

- Inappropriate positioning of a wash hand basin, bath, shower, bidet, kitchen worktop, sink, etc.
- Inappropriate positioning of window controls.

Eligibility Definitions

(b) – Definition of Vulnerability

For the purposes of this policy a vulnerable householder is one in receipt of one of the principal income related benefits and is either:

- over 60 years old, or
- considered disabled or suffering from a limiting long term illness, or
- has children under the age of 16 years

Qualifying benefits include:

- Income Support
- Council Tax Benefit
- Guaranteed Pension Credit
- Working Tax Credit with an income of less than £16140 + Disability Premium
- Child Tax Credit with an income of less than £16140
- Income based Job Seekers Allowance

NOTES:

- 'Householder' includes the applicant's spouse or partner if they are living with the applicant.
- Partner means the spouse or person with whom the applicant lives as husband or wife or civil partner. This includes same sex partners.

HRA APPENDIX II

Eligibility Definitions

(c) – Summary definition of a decent home

A decent home is one which is wind and weather tight, warm and has modern facilities. It reflects what social landlords spend their money on. To set a national target a common definition of decent is needed so all social landlords can work towards the same goal.

A decent home meets the following four criteria:

a – It meets the current statutory minimum standard for housing.

Dwellings below this standard are those where a Category 1 hazard (as defined by the Housing Health and Safety Rating System) exists, and where action must be taken as set down in the Housing Act 2004.

b – It is in a reasonable state of repair.

Dwellings which fail to meet this criterion are those where either:

- one or more of the key building components are old and, because of their condition, need replacing or major repair; or
- two or more of the other building components are old and, because of their condition, need replacing or major repair.

c – It has reasonably modern facilities and services

Dwellings which fail to meet this criterion are those which lack three or more of the following:

- a reasonably modern kitchen (20 years old or less);
- a kitchen with adequate space and layout
- a reasonably modern bathroom (30 years old or less);
- an appropriately located bathroom and WC;
- adequate insulation against external noise (where external noise is a problem);
- adequate size and layout of common areas for blocks of flats.

A home lacking two or less of the above is still classed as decent therefore it is not necessary to modernise kitchens and bathrooms if a home passes the remaining criteria.

d – It provides a reasonable degree of thermal comfort.

This criterion requires dwellings to have both effective insulation and efficient heating.

Housing Renewal Assistance Policy 2011

HRA APPENDIX III – Summary of Tunbridge Wells Borough Council Housing Renewal Assistance Policy Activities 2011

Activity	Who can apply	Objective
<p>1. Disabled Facilities Grant (DFG)</p> <ul style="list-style-type: none"> • <i>Mandatory grant</i> • <i>Means-tested except in the case of DFGs for children</i> • <i>Up to £30,000</i> • <i>For owner occupier grants in excess of £5000, up to £10,000 is repayable on the sale of the property within 10 years</i> 	<p>Disabled people supported by an Occupational Therapist</p>	<p>To enable disabled people to live safely and independently in their own homes.</p>
<p>2. Relocation Assistance</p> <ul style="list-style-type: none"> • <i>Discretionary assistance</i> • <i>Up to £10,000</i> • <i>For legal and removal costs only</i> • <i>Repayable if another move is made within 10 years</i> 	<p>People eligible for a DFG but whose homes are not suitable for adaptation.</p>	<p>Where it not considered reasonable or practical to adapt the home of an applicant for a DFG, assistance may be provided to help the person move to more suitable accommodation, provided they are willing to do so.</p>
<p>3. Decent Homes Assistance</p> <p>Discretionary assistance for essential improvements or repairs to make homes occupied by vulnerable owner occupiers decent. Remedial works to which may be eligible include:</p> <ul style="list-style-type: none"> • <i>Rewiring</i> • <i>Replacement windows</i> • <i>Damp and mould</i> • <i>Kitchen and bathroom improvements</i> <p>Maximum £20,000. Repayable.</p>	<p>Vulnerable owner occupiers as defined in Appendix II(b) (ie in receipt of a qualifying benefit) or who are over 70 years of age and whose state pension is more than 50% of their income with savings less than £16,000</p>	<p>To increase the number of vulnerable people living in a decent home.</p> <p>To enable vulnerable owner occupiers to remain living in their own home.</p> <p>Recycle more monies for private sector renewal.</p>
<p>4. Landlords Assistance</p> <p>Discretionary assistance (maximum £2,000) for landlords to bring properties up to the Decent Homes Standard and above. Repayable on sale within 10 years.</p>	<p>Landlords of properties accredited under the Council's Private Accredited Lettings Scheme.</p>	<p>Link with accreditation scheme to improve the management and conditions of rented properties including Houses in Multiple Occupation (HMOs).</p>

Housing Renewal Assistance Policy 2011

Activity	Who can apply	Objective
<p>5. Coldbusters</p> <p>Discretionary assistance to provide energy efficient heating and insulation for vulnerable private sector households at risk of fuel poverty. Where eligible, Warm Front/CERT/other external funding streams will be utilised in the first instance unless works are required to meet an urgent need</p> <p>Eligible works include:</p> <ul style="list-style-type: none"> • <i>Central heating systems</i> • <i>Replacement boilers and heating controls</i> • <i>Insulation measures not funded by national schemes</i> • <i>Wood fuel heating for properties not connected to mains gas</i> <p>This initiative will also include decency surveys. Assistance in excess of £300 will be repayable.</p>	<p>Households eligible for Warm Front</p> <p>Homeowners who meet the Council's Definition of Vulnerability as set out in APPENDIX II(b).</p> <p>Homeowners aged over 70 with a State Retirement pension that provides more than 50% of their income and with savings less than £16,000.</p>	<p>Reduce the number of vulnerable households living in fuel poverty.</p> <p>Increase the number of vulnerable households living in decent homes that are affordable to heat.</p> <p>Improve take up of Warm Front and CERT initiatives.</p> <p>To provide top up funding when the cost of heating and insulation exceeds government grant funding</p>
<p>6. Empty Property Assistance</p> <p>Discretionary assistance to renovate, improve or convert long term empty properties (including flats above commercial properties) and return them to use.</p> <p>Assistance is conditional on the Council having tenant nomination rights for a five-year period with the rent set at below market rent.</p> <p>Repayable on sale of the property.</p>	<p>Owners of properties that have been vacant for more than six months.</p>	<p>To increase the supply of affordable housing and reduce housing waiting lists.</p> <p>To maximise the use of the existing housing stock and reduce the number of empty homes in the borough.</p>
<p>7. No Use Empty Loan Interest</p> <p>Assistance to fund the interest payments on loans taken out under the Kent County Council 'No Use Empty' Loan Scheme.</p>	<p>Owners of empty properties who have applied for loans through the Kent County Council 'No Use Empty' Fund.</p>	<p>To maximise the use of the existing housing stock and reduce the number of long term empty homes in the borough.</p>