
REPORT FOR: CABINET

Date of Meeting:	10 th October 2019
Subject:	Update on the Harrow Self-build Register and proposed changes to the registration process
Key Decision:	Yes (affects more than one ward)
Responsible Officer:	Beverley Kuchar, Interim Chief Planning Officer
Portfolio Holder:	Cllr Keith Ferry, Portfolio Holder for Regeneration, Planning and Enterprise
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	Appendix A - Harrow Self-build Register: summary report

Section 1 – Summary and Recommendations

The Self-build and Custom Housebuilding Act 2015 imposed a duty upon local authorities to maintain a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in their area in order to build homes for their own occupation. There has been an obligation to keep a register since 1st April 2016.

This report provides a summary of the entries on the Harrow Self-build Register, including number of entries (468 individuals and 4 associations, as at 12 June 2019), where applicants currently live, areas applicants have

expressed an interest in acquiring a self-build plot and the type of home / plot they wish to purchase. A full analysis of the register is included at Appendix A.

The analysis of the register has identified that a significant number of entries on the register are from people who have no local connection to Harrow and / or have expressed interest in multiple boroughs. The register as it currently stands is therefore likely to significantly over-state the true demand for self-build plots in Harrow. This is problematic as the Act also places an obligation on local authorities to grant permission of sufficient serviced self-build plots to meet demand, as identified through the register.

The report therefore sets out proposed changes to the Harrow Self-build Register under the Self-build and Custom Housebuilding Regulations 2016. These include splitting the register into two parts (Part A – local criteria and Part B – standard national criteria i.e. ‘the rest’), the introduction of eligibility criteria, and changes to the registration fee. These measures are anticipated to make the register better reflect true demand for self-build plots in Harrow. For example, approximately 60 individual entries are anticipated to meet the proposed local connection test / funding criteria, of which 23 have expressed Harrow as their ‘first choice’ (where stated).

Recommendations:

Cabinet is requested to:

1. Approve the introduction of a two part self build and custom build register
2. Approve the local eligibility criteria for joining Part 1 of the register:

Part 1:

- i. *Residency in the borough for two of the previous three years prior to the date of application; **or***
- ii. *Continuous employment in the borough for at least three years prior to the date of application (more than 16 hours per week); **or***
- iii. *In the service of the regular armed forces or have served in the armed forces within the previous three years prior to the date of application*

and

- iv. *Able to provide evidence of “sufficient resources” to purchase land. (Applications should be evaluated individually to provide a fair assessment, although funding of at least £250,000 is likely to be required as a starting point to purchase any sizeable plot of land in Harrow based on desktop research carried out in June 2019).*

For associations of individuals wishing to be added to the Harrow Self-build register, at least three-quarters of the members of the association must meet the local connection criteria above and be able to demonstrate that the association collectively has sufficient financial resources to purchase a plot large enough to accommodate its

members, in order to be added to Part 1 of the register.

In applying the local connection and financial resources criteria to applications from individuals, consideration may be given to exceptional circumstances (for example, the local connection test not being fully met due to a person escaping domestic violence).

Part 2 eligibility will be the national criteria i.e. over 18 years old *and* a British Citizen or national of an EEA State *and* seeking to acquire a serviced plot of land to build a house to occupy as sole or main residence.

3. Approve the adjusted fee for joining each part of the register, to be effective from 31st October 2019:
 - i. *Fee for entry to Part 1 of register: £100, with annual retention fee of £50*
 - ii. *Fee for entry to Part 2 of the register: £50 (annual retention fee is not allowed for Part 2)*
4. Approve the maintenance of the existing entries on the register until 30th October 2019 after which date they will be re-assessed against the new eligibility requirements and subject to payment of the appropriate fee.
5. Delegate authority to the Interim Chief Planning Officer following consultation with the Portfolio Holder for Regeneration, Planning and Enterprise to develop detailed guidance and documentation regarding the agreed criteria, revised registration process (including in-house register / web form) and assessment of applications to be placed on the register.
6. Delegate authority to the Interim Chief Planning Officer to assess applications to be included on the Harrow Self-build Register in accordance with the local connection tests outlined above.
7. Note:
 - (a) the analysis of the current Harrow Self-build Register contained in the report and Appendix A.
 - (b) the intention to bring maintenance of the register in-house, using a new web-form.

Reason: (For recommendations)

To ensure that the self build register reflects genuine local demand for land for custom and self build housing and to assist the Council in better meeting its obligations under the Self-build and Custom Housebuilding Act 2015.

Section 2 – Report

1. Introductory paragraph

- 1.1 This report and accompanying analysis report (Appendix A) provides background to the current self-build registration process, analysis of current register entries, and proposed changes to registration to introduce a two-part register. These changes are permissible under the Self-build and Custom Housebuilding Regulations 2016. This overhaul is required in order to accurately determine the baseline demand for self-build plots in the borough. The Council will be required to meet the baseline demand determined by the total number of entries in Part 1 of the register within three years of the conclusion of each base period. Entries on Part 2 do not count towards demand for the purpose of the Self-build and Custom Housebuilding Act 2015 but local authorities must consider Part 2 of the register when carrying out planning, housing, land disposal and regeneration functions.

2. Options considered

- 2.1 Local authorities must give suitable planning permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. Currently the level of demand is determined by the total number of all registrations during a base period (running yearly ending on 30 October). Harrow's current single register is collated by Ecomotive, a social enterprise company who host the 'national' Local Self Build Register which aims to be a "one stop shop" for connecting self builders and local councils. This register hugely overestimates demand however because it is a register of interest rather than a register of intent. An overestimation of the local demand could result in the Council having to grant permission for self-build housing on more sites than actual demand requires. This would have subsequent implications for the Council's ability to meet its London Plan housing targets, which will increase significantly with the final publication of the New London Plan (anticipated early 2020). The option of maintaining the current register has been considered but dismissed.
- 2.2 It is proposed to split the register into Part 1 and Part 2. There will be local connection criteria to join Part 1. The level of demand will be established by reference to the number of entries added to Part 1 during a base period. Land for development is under great demand in Harrow so a local connection test is necessary to ensure that people who have the strongest connections to the area are being prioritised for self build, as allowed for under the Act. The option of not setting local criteria has been considered but dismissed.
- 2.3 It is considered that the new two-part register should have "sufficient funds" criteria to join Part 1. Applications will be evaluated individually to provide a fair assessment. It would be unfair to allow people to join Part 1 of the register at a cost of £100 and pay the annual retention fee if they could not afford to purchase a plot. It also prevents overestimation of demand and the

Council granting permission for more self build plots than will be taken up. This would have subsequent implications for the Council's ability to meet its housing targets. The option of not setting a requirement to have "sufficient funds" for Part 1 has been considered but dismissed.

- 2.4 The variation of fees is considered necessary to bring them in line with other similar local authority areas. The current listed fee for Harrow is £262.50 to join either part of the register and £26.30 each year to remain on Part 1. Lowering the initial fee to £100 for Part 1 and £50 for Part 2, and raising the annual fee to remain on Part 1 to £50 better reflects the cost recovery purpose of the fee. The requirement that the fee does not act as a deterrent for people to enter or remain on the register is also better fulfilled. The option of not varying the fees has been considered but dismissed.
- 2.5 Appendix A provides a full analysis of the current register and approaches / options used by other boroughs in setting local criteria and fees.

3. Key findings from analysis of current register

- 3.1 There have been 468 unique individual applicants to Harrow's Self-build Register since May 2016. Only 52 of these applicants (11.1%) currently live in Harrow. The majority of applicants (73.5%, including those who already live in Harrow) live in Greater London.
- 3.2 Most applicants expressed an interest for self build in multiple areas. 396 applicants (84.6%) of applicants who registered with Harrow also registered with an additional six or more other local authorities. Nearly a quarter of applicants (116 or 24.8%) registered with 40 or more other local authorities in addition to Harrow. This makes it impossible to determine true demand for self build plots in each area.
- 3.3 A relatively small proportion of the 468 individual applicants actually have Harrow as their first preference of location. Harrow was named as top choice by 56 (12%) of applicants. Thirty of these 56 individuals already live in Harrow. Currently, anyone is able to join the Harrow Self-build Register without any personal connection to the borough and those who have indicated a connection have not had to prove this.
- 3.4 The most popular type of plot / dwelling for applicants is a detached 3 bedroom house on a single or small (2-15 homes) site. These types of dwellings do not make the most efficient use of land, and to meet the level of demand suggested by the current register would be unfeasible given the lack of suitable space to build in the borough and the demanding housing targets of the draft New London Plan.
- 3.5 With regards to finance, 35% of applicants on Harrow's Self-build Register have available funding of £250,000 or less (via savings, private finance or a mortgage). This is unlikely to be sufficient to purchase a plot of land at the current market rate in the borough.
- 3.6 There are currently four associations of individuals seeking self-build plots in Harrow. None of these associations expressed Harrow as their first choice, with three expressing an interest in 7-40 local authorities and the other

between 41-100 areas. None of the associations have members who currently live in Harrow, but all associations are based in London. The number of plots sought range from 4 to over 20. The association seeking over 20 plots only has one household in the group and is a private limited company with a website indicating they are a development company (rather than a group of individuals with a genuine interest in); such an 'association' is therefore considered unlikely to meet the intent of the self-build register.

3.7 Appendix A provides a full analysis of the current register.

4. Proposed changes to register/fees

4.1 The October 2016 *Self-build and Custom Housebuilding (Time for Compliance and Fees) Regulations 2016* and the *Self-build and Custom Housebuilding Regulations 2016* gave greater discretion to local authorities to set eligibility requirements. These enabled local authorities to:

- i. charge a fee for entries on to the register (and an annual fee to remain on the register) to cover the cost of the administration involved in compiling and maintaining the register;
- ii. set a local connection test (any local eligibility test will be deemed to be satisfied if the individual is in the service of the regular armed forces of the Crown and for a period after leaving service); and
- iii. set a requirement to provide evidence of sufficient resources to purchase land for self-build and custom housing.

4.2 Local authorities who set up local eligibility criteria must divide their self-build register into two parts, with Part 1 of the register including all entries meeting all eligibility requirements set by the relevant local authority and Part 2 being those entries which meet all nationally applicable eligibility criteria.

4.3 The total number of entries in Part 1 of the register will be the "baseline demand" for plots. The need must be met within three years of the conclusion of each base period. Entries on Part 2 do not count towards demand for the purpose of the 2015 Act but local authorities must consider Part 2 of the register when *carrying out* planning, housing, land disposal and regeneration functions.

4.4 It is proposed that Harrow should set up a two part register due to the large number of people on the current register many of whom have no local connection, and a significant proportion of whom do not have financial resources for self build to be viable in Harrow. As of June 2019, six London boroughs had implemented the two part register.

4.5 **Local connection:** A residence and/or work connection seems logical to give priority to people who have the closest links with the borough. Some boroughs only accept residency within the borough, whilst others also include working in borough as a suitable connection. *Length* of time required ranges from 2-7 years, with some boroughs requiring this to be continuous.

- 4.6 **Funding criteria:** This only needs to demonstrate that sufficient resources are available to purchase land. Regulations do not require evidence of sufficient funds to *cover* build costs or other associated costs. The amount is usually based on average land prices within the borough. Some boroughs set a specific level (of the order of £350,000 in central London locations), and some simply require “sufficient resources”. The officer making the assessment would then judge what is deemed sufficient based on the size of plot the applicant requires and current land value trends.
- 4.7 The criteria set depend on the purpose of self-build schemes for Harrow. Such schemes could provide a way for people who may never get on the housing ladder in the *traditional* way to own their own home. Self-build could also provide chances to create new eco-friendly communities in the borough. In these cases more lenient criteria could be applied, and such schemes may also qualify for external funding assistance.
- 4.8 **Proposed criteria for Part 1 of the register:**
- i. Residency in the borough for two of the previous three years prior to the date of application; *or*
 - ii. Continuous employment in the borough for at least three years prior to the date of application (more than 16 hours per week); *or*
 - iii. In the service of the regular armed forces or have served in the armed forces within the previous three years prior to the date of application
- and*
- iv. Able to provide evidence of “sufficient resources” to purchase land. (Applications should be evaluated individually to provide a fair assessment, although funding of at least £250,000 is likely to be required as a starting point to purchase any sizeable plot of land in Harrow based on desktop research carried out in June 2019).
- 4.9 For associations, it is acknowledged that in some instances not all members will meet the proposed local connection and financial criteria but have a genuine interest in a self-build plot in Harrow as part of an association of individuals for which they have some connection / common interest. It is therefore proposed that at least three-quarters of the members of an association must meet the criteria.
- 4.10 Should the two part register be agreed, everyone currently on the Harrow Self-build Register would be contacted and invited to apply to join the two-part register. Applicants should provide evidence that they meet the criteria to join either Part 1 or Part 2 of the register, including proof of age and nationality. This will give a more accurate and current indication of level of demand.
- 4.11 It is also proposed that a new registration process be implemented. The current service provided by Ecomotive is neither convenient nor efficient. The questions asked in relation to local connections are not specific enough, and it is hard to ascertain which applicants are genuinely interested in

Harrow due to multiple districts being selected. It is cumbersome to extract data from the system, and the customer service provided by the company can be slow. It is considered that it would be more efficient to maintain the register 'in-house'.

- 4.12 A fee to cover the increased administration costs of reviewing submitted documents, updating the register and sending the outcome of the application seems justifiable. It would also ensure that people registering have a real intention of progressing with a self-build project. The Council does not currently implement a fee, although a self build registration fee is included in the Council's fees and charges. The fee is listed as £262.50 to join either part of the register and £26.30 per year to remain on Part 1.
- 4.13 Authorities can only set fees on a cost recovery basis. London boroughs tend to charge relatively high fees of up to £350; most local authorities outside the capital who choose to charge a fee have set it at less than £100. For example, several local authorities in Surrey charge £25 for an application to enter on to the register and an annual fee of £10 to remain on Part 1. The current fee listed by Harrow Council to join the register therefore seems disproportionately high and should be reviewed.
- 4.14 **Proposed fees for the Harrow register:**
- i. Fee for entry to Part 1 of register: £100, with annual retention fee of £50
 - ii. Fee for entry to Part 2 of the register: £50 (annual retention fee is not allowed for Part 2)
- 4.15 This is based on the assessment that each new application would take approximately one hour of an Officers time. Other boroughs argue that the cost is more than this because Planning Officers have to incorporate demand into planning policies. However, legislation states that any fee should not act as a deterrent for people to be entered on or remain on the register.
- 4.16 The Council would have 28 days to confirm entry onto Part 1 or Part 2 of the register and request payment. If an application is not eligible then the council must explain the reasons within 28 days of determining the application.
- 4.17 Introducing the proposed criteria would reduce the current 'baseline' of 468 plots to an estimated 60 plots. Demand should be met within three years of each Base Period, meaning that the Council is required to grant planning permission for approximately 24 plots by 30th October 2019 (based on modelled data; this compares with 207 if register continues in its current form).
- 4.18 Appendix A provides a full analysis of the approaches / options used by other boroughs in setting local criteria and fees.

5. Planning Policy Working Group / Ward Councillors' comments

- 5.1 The Planning Policy Working Group considered the analysis of the Harrow Self-Build Register and proposed changes to the registration process at its meeting on 3 September 2019. The draft minutes of the meeting's consideration of the item are included below:

Members received a presentation on the Harrow Self-build Register, which was proposed to be brought in house rather than being administered by an external party. The briefing noted that there were a significant number of entries on the register from people who did not live in the borough and who had expressed an interest in multiple boroughs; this was likely to overstate the true demand for self-build plots in Harrow. Additionally, members heard that a significant portion of people on the register were looking for detached dwellings on individual plots, raising concern about their ability to afford to purchase such a plot. As a result of this, it was proposed to introduce a local connection test (resident or employment), financial resources test and to charge a fee to be entered on the register and (for the proposed local criteria) to be charged an annual fee to remain on the register.

It was queried as to how many self-build developments had the borough permitted. Officers advised that the borough had permitted 10 such developments since the self-build legislation had been introduced; this did not meet the demand suggested by the current register.

It was queried if a self-build development could be brought forward as a block of flats or an HMO. Officers advised that the development would have to be for the primary residence of the applicant, and policies would still be applied to any scheme coming forward. Harrow would need to demonstrate meeting self-build demand.

Members questioned if a self-build development was for a primary residence, how was it monitored to ensure that the applicant remained the occupier of the developer, and hadn't sold/rented the dwelling. Officers advised that a self-build dwelling gets relief from CIL (Community Infrastructure Levy). However, the charge is registered on the land title, and should the applicant sell the property within the 3 year time frame, then the CIL charge would be payable to the Council. CIL is often a sizeable fee, and would act as a deterrent.

With regard to the means testing, it was requested that notwithstanding the proposed tests, exemptions should be able to be made, for example for persons fleeing domestic violence. Officers noted this request.

- 5.2 Reference to exceptional circumstances (i.e. persons escaping domestic violence) has been included in the proposed criteria.
- 5.3 As this report affects all wards, Ward Councillor comments have not been directly sought.

Performance Issues

If the proposed split of the register does not go ahead there is a risk of overestimation of the local demand for self-build plots. This could result in the Council having to grant planning permission for self-build housing on more sites than actual demand requires. It would have subsequent implications for the

Council's ability to meet the significantly increased housing targets in the New London Plan, particularly as self-build plots of the nature sought by the majority of individuals currently on the register (detached houses on individual plots) represent an inefficient use of urban land and contrary to the direction of travel at a national and regional level to increase densities in established urban areas so as to meet housing need whilst not encroaching on Green Belt / Metropolitan Open Land.

There are no clear penalties under the Act for local authorities that fail to grant planning permission for sufficient self-build plots to meet demand identified on the register. However, self-build demand will be considered as part of the examination into the forthcoming revised Harrow Local Plan, and recent appeal decisions on planning decisions (elsewhere in the country) suggest Planning Inspectors are taking failure to meet self-build demand as a consideration in deciding appeals where the Local Planning Authority has refused the application due to 'principle of development' reasons i.e. development on environmentally sensitive land.

Environmental Implications

None – recommendations relate to process / charges. Any proposals for self-build plots will be assessed against the London Plan and Harrow Local Plan, including any relevant environmental policies.

Data Protection Implications

Personal data for those applying to join the register will be collected via a new web-form as it is proposed to terminate the current arrangement with Ecomotive. It is necessary to collect information of a personal nature so that the Council can check that each applicant meets the relevant criteria and also to gather information on what type of plots applicants are looking for, what self build projects they wish to undertake, and how to contact applicants in the future. The data will be gathered, processed and stored in accordance with General Data Protection Regulation (GDPR) requirements.

Risk Management Implications

Risk included on Directorate risk register? No
Separate risk register in place? No

There will be an increase in the amount of time each application takes to process under the new two-part register due to the requirement to check documentation to ensure that applicants meet the national and (for Part 1) local criteria. The implementation of the fee will off-set this additional cost.

There is a legal requirement for the Council to grant planning permission for enough serviced plots to meet the baseline demand, which is equal to the total number of entries in Part 1 of the register for each base period. The baseline demand must be met within 3 years of the relevant base period end. The land must be suitable for self-build or custom-house building in general, but it doesn't

need to be provided to people on the register or to meet their particular requirements. By closely monitoring demand, it will be possible to ensure enough plots are identified and granted planning permission.

There is a legal requirement for the Council to take into consideration the number of entries on Part 2 of the register when carrying out planning, housing, land disposal and regeneration functions. This will be achieved by regular reviews of numbers of applicants joining Part 2. The above will reduce the risk of the Council not meeting its obligations under the Act.

Given the intention to no longer use Ecomotive to maintain the Harrow register, the new Harrow web-form / registration process will need to be in-place when the current arrangements end. Should this not occur, 'manual' arrangements are possible in the short-term to mitigate this risk.

Housing Service Implications

The proposed local connection and financial resources criteria were discussed with the Housing Service, particularly in the context of work they are doing on community-led housing (CLH). Community-led housing allows potential residents / community organisations to get directly involved in building and managing new homes themselves, often through co-operatives and community land trusts.

None of the groups the Housing Service is working with are currently on the Harrow Self-build Register (as 'associations'). This is likely to be because they are already registered with the GLA CLH Hub, with the Mayor of London recently announcing a £38 million fund to work with such groups.

One of the groups known to the Housing Service is a local charity working in the area of mental health, whose client group may not be exclusively be people living and/or working in Harrow. Consequently, the criteria for associations to be added to the self-build register include some flexibility in that only three-quarters of the association's members must meet the local connection requirements. The association would also be expected to demonstrate it will have sufficient financial resources to purchase a large enough plot to accommodate all of its members. How these financial resources are identified / secured is likely to vary between associations; the proposed requirement (without specifying a minimum financial amount) is considered to provide sufficient flexibility. This approach means that the focus on meeting local need is maintained, but not to the detriment of potential associations whose client members are not exclusively local residents / employees.

A small number of Council / HRA sites likely to be suitable for community-led housing schemes are also likely to be suitable for self-build plots. Any future Cabinet decisions on the use of these sites will need to weigh up each potential option, noting however that CLH groups may have objectives / purposes other than providing housing (i.e. providing housing for vulnerable persons with mental health conditions) and be more likely to bring forward a development as this can be part of the decision process for CLH whereas for the self-build register, the financial test can only extend as far as having sufficient resources to purchase a self-build plot but not to build an actual home.

Procurement Implications

The contractual arrangement with Ecomotive is annual ending 30 October each year. We will therefore not be renewing this relationship beyond the current end date. By this time the internal process for managing the register will be established.

Legal Implications

There is a legal requirement for the Council to grant planning permission for enough serviced plots to meet the baseline demand, which is equal to the total number of entries in Part 1 of the register for each base period. The baseline demand must be met within 3 years of the relevant base period end. The land must be suitable for self-build or custom-housebuilding in general, but it doesn't need to be provided to people on the register or to meet their particular requirements.

There is a legal requirement for the Council to take into consideration the number of entries on Part 2 of the register when carrying out planning, housing, land disposal and regeneration functions.

There is a requirement to meet GDPR legislation during the collection, processing and storage of personal information provided by applicants.

Financial Implications

The proposed introduction of the local eligibility criteria for joining the Self Build Register is anticipated to reduce the number of registrations. Currently a one-off registration fee and an annual fee for remaining on the Register are charged and these are included in the Council's fees and charges schedule. A benchmarking exercise undertaken recently indicates that there is a scope to reduce the fees in order to better reflect full cost recovery. The proposed fees are therefore detailed in Section 4.

Based on the application numbers over the last couple of years, the Council would receive an average of £14k per annum as one-off registration fee. This is likely to reduce following the implementation of the proposed changes on both criteria and fees. In terms of annual retention fees, the anticipated reduction is marginal and will be managed within Planning Service.

The initial cost of bringing the register management in-house i.e. staff time, will be borne by the Planning Service from within existing revenue budgets.

There will be a small saving arising from the cancellation of the contract with Ecomotive. This can be used to offset the loss of income currently achieved from the annual retention fees.

Equalities implications / Public Sector Equality Duty

The criteria which applicants must meet to be eligible to join the register have been carefully considered to ensure that no protected group is disadvantaged. This has been tested through the completion of an Equality Impact Assessment (EqIA) with no residual impacts identified for all protected characteristics.

An equalities monitoring form will be included as part of the web-form registration process to provide insight into which groups are using this service (it will be optional for applicants to answer these questions).

Council Priorities

Building a Better Harrow – this proposal contributes towards this priority by proactively encouraging self-build and custom build developments. It will help to increase total housing numbers, and also diversify housing delivery reducing reliance on the big housing developers. It empowers people to design and/or build their own homes which leads to stronger communities and personal investment in their local area. Self-build homes are often less expensive than buying homes in the traditional way, meaning that it opens up opportunities to people who may be excluded from the conventional housing market.

Delivering a Strong Local Economy for All – self build projects are much more likely than national developers to use local business to meet their needs. This will help to stimulate the local economy.

Section 3 - Statutory Officer Clearance

Name: Jessie Man	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 9 September 2019		

Name: Rosemary Lansdowne	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 30 August 2019		

Name: Nimesh Mehta	<input checked="" type="checkbox"/>	Head of Procurement
Date: 30 August 2019		

Name: Elaine Slowe

on behalf of the
Chief Housing Officer

Date: 2 September 2019

Name: Paul Walker

Corporate Director

Date: 12 September 2019

MANDATORY

Ward Councillors notified:

**NO as it impacts on all
Wards**

EqIA carried out:

YES

EqIA cleared by:

Dave Corby, Head of
Service – Community
Engagement, 29 August
2019.

**Section 4 - Contact Details and Background
Papers**

Contact: David Hughes, Planning Policy Manager

Telephone: 020 8736 6082

Email: David.Hughes@harrow.gov.uk

Background Papers: none

**Call-In Waived by the
Chair of Overview and
Scrutiny Committee**

NO