

Appendix A

Harrow Self Build Register: summary report

Contents

A. The Current Register

BACKGROUND	2
CRITERIA	2
WHO IS ON THE HARROW SELF BUILD REGISTER?.....	3
WHERE ARE INDIVIDUAL APPLICANTS CURRENTLY LIVING?	5
NUMBER OF DISTRICTS APPLIED TO	6
FIRST CHOICE OF DISTRICT	7
LOCAL LINKS	8
TYPE OF HOMES	8
ASSOCIATIONS	10
FINANCIAL	11
COMMON THEMES IN REASONS GIVEN FOR WANTING TO SELF BUILD	12

B. Determining Self Build Demand

SPLITTING THE REGISTER	13
APPROACHES USED BY OTHER COUNCILS	13
NEXT STEPS	16
APPROXIMATE BASELINE DEMAND.....	18
MEETING THE BASELINE DEMAND	19

A. The Current Register

BACKGROUND

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. The Act does not distinguish between self build and custom housebuilding i.e. where an individual, an association of individuals, or persons working with or for individuals or associations of individuals, build or complete houses to be occupied as homes by those individuals. There has been an obligation to keep a register since 1st April 2016.

Many local authorities, including Harrow Council, currently use Ecomotive's Local Self Build Register to meet this requirement. Ecomotive is a workers' co-operative which grew out of a community self build project in Bristol. Ecomotive's online platform allows interested people from across the UK to register their details, select multiple local authority areas for preferred location of their self build and answer a standard set of questions.

CRITERIA

To register on self-build lists, applicants have to meet the following criteria:

1. be over 18 years old
2. be a British citizen or national of an European Economic Area State (member states of the European Union, Iceland, Lichtenstein and Norway), or a national of Switzerland
3. be seeking (either alone or with others) to acquire a serviced plot of land to build a house to occupy as sole or main residence

The Ecomotive Register serves as an 'expression of interest' database. It is free to join the register and currently applicants do not have to provide proof they meet the above criteria. The aim is to allow councils to assess the demand for self build plots (although demand is likely to be overestimated due to duplicate entries with multiple local authorities).

WHO IS ON THE HARROW SELF BUILD REGISTER?

There have been 468 unique individual applicants since May 2016 who have expressed an interest in self build in Harrow.

Base Period	Number of Unique Individual Applications	Percentage
1 (1 April 2016 – 30 October 2016)	207	44.2
2 (31 October 2016 – 30 October 2017)	150	32.1
3 (31 October 2017 – 30 October 2018)	53	11.3
4* (31 October 2018 – present)	58	12.4
Grand Total	468	100

* BP4 will not end until Oct 2019, data extract taken on 12th June 2019

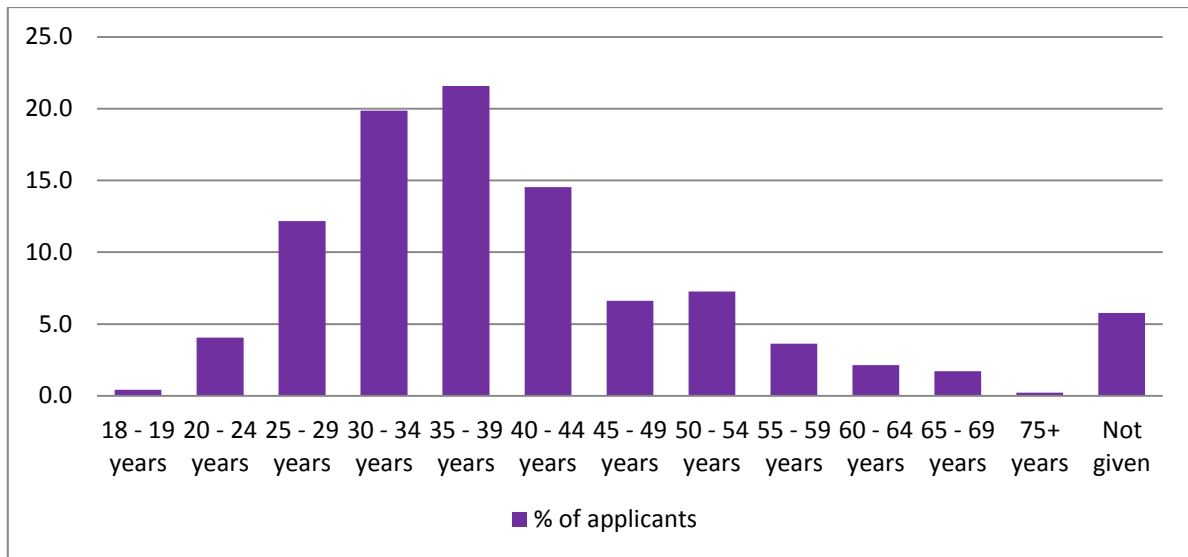
Additionally there have been 4 unique association applications:

Base Period	Number of Unique Association Applications	Percentage
1	0	0
2	1	25
3	2	50
4*	1	25
Grand total	4	100

* BP4 will not end until Oct 2019, data extract taken on 12th June 2019

The gender split of the individual applicants is approximately two thirds men to one third women.

All age ranges are represented but the majority of applicants tend to be relatively young, as shown on the graph below. Two thirds of applicants are between 25 and 44 years old.



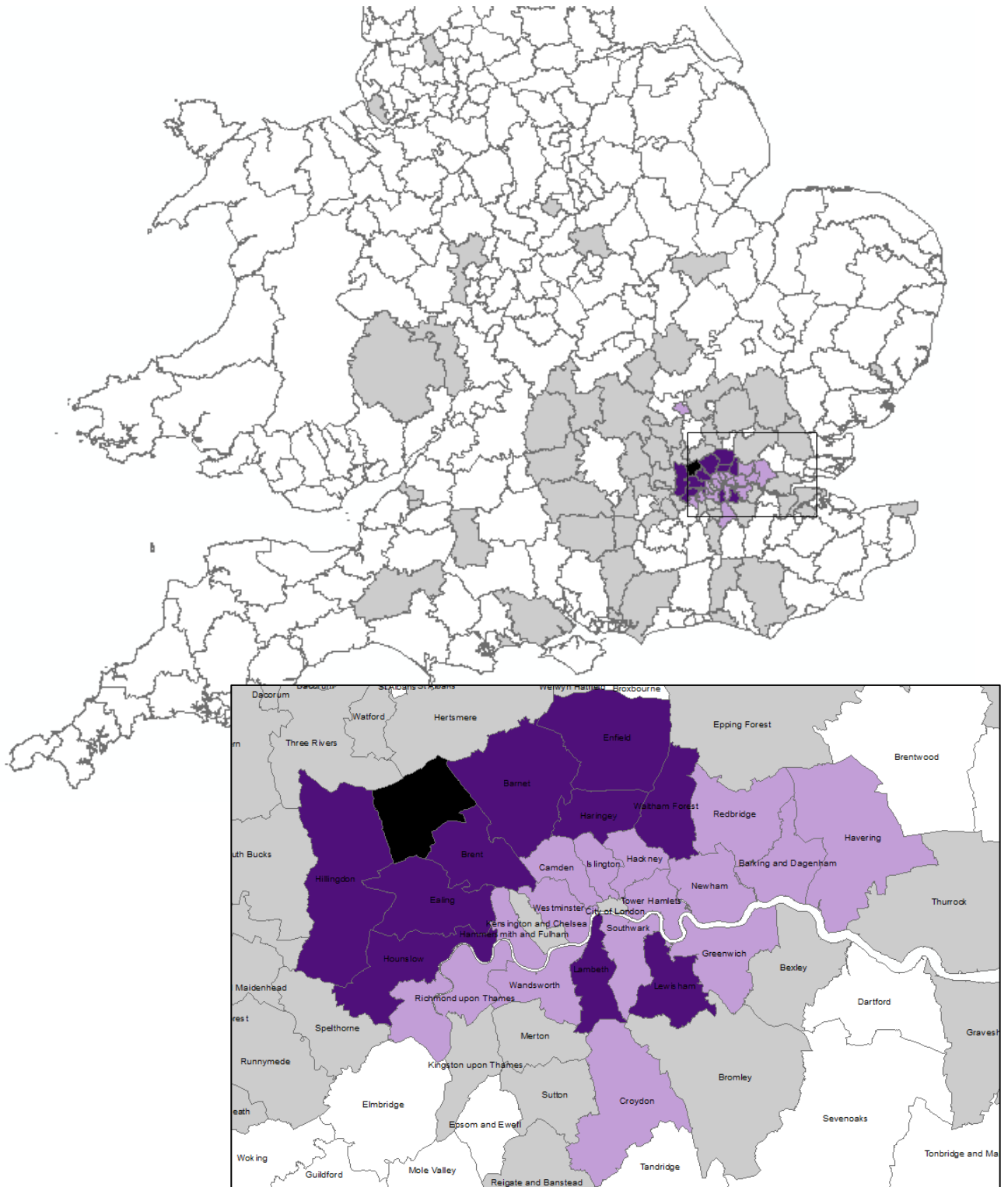
The vast majority of individual applicants are British (87.2%). 17 other nationalities are represented, all within the EEA. The second most common nationality is Irish (2.4%), then Polish (2.1%), Italian and Romanian (1.7% each).

14 applicants (5.4%) from Base Periods 2 to 4 are currently serving in the armed services, or have done within the last 5 years. No data is available relating to this for Base Period 1.

WHERE ARE INDIVIDUAL APPLICANTS CURRENTLY LIVING?

52 applicants (11.1%) currently live within Harrow i.e. the majority of people expressing an interest in self build in Harrow are from outside the borough.

As can be seen on the map below there is a wide spread of applicants from across the south east of England, and some from further afield. However, most applicants are currently living in Greater London (73.5%, including those who already live in Harrow). The highest numbers of applications come from those who live in a northern or western London borough.



NUMBER OF DISTRICTS APPLIED TO

At present applicants can express an interest in as many local authority areas as they wish. Based on this, applicants can be put into 3 broad groups:

Group 1: Focused on Harrow (15%) - those applicants who selected up to 6 areas of which Harrow was one. Harrow was the only choice of 14 applicants (3%) Of these, 9 already live in Harrow. 12% of applicants indicated Harrow as a choice out of 2 to 6 other options.

Group 2: Interested in Harrow as one of multiple options (60%) - those applicants who selected Harrow amongst 11 to 40 other districts. These applicants tend have a wish to self build in the London or surrounding area. Harrow would be of interest, but not a priority.

Group 3: Don't mind where they self build (25%) - those applicants who selected over 40 districts. These tend to be applicants who want to self build and don't have a strong preference where. None of these applicants currently live in Harrow.

Individuals:

	Number of districts applicant expressed interest in	Number of applicants	% of applicants	Number of applicants who currently live in Harrow	% of applicants who currently live in Harrow
Group 1	1	14	3.0%	9	64.3%
	2-6	58	12.4%	22	37.9%
Group 2	7-40	280	59.8%	21	7.5%
Group 3	41-100	73	15.6%	0	0%
	101+	43	9.2%	0	0%

Associations:

	Number of districts applicant expressed interest in	Number of applicants	% of applicants	Number of applicants who currently live in Harrow	% of applicants who currently live in Harrow
Group 1	1				

	Number of districts applicant expressed interest in	Number of applicants	% of applicants	Number of applicants who currently live in Harrow	% of applicants who currently live in Harrow
	2-6				
Group 2	7-40	3	75%	0	0%
Group 3	41-100	1	25%	0	0%
	101+				

It is clear that most applicants are registering with multiple local authorities making it difficult to determine true demand for self build plots in each area.

FIRST CHOICE OF DISTRICT

Applicants have the option of answering the question “If you had to choose, which of these areas would be your number one preference?” 364 applicants (78%) provided an answer.

A relatively small proportion of the 468 individual applicants who expressed an interest in self build in Harrow actually have Harrow as their first preference of location. Harrow was named as the top choice by 56 applicants i.e. 15.4% of those who gave a response to this question, or 12% of all applicants. 30 of these applicants already live in Harrow.

62.3% of individual applicants who responded to this question named a London borough other than Harrow as their top choice, with Hertfordshire being the next most popular area at 7.1%.

Of the 4 association applications, none put Harrow as their first choice.

LOCAL LINKS

Applicants are asked the question “Please tell us of any connection you have with Harrow”, with the options of ‘home’, ‘family’, ‘work’ and ‘other’. Some applicants have multiple connections of course.

Base Period	Home	Work	Family	Other
BP1	22	49	49	14
BP2	22	26	41	26
BP3	7	3	7	1
BP4*	11	10	12	11

* BP4 will not end until Oct 2019, data extract taken on 12th June 2019

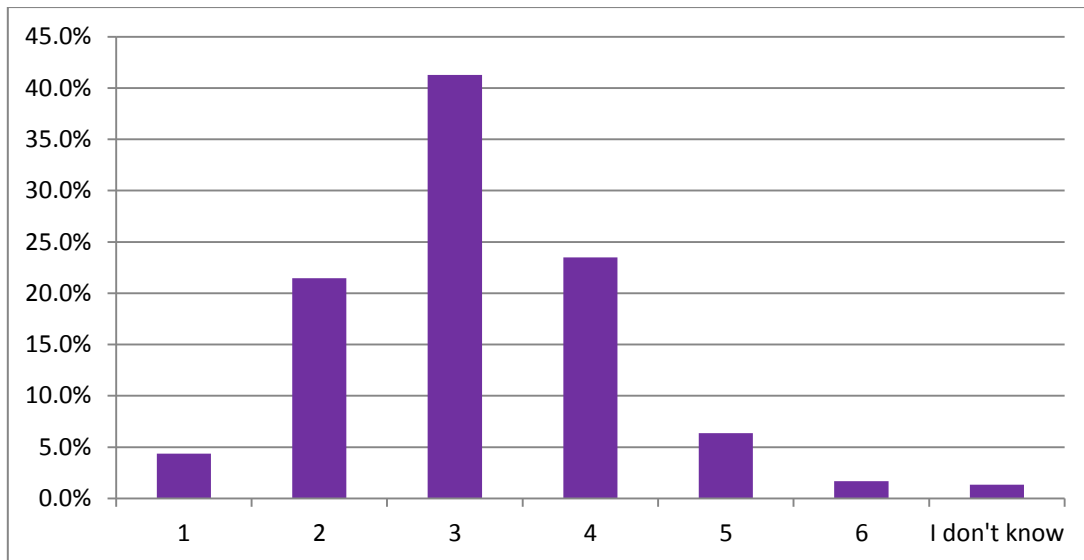
Applicants do not have to have any local connection in order to join the register currently. Those who do state a local connection do not have to prove it. It is therefore likely that the local test data may not be accurate. For example, a total of 62 applicants indicated that their local connection with Harrow is “home”, but only 52 of those actually had their registered address within the borough.

The information gathered is too vague to be truly useful. There is no information about length of residency. There are no criteria for family connection i.e. how closely related the applicant has to be to any family currently living in Harrow. There is also no definition of ‘work’ i.e. a formal employment contract, and several applicants have indicated they work in multiple boroughs/districts.

‘Other’ was given as an answer by 52 applicants. Reasons given include a convenient location to commute to work, previously lived in Harrow, children attending schools in the borough and being born in the borough.

TYPE OF HOMES

Individual applicants are given the option to state how many bedrooms they would realistically need in their self build house. 294 applicants provided answers. The graph below shows the answers of those who responded to this question; the most popular size being 3 bedrooms.



Applicants can also state the type of home they are interested in building. Most applicants selected more than one option. Detached houses are the most popular option, but many applicants are flexible, particularly between detached and semi/terrace.

What type of home would you like?	Number of applicants who ticked this box	Applicants who will only consider this option
Detached	292	95
Semi or terrace	197	6
Apartment	82	1

There is the opportunity to state type of preferred development with the options of:

- Single home site
- Small development (2-15 homes)
- Medium development (16-40 homes)
- Large development (40+ homes)

294 applicants answered this question. Again most applicants selected more than one option. Generally, single plots and small sites are favoured over larger sites.

What type of site would you like?	Number of applicants who ticked this box	Applicants who will only consider this option
Single	274	71
Small	216	11
Medium	148	8
Large	111	0

In conclusion the most popular type of home which applicants want to build is a 3 bedroom, detached house on a single plot or small development.

ASSOCIATIONS

Four separate associations expressed an interest to self build in Harrow. They have a variety of proposals for self build schemes.

Name of Association	Number of plots applying for	District based	How many households are currently in your group?	Are you open to more people joining	How many homes are you planning to build	Are you a legally constituted body?
RICL	4	Hackney	4	No	2-5	No
RightBuild	10	Kensington & Chelsea	not answered	not answered	not answered	not answered
Out of the Area	5	Lambeth	6	Yes	6-10	No
Stonebuild Developments	over 20	Croydon	1	Yes	over 20	Yes

RICL are planning to construct a single building containing 4 one-bed separate properties with shared utilities on an in-fill, awkward or otherwise nonviable site, providing ground-floor commercial/community space if possible.

RightBuild gave no details about the type of scheme they have planned.

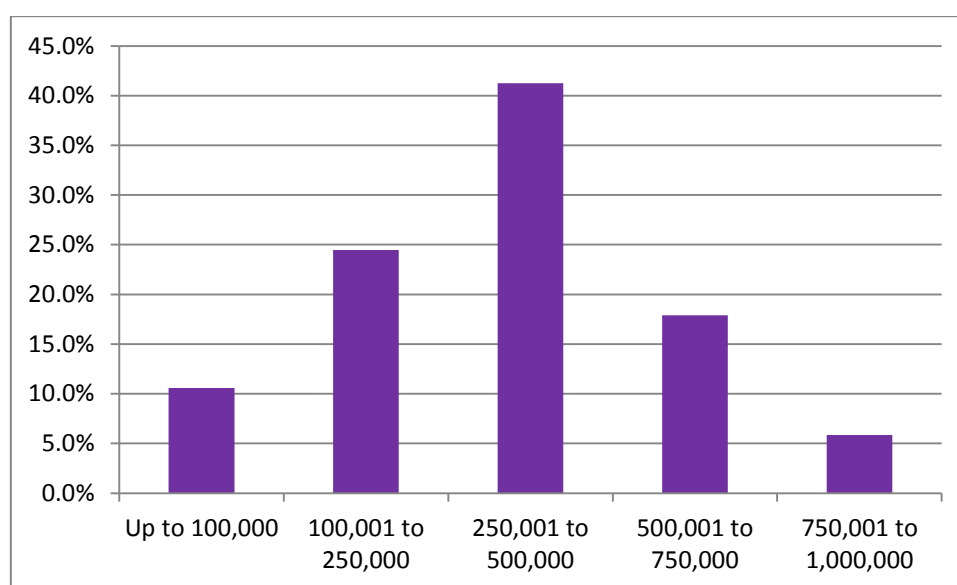
Out of the Area are looking for plots, or don't mind taking on council voids, i.e. current dwellings which need lots of repair.

Stonebuild Developments would like to be involved in a housing association development, although this would not fall within the self build remit.

FINANCIAL

Applicants have the option to give details about their finances, and how viable it would be for them to afford to purchase land. 274 applicants gave a response.

	Level of private finance available – number of applicants	What value mortgage do you need and can realistically afford – number of applicants	Total finance (private + mortgage) – number of applicants	Total available finance - % of applicants
Up to £100,000	144	27	29	10.6%
£100,001 to £250,000	63	93	67	24.5%
£250,001 to £500,000	63	95	113	41.2%
£500,001 to £750,000	0	0	49	17.9%
£750,001 to £1,000,000	0	0	16	5.8%
			274	100%



35% of applicants have funding of £250,000 or less which is unlikely to lead to a viable self-build project, without additional funding assistance. There are some national funding opportunities available particularly for community self build of affordable housing.

The cost of a single build plot in the north west of London of approximately 100 square metres with residential planning permission had an average market rate of £250,000 in June 2019.

COMMON THEMES IN REASONS GIVEN FOR WANTING TO SELF BUILD

- Construction of an eco-home/low environmental impact
- To build a house to suit specific needs e.g. disability access
- Desire to create something unique using own ideas/skills
- Desire to be part of new community with other self builders
- Self build is seen as a more affordable option to get on the housing ladder

B. Determining Self Build Demand

SPLITTING THE REGISTER

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

- 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;
- 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
- set a requirement to provide evidence of sufficient resources to purchase land for self-build and custom housing.

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.

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.

APPROACHES USED BY OTHER COUNCILS

The other 32 London Borough Councils and Harrow's two neighbouring Hertfordshire boroughs of Three Rivers and Hertsmere were reviewed to establish their approaches to setting criteria for their self build registers. Camden, Islington, Tower Hamlets, Waltham Forest, Wandsworth, Westminster and Three Rivers have all introduced the new two part register. The criteria set vary considerably from borough to borough as can be seen in the table below:

Borough	Local connection requirement	Funding requirement	Fee to join register
Camden	<ul style="list-style-type: none"> • lived in the borough for at least five of the last seven years • currently in the service of the regular armed forces of the Crown, or have been formerly in the services no more than seven years ago. 	Must have access to sufficient financial resources to acquire land valued at £360,000 (what the council considers the minimum likely cost of a self build plot in Camden)	£350 for Part 1, £175 for Part 2. Associations will need to pay a fee for each member they wish to include in their entry.
Islington	<ul style="list-style-type: none"> • resident in the borough on the day of their application for entry in the register; and have been resident in the borough for a continuous period of five years, up to and including the day of their application for entry in the register. • currently in the service of the regular armed forces of the Crown or within five years after leaving service. 	Evidence of sufficient resources to purchase land	£350 for entry onto Part 1 or Part 2. An additional fee may be charged to those on Part 1 of the register on an annual basis to cover the costs of assessing information of continued eligibility. This will be determined and published at a later date.
Tower Hamlets	<ul style="list-style-type: none"> • currently live in the borough and have done for a continuous period of at least 3 years. • currently work in the borough and have done for a continuous period of at least 3 years 	Evidence of sufficient resources to purchase land	No fee
Waltham Forest	<ul style="list-style-type: none"> • living and/or working in the borough for a continuous period of at least two years; • currently in the regular service of armed forces of the Crown, or left the service not more than two years ago 	Evidence of sufficient resources to purchase land	No fee
Wandsworth	<ul style="list-style-type: none"> • currently live and have continuously lived within the Borough of Wandsworth for the past two years from the date of application • in the service of the regular armed 	Have access to a minimum of £350,000 (either in savings or through private finance or mortgage in	£150 for eligible applicants to join Part 1 register for one year, with an annual re-registration fee of £150 to remain on the register thereafter, subject to re-

Borough	Local connection requirement	Funding requirement	Fee to join register
	forces or have served in the armed forces within the last two years from the date of application	principle)	assessment of any relevant eligibility criteria at that time. No fee to join the Part 2.
Westminster	<ul style="list-style-type: none"> • lived or worked in the borough for at least the last 12 months. • serving in the regular armed forces of the Crown 	Evidence of sufficient resources to purchase land	£95 fee for entering either Part 1 or Part 2 of the register and a £95 annual fee thereafter to remain on Part 1 of the register
Three Rivers	<ul style="list-style-type: none"> • continuously a resident of the District for a minimum of two years prior to the date of their application • permanently employed in the District and work for a minimum of 16 hours per week (if this employment ceases the individual/association is no longer eligible) • have close family (parents, siblings or children) who, on the date of the application to enter the Register, reside in the District and have done so continuously for 10 years or more; • currently or previously in the service of the regular armed forces of the Crown, having left no more than 5 years ago 	Not stated	£200 for entry onto Part 1 or Part 2 of the register. £175 annual fee to remain on Part 1

NEXT STEPS

Setting criteria

Local connection: A residence and/or work connection seems logical to give priority to people who have the closest links with the borough; the current register of interest shows that those applicants who are most focused on self build in Harrow are generally those who already live in the borough. Evidence of residency in the borough can be proven through submission of utility bills, council tax statements and/or lease agreements. Evidence of employment in the borough can be provided via tax records or documentation from the employer.

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. Councils may set a specific level, or alternatively 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.

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.

Setting-up a 2-part register

It is recommended that everyone currently on the Harrow Self Build Register is 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 providing proof of age and nationality. This will give a more accurate and current indication of level of demand.

A new registration process should 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 self build in Harrow due to multiple districts being selected. It is difficult 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 produce the register internally.

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.

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.

Suggested fees for the Harrow register:

Fee for entry to Part 1 of register: £100, with annual retention fee of £50

Fee for entry to Part 2 of the register: £50 (annual retention fee is not allowed for Part 2)

This is based on the assessment that each new application would take approximately one hour of an Officers time. One hour of a 'G9' Officer's time (including overheads) would be approximately £85-£95. 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.

The Council would have 28 days to confirm entry into 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.

Suggested criteria:

- Residency in the borough for two of the previous three years prior to the date of application; *or*
- Continuous employment in the borough for at least three years prior to the date of application (more than 16 hours per week); *or*
- 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

- 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).

APPROXIMATE BASELINE DEMAND

There is very limited government guidance about the methodology that should be used to establish local demand for self build housing. Therefore, the exercise below is based on the proposed criteria. i.e. those applicants who, if they confirmed they wanted to stay on the register, would qualify to join Part 1.

Information is not available from the Ecomotive registrations for length of time living or working in the borough, so everyone who ticked these boxes is included – although this is likely to overestimate the number who will actually be eligible. Applicants who are currently, or have recently been, in the armed services (and so would automatically meet the local criteria test for all local authority areas) have been included where Harrow is stated as their first preference. No data about armed services is available for Base Period 1 from Ecomotive – so the baseline demand for BP1 may be underestimated.

Base Period	Home/Work Connection	Serving/Previously Served in Armed Forces (of which Harrow first choice)	Meet local connection and have £250,000+ funding “Baseline Demand”	Number of applicants from “Baseline Demand” who have Harrow as first choice (if stated)
BP1	62	data not available	24	6
BP2	44	5 (0)	18	8
BP3	9	7 (1)	6	3
BP4	19	2 (0)	12	6
Grand total	134	14 (1)	60	23

Based on this exercise the baseline demand is calculated to be 60 plots. However, this exercise only looks at those applicants who meet the criteria. They may also meet the criteria of other local authorities, and Harrow may not be the preferred location for their self build. Only 23 of the 60 applicants who reported out in the “Baseline Demand” stated that Harrow would be their first choice of location. The introduction of a fee to join the register is likely to narrow it down to only those applicants who are genuinely interested in self build in Harrow. The true Baseline Demand i.e. those applicants who would be prepared to pay £100 to join Part 1 of the new register, is likely to be closer to 23 than to 60.

MEETING THE BASELINE DEMAND

Legislation states that the Baseline Demand must be met within three years of the conclusion of each Base Period. The Council must grant planning permission for development of enough suitable plots to meet the demand indicated by Part 1 of the register. 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.

A number of self builds are undertaken every year in the borough on sites which self builders have sourced themselves. These projects benefit from self build relief under the Community Infrastructure Levy, therefore it is possible to track the number of self builds which have had planning permission granted each year. The figures are shown below:

Base Period	Number of self build reliefs granted
1	3
2	5
3	2
4*	0
Grand total	10

* BP4 will not end until Oct 2019, data extract taken on 16th July 2019

The current level of self builds which have planning permission granted is not sufficient to meet the requirements of the Baseline Demand, but could be used to count towards it. However, this is a passive approach which is not in the spirit of the self build guidelines. The intention is for councils to pro-actively encourage self build as a means of increasing housing levels. Self-build relief under CIL is now predominantly used by redevelopments of existing dwellings and so these do not result in an increase in housing numbers. Options to proactively boost self build opportunities in the borough will need to be considered. This includes specific policies within the Local Plan and incorporating self build plots on larger development sites (many of which are owned by the Council).