UK Statistics Authority

Assessment of compliance with the Code of Practice for Official Statistics

Statistics on Green Belt Land and Planning Applications

(produced by the Department for Communities and Local Government)

Assessment Report 213

June 2012

About the UK Statistics Authority
The UK Statistics Authority is an independent body operating at arm's length from government as a non-ministerial department, directly accountable to Parliament. It was established on 1 April 2008 by the *Statistics and Registration Service Act 2007*.

The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. It is also required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has two main functions:
1. oversight of the Office for National Statistics (ONS) – the executive office of the Authority;
2. independent scrutiny (monitoring and assessment) of all official statistics produced in the UK.

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ASSESSMENT AND DESIGNATION

The *Statistics and Registration Service Act 2007* gives the UK Statistics Authority a statutory power to assess sets of statistics against the *Code of Practice for Official Statistics.* Assessment will determine whether it is appropriate for the statistics to be designated as National Statistics.

Designation as National Statistics means that the statistics comply with the *Code of Practice*. The *Code* is wide-ranging. Designation can be interpreted to mean that the statistics: meet identified user needs; are produced, managed and disseminated to high standards; and are explained well.

Designation as National Statistics should not be interpreted to mean that the statistics are always correct. For example, whilst the *Code* requires statistics to be produced to a level of accuracy that meets users' needs, it also recognises that errors can occur – in which case it requires them to be corrected and publicised.

Assessment reports will not normally comment further on a set of statistics, for example on their validity as social or economic measures. However, reports may point to such questions if the Authority believes that further research would be desirable.

Assessment reports typically provide an overview of any noteworthy features of the methods used to produce the statistics, and will highlight substantial concerns about quality. Assessment reports also describe aspects of the ways in which the producer addresses the 'sound methods and assured quality' principle of the *Code*, but do not themselves constitute a review of the methods used to produce the statistics. However the *Code* requires producers to "seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews".

The Authority may grant designation on condition that the producer body takes steps, within a stated timeframe, to fully meet the *Code's* requirements. This is to avoid public confusion and does not reduce the obligation to comply with the *Code*.

The Authority grants designation on the basis of three main sources of information:
   i.   factual evidence and assurances by senior statisticians in the producer body;
   ii.   the views of users who we contact, or who contact us, and;
   iii. our own review activity.

Should further information come to light subsequently which changes the Authority's analysis, it may withdraw the Assessment report and revise it as necessary.

It is a statutory requirement on the producer body to ensure that it continues to produce the set of statistics designated as National Statistics in compliance with the *Code of Practice.*

Contents

1 Summary of findings

1.1 Introduction

1.1.1 This is one of a series of reports[1] prepared under the provisions of the *Statistics and Registration Service Act 2007*[2]. The Act requires all statistics currently designated as National Statistics to be assessed against the *Code of Practice for Official Statistics*[3]. The report covers the set of statistics reported in *Local Planning Authority Green Belt Statistics* [4] *(Green Belts)* and *Planning Applications*[5], produced by the Department for Communities and Local Government (DCLG).

1.1.2 Section 3 of this report adopts an 'exception reporting' approach – it includes text only to support the Requirements made to strengthen compliance with the *Code* and Suggestions made to improve confidence in the production, management and dissemination of these statistics. This abbreviated style of report reflects the Head of Assessment's consideration of aspects of risk and materiality[6]. The Assessment team nonetheless assessed compliance with all parts of the *Code of Practice* and has commented on all those in respect of which some remedial action is recommended.

1.1.3 This report was prepared by the Authority's Assessment team, and approved by the Board of the Statistics Authority on the advice of the Head of Assessment.

1.2 Decision concerning designation as National Statistics

1.2.1 The Statistics Authority judges that the statistics covered by this report are readily accessible, produced according to sound methods and managed impartially and objectively in the public interest, subject to any points for action in this report. The Statistics Authority confirms that the statistics published in *Local Planning Authority Green Belt Statistics* (Green Belts) and *Planning Applications* are designated as National Statistics, subject to DCLG implementing the enhancements listed in section 1.5 and reporting them to the Authority by September 2012.

1.3 Summary of strengths and weaknesses

1.3.1 DCLG produces the statistics using existing administrative data held by local authorities (LAs). Although LAs are not obliged to supply their data, DCLG's

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[1] http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html
[2] http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf
[3] http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html
[4] http://www.communities.gov.uk/planningandbuilding/planningbuilding/planningstatistics/localplanningauthority/
[5] http://www.communities.gov.uk/planningandbuilding/planningbuilding/planningstatistics/statisticsplanning/
[6] http://www.statisticsauthority.gov.uk/assessment/assessment/guidance-about-assessment/criteria-for-deciding-upon-the-format-of-an-assessment-report.pdf

data collection exercises achieve consistently high response rates of between 95 and 100 per cent.

1.3.2 DCLG engages with users of the statistics by participating in the Central and Local Information Partnership Planning Sub Group (CLIP Planning). Aside from CLIP, DCLG has not been proactive in identifying and engaging with wider users of the statistics.

1.3.3 The releases do not include sufficient explanation of the statistics themselves or the methods used to compile the statistics. The releases do not include sufficient information about the quality of the statistics.

1.4   Detailed recommendations

1.4.1 The Assessment team identified some areas where it felt that DCLG could strengthen its compliance with the *Code*. Those which the Assessment team considers essential to enable designation as National Statistics are listed in section 1.5. Other suggestions, which would improve the statistics and the service provided to users but which are not formally required for their designation, are listed at annex 1.

1.5   Requirements for designation as National Statistics

Requirement 1	Take steps to develop a more complete understanding of the use made of the statistics, publish the relevant information and assumptions, and use them to better support the use of the statistics (para 3.2).
Requirement 2	Improve the information about revisions in *Green Belts* and *Planning Applications* so that it indicates the scale of the changes (para 3.3).
Requirement 3	Provide more explanation about the methods used to compile the statistics, including reasons why particular choices have been made (para 3.4).
Requirement 4	Improve the information provided about the quality and reliability of the statistics in relation to the range of potential uses, and ensure that users are informed about the main sources of error (para 3.5).
Requirement 5	Provide users with links to equivalent statistics for other countries of the UK (para 3.6).
Requirement 6	Improve the commentary in the releases so that it aids user interpretation of the statistics (para 3.7).
Requirement 7	Review the pre-release access lists for *Green Belts* and *Planning Applications* and ensure that they

meet the requirements set out in the *Pre-release Access to Official Statistics Order (2008)* (para 3.8).

Requirement 8   Update the Statement of Administrative Sources so that it includes the administrative systems used to produce the statistics on green belt land and planning applications (para 3.9).

2   Subject of the assessment

2.1   *Local Planning Authority Green Belt Statistics* (*Green Belts)* is an annual release which presents statistics on areas of green belt land in England by region and LA. *Green Belts* has been published each April since 1997; from 2012, the publication date will move to September.

2.2   *Planning Applications* has been published quarterly since 1997. It presents statistics for England on the number of planning applications received, decisions made, and applications that have been granted in England. *Planning Applications* also includes statistics on the speed at which planning decisions are made, residential planning decisions and household developments, and enforcement action that is taken in relation to planning applications. DCLG also presents the statistics on planning applications in 'Live Tables'[7] on its website.

2.3   The statistics are derived from administrative data that are held by LAs and collected using Interform[8] – DCLG's web-based data collection system. Interform conducts automated validation checks on data, for example to ensure the data are complete and consistent with previous returns. DCLG achieves a response rate of between 95 and 100 per cent. If DCLG does not receive a response from an LA, it imputes a value based on previous returns and the returns of similarly grouped LAs. Data on the area of green belt land were originally captured from paper records held by LAs. Digital mapping data were introduced as a more cost effective alternative in 2007, and have been used ever since.

2.4   The statistics on planning applications are used by DCLG to monitor progress against Impact Indicator 8[9] which requires data on the proportions of planning applications that are granted. Government also uses the planning application statistics to meet a Eurostat data requirement[10] in relation to building permits awarded in the UK.

2.5   Users told us they use the statistics in a variety of ways, including to:
- monitor the number of planning applications that receive approval;
- determine whether the current planning system poses a barrier to development;
- ensure that government meets its policy commitments in relation to green belt land.

2.6   DCLG told us that it costs about £25,000 to produce *Green Belts* and about £70,000 to produce *Planning Applications.*

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[7]http://www.communities.gov.uk/planningandbuilding/planningbuilding/planningstatistics/livetables/livetablesondevelopmentcontrolst/
[8] http://www.communities.gov.uk/housing/housingresearch/housingstatistics/datacollection/interform/
[9] As part of the 2011-15 DCLG Business Plan:
http://www.communities.gov.uk/publications/corporate/businessplan2011
[10] Part of the Short-term statistics Regulation:
http://epp.eurostat.ec.europa.eu/portal/page/portal/short_term_business_statistics/legislation

3   Assessment findings

3.1   DCLG regularly engages with government users of the statistics through the CLIP Planning Sub Group[11] – a user group where stakeholders can contribute to the development of the statistics. Information about forthcoming meetings and minutes from previous meetings is published on CLIP's website; however this information has not been updated since 2009. CLIP's website states that the planning subgroup brings together users in central and local government. We suggest that DCLG work with other members of CLIP to ensure that minutes and other relevant information are published promptly.

3.2   DCLG told us that users can sign up to a 'Planning Statistics Alert[12]' to join a mailing list for the green belt land and planning applications statistics. DCLG consulted users about its Annual Statistics Plan[13] during April 2011 and published the outcome on its website. Aside from this, DCLG has not proactively sought the views of users from outside government. As part of the designation as National Statistics, DCLG should take steps to develop a more complete understanding of the use made of the statistics, publish the relevant information and assumptions, and use them to better support the use of the statistics[14] (Requirement 1). We suggest that DCLG refer to the types of use put forward in the Statistics Authority's Monitoring Brief, *The Use Made of Official Statistics*[15] when documenting use.

3.3   *Green Belts* explains that revisions to previously published statistics are carried out as more LAs adopt DCLG's preferred method for calculating land area; the Excel tables accompanying *Green Belts* clearly indicate where revisions have been made to previously published statistics. *Planning Applications* explains that scheduled revisions take place at the end of the financial year to account for late returns that were not available at the time of publication. DCLG told us that the annual figures may differ from the sum of the quarterly figures as a result of these revisions. *Planning Applications* also explains that at the time of publication, provisional figures are labelled with a 'P'. However, neither release indicates the scale of the revisions. As part of the designation as National Statistics, DCLG should improve the information about revisions in *Green Belts* and *Planning Applications* so that it indicates the scale of the changes[16] (Requirement 2).

3.4   *Green Belts* and *Planning Applications* both include some information about the methods used to compile the statistics. For example, *Planning Applications* describes some recent changes by saying that 'PS1' and 'Fee1' returns are now combined; however these terms are not explained so the relevance of the change is not clear. *Green Belts* states that DCLG's preferred method of calculating estimates is using Cartesian[17] coordinates, however, it does not explain what they are or why they are preferable. As part of the designation as

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[11] http://www.clip.local.gov.uk/lgv/core/page.do?pageId=34992

[12] http://www.communities.gov.uk/planningandbuilding/planningbuilding/planningstatistics/planningstatisticsalert/

[13] http://www.communities.gov.uk/publications/corporate/statistics/plan201112?view=Standard

[14] In relation to Principle 1, Practice 2 of the *Code of Practice*

[15] http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-briefs/monitoring-brief-6-2010---the-use-made-of-official-statistics.pdf

[16] In relation to Principle 2, Practice 6 of the *Code of Practice*

[17] A two dimensional coordinates system

National Statistics, DCLG should provide more explanation about the methods used to compile the statistics, including reasons why particular choices have been made[18] (Requirement 3).

3.5 *Green Belts* and *Planning Applications* both include some information about the quality of the statistics. For example, *Planning Applications*[19] includes information about the response rate, and compares it with the response rate achieved during the previous quarter. *Green Belts* says that some LAs use a different method to calculate areas of land, which yields slightly different results to the method used by most LAs. DCLG told us that these differences are minimal and have no significant impact on the statistics, although *Green Belts* does not make this clear. *Planning Applications* describes how the quality of the data is assured. Neither *Green Belts* nor *Planning Applications* includes information about sources of error that quality assurance processes may not detect: for example, inconsistencies in the ways that local authorities apply classifications and definitions. As part of the designation as National Statistics, DCLG should improve the information provided about the quality and reliability of the statistics in relation to the range of potential uses, and ensure that users are informed about the main sources of error[20] (Requirement 4).

3.6 The statistics presented in *Green Belts* and *Planning Applications* relate to England. Neither release provides links to equivalent statistics for the other parts of the UK nor describes any differences in the ways that these statistics are compiled. As part of the designation as National Statistics, DCLG should provide users with links to equivalent statistics for other countries of the UK[21] (Requirement 5). We also suggest that DCLG publish summary information about any differences between these statistics and the equivalent statistics produced by other UK administrations.

3.7 *Green Belts* and *Planning Applications* both present statistics in tables alongside commentary which describes how the statistics have changed from previous years. *Planning Applications* also uses graphs to illustrate trends. Neither release contains sufficient narrative or contextual information to help users interpret the statistics appropriately. *Green Belts* states that a time series is available back as far as 1997 but it does not provide any information about long-term trends. Neither release includes sufficient explanation of some of the terms that are used, for example the difference between minor and major planning applications. As part of the designation as National Statistics, DCLG should improve the commentary in the releases so that it aids user interpretation of the statistics[22] (Requirement 6). We suggest that in meeting this requirement DCLG should consider the points detailed in annex 2.

3.8 On the landing page for each release, DCLG publishes a list of individuals who are granted pre-release access. Both lists include DCLG's Press Office. The *Pre-release Access to Official Statistics Order (2008)*[23] requires that pre-release access lists refer specifically to job title and organisation rather than departments or offices. As part of designation as National Statistics, DCLG

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[18] In relation to Principle 4, Practice 1 of the *Code of Practice*

[19] *PA* release for quarter ending September 2011

[20] In relation to Principle 4, Practice 2 and Principle 8, Practice 1 of the *Code of Practice*

[21] In relation to Principle 4, Practice 6 of the *Code of Practice*

[22] In relation to Principle 8, Practice 2 of the *Code of Practice*

[23] http://www.legislation.gov.uk/uksi/2008/2998/made

should review the pre-release access lists for *Green Belts* and *Planning Applications* and ensure that they meet the requirements set out in the *Pre-release Access to Official Statistics Order (2008)*[24] (Requirement 7).

3.9   DCLG has published a Statement of Administrative Sources[25] which presents information about the administrative data sources which are used (or have the potential to be used) in the production of official statistics. The green belt and planning application statistics are derived from administrative data systems maintained by LAs, but these systems are not currently included within DCLG's Statement of Administrative Sources. As part of the designation as National Statistics, DCLG should update its Statement of Administrative Sources so that it includes the administrative systems used to produce the statistics on green belt land and planning applications[26] (Requirement 8).

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[24] In relation to Protocol 2, Practice 7 of the *Code of Practice*
[25] http://www.communities.gov.uk/publications/corporate/statementadministrativesources
[26] In relation to Protocol 3, Practice 5 of the *Code of Practice*

Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to DCLG's green belt and planning application statistics, in the interest of the public good. These are not formally required for designation, but the Assessment team considers that their implementation will improve public confidence in the production, management and dissemination of official statistics.

Suggestion 1	Work with other members of CLIP to ensure that minutes and other relevant information are published promptly (para 3.1).
Suggestion 2	Refer to the types of use put forward in the Statistics Authority's Monitoring Brief, *The Use Made of Official Statistics* when documenting use (para 3.2).
Suggestion 3	Publish summary information about any differences compared to equivalent statistics produced by other UK administrations (para 3.6).
Suggestion 4	Consider the points detailed in annex 2, in seeking to improve the statistical releases (para 3.7).

Annex 2: Compliance with Standards for Statistical Releases

A2.1   In October 2010, the Statistics Authority issued a statement on *Standards for Statistical Releases*[27]. While this is not part of the *Code of Practice for Official Statistics,* the Authority regards it as advice that will promote both understanding and compliance with the *Code*. In relation to the statistical releases associated with the green belt and planning statistics, this annex comments on compliance with the statement on standards.

A2.2   In implementing any Requirements of this report (at paragraph 1.5) which relate to the content of statistical releases, we encourage the producer body to apply the standards as fully as possible.

Appropriate identification of the statistics being released

A2.3   The releases include a title that describes the coverage of the statistics and the time period to which they relate. The releases do not include a statement about the frequency of the statistics, but this is implied within the text.

A2.4   The releases use standard headings and logos. Both also include the name of the originating department and contact details for the responsible statistician. Both releases include a brief introduction at the start.

Include commentary that is helpful to the non-expert and presents the main messages in plain English

A2.5   Both releases include a summary which sets out the main messages in bullet points.

A2.6   *Green Belts* includes short commentary which compares the most recent statistics with previous years. *Green Belts* also states that a time series is available back as far as 1997 but it does not present, describe or explain long-term trends. *Green Belts* explains that boundary changes are rare and must satisfy the requirements in place for protecting areas of greenbelt land. However it does not go on to explain what the implications of this are for the statistics – such as that often, the statistics do not change substantially from one year to the next.

A2.7   *Planning Applications* includes commentary which describes changes in the statistics compared with previous quarters, and compared with the same quarter the previous year. The commentary also draws some comparisons between geographic areas. *Planning Applications* does not go further to draw out and explain the main trends, and make suitable comparisons – for example with equivalent statistics from other UK administrations. *Planning Applications* includes a background notes section which explains what is meant by some of the terms used, for example 'district level planning' and 'householder developments'. However, *Planning Applications* still includes some terms that are not sufficiently explained, for example 'enforcement action' and 'regulation 3 and 4 consents'.

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[27] http://www.statisticsauthority.gov.uk/news/standards-for-statistical-releases.html

Use language that is impartial, objective and professionally sound

A2.8   The language used in the releases is impartial and professionally sound. The descriptive statements are demonstrably consistent with the statistics presented.

Include information about the context and likely uses

A2.9   *Green Belts* includes some information about the policy context within which the statistics are produced and sets out the purpose of green belt land. However, *Green Belts* does not make it clear how the statistics are used in relation to policy, or for other purposes. *Planning Applications* does not include any information on the likely uses of the statistics, or the policy context in which the statistics have been collected. Including summary information about the planning process would provide a useful context within which to interpret the statistics.

A2.10 *Green Belts* and *Planning Applications* include some information about the quality of the statistics; however this information is not comprehensive.

Include, or link to, appropriate metadata

A2.11 *Green Belts* and *Planning Applications* include some information about the methods used to compile the statistics but this information is not sufficiently detailed or explained. For example, *Green Belts* states that DCLG's preferred method of calculating area is uses Cartesian coordinates, but it does not explain what this is or how it differs from other methods. *Planning Applications* describes some recent changes to the data collection process but does not explain some of the terms used, making this information inaccessible for the lay reader. Neither *Green Belts* nor *Planning Applications* provides any indication of the statistics comparability with other similar data, for example statistics for other UK administrations.

A2.12 *Green Belts* and *Planning Applications* both include information about why the statistics may be revised – for example *Planning Applications* explains that scheduled revisions take place at the end of the financial year to account for late returns that were not available at the time of publication. However, neither release provides an indication of the scale of the revisions that have been carried out.

Annex 3: Summary of assessment process and users' views

A3.1   This assessment was conducted from October 2011 to April 2012.

A3.2   The Assessment team – Ruth James and Neil Wilson – agreed the scope of and timetable for this assessment with representatives of the DCLG in November. The Written Evidence for Assessment was provided on 5 March. The Assessment team subsequently met DCLG during March to review compliance with the *Code of Practice*, taking account of the written evidence provided and other relevant sources of evidence.

Summary of users contacted, and issues raised

A3.3   Part of the assessment process involves our consideration of the views of users. We approach some known and potential users of the set of statistics, and we invite comments via an open note on the Authority's website. This process is not a statistical survey, but it enables us to gain some insights about the extent to which the statistics meet users' needs and the extent to which users feel that the producers of those statistics engage with them. We are aware that responses from users may not be representative of wider views, and we take account of this in the way that we prepare Assessment reports.

A3.4   The Assessment team received 14 responses from the user consultation. The respondents were grouped as follows:

Central government	3
Local government	1
Charity	1
Data suppliers	9

A3.5   Users told us that generally, the statistics meet their needs well. One told us that they would prefer the planning application statistics to be published one month earlier. Another suggested the publication date should coincide with the land use change statistics. Several users told us that they are satisfied with the way that DCLG engages with them as a user describing DCLG's response to queries as 'helpful' and 'prompt'.

A3.6   Data suppliers told us that they would collect the data anyway for their own monitoring purposes. Several told us that the guidance and instructions are clear and easy to understand, and the data return process is straightforward.

Key documents/links provided

Written Evidence for Assessment document