

Assessment of compliance with the Code of Practice for Official Statistics

Statistics on Land Use Change in England

*(produced by the Department for Communities and
Local Government)*

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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*.

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1 Summary of findings

1.1 Introduction

1.1.1 This is one of a series of reports¹ 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 *Land Use Change Statistics in England*⁴ (LUCS) produced by the Department for Communities and Local Government (DCLG).

1.1.2 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 *Land Use Change Statistics in England* are designated as National Statistics, subject to DCLG implementing the enhancements listed in section 1.5 and reporting them to the Authority by February 2012.

1.3 Summary of strengths and weaknesses

1.3.1 The method of data collection ensures consistency across the whole of England and avoids placing a burden on local authorities. However, the methods are not well described and DCLG does not publish sufficient information about the quality and reliability of the statistics nor about the extent and timing of revisions.

1.3.2 The commentary focuses on the main areas of public concern but it could be improved by the inclusion of more contextual information, and by providing a high level overview of trends in land use

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 <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/landusechange>

1.5 Requirements for designation as National Statistics

- | | |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| Requirement 1 | Publish more information on the nature and extent of revisions (para 3.4) |
| Requirement 2 | Publish more information about the methods used to produce land use change statistics and about their quality and reliability (para 3.10) |
| Requirement 3 | Improve the commentary and provide more contextual information to aid user interpretation of the statistics (para 3.17) |
| Requirement 4 | Expand the Statement of Administrative Sources so that it covers all of the elements required by the <i>Code</i> (para 3.26) |

2 Subject of the assessment

- 2.1 DCLG has been measuring changes in land use since 1985. The statistics provide several indicators of importance to planning and environmental policy, including the proportion of new dwellings built on previously developed land, the amount of housing development in flood risk areas and the extent of development in the Green Belt. These are all matters of considerable public and media interest. Users of the statistics include pressure groups, government departments, the Bank of England, house builders and developers.
- 2.2 The raw data are collected by Ordnance Survey (OS) during its regular mapping activities, either by surveyors working on the ground or by the use of aerial photography.
- 2.3 DCLG's classification of land use has changed little since data collection began. There are 24 categories, combined into ten groups for reporting purposes. Examples of the latter include residential, industry and commerce, agriculture, and outdoor recreation. In addition to the land use information, the number of new dwellings built and the number demolished have been part of the data collection since 1989. In 2010 the Government decided to remove residential gardens from the definition of previously-developed land. This change will be reflected in *LUCS*, which will show the level of new development on residential gardens from 2011 onwards.
- 2.4 The statistics are presented in an annual release containing text and charts, and in associated 'Live Tables'⁵ on DCLG's website. These include time series dating back to 1989 and some breakdowns for regions and local authorities. The main focus of the statistics is on new development for residential use, including the area and percentage of land in each category that has changed to residential use and the density of new housing development (in dwellings per hectare). The percentage of newly built dwellings that are located in the Green Belt or in areas of high flood risk is also provided, together with the associated percentage of land (by area) that has changed to residential use.
- 2.5 Until 2010, DCLG published provisional estimates in May of the proportion of new dwellings that were built on previously developed land in the previous calendar year. Subsequent publications in July, October and January revised these initial figures and provided additional measures such as the area of land changing use. DCLG now publishes a single, annual set of statistics in July.
- 2.6 DCLG recently consulted on its statistics plan for 2011/12⁶. The plan states that the department is not proposing to make any further changes to the land use change statistics, which it regards as part of the core evidence base for the department and its partners.
- 2.7 DCLG estimates that the total cost of producing the statistics in 2009-10 was £128,000. This includes the staff time spent in analysis, quality assurance and

⁵<http://www.communities.gov.uk/planningandbuilding/planningbuilding/planningstatistics/livetables/landusechange/>

⁶<http://www.communities.gov.uk/publications/corporate/statistics/plan201112consultation>

dealing with Parliamentary Questions and other queries, as well as the cost of purchasing the data.

3. Assessment findings

Principle 1: Meeting user needs

The production, management and dissemination of official statistics should meet the requirements of informed decision-making by government, public services, business, researchers and the public.

- 3.1 DCLG has documented the main users and uses of *LUCS* in its user engagement strategy⁷. The producer team gathered user information from requests for data and through responses to user consultations. DCLG participates in the Central and Local Information Partnership (CLIP) Planning Statistics Sub Group⁸. No minutes of meetings of this group have been published on the CLIP website since those for the meeting in November 2009. DCLG informed us that the group continues to meet regularly and that the local authority side is responsible for taking the minutes and adding them to the website. We suggest that DCLG work with other members of the group to ensure that minutes and other papers are published promptly.
- 3.2 DCLG conducted a consultation⁹ on proposed changes to several sets of planning statistics, including *LUCS*, in 2010. It sought views about changing the frequency of the publication of *LUCS* from quarterly to annual and announced the introduction of the additional category of development on residential gardens. DCLG then published its response to the consultation, setting out the user feedback and the decision to move to an annual publication.

⁷ <http://www.communities.gov.uk/publications/corporate/statistics/engagementstrategystatistics>

⁸ <http://www.clip.local.gov.uk/lgv/core/page.do?pageId=31599>

⁹ <http://www.communities.gov.uk/publications/planningandbuilding/statisticschangesconsultation>

Principle 2: Impartiality and objectivity

Official statistics, and information about statistical processes, should be managed impartially and objectively.

- 3.3 DCLG publishes *LUCS* in an impartial and orderly manner. The statistics are available free of charge on its website and via the National Statistics Publication Hub.
- 3.4 DCLG has published a revisions policy¹⁰ which states, among other things, that it will explain the nature and extent of revisions. *LUCS* contains provisional data with revisions occurring in subsequent releases. The release states that the data are continually updated and that the statistics are 'eventually' very comprehensive, but there is no indication of how much the statistics might change nor how long it takes for them to become comprehensive. As part of the designation as National Statistics, DCLG should publish more information on the nature and extent of revisions¹¹ (Requirement 1).

¹⁰ <http://www.communities.gov.uk/publications/corporate/statisticalnoticerevisionspolicy>

¹¹ In relation to Principle 2, Practice 6 of the *Code of Practice*

Principle 3: Integrity

At all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests.

- 3.5 No incidents of political pressures, abuses of trust or complaints relating to professional integrity, quality or standards were reported to or identified by the Assessment Team.

Principle 4: Sound methods and assured quality

Statistical methods should be consistent with scientific principles and internationally recognised best practices, and be fully documented. Quality should be monitored and assured taking account of internationally agreed practices.

- 3.6 Urban areas – where changes in land use are more frequent – are mainly covered by OS surveyors making on-site visits, often in response to prior intelligence that a change has taken place. Rural areas tend to be covered in regular but less frequent sweeps, using aerial photography. OS marks up changes of use and applies DCLG’s coding frame to record their nature. The land use classification is in addition to the information that OS records as part of map revision. We were told that the classification used by DCLG is generally consistent with international land use and land cover classifications.
- 3.7 The initial unit of measurement is a ‘parcel’ of land: an area with a clear boundary devoted to a single use. Parcels can therefore vary widely in size. Information collected about each parcel includes grid reference, area, current and previous uses, the year a change in use is believed to have occurred, and an estimate of the number of dwelling units that have been demolished and built. Conversions within existing buildings do not produce a physical change and DCLG therefore uses data from local authorities to estimate the impact of conversion activity on the proportion of new dwellings on previously developed land.
- 3.8 The method of data collection ensures a consistent approach across the whole of England which might not be achievable if most of the data were collected from local authorities. The main weakness relates to the time lag between a change in use occurring and it being recorded by OS. This lag can vary depending on the circumstances surrounding the change of use. OS receives intelligence on planning permissions from local authorities, as well as changes in addresses through the Postcode Address File¹². New building in a built up area is therefore likely to be identified more quickly than (say) a change from agriculture to forestry. OS supplies its best estimate of when each change actually took place: this date is likely to be more accurate when it has received notification of a planning permission than when the change of use is discovered through an aerial survey. The statistics for each year are therefore subject to revision as more information comes to light.
- 3.9 We were told that OS uses built-in validation checks on items such as dates and area codes, and audits a sample of records. DCLG checks unusual change records, such as those with particularly high or low densities, and follows up any issues with OS. DCLG published general quality guidelines¹³ for its statistics in February 2010.
- 3.10 The release provides a brief overview of data collection methods and draws attention to issues arising from the time lag, one consequence of which is that

¹² Royal Mail’s database of all known addresses and postcodes in the UK:

http://www2.royalmail.com/marketing-services/address-management-unit/address-data-products/postcode-address-file-paf?campaignid=paf_redirect

¹³ <http://www.communities.gov.uk/publications/corporate/statisticalnoticequalityguidance>

estimates based on percentages can be produced more quickly and reliably than statistics giving area (in hectares). A more detailed guidance document from 2004 provides more information about the data collection process and land use categories, but is now out of date. Taken together, however, we do not consider that these documents provide a sufficient description of the methods used or of the completeness and accuracy of the land use change data. As part of the designation as National Statistics, DCLG should publish more information about the methods used to produce land use change statistics and about their quality and reliability¹⁴ (Requirement 2).

- 3.11 DCLG told us that the other countries in the UK do not produce equivalent statistics. The Welsh Government stopped purchasing data from OS in the 1990s and instead uses planning permission data collected by local authorities. Scotland and Northern Ireland are largely rural and their administrations rely more on satellite imagery for information about changes in land cover¹⁵. The Scottish Government produces annual statistics on vacant and derelict land in Scotland¹⁶, using data collected from local authorities, but we could not find any other official statistics relating to the devolved administrations. We suggest that DCLG include information in *LUCS* about the limited availability of land use change statistics for other parts of the UK and the reasons for this.

¹⁴ In relation to Principle 4, Practices 1 and 2 and Principle 8, Practice 1 of the *Code of Practice*

¹⁵ The Natural Environment Research Council's Centre for Ecology and Hydrology has recently produced a UK land cover map for the Countryside Survey, based on 2007 data – see <http://www.countrysidesurvey.org.uk/land-cover-map-2007>

¹⁶ <http://www.scotland.gov.uk/Publications/2011/01/24153858/0>

Principle 5: Confidentiality

Private information about individual persons (including bodies corporate) compiled in the production of official statistics is confidential, and should be used for statistical purposes only.

3.12 DCLG has assured us that it takes all necessary steps to protect the confidentiality of data it holds. Data on land use change do not contain confidential personal or organisational information.

Principle 6: Proportionate burden

The cost burden on data suppliers should not be excessive and should be assessed relative to the benefits arising from the use of the statistics.

3.13 The method of data collection avoids placing any additional burden on local authorities. OS records information for mapping purposes, but is commissioned by DCLG to code changes in land use according to the department's classification. The information on planning permissions that is provided to OS by local authorities is collected for other purposes. DCLG collects information on conversion activity from the housing flows reconciliation form, which is also used for other purposes.

Principle 7: Resources

The resources made available for statistical activities should be sufficient to meet the requirements of this Code and should be used efficiently and effectively.

- 3.14 DCLG told us that it regularly reviews the information it requests from OS. It has secured funding for a further year but will move to competitive tender for the next contract. New ways of estimating land use change may now be available and DCLG told us that it will consider different options in the next procurement exercise, although the implications for the time series would need to be investigated.
- 3.15 Statistical activity is not centralised within DCLG and there is no single budget covering all statistical activities. However, the draft statistics plan for 2011-12 included the staffing and other costs associated with each of the seven statistical theme areas (of which planning is one) and reported on activity over the previous year. The plan also sought views on whether to retain, cease or reduce the scope of individual products.
- 3.16 DCLG follows Government Statistical Service (GSS) recruitment processes and uses the GSS competency framework. It requires its statistical staff to undertake continuing professional development.

Principle 8: Frankness and accessibility

Official statistics, accompanied by full and frank commentary, should be readily accessible to all users.

- 3.17 *LUCS* includes commentary highlighting some of the findings and provides a series of illustrative charts. However it provides little explanation of the reasons for patterns and trends in the statistics and the text is unclear in places. As part of the designation as National Statistics, DCLG should improve the commentary and provide more contextual information to aid user interpretation of the statistics¹⁷ (Requirement 3). We suggest that in meeting this requirement, DCLG consider the points detailed in annex 2.
- 3.18 DCLG makes further statistics available in Excel in the Live Tables area of its website, in order to support re-use and further analysis. The full record of every change since 1985 is held on a SAS database which contains more than three million rows of data. We were told that the producer team runs ad hoc queries and users can request extracts. DCLG has also given some academic researchers access to the database under licence¹⁸. We suggest that these possibilities for further analysis are explained on the website and in the release.
- 3.19 *LUCS* does not provide an overview of all types of land use change, as it focuses on particular issues of public interest. We suggest that DCLG indicate the volume of change between each land use group, perhaps in diagrammatic form in *LUCS*, with more detail in the Live Tables.
- 3.20 We also suggest that DCLG consider contextualising the *LUCS* statistics with a broad overview of existing land use. This might be done with reference to statistics published in 2005¹⁹ and the cumulative change since that time, or by using any new methods that are deployed after the data collection work has been tendered.

¹⁷ In relation to Principle 8, Practice 2 of the *Code of Practice*

¹⁸ DCLG told us that under the terms of the current data collection contract, OS has a share of the intellectual property rights in the detailed data, so a licensing agreement is required to disseminate these data.

¹⁹ A 'Generalised Land Use Database' was produced using digital mapping from OS 2005 data and published as experimental statistics with a different set of land use categories. These statistics were not published again for 2006 or subsequent years because of significant issues identified during quality assurance of the 2006 data.

<http://www.communities.gov.uk/publications/planningandbuilding/generalisedlanduse>

Protocol 1: User engagement

Effective user engagement is fundamental both to trust in statistics and securing maximum public value. This Protocol draws together the relevant practices set out elsewhere in the Code and expands on the requirements in relation to consultation.

3.21 The requirements for this Protocol are covered elsewhere in this report.

Protocol 2: Release practices

Statistical reports should be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation.

- 3.22 DCLG told us that it releases the statistics as soon as practicable. *LUCS* is available through DCLG's website at 9.30am on the day of release.
- 3.23 The name and contact details for the responsible statistician are published in the release.
- 3.24 A link is given to the pre-release access list alongside the statistical release. Access is given to seven people in DCLG.

Protocol 3: The use of administrative sources for statistical purposes

Administrative sources should be fully exploited for statistical purposes, subject to adherence to appropriate safeguards.

- 3.25 The statistics are not derived from administrative data, although OS uses information on planning permissions supplied by local authorities to identify where changes may have occurred. DCLG uses information on conversion activity from housing flows reconciliation forms – completed annually by local authorities – in order to improve the estimate of how much housing has been built on previously developed land.
- 3.26 DCLG has a statement of administrative sources but this does not cover all the elements required by the *Code*²⁰. The department has informed us that its use of administrative systems may change as a result of various reviews that are in progress. It expects to expand and revise its Statement of Administrative Sources in early 2012. As part of the designation as National Statistics, DCLG should expand its Statement of Administrative Sources so that it covers all of the elements required by the *Code*²¹ (Requirement 4).

²⁰ See Assessment Report 63

²¹ 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 *LUCS*, 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.

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|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Suggestion 1 | Work with members of the CLIP Planning Statistics Sub Group to ensure that minutes and other papers are published promptly on the CLIP website (para 3.1) |
| Suggestion 2 | Include information in <i>LUCS</i> about the limited availability of land use change statistics for other parts of the UK, and the reasons for this (para 3.11) |
| Suggestion 3 | In meeting Requirement 3, consider the points detailed in annex 2 (para 3.17) |
| Suggestion 4 | Provide information on the DCLG website and in the release about the possibilities for further analysis of the land use change dataset (para 3.18) |
| Suggestion 5 | Indicate the volume of change between each land use group (para 3.19) |
| Suggestion 6 | Consider contextualising the statistics with a broad overview of existing land use (para 3.20) |

Annex 2: Compliance with Standards for Statistical Releases

- A2.1 In October 2010, the Statistics Authority issued a statement on *Standards for Statistical Releases*²². Whilst 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 *LUCS*, 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 statistical release has a clear title that includes the coverage (England), the reference year of the statistics and month and year of publication. The introductory paragraph states that the data are annual. The background information explains about the change in the frequency of publication from quarterly to annual but the release does not set out the timing of the decision. The cover page gives an outline of the content of the release.
- A2.4 The release has the National Statistics logo and the name of the originating department, and also gives the name and contact details of the responsible statistician. The footer in the release from page 2 onwards says 'Planning Statistical Release' (because *LUCS* is one of a series of planning statistics) but does not give the actual name of the release.

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

- A2.5 The release summarises the main findings on the front page. It explains technical terms in the background notes at the rear but the commentary is unclear in places. For example: 'In 2009, on a provisional estimate, 39 per cent of land changing to a developed use within the Green Belt was previously-developed'. The text includes a series of bullet point findings but tends to concentrate on the latest change.

Use language that is impartial, objective and professionally sound

- A2.6 The commentary is impartial and factually correct but fails to explain some major patterns and changes in the data, for example:
- a. The step change in the density of new dwellings (illustrated in figure 4 of the release).
 - b. Why the greatest increase in the density of new dwellings has occurred in London (which already had a high development density compared with the other regions).
 - c. The long term trend and the issues behind the building of new dwellings in areas of high flood risk.

²² <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-releases.html>

Include information about the context and likely uses

A2.7 The release has a section near the end that sets out the main purposes of the statistics but it makes no mention of any relevant targets (former or current). It gives some background information about the statistics but it is insufficient to judge their quality and reliability.

Include, or link to, appropriate metadata

A2.8 The release gives an outline of the data collection by OS but lacks detail. For example it is not clear how frequently OS surveys rural areas, how it converts aerial information into change records or how the type of change is determined. The associated guide is out of date.

A2.9 There is no reference to other parts of the UK. The release does say that the data are provisional and that figures will be updated in the future but no indication is given of the likely change or when the figures will become final.

Annex 3: Summary of assessment process and users' views

- A3.1 This assessment was conducted from February to September 2011.
- A3.2 The Assessment Team – Jill Barelli and Penny Babb – agreed the scope of and timetable for this assessment with representatives of DCLG in February. The Written Evidence for Assessment was provided on 8 April. The Assessment Team subsequently met DCLG during May 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 8 responses from the user consultation and one response from a data supplier. The users were grouped as follows:
- | | |
|------------------------------|---|
| DCLG | 2 |
| Other government departments | 2 |
| Local government | 1 |
| Pressure groups | 2 |
| Financial institution | 1 |
- A3.5 All users expressed satisfaction with the aspects of the statistics on which they gave feedback (presentation and commentary, reliability and accessibility) and those who had had contact with the producer team were satisfied with their engagement. Two users suggested areas for improvement: one would like information about the development of previously developed land for non-residential purposes, and the other would like more timely data and a longer time series.

Key documents/links provided

Written Evidence for Assessment document

