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Dear Bob

Consultation on proposed changes to the Department's statistics: Land Use Change Statistics, Rationalised Collection of Local Authority Housing Statistics and Publication of Regional Statistics

East Midlands Councils (EMC) is the consultative forum for all 46 authorities in the Region. It provides support to Councils to improve their services and is a strong voice for the East Midlands. EMC officers have worked closely with officers within member councils to agree the following comments on the above consultation:

Land Use Change Statistics

Assessing the success of policy depends on consistent, reliable and accurate evidence gathering. It is because of this evidence that local authorities should be able to look at the proportion of new development taking place on brownfield land and examine how policy can be developed and further improved. However, this data has often proved to be incomplete and not always reliable in the past and there would seem to be little value in continuing with its publication. However, if data can be made more statistically robust then officers believe there may be merit in its retention and publication so that the outcomes of policy decisions relating to planning and regeneration can be properly evaluated.

In this case 'Option A: Retain current data coverage (on all 25 categories)' would be most useful to local authorities as it builds on the historic data series to look at trends over time. However, collecting land use change data is labour intensive at a time when resources are scarce. A stock take of changes every three years, possibly phased across the country to make most efficient use of resources, is therefore likely to be sufficient in most cases and any major changes could be assessed retrospectively from planning application records.

Rationalised Collection of Local Authority Housing Statistics

Officers welcome the Government's intention to reduce the burden of data collection and any proposal to consolidate data from local authorities, so long as essential detail is not lost. There are a number of reservations about whether it is realistic to implement the changes for the 2011/12 monitoring year and concerns that any failures in the first year will undermine confidence in the new data. Whilst it is noted that new data fields are optional for 2011/12, they are presumably compulsory thereafter and will place additional resource pressures upon already cash-strapped local authorities, possibly leading to resources being diverted away from front-line services. To leave housing 'Under Review' until after the monitoring year is unreasonable if there is then the expectation for it to be reported for 2011/12. In particular, local planning authorities may have real problems in pulling together the more detailed planning permission requirements for affordable housing at this notice, even though there is general agreement in principle with many of the proposals for data collection. Other parts of the new form e.g. Section C: 2a1 to 5 and 2b (Household allocations) could be difficult to collect for a number of local authorities using their current monitoring processes – this change makes one of the most time-consuming aspects of the form harder still.

The emphasis being placed on HMOs is welcomed. Although data is known to have some reliability issues, given the major impact on household forecasts this data would be valuable. It is also suggested that Right To Buy sales should be reported quarterly if the Coalition Government is seeking to encourage them again.

There are also major reservations that the old HSSA Appendix A will rely more on Council Tax based assessments of total stock and total vacant dwellings. The way data would be validated is not clearly presented. Relying on council tax records to record new dwelling completions is problematic as new stock is rarely added on completion and there can often be a long lag-time. Returns should still have some component of recording additions through the planning applications process. Local authorities are particularly keen to ensure that when calculating returns, for the purpose of the New Homes Bonus, that the data is able to be validated and cross checked for the recording year so as to be as accurate as possible.

Publication of Regional Statistics

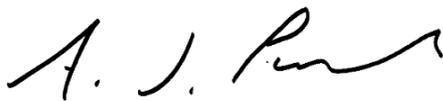
Whilst the regional Government Offices and regional development agencies have been (or are in the final stages of being) abolished, there is still a significant amount of recent regional and sub-regional research in use in both the public and private sectors, and regions are still used in many current statistician publications e.g. house price research, energy data, economic and transport statistics. Typically, when comparing planning authorities and the housing market areas to wider geographies, a regional comparison is almost always more useful than a national one. Some statistics have historically only been published at a regional level (and not below), and in such cases should not be replaced by national figures which would have limited value. Whilst it may be useful to have information by LEP area (which has been suggested as a possibility), which can use statistics built from their constituent authorities, these are not likely to have quite the same longevity of the historic counties on

which regions are based, and have been established for non-statistical reasons, calling into question the value of the data. Retaining Regional Trends and other key regional statistics is an integral part of the UK successfully engaging with its European partners and accessing European funding streams now and into the future.

If it is not possible to retain regional statistics in their current format, there should be a way of making district information available in ways that would allow for data to be presented in a range of sub-national geographies (HMAs for calculating housing requirements, LEP areas, EA and HCA regions) including the GO standard regions used by DCLG in the past and still used by other departments. Comparing local authority/HMA statistics with a region is a useful tool to assess whether a smaller locality is bucking a trend / behaving like a neighbouring region as in the South Midlands. This seems essential when setting up and evaluating the performance of LEPs for example. It should be noted that, in many cases, although data will still be published at local authority level, it would not simply be a case of aggregating local authority level data to recreate regional information if it is wanted: this is because data at local authority level tends to be rounded, so any regional calculations would be affected by this. Regional trend information for this data, therefore, would not be possible once this level of publication is stopped – unless the raw, unrounded data at local authority level is made available.

I hope these comments are helpful. Please do not hesitate to get in touch if you require any further information.

Yours sincerely



Andrew Pritchard
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