HARROW MONITORING GROUP

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Harrow Monitoring Group response to the consultation on Land use and land use change statistics: methodology changes

Executive summary

Harrow Monitoring Group (HMG) welcomes the proposed modernisation of England's land use and land use change statistics. Moving to the Ordnance Survey National Geographic Database offers an important opportunity to produce richer, more current and geographically detailed evidence about one of the country's most finite resources: land.

HMG's principal interest is not the technical methodology in isolation, but what better land-use information can enable communities, policymakers and public bodies to understand. Land is simultaneously required for homes, employment, transport, schools, health facilities, energy infrastructure, food production, biodiversity, flood management, recreation and other community needs. These pressures manifest themselves differently in densely populated urban and inner-city areas, suburban boroughs such as Harrow, and rural communities. A modern statistical system should therefore make those competing demands more visible rather than simply classify the physical land beneath them.

Harrow provides a useful example. Its Local Plan 2021–2041 was adopted in March 2026 and addresses housing needs, economic sustainability, health and inequality, biodiversity and protection of the borough's suburban character. Its evidence base also encompasses climate and nature, energy planning, flood risk, housing need and development capacity. The Council's own site-selection work has considered how housing requirements can be accommodated while protecting Green Belt and Metropolitan Open Land. Better national land-use data should make it easier for communities to interrogate precisely these relationships.

HMG therefore broadly supports the methodological modernisation, but considers that its public value could be significantly greater if the statistics are designed not only for government, planners, developers and technical specialists but also for residents, voluntary organisations and community groups. The ability to examine data at MSOA and LSOA level is particularly valuable. National and even local-authority averages can conceal significant differences between neighbourhoods.

We also have reservations about aspects of the consultation itself. Its tone and content are predominantly technical and producer/user focused. The questions are understandable for established statistical users but are less well adapted to community organisations that may not currently use the statistics precisely because the existing products have not been sufficiently accessible or connected to the questions communities actually ask. Asking what respondents currently use the statistics for, and how frequently they use them, risks giving greater evidential weight to established users than to potential future users of a substantially modernised dataset.

A modernisation exercise should therefore ask not only, "How should we reproduce and improve these statistics?" but also, "What should communities be able to understand from them that they cannot readily understand now?" That distinction is important. Modern data should help democratise information about land, enabling communities to examine how decisions about housing, energy, food security, green infrastructure and public services interact within the places where people live.

Consultation questions

Question 1 – What is your name?

Husain Akhtar, Coordinator, Harrow Monitoring Group.

Question 2 – What is your email address?

As shown on HMG's organisational letterhead.

Question 3 – What user group(s) do you fit into?

HMG is an independent community-based public-interest organisation concerned with the effectiveness, accessibility, governance, transparency, accountability and assurance of public services and public decision-making.

Question 4 – What do you use the land use statistics for currently?

HMG's interest is primarily in using public data to understand and scrutinise how national and local policy translates into outcomes for communities. Land-use statistics have potential relevance to housing and housing density, planning, development, protection of open space, community infrastructure, climate and energy policy, food growing and the wider allocation of finite land resources.

Our interest is particularly in whether national statistics can provide sufficiently accessible local evidence to enable residents and community organisations to understand changes occurring within their own neighbourhoods and to participate meaningfully in planning and policy consultations.

Question 5 – How often do you use the statistics?

HMG would answer "Annually" for Land Use Statistics and "Annually" for Land Use Change: New Residential Addresses Statistics. For Land Use Change: Hectarage Statistics, "Annually" is the closest available response reflecting our periodic rather than routine use, although the publication itself is triennial.

This question illustrates one limitation of the consultation. Frequency of current use is not necessarily a reliable measure of the future value of modernised statistics. Community organisations may become substantially greater users if data become more accessible, locally granular and easier to interpret.

Question 6 – Do you support the proposal to adopt Ordnance Survey's classification in place of the previous 28 categories?

Partially.

HMG supports moving towards a richer and more contemporary classification based directly upon the National Geographic Database. MHCLG identifies greater analytical flexibility, richer attribution and more frequent updating as advantages of the NGD, and these are significant benefits.

However, adoption of the OS classification should not be allowed to determine entirely what government publishes. Statistical categories should ultimately respond to public-policy and community information needs. Where issues such as renewable energy, food growing, community infrastructure or particular forms of housing are important but are not adequately visible within the underlying Tier A classification, supplementary categories or derived statistics should be considered.

Question 7 – Do you support continuing to present land use and land cover as a single combined list of categories?

Partially.

A combined presentation may make headline statistics easier to use, but the distinction between land use and land cover remains analytically important. What land physically consists of and what social or economic function it performs are different questions.

HMG therefore supports an accessible combined headline presentation provided that users can also separately interrogate land use and land cover. Combining the concepts should simplify presentation, not remove useful information.

Question 8 – Are there specific land uses not separately identified that you would want published as their own category?

Yes. HMG would particularly welcome sufficient identification of renewable and low-carbon energy infrastructure, allotments and community food-growing land, community facilities, health and care facilities, educational land, different forms of residential use where technically feasible, and significant mixed-use development.

Food-growing land is relevant in both urban and rural settings. Harrow Council itself describes allotments as contributing to fresh affordable produce, biodiversity, social interaction and a more sustainable local food system. At national level, agricultural land is central to food security; at urban level, allotments, community gardens and other productive spaces can have a different but complementary significance. A modern classification should enable these relationships to be examined.

Question 9 – Should features within a recognisable site be classified as a whole using the land use of the largest site?

Partially.

HMG understands the rationale for treating a recognisable school, hospital or similar site as a coherent whole. However, automatically assigning nested features according to the largest containing site risks concealing significant secondary uses.

A hospital containing substantial residential, energy-generation, parking or green-space areas is not necessarily best understood statistically by describing every component simply as health-related land. Similarly, large educational or mixed-use campuses may perform several functions. The top-down classification is useful for headline reporting, but the underlying granularity should be retained and, where practicable, available for analysis.

Question 10 – Do you agree with the proposed developed/non-developed category split?

Partially.

The distinction remains useful, particularly for monitoring development pressure and the reuse of previously developed land, but it should not become an overly simplistic binary description of land value.

Non-developed land can provide food production, biodiversity, flood management, carbon storage, recreation or other important functions. Developed land can likewise contain substantial green infrastructure or renewable-energy capacity. The statistical system should therefore allow the developed/non-developed distinction to be examined alongside functional characteristics rather than treating it as the principal description of the land.

Question 11 – Which land use change measures matter most?

The proportion of new residential addresses on previously developed land, residential density and hectarage flows between categories are all important.

For community use, however, these measures become substantially more informative when connected. Residents should be able to understand not simply how many homes have been added, but what land use they replaced, at what density, what other land uses have changed, and how the cumulative pattern differs between neighbourhoods.

In Harrow, these issues are particularly relevant because the adopted Local Plan addresses housing growth alongside protection of Green Belt, open space, biodiversity, economic uses and suburban character.

Question 12 – Are you content with dropping the discrete "vacant" category?

No**.**

HMG considers vacancy to be meaningful information in its own right. Classifying vacant land solely according to its last known use tells the user something about its history but potentially conceals its present condition.

Vacant residential, industrial or commercial land may represent development capacity, economic change, dereliction or an opportunity for alternative community use. We therefore suggest retaining "last known use" while also providing a vacant-status indicator. The two pieces of information answer different questions and should not be treated as alternatives.

Question 13 – Do you agree with the proposed methodology for calculating new residential address density?

Partially.

HMG supports a consistent methodology capable of showing changes in residential density, but density figures need careful contextualisation. A numerical increase in addresses per hectare does not by itself demonstrate whether development has produced appropriate housing, adequate infrastructure or a sustainable community.

The statistics would be more useful if density could be analysed alongside previous land use, location, accessibility to relevant infrastructure and, where other datasets permit, characteristics of housing development.

Question 14 – Other suggestions for new residential address or hectarage releases

The releases should make cumulative local change easier to understand. In addition to annual movements, users should be able to examine trends over several years and compare neighbourhoods.

Where feasible, the data architecture should also enable linkage or intersection with complementary datasets concerning housing, deprivation, transport accessibility, energy infrastructure, environmental risk and community facilities. The objective should not necessarily be to incorporate every subject into one publication, but to create interoperable statistics that make such analysis possible.

Question 15 – How important is comparability with statistics published up to 2022?

Very important.

HMG accepts MHCLG's reasoning that attempting artificially to recreate the previous methodology from fundamentally different source data could give a misleading impression of continuity. The consultation itself explains that the NGD differs materially in mapping detail, attribution and grouping.

Nevertheless, longitudinal analysis matters. Without some bridge between the series, it becomes more difficult to establish whether patterns observed after 2024 represent genuine land-use change or methodological change. Historical comparison is particularly important for community scrutiny because many planning, housing and environmental strategies operate over long periods.

Question 16 – Would an approximate, caveated correspondence between LUCS and OS Tier A categories be useful?

Very useful.

HMG strongly supports publication of such a correspondence, provided that its limitations are prominently explained. Imperfect comparability, transparently presented, can be more useful than no comparability at all.

Ideally, MHCLG should also provide worked examples showing where correspondence is reasonably strong and where users should not draw longitudinal conclusions.

Question 17 – Do you agree with the proposed publication schedule?

Yes, subject to review.

Resuming annual land-use stock and residential-address releases is welcome. The proposed initial publication of the 2024, 2025 and 2026 stock statistics together should provide an early indication of how useful the new series will be.

HMG suggests reviewing user demand after the first releases, particularly whether more frequent or readily updateable digital data could eventually complement the formal annual publications.

Question 18 – Do the proposed publication format and geographic breakdowns meet your needs?

Local-authority, MSOA and LSOA data are valuable and should be retained. For community organisations, LSOA and MSOA information can be particularly important because borough-wide statistics may conceal substantial differences between neighbourhoods.

However, downloadable tables and technical notes alone do not constitute genuinely accessible community information. HMG recommends an interactive mapping facility through which a resident or community organisation can enter a postcode or select an area and examine land use and land-use change visually.

The publication should therefore operate at two levels: robust open data for professional and research users, and accessible visual information for residents and community organisations.

Question 19 – What additional breakdowns, classes or geographic intersections would be most valuable?

HMG would particularly value intersections capable of illuminating the relationships between land use and housing pressure, deprivation, energy infrastructure, food production, public transport accessibility, community facilities, biodiversity, flood risk and other environmental constraints.

Different intersections will be important in different places. Rural communities may need detailed understanding of agricultural land, renewable-energy development, nature recovery and housing. Inner-city communities may be more concerned with housing density, loss or provision of community facilities, green-space availability, heat resilience and redevelopment. Outer-London boroughs such as Harrow can experience both urban intensification and pressures associated with protecting suburban, open and Green Belt land.

The statistical framework should be sufficiently flexible to illuminate these different spatial realities rather than assuming that the same headline indicators will answer every community's questions.

Question 20 – Other comments or suggestions

HMG welcomes the modernisation but encourages MHCLG to consider more explicitly who the future users of these statistics should be.

The consultation is described as a technical consultation, and its questions understandably concentrate on taxonomy, methodology, continuity and publication arrangements. However, this also shapes who is readily able to participate. Terms such as LUCS, NGD, Tier A, hectarage flows, land cover and spatial intersections are familiar to specialist users but create a relatively high entry threshold for residents and smaller community organisations.

The consultation therefore appears primarily designed around existing users of official land-use statistics. That is understandable from a statistical-production perspective, but it risks missing an important opportunity. A richer National Geographic Database should make possible not simply better statistics for existing specialists but better public understanding of land itself.

The question of land use is becoming increasingly important because the same finite resource must accommodate housing, economic activity, clean-energy infrastructure, food security, nature recovery and community needs. MHCLG itself identifies the Land Use Framework, housebuilding ambitions and clean-energy infrastructure as reasons why the previous statistics are no longer sufficient.

Harrow illustrates the practical relevance. Its recently adopted Local Plan deals simultaneously with housing, economic sustainability, inequality, biodiversity and the protection of suburban character, while its supporting evidence includes housing need, development capacity, energy planning, climate and nature, and flood risk. These are not separate abstract subjects: they compete and interact spatially.

HMG therefore suggests that MHCLG apply a simple public-value test to the redesigned system: can a community readily establish what land exists in its area, how that land is being used, how its use is changing, what significant functions may be being gained or lost, and how its experience compares with similar communities elsewhere?

That requires not only accurate data but accessible presentation, geographical granularity, historical context and sufficient functional detail. Modernisation should ultimately turn land-use statistics from a specialist statistical series into a stronger piece of public infrastructure: evidence that government, councils, researchers and communities can use to understand how England's finite land resource is being managed and how the choices made about it affect the places in which people live.