



The Scottish Parliament
Pàrlamaid na h-Alba

Ed Humpherson
Director General for Regulation

By Email – regulation@statistics.gov.uk

Tuesday, 17 December 2024

Dear Ed,

RE: Misleading figures on Scottish Planning Approvals

I am concerned that a figure that is being used by the Scottish Government, which claims that 164,000 homes across Scotland have planning permission but are not yet built is not based on accurate data and so should not be used as a verifiable statistic in the course of government business.

The Scottish Government has used this figure on a number of occasions including in a statement to the Scottish Parliament made by Minister for Public Finance Ivan McKee on 12 November 2024, and in its publication of the same date: “Planning and the housing emergency: delivery plan”. The number was picked up and widely reported in national press.

I submitted a series of questions to the Government exploring how this number had been calculated. From the Government’s responses, it was clear that it considered the number to be arrived at through aggregation of local authority housing land audits to create “a broad national picture of the scale of land available across Scotland” (Question S6W-31670). Further questions clearly indicated that the Government had little or no idea of how this number had been calculated. It also indicated in its response that it had little confidence that the land audits used gave an accurate estimate, going on to say that it intended to publish new guidance on housing land data audits to build a clearer picture of available land in Scotland. Those figures have been questioned by various bodies, including Homes for Scotland. It had called for robust interrogation of the “stalled sites”.

Although the number is described as an estimate, it is clear to me that when a government puts a figure in the official record it implies official validation of the data as accurate. That is why it is important that, even when using estimates, those estimates should be built on robust data sources which have been properly interrogated to ensure the figure is as accurate as possible. It is of particular importance when that figure goes on to be used as the basis for development of

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government policy. The correct use of statistics and data is vital to ensure public confidence.

The public must have faith in the accuracy and truthfulness of statistics that are cited by Government ministers. As such, I would be grateful if you could investigate and provide guidance on the matter.

I look forward to hearing from you.

Yours sincerely

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