

Response to HM Land Registry's fees and charging consultation

This is the Centre for Public Data's response to HM Land Registry (HMLR's) [consultation](#) on its fees and charging structure.

Theme 1 – Supporting the land and property information agenda and encouraging innovation through better/open access to HM Land Registry data

Question 1a: How do you or your organisation use HM Land Registry data?

I am responding on behalf of the Centre for Public Data, a non-profit working for stronger UK public data to support civil society and business.

We have used data obtained from Freedom of Information requests to Land Registry to publish original research on topics including property owned by overseas individuals, and property owned by trusts. In the course of this research we have used HMLR's public datasets on corporate ownership.

We also work closely with organisations in need of better data, particularly in the housing sector. We have spoken to many campaigners, advocacy organisations and researchers who would benefit from better data from HMLR to support their work.

I am also responding in a personal capacity, as in a previous role I led data work at the investigative project Who Owns England, which used HMLR data extensively to research land ownership in England & Wales.

1b. How important is HM Land Registry data to you or your organisation?

Very important

1c. What are the five organisations that you most often obtain land and property data from?

- Department for Levelling Up, Housing & Communities: Open EPC register
- Defra: Various land-related datasets e.g. subsidy awards
- Ordnance Survey: Postal address data
- Companies House: England & Wales company addresses
- Local authorities: Various land and property datasets

1d. How does HMLR compare with these organisations?

- HMLR data is about as easy/difficult to obtain

Question 2: What other data would you find useful if it was available (including data held elsewhere or not currently collected) and what would you use it for? How important is it to you?

- National Polygon dataset - used to understand geospatial extents of ownership
- Title Number and UPRN lookup dataset - used to join information on ownership to other address datasets
- Form A restrictions data - used to understand ownership by trusts
- Data on all ownership of land (not property), i.e. a dataset like CCOD/OCOD but including ownership by individuals, and only relating to land, not property

Question 3: What concerns, risks or opportunities do you see in making our land and property data more open/available?

Following the release of CCOD and OCOD, is it now possible to identify individual ownership of land and property wherever there are companies in the ownership chain, by joining HMLR CCOD/OCOD datasets with Companies House ownership data. This may or may not create real risk, but I am not sure the possibility of risks has been adequately examined.

Better information on unregistered land might result in an increased number of adverse possession claims. Again, this might or might not be a real risk.

Opportunities:

Many opportunities and benefits would be created by making more data available - e.g. new products and services, better information for successful policymaking, better analysis and information for researchers, etc.

Question 4: Is paying for data a barrier?

Yes.

Question 5: Are there any other barriers or challenges in obtaining and using HM Land Registry data? Please provide examples.

In general, HMLR's public datasets are usable, well presented and the documentation is excellent.

However, there are still some problems that significantly affect the usefulness of the current datasets, both scope and format:

- Many public datasets lack UPRNs (CCOD, OCOD, Price Paid), despite the recent directive from the Cabinet Office that UPRNs should be included - this makes them extremely difficult to join to other datasets, making them far less useful than they could be
- Where UPRNs are available they are often poor-quality - e.g. flats tend to be identified by the postal address point for the flats, rather than individual UPRNs

- Company numbers in OCOD and CCOD are still often incorrect or messy - it would be great if these could be cleaned up against public Companies House data
- The lack of identifiers in Price Paid also significantly affects its usefulness, as it is difficult to join to other datasets
- The lack of geospatial boundaries in public CCOD and OCOD significantly affects their usefulness for e.g. land use research or housing market research
- No data is stored internally on the nature of Form A restrictions (as I understand it) which means that it is not possible to identify the number of properties owned by trusts, versus tenants in common. This is a major problem for research and policymaking around trusts.

Theme 2 – Modernising and simplifying our fee structure

Question 6: To what extent would you agree that it is easy to calculate the exact fees and charges for HM Land Registry's services?

Disagree

Question 7: Does the structure of HM Land Registry's fees and charges create barriers and challenges? Please provide examples.

Yes - the £20k flat fee for the National Polygon dataset is too high, especially since there is no discount for non-profit or research organisations.

Such organisations cannot afford this fee, which means that effectively the only use of this dataset is by well-funded commercial organisations. This reduces its economic and social value.

Also, the flat £3 fee for a title and title plan are too high for volume data requests. There should be a steep discount for volume requests (as I understand this used to exist but does not any longer). This limits the use of HMLR data particularly for research.

Question 8: If you were to create a new fee structure what would it look like? For example, this could be introducing a single fee for a property transaction event as opposed to charging for individual services, or standard flat fees, or scaled fees.

This response relates to information and data requests.

Ideally the National Polygon and Title Number / UPRN datasets should be free to access, as is the case in other countries like New Zealand.

However, if this is not possible:

- Access to the National Polygon and Title Number / UPRN datasets should be steeply discounted for small and non-profit organisations.
- Bulk data requests should also be discounted.

Question 9: How easy or difficult is it to make payments for HM Land Registry services? (Please think about making payment and payment channels but not calculating the fee.) How does HM Land Registry compare with other organisations?

No view.

Question 10: Do you foresee any negative impacts if we stopped taking cheques and postal orders as a payment method? What would help mitigate these impacts?

No view.

Theme 3 – Ensuring our fees are fair and reasonable across our customer base

Question 11: Should HM Land Registry set fees differently for specific customer groups or services? If yes, which group/services do you think should pay more? For example, individuals, second homeowners, property development industry, local authorities, conveyancers, PropTech or fast tracking, account management support, pre-lodgement checking, and so on.

Yes. Non-profits, media organisations and researchers should be able to access datasets more cheaply (or free) to maximise their social value. Startups and small businesses based should also be given reduced fee (or free) access to maximise their economic value.

Question 12: Our fee structure is complex. Do you or your organisation currently utilise (or know of) other fees and charging models (for example subscription-based) that are used by other organisations and you think might work for HM Land Registry? Please provide details of the fees and charging models including the name of the organisations and their advantages and disadvantages.

No view.

Question 13: Should customers who provide complete and accurate application data, requiring less HM Land Registry staff checking time, be charged lower fees for making applications? Would lower fees incentivise you or your organisation to sign up to a process enabling this?

No view.

Question 14: Are there any additional services or commercial propositions that HM Land Registry might develop to support you and/or more widely, improvements in the property market?

No view.