



Department for
Science, Innovation
& Technology

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10th May 2024

Lord Clement-Jones
House of Lords
London
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Dear Lord Clement-Jones,

Thank you for your letter dated the 26th April in relation to amendment 252 and providing me the opportunity to expand on my statement in the house in relation to this amendment.

Geospatial data, and in particular address data, underpins activities across the economy. Address data is critical to a host of activities from enabling electoral registration and emergency service response to driver licence management, enabling identities to be verified and locations to be linked, driving better and more efficient services. In the private sector it enables activity from the critical management of utilities to sophisticated analysis in the financial services to everyday deliveries – from traditional logistics to innovative online food delivery. The requirement for good quality address data remains high and is growing.

The UK context

The UK has no single authoritative list of addresses. Instead, it has a number of definitions and standards that provide for the different addressing needs of the UK. For example, Local Authorities have responsibility for setting the street naming and numbering as part of the planning process and create the official address. In a number of instances this can differ from the postal address that the public recognise. Following the privatisation of Royal Mail the Postcode Address File (the PAF), which is the UK's list of postal addresses, is privately owned although access to it remains regulated by Ofcom under the Postal Services Act.

All of these various current address standards, including the PAF and Local Authority addresses, are brought together in the National Address Gazetteer (NAG) which is owned by GeoPlace, a Local Government Association/Ordnance Survey joint venture. GeoPlace assign the Unique Property Reference Number (UPRN) to every address. Created in 2008, the NAG and its productised version AddressBase resolved significant confusion in the marketplace, as prior to which there were multiple spatial address datasets all of which recorded the same property slightly differently.

As you highlight the EU's Open Data Directive, or Directive on open data and the re-use of public sector information, entered into force in July 2019 and has required member states to make a list of high-value datasets that were deemed to have "high commercial potential and



can speed up the emergence of value-added EU-wide information products” available free of charge. The remit of this directive does however only cover public sector information and not that held by private companies.

The UK’s addressing system includes a mix of both public (Local Authority Local Land and Property Gazetteer) and privately (the Postcode Address File at Royal Mail) owned data which makes the UK different to those countries you list in your letter. The UK system has also developed over many decades and the origin data from Royal Mail and Local Government in particular are exchanged in different ways to create new data sets – with commercial contract arrangements and payments in place.

The 2016 exploration of an Open Address Register

The work that was undertaken in 2016 considered the creation of an Open Address Register, was a joint project undertaken by HM Treasury, The Department for Business, Energy and Industrial Strategy and Government Digital Service in 2016. The project consisted of four workstreams:

- Policy development
- Legal Advice
- Commercial considerations including negotiations with owners of relevant intellectual property owners in relation to potential inclusion within an Open Address Register
- Evaluation of options to build an Open Address Register that did not include privately owned Intellectual property

As I mentioned during the consideration of the amendment in the House, there was analysis undertaken in 2016 on the viability of creating an address database which did not rely on private sector data, including Royal Mail.

The approach that was taken achieved a greater level of completeness than any other previous attempt, but still resulted in 4.2 million (13%) addresses that are present within the National Address Gazetteer which could not be accurately captured through this methodology. This 4.2m addresses included blocks of flats and halls of residence where there are multiple addresses within a single building. This is a significant proportion of the circa 32m addresses of homes and businesses that we have across the UK and would impair the application of any open dataset within the digital economy as it would exclude significant sections of the population from engaging with them.

The legal and commercial aspects of the Open Address Register Programme considered options for alternative access routes to Royal Mail data. As the owners of the PAF Royal Mail government would be required to seek a licence from them in order to make the data available openly. The commercial activity identified indicative costs of such a licence would not have represented value for money for the taxpayer in the event that Royal Mail were willing to consider offering such a licence, which as a private company who owned the data in question they were under no obligation to do.

As a result, the conclusion of the 2016 work was that without the privately owned data the proportion of missed or inaccurate addresses created significant risks for the use of any OAR, and that a licence, should Royal Mail have been willing to grant one, did not represent value for money.

Current Regime

The cost of PAF is often cited as the barrier to use. Over 50 000 businesses are licensed to use the PAF, of which 46% pay less than £10 per annum in licence fees to Royal Mail, with a

further 33% paying more than £10 but less than £100 per annum. In addition, consumers have free access to look up 50 addresses per day via Royal Mail's online Postcode Finder service, which relies on PAF.

The Government remains focussed on making improvement within the current ecosystem, working with all relevant parties in both the public and private sectors. This has included the continuation of the PAF Public Sector Licence and the Public Sector Geospatial Agreement which together provide free at the point of use access to both PAF data and also the National Address Gazetteer (in its productised form which is called AddressBase) to over 6000 public sector users.

Recognising that the public sector generates a significant amount of data that is of interest beyond the public sector, we have enabled the open release of Unique Property Reference Numbers, and their associated location, from the National Address Gazetteer under an Open Government Licence. The UPRN is a critical identifier that enables the data to be managed and analysed more efficiently, increasing accuracy when matching datasets through machine learning.

This is further supported by the Government Digital Service's mandation of the inclusion of UPRNs within all government datasets that include an address, supporting machine to machine communication and interoperability of datasets. Alongside the public sector licenses this enables the public sector to release information about an address, with its UPRN and location to support activities in the wider digital economy. For example, this enables rapid and accurate linking of property data to support housing development.

The Government is committed to continually improving the quality and accessibility of address and wider geospatial data where it is feasible and there is an economic case to do so.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'C. Camrose', written in a cursive style.

Viscount Camrose
**Parliamentary Under Secretary of State at the
Department for Science, Innovation & Technology**