# Guildford Residents Association Hearing Statement

M1

1.1   Sustainability Appraisal

1.   The attention given to landscape during the Appraisal process has improved from a weak start.

2.   Given the extent to which protected countryside would be developed, it is not credible to conclude that, overall in terms of landscape, the Plan will provide significant positive effects. The commentary relies on countryside beyond the Green Belt to draw this conclusion but does not give great weight to Green Belt preventing the sprawl of Guildford or to its overall strategic role as a Metropolitan designation. The Green Belt sensitivity traffic light coding is applied even though this has no basis in policy for judging relative value. Serving two functions well is as valuable as serving five. It could be argued Gosden Hill is one of the most significant tracts of Green Belt providing a sweep of countryside that conceals Guildford as approaching from London along the A3. The string of Green Belt incursions along the A3 is evident in this preferred option[1] judged as significantly positive for landscape.

Option 1 – OAN + 9.4%
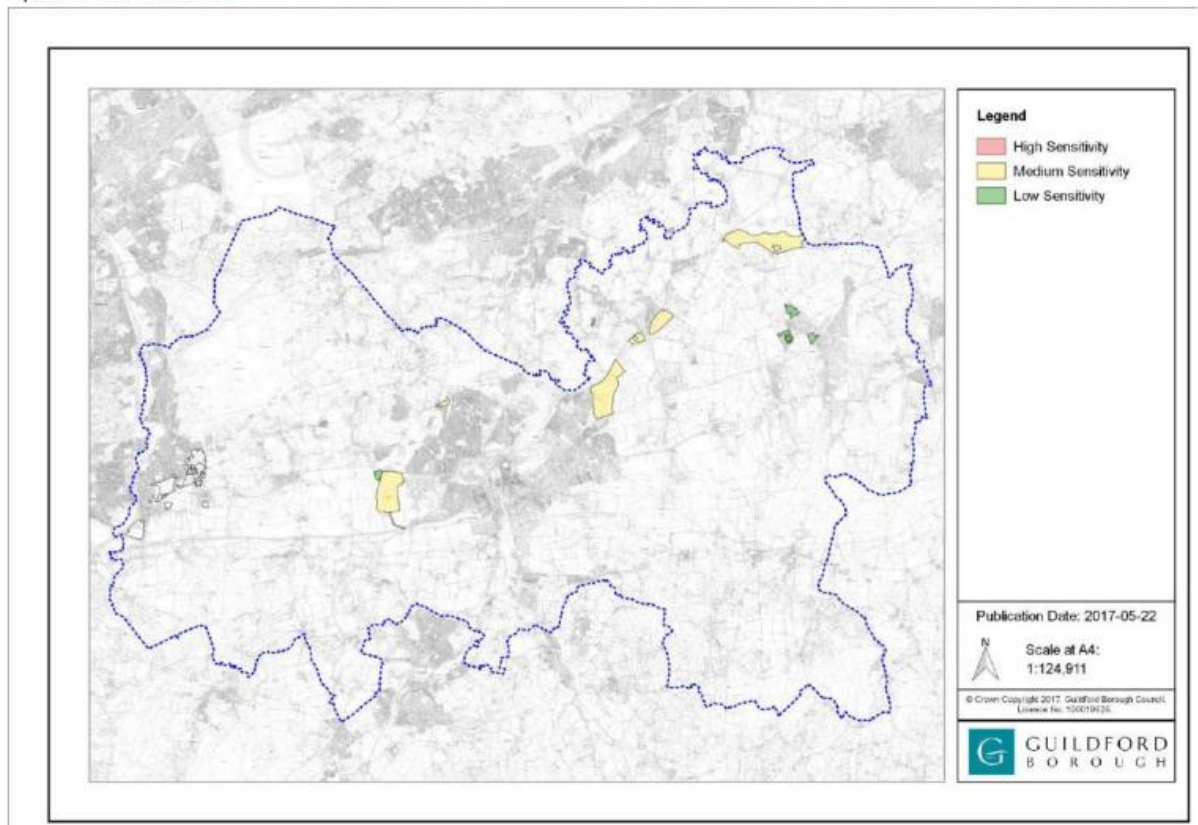
3.   The overly positive landscape assessment, alongside community and health assessments which might more credibly be neutral, skews the overall assessment of the sustainability of the Plan.

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[1] GBC-LPSS-CD-005

1.2   Thames Basin Heaths SPA

4.   Suggest P5 3) specifies SANG should provide <u>new</u> opportunities. SANGs that involve rebranding and urbanisation of *established* areas of nature conservation, landscape and recreation value do not represent new provision and are not a credible approach to avoiding and mitigating harm to SPA. They are also poor value for money.

5.   Suggest the Plan should set out more clearly, in the context of housing development affecting SPA, that in English law the presumption in favour of sustainable development does not apply in cases where an Appropriate Assessment is required, especially following the recent ECJ Ruling that mitigation should only be taken into account after Appropriate Assessment screening[2].

6.   Suggest P5 should clarify that developers in the zone of Influence, and of larger proposals beyond, will no longer be able to use SANG to avoid Appropriate Assessment. It will now be at Appropriate Assessment stage that developers can demonstrate how SANG would mitigate damage to the SPA. 4.3.50c needs updating.

M2   Are calculations in SHMA Addendum an appropriate basis for establishing the OAN for Guildford?

2.1   Migration trends and unattributable population change.

7.   **There can be little doubt that the 2014-based household projection (the 2014 SNHP) exaggerates the likely growth in the number of households in Guildford as it is based on estimates of past net migration flows into Guildford that are too large.**

8.   The official projections are trend-based, the trends being taken from ONS estimates of past births, deaths and migration flows. If the estimates in the trend periods are inaccurate, the projections will be wrong.

9.   It is indisputable that there are major problems with the demographic data for Guildford. The 2001 and 2011 censuses suggests that Guildford's population increased by 7,800 between the two censuses. However, the ONS's estimates for births, deaths and net migration flows suggests that the population should have grown by 15,000. The difference – 7,200 people (which the ONS call Unattributable Population Change - UPC) is more than 90% of the population change suggested by the censuses. This is an exceptionally large error.

10.   As we have high quality systems for recording births and deaths, UPC must be due to either errors in the censuses or errors in the migration flow estimates. The size of UPC means that it is highly unlikely that errors in the censuses were responsible for more than a small part of the error as for that to be the case the percentage errors in the census population estimates for some age groups would have had to have been extremely large. That means that most of the error was due to the migration flow estimates.

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[2] ECLI:EU:C:2018:244 Court Ruling 12 April 2018:Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.

11. Most of UPC is in the cohort that was aged 20-29 in 2011. The ONS have commented (see email exchange at Appendix A):

> *"The analysis [in an ONS report in 2015] suggests that the main reasons for the overestimate of 20-29 year olds in the rolled forward mid-year estimates for 2011 was error relating to migration (both international and internal). In particular for Guildford, and many other areas with students, this reflects our effectiveness at moving students into 'study' areas and the relative difficulty at moving graduates out at the conclusion of their studies."*

12. It has been suggested (e.g. SHMA Addendum paragraph 3.40) that, due to changes used by the ONS to measure migration, if UPC is related to migration, the biggest impacts are likely to have been in the earlier part of the decade (2001-06) and that they would not therefore have affected the trend periods used for the 2014 SNPP. There are, however, two reasons for believing that this is not the case.

   a. As discussed in the NMSS of June 2017 Report[3] and confirmed by the ONS in the email exchange at Appendix A, the only plausible explanation for the large UPC errors in the cohorts that were aged 20-29 in 2011 is that they were due to errors in the migration flows when those cohorts were aged 19 and over. This is because the errors are so large that they would have had to have been exceptionally large proportions of the flows when the cohorts were under 19 had those flows been significant contributors to UPC. The cohorts aged 21-23 in 2011 were only aged 19 and over in the second half of the period between the censuses (i.e. 2006-11) so the migration errors must have been continuing in the second half of the census period.

   b. On 22 March 2018 the ONS issued revised estimates for international migration outflows from local authorities in the years 2011-12 to 2015-16[4]. In Guildford's case these increased the international migration outflow by an average of 236 people a year. This suggests that the earlier methods were underestimating outflows and that the problem continued post 2011.

Other reasons for believing the OAN has been exaggerated

13. There are three other reasons for believing that the SHMA Addendum exaggerates the likely increase in the number of households in Guildford.

   a. The Addendum re-bases the 2014 SNPP to what was then the ONS's population estimate for mid-2015 (146,080). The revised ONS estimate for that year is now 145,056, 1024 people fewer.

   b. In the 2016 National Population Projections (the '2016 NPP')[5], the ONS have reduced their life expectancy assumptions, thereby increasing the projected number of deaths and reducing the projected population increase. These revised assumptions

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[3] See paragraphs 2.12 to 2.21

[4] Revised population estimates for England and Wales: mid-2012 to mid-2016, ONS, 22 March 2018 available at:
https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/latest

[5] National Population Projections: 2016-based statistical bulletin, ONS, 26 October 2017, available at:
https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2016basedstatisticalbulletin

will be reflected in the forthcoming 2016-based sub-national projections and should reduce the projected population growth in Guildford.

c. The 2016 NPP also assumes lower net international migration. That too will reduce the projected population growth in Guildford.

d. The revised international migration estimates which the ONS published on 22 March are only the first stage of a revision of their mid-year population estimates. They have announced that next year they will adjust their internal migration estimates. This should also reduce further the population projections.

14. NMSS modelling suggests that if the above factors are taken into account the estimated housing need over the period 2015-34 (the demographic-based OAN) would fall from the 557 homes a year suggested by the 2014 SNHP to 409 homes a year. The following table summarises the impact of the separate adjustments that have been made in reaching this figure.

Adjustments needed to DCLG's 2014-based projections	Homes per year 2015-34
2014-based DCLG projections (2014 SNHP)	557
Adjustment for UPC	-88
2014 SNHP + UPC adjustment	469
Adjustment for 10 YR UK flows	-17
2014 SNHP + UPC adjustment + 10 YR UK flows	452
Adjustment for ONS's new mortality and migration assumptions	-43
2014 SNHP + UPC + 10 YR UK flows + revised ONS assumptions	**409**

15. The following chart compares the adjusted projection with the 2014 SNHP and the exponential trend line taken from the historic data for the period 1991-2011.
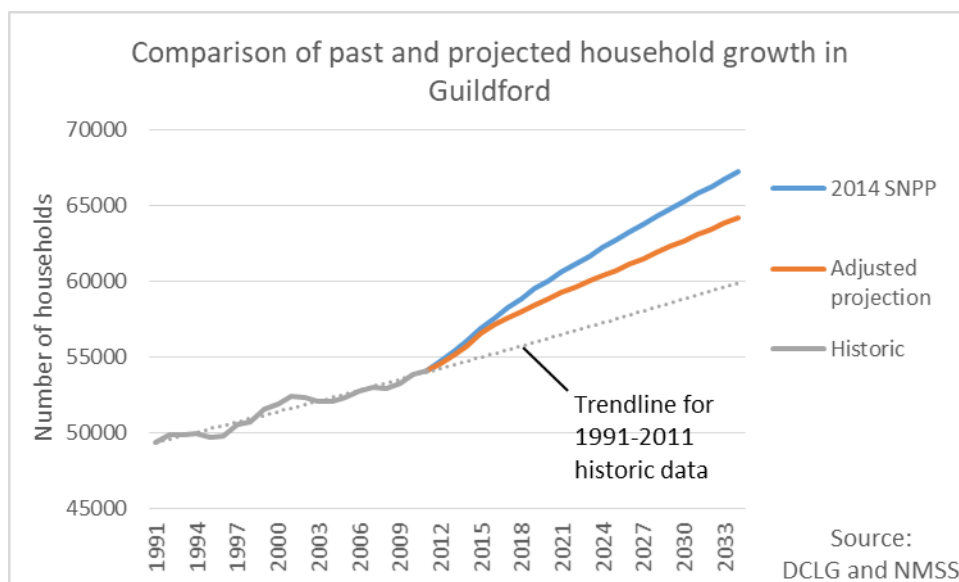
16. As can be seen, the adjusted projection is significantly above the trend line drawn from the historic data. The 2014 SNPP is even further above the historic trend line, underlining its lack of credibility.

17. The ONS's 2016-based population projections (which are due to be published on 24 May) should include the impact of ONS's new mortality and migration assumptions and their

revised estimates of past international migration. They will not include the forthcoming adjustments to their historic internal migration estimates; make full allowance for UPC; or be based on 10-year trend periods. It is therefore likely that they will still overestimate the likely growth in Guildford's population.

2.2   Student migration and its impact on the housing market.

18. **Contrary to what is suggested in the SHMA Addendum, it seems highly likely that the official projections over-estimate the impact which students are likely to have on the Guildford housing market. This means that there is no need to add additional homes to cater for student needs.**

19. There are three reasons for this:

   a. As discussed above, it seems likely that the majority of UPC is due to errors in estimating student flows, particularly the under-estimation of the numbers of students leaving Guildford. This means that the population estimate for the start of the plan period (2015) will include students who will in fact have left Guildford.

   b. The projections envisage that over the plan period the number of 18-23 year olds living in market housing in Guildford (as opposed to in student halls of residence) will increase by 2,753. This compares with GL Hearn's estimate that 1,710 extra students need to be accommodated in the general housing stock over the plan period – suggesting that the household projections over-provide for students living in rented accommodation. (Appendix B explains why the SHMA Addendum mistakenly concludes that the 2014 SNHP does not provide for the increase in student housing needed.)

   c. Most students living in rented accommodation will fall into the category of "other households". The 2014-based projections envisage that the number of "other households" in Guildford aged 15-24 will increase by 579 over the plan period. This compares with GL Hearn's estimate that 428 extra dwellings are needed for students – again suggesting that the household projections over-provide for students.

2.3   Market signals and the issue of housing affordability.

20. A 'percentage uplift' approach to affordability adjustments has been used in Waverley and elsewhere. However, there is no evidence base to suggest that the percentages used in such adjustments are appropriate: at best there is some attempt relate the size of the percentage applied to the severity of the problem. If this approach is to be applied to Guildford the percentage used should be below that for Waverley as Guildford's lower quartile workplace-based affordability ratio (12.18 in 2016) is significantly lower than that for Waverley (14.63 in 2016).

21. Any uplift should be applied to the 'starting point' demographic OAN after the adjustments suggested above. To apply an uplift on top of, say, a housing need figure uplifted to allow for economic growth would be double counting. This is because an uplift to improve affordability and an uplift to support job growth are both seeking to address the same thing, namely the consequences of the undersupply of housing. Prices rising relative to earnings (i.e. declining affordability) are an indication of supply being too low relative to demand. Similarly, if there are not sufficient homes to accommodate the workers needed to fill the jobs that are likely to be created there will be an undersupply of housing and prices will rise.

Indeed, the past deterioration in affordability may have been due in large part to the failure of housing supply to keep pace with the increasing demand for housing to accommodate people working in Guildford.

2.5   Employment growth

22.   The SHMA Addendum analysis of the number of homes needed to support job growth is based on averaging the job growth rates produced by three different forecasters which suggest job growth varying from 0.5% to 0.9% a year. The Addendum then uses economic activity rates from three different sources to estimate the population to support job growth (and hence the number of homes needed).

23.   The approach is fundamentally flawed as it uses economic activity rates that are different from those implicit or explicit in the forecasts being interpreted. This produces meaningless results as, had the forecasters made different assumptions about activity rates, they would have projected a different sized workforce and reached different conclusions about the number of jobs in the economy. The only sound way to estimate the number of homes needed to support a given jobs forecast is to use economic activity rates that are consistent with that forecast.

24.   This is a complicated area that has not always been well explained to planning inspectors. However, there are now a number of cases in which inspectors have rejected 'homes for jobs' calculations which use inconsistent economic activity rates. An example is the Nipsells Farm Lodge appeal[6] in which the Inspector concluded:

> *".....The appellant's approach attempts to estimate the number of people needed to support a forecasted increase in jobs by applying assumptions about the relationship between jobs and population that are different from those used in the original forecasts. This does not seem a robust approach in my view, as it has the potential to over-inflate the projection of homes to meet future job growth."*

25.   It is unfortunate that the Council have not released the detail of the jobs forecasts used in the SHMA Addendum. When this was done during the recent Waverley Local Plan Examination it was a straightforward matter to show that for two of the three forecasts no additional homes were needed to support job growth. (For the third forecast there was insufficient data to make a sound estimate.) The end result was that no additional homes were included in the calculation of the Waverley housing requirement.

26.   There are a number of additional reasons why it is likely that the SHMA addendum exaggerates the number of homes needed to support job growth in Guildford.

   a.   Sufficient detail of the Guildford jobs forecasts used in the West Surrey SHMA of September 2015 were provided to allow the NMSS to make a proper estimate of the number of homes needed to support the then OE and CE jobs forecasts. That analysis[7] showed that in neither case were additional homes needed to support job growth. As the forecasts used in the SHMA Addendum are substantially lower[8], it seems highly unlikely that the new forecasts will require any additional homes.

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[6] Appeal Ref: APP/X1545/W/15/3139154. Nipsells Farm Lodge, Nipsells Chase, Mayland, Essex. Decision by Jonathan Manning dated 7 December 2016
[7] See paragraphs 6.11 to 6.16 of NMSS Report of June 2016
[8] SHMA Addendum, paragraph 4.7

b. In analysing the impact of different economic activity rates the SHMA Addendum does not use the Oxford Economics' assumptions on economic activity rates which they describe as "some of the highest"[9]. Had they used those assumptions they would have produced a scenario with lower estimates of extra population need and hence fewer homes. Moreover, if GL Hearn had misgivings about the economic activity rates used by OE they should not have used the OE forecast at all as those misgivings imply that the forecast was thought to be unsound.

c. The SHMA Addendum calculates the additional population needed to support job growth by adjusting migration flows into and out of Guildford. It assumes that the age/sex profile of the additional migrants is the same as in the ONS's Sub-national Population Projections[10]. That age/sex profile is not appropriate as it includes significant numbers of people who will be moving for reasons that are unconnected with employment. It is, for example unlikely that many additional people who are over or near retirement age will decide to move to Guildford because of the strong job growth there. It would be more appropriate to assume that most of the additional, job-related migrants are well under retirement age. If this is done fewer additional migrants would be needed (as younger people have higher economic activity rates) and even fewer extra homes would be needed as younger people have lower household formation rates.

d. The SHMA Addendum assumes that 4.3% of people working in Guildford have more than one job. This figure is based on an average over the period 2004-15, despite the clear upward trend in the proportion with more than one job. The Addendum itself notes, "The 4.3% assumption is potentially conservative given that there is some upward trend shown in the historical data."[11] Had allowance been made for either a continuation in the rising rate or the rates of double jobbing seen in recent years the estimate of the number of homes needed would have been lower.

27. **As:**

   a. **the method used to estimate the number of homes needed to support job growth is flawed;**

   b. **earlier analysis based on higher jobs growth suggested that no additional homes were needed; and,**

   c. **there are a number of other reasons for believing that the number of homes needed to support job growth has been over-estimated,**

   there is no sound basis on which to add a 'homes for jobs' uplift to the demographic OAN in estimating Guildford's housing requirement.

M3. Unmet Need in Housing Market Area (HMA)

28. Suggest there is no sound basis for applying an uplift to meet estimated unmet in Woking needs as that estimate is out of date and highly uncertain. The estimate is based on:

   a. An estimate of the objectively assessed needs of Woking comes from a 2015 SHMA that is untested in a local plan examination; is based on projections that have now

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[9] SHMA Addendum, paragraph 4.9
[10] SHMA Addendum, paragraph 4.29
[11] SHMA Addendum, paragraph 4.24

been superseded; and includes a large and potentially contentious uplift for homes to support job growth;

b. A plan housing requirement that is based on the long defunct South East Plan;

c. It is assumed that (a) and (b) will hold good until 2027 when the Government has made it clear that plans should be reviewed every 5 years.

29. It is highly likely that a more rigorous assessment based on the latest evidence of need and the scope for providing housing in Woking would conclude that the shortfall was much smaller.

3.1 Allowance of 83dpa within Waverley

30. Guildford is too constrained to accommodate unmet need from Woking. It would be unsustainable to harm Green Belt here, by increasing the rate of development, to protect Green Belt in Woking which respected its constraints. Guildford is more constrained than Woking or Waverley in terms of the extent of environmental designations that restrict development:

> Proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest[12]
> | | |
> |---|---|
> | Guildford | 89% |
> | Woking | 63% |
> | Waverley | 64% |

3.2 Constraints (Green Belt and other designations) and Green Belt release to meet Guildford's OAN.

31. The full DCLG data set[12] shows Guildford is in the top 9 most restricted of all 329 local authorities in the country in terms of environmental designations. This is based on data DCLG describes thus:

> "*This provides an indication of land that is not generally available for development, to illustrate the point in the consultation document that not all authorities will be able to meet their need in full within their own area.*"

32. In addition to these environmental designations, Guildford's current and future capacity is limited by:

- Special Protection Areas
- the geography of being a constricted and divided gap town through which transport infrastructure is squeezed,
- the pressures of being in London commuter belt, a university town and having notable flood risk, and
- being a place in which views (countryside and townscape) make an important contribution to the qualities that underpin economic success.

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[12] Housing need consultation data table https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals

33. We consider the scale of Green Belt release proposed for Guildford to meet, and in practice exceed, OAN to be excessive. The function of the Green Belt would be compromised by a perception of a string of development with reduced gaps along the A3.

34. It is not a sustainable approach to stoke up growth that will beget demand for more growth in such a constrained district when more sustainable strategies could be pursued. The pace at which any capacity in Guildford is used needs to be judged wisely not expended in a plan period. The Sustainability Appraisal flags the problem of linear sprawl along the A3 if Guildford expands further.

3.3 Any other unmet need issues.

35. Suggest reconfiguring the HMA in the next Plan review and giving greater focus to sustainable commuting in the interim. It is helpful to note that the HMA is rather artificial and distorts the picture by cutting Guildford off from places such as Aldershot where many people who work and socialise in Guildford live. The picture and opportunities for housing look very different if more of the area beyond the Green Belt, with which Guildford's economy is so intertwined, are brought into play.

36. Guildford's exceptionally high commuting levels reflect not just commuting to London but also commuting southward. A sizeable number commute in from communities beyond the Green Belt. Commuting in from less constrained settlements could be a sound approach if transport is sustainable. About half of Guildford's working population commutes out and about half of its workforce commutes in.

– Source and Destination of In-commuters and out-commuters
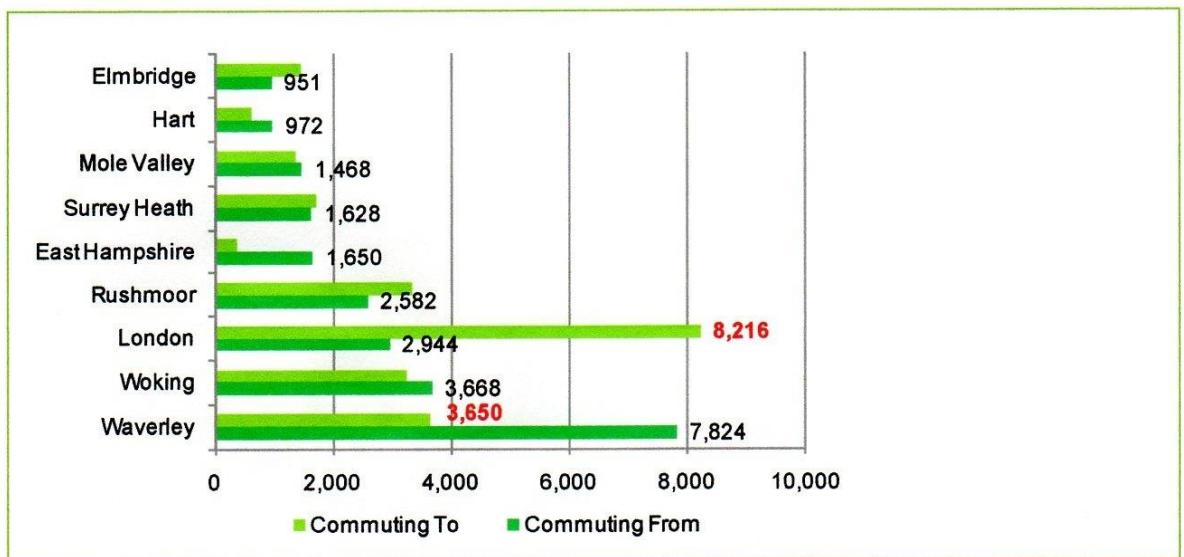
Source: Census of Population 2001

M4. Housing Trajectory

4.1 Increasing early delivery

37. Suggest giving greater priority to student campus accommodation could make more housing available earlier. This could be a quick win which avoids infrastructure and environmental

constraints. Recent progress in boosting student provision to pledged levels indicates what could be achieved if the University were more ambitious in supporting our constrained borough by <u>actively encouraging</u> as many students as possible onto campus. The reasons given for not increasing the campus accommodation target appear at odds with the University students' union consultation responses seeking more campus provision. The University's provision of attractive letting agency services for landlords encourages homes in the town to be taken out of circulation for other residents. The University may be in the top 5% when benchmarked for student accommodation: it is possibly the top University nationally in terms of percentage if its district with environmental designations that constrain development[12]. An ambitious approach to campus provision would be appreciated.

38. Suggest caution in pursuing accelerated delivery in later years. It would not be sustainable to stoke up future demand for housing growth in such a constrained place. The NPPF and new draft are both clear that, having identified OAN, authorities should consider the extent to which the plan can meet those needs consistently with the policies of the Framework. Is there a risk that, in its commendable zeal to plan positively and address past shortfalls and in the absence of progress with brownfield initiatives, the Council is proposing to release and develop so much Green Belt in a single Plan period that it is harming the openness of the Metropolitan Green Belt and exceeding the tipping point of causing adverse effects that outweigh the benefits of development? We consider Green Belt impact to be a reason for pursuing positive, alternative strategies to add value and meet needs and that failing this, the overall scale and type of development in the plan area should be restricted and phased.

39. We note that the Local Plans Expert Group foresaw it was "likely that local plans (particularly in London and the South East) may not enable the full scale of housing need to be met" and made recommendations for supplementary measures. Current and draft NPPFs anticipate adverse impacts on specified designations may outweigh the benefits of development.

M7.   Meeting Employment Needs

7.4   <u>Protection of employment floorspace</u>

40. Concern at loss of small business sites.

M8.   Retail and Service Centres

8.1   <u>Town Centre and changing retail patterns</u>

41. Proposed reliance on further retail studies perpetuates the problem that these are behind the curve of retail change. The Plan underestimates the pace of transformation in the role of town centre buildings people will visit (as opposed to virtual interaction) and in so doing, through proposed retail overexpansion, puts our High Street, which has been resilient by adapting while retaining character, at risk.

42. North Street should be described as "mixed use" rather than retail-led, reduce retail, increase residential and embrace high added-value, high tech opportunities.

M9.   Spatial Strategy, Green Belt and Countryside Protection

9.1   Preamble to S2 - distribution of development and guide to future development

43.   4.1.5 Suggest adding Guildford is characterised by

- a dynamic and historical town centre,
- established garden suburbs, and
- countryside with villages.

The spatial strategy aims to allocate development between these three elements in a way that respects, and where possible enhances, the valued character and capacity of each.

44.   4.1.8 Suggest adding after "therefore,":

- work with adjoining HMAs to identify opportunities for meeting need beyond the Green Belt linked to sustainable travel and
- work with tertiary education providers to optimise the scope for student campus accommodation, and
- acknowledge capacity limits in view of constraints and the need to provide scope for the borough to continue to grow in future.

45.   4.1.9 Suggest adding after "deliverability" capacity

9.2   Is housing directed strategically to the right places?

46.   Concern at cumulative effect of sprawl along A3 and exacerbation of car use and congestion. The effectiveness of the Sustainable Movement Corridor will be restricted by the narrowness of roads and numerous pinch points where the corridor will merge with other road users.

47.   Development is being directed to some sites on which part of the land needs to be available for future infrastructure if Guildford is to manage its constraints and grow further:

- An additional bridge over the river/railway to improve connectivity across physically divided town.
- A central, all-direction bus interchange enabling sustainable travel in any direction from one point.
- Potential tunnel entrances for A3 through traffic.

9.4   Residential development in urban area

48.   Plan should identify opportunity areas now for delivery of more strategic brownfield sites in next Plan review.

9.5   Are Green Belt release and locations justified by exceptional circumstances?

49.   The exceptional feature is the extent of protected land and other constraints. There is real concern that the Council turned too readily to Green Belt options on a large scale without doing enough to pursue options that avoid this (brownfield, campus accommodation, sustainable commuting from outside the HMA). There is also concern at too much focus on retail expansion illustrated by loss of a town centre housing site to a supermarket.

50. The GB&CS was improved but continues to use flawed criteria to assess potential parcels of land for removal. It does not look strategically at the functioning of the Green Belt under different scenarios or whether there are exceptional circumstances.

9.8 Implications for spatial strategy of greater housing requirement

51. A further increase would have an even more harmful effect and not be sustainable or deliverable.

M10. Built Environment and Heritage Assets

10.1 Promotion of good urban design

52. Welcome merging D1 and 4. Suggest care is taken to ensure a combined policy applies equally well to promote sensitive redevelopment given the significant contribution to new housing coming from infilling in established residential areas. Through promoting good design and appropriate density on a case by case basis, the Plan should avoid harmful cramming and erosion of views (not just of listed buildings) that are so significant in our gap town set in AONB. Character underpins the economic success and environmental resilience of Guildford.

53. Suggest policy reference to green edges to settlements and along routes, a distinctive Guildford trait.

M11. Site Allocations

11.1   A6 should increase residential by reducing retail rather than adding bulk.

11.2   We need such sites for the wider population given the recent increase in provision of off-campus, purpose-built student halls.

11.3   Proposed Cathedral development would cause landscape harm detracting from this heritage asset.

11.10   Cost of relocating sewage treatment works, remediating contaminated land, providing road links and SANG restricts scope for affordable homes and community facilities without additional funding. The Council has shown determination and good partnership working taking this forward.

11.11   Yes, essential plus need to leave land for a potential tunnel entrance available.

11.13   Not established.

11.14   Yes. Far more attention needs to be given to the significant diminution of the Green Belt that would occur in this locality. The prominent sweep of this land means development on the scale proposed would create the perception of the eastward sprawl of the wider Guildford urban area along the A3

11.15   This would constitute major development in AONB causing significant detriment to the landscape. The relevant test would apply.

11.18   Suggest taking account of opportunities in the town centre linked to reduced retail floor space requirement.

11.19   Not established.

11.21   The density of permissions in this area is notably low notwithstanding land allocated for water management.

11.22   Yes.

11.23   Any development would constitute major development in AONB. The development test applies. SA points to need for landscape sensitivity.

11.29   The long-term viability of sustainable transport modes is a risk.

11.34   In combination with A25, there is a risk of a significant diminution of the Green Belt in this locality giving the perception of eastward sprawl of the wider Guildford urban area along the A3, with encroachment into undeveloped gaps.

APPENDIX A

Text of email exchange between Neil McDonald (NMSS) and Neil Park (ONS) June and July 2017

Email from Neil Park of 20 July 2017

Hi Neil

Thanks for your query regarding the population estimates for Guildford. Apologies for the slight delay in responding but we've been busy putting together the population estimates for mid-year 2016.

In 2015 we released a report giving our best assessment of the causes of discrepancies between the 2011 census estimate and mid-year estimates rolled forward from 2001. The analysis is this report suggests that the main reasons for the overestimate of 20-29 year olds in rolled forward mid-year estimates for 2011 was error relating to migration (both international and internal). In particular for Guildford, and many other areas with students, this reflects our effectiveness at moving students into 'study' areas and the relative difficulty at moving graduates out at the conclusion of their studies. For Guildford this was further complicated by a large number of students being on sandwich courses at the University of Surrey; many students would have been resident in Guildford for 3 years in a 4 year period, however in the population estimates they would tend to have been counted in Guildford for a 4 years.

In response to your four main points.
- *It is clear the net migration flows have been over-estimated: the concentration of UPC in the ages 21-28 in 2011 is such that census errors could not explain the discrepancies.*
You are correct, statistical uncertainty relating to the 2011 Census does not explain all of the difference between estimates for 2011 - but it might explain some of the difference. However, it is relatively certain than uncertainty due to internal migration and international migration in the MYEs will have had a greater impact.
- *The inaccuracies must be largely in the 18 and over flows as the under 18 flows are too small to account for a significant proportion of UPC without postulating implausible error margins.*
Inaccuracies are due to flows post aged 18, particularly the outflow of graduates/higher education leavers.
- *UPC is likely to be due to the under-recording of outflows rather than the over-estimation of inflows given the methods used to estimate the flows.*
Particularly with regard to internal migration flows, we're very good at moving students in but less able to move graduates out. It is much to estimate to-study movements than post study movements. In particular when people go to university they are often encouraged/compelled to register with the university health service and we have information from the Higher education Statistics Agency (HESA) that puts them at their student address. When these people leave university they are left to their own devices and it may sometime before they register with a new health service.
`• *As the flows in the years in question are dominated by students and estimated outflows appear to have fallen relative to inflows during the period 2001-15 it seems likely that the inaccuracies are greater in the later years of the period.*
There are some methodological differences affecting the comparisons of international migration that you make. Up until mid-year 2006 international immigration and international emigration data weadd page numbers re both modelled, at the LA level, using a regression model. Post 2006 we

moved to an immigration method that apportioned immigrants from the International Passenger Survey (IPS) to local authority using administrative data. Analysis conducted at the time of the 2011 census supported this change of approach (the admin data approach moved us nearer to the census than the modelling approach). Additionally the way we calculate the age/sex distribution of immigrants has changed, up until 2011 this primarily used data from the IPS, post 2011 we switched to using the age/sex distribution of immigrants found in the 2011 Census. The similarity between the age profile of immigration estimates for 2001/2 and emigration for 2004/5 is partly because the methods were quite similar and closely interlinked - in fact one of the covariates in the emigration model was the previous year's immigration. In the later period we've moved to better methods that lead to better estimates.

For the 2017 mid-year estimates (to be published in June 2018) we will be introducing some new methods for internal migration and international emigration that will result in changes to the population estimates. Details of these methods changes can be found here (see appendix 2) https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationesti mates/methodologies/methodologyguideformid2015ukpopulationestimatesenglandandwalesjune2 016

Lastly, earlier this year we published a set of uncertainty measure (effectively confidence intervals) for the mid-year estimates at local authority level. For Guildford this suggested that the 95% confidence interval around the mid-2015 estimate for the total population was +/- 7,510 (or +/- 5.1%).

I hope this helps.

Thanks,
Neil

Neil Park
Population Estimates Unit
Population Statistics Division
Office for National Statistics
Tel: 01329 44 7823

From: Pop Info
Sent: 12 June 2017 10:51
To: Park, Neil <neil.park@ons.gov.uk>; Pateman, Tim <tim.pateman@ons.gov.uk>
Subject: FW: Understanding the 2015 MYE for Guildford

Dear All

Please can you see the email below. I think it needs input from PEU.

Regards Paula

From: Neil McDonald [mailto:neilkmcdonald@googlemail.com]
Sent: 09 June 2017 15:39
To: Pop Info <pop.info@ons.gov.uk>
Subject: Understanding the 2015 MYE for Guildford

2015 MID-YEAR ESTIMATES FOR GUILDFORD

I have been attempting to understand the implications of the 2015 Mid-Year Estimates (2015 MYE) for Guildford and, in particular, the large Unattributable Population Change (UPC). The latter is so large that it raises questions about the estimates made of migration flows. However, it strikes me that the extent to which UPC is concentrated in certain age groups gives some fairly clear pointers as to the causes of UPC which help in understanding the data. I would, however, welcome an expert view.

As I am sure you know, using the components of change data provided in the 2015 MYE it is possible both to calculate both the total size of the discrepancy between the 2011 census-based population estimate and the estimate produced by rolling forward the 2001 census-based estimate of the population (i.e. UPC) and to disaggregate that discrepancy by age and sex. In Guildford's case the discrepancy totals 7,173. That compares with a population change between 2001 and 2011 suggested by the census-based estimates of 7,806. This means that UPC is almost 92% of the change in the census estimate.

The following chart disaggregates UPC by age and sex:
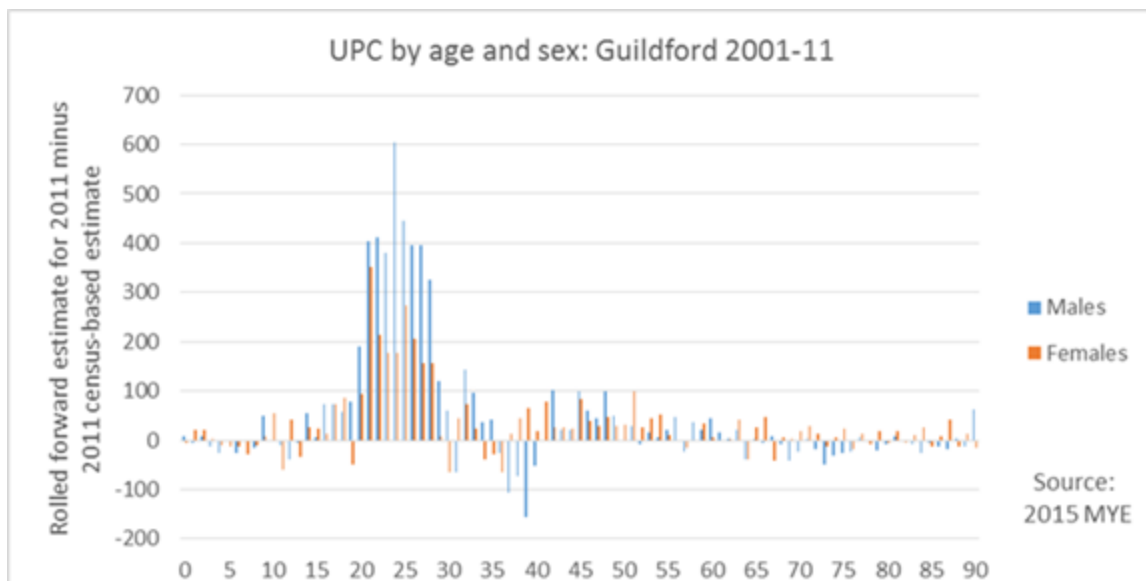
As can be seen from the above chart, UPC is heavily concentrated in the groups that were aged 21 to 28 in 2011. In these ages, UPC was not only large but was large compared with the 2011 census-based estimate of the population, as the following table shows:

UPC compared with population in 2011: Guildford ages 21-28 in 2011						
Age	Males	Females	Male pop in 2011	Female pop in 2011	UPC as % of 2011 pop - males	UPC as % of 2011 pop - females
21	404	351	1225	1050	33%	33%
22	411	214	1291	1167	32%	18%
23	380	178	1184	1031	32%	17%
24	604	178	987	964	61%	18%
25	445	273	980	884	45%	31%
26	396	206	1030	891	38%	23%
27	397	157	965	871	41%	18%
28	326	156	938	857	35%	18%

It is, of course, the case that, as we have high quality systems for recording births and deaths, UPC is likely to be due to inaccuracies in the census numbers or the estimates of migration flows. However, for those who were 21-28 in 2011 UPC is much greater than the ONS's 95% confidence limits for the census counts. This implies that the bulk of UPC must have been due to inaccuracies in the estimation of the migration flows. The following tables show the 2015 MYE estimates for migration flows into and out of Guildford (internal and international) for males in the age groups and years that will have contributed to the rolled forward population estimates for those aged 21 to 28 in 2011, with flows contributing to the 23 year olds highlighted.
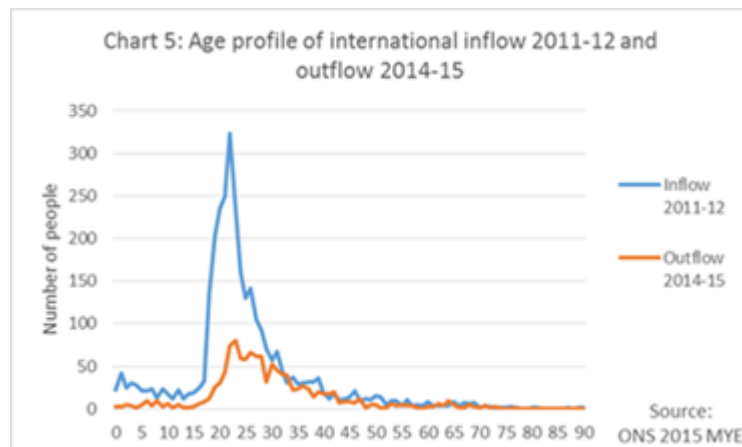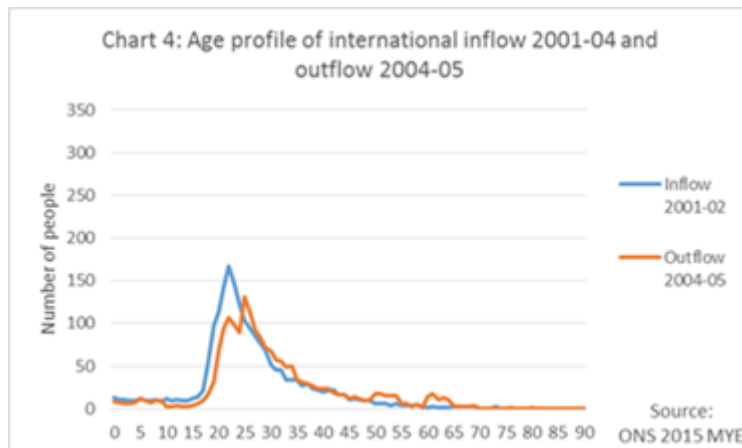
2015 MYE estimates of migration flows into Guildford: 2001-11: males										
	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11
12	44	34	30	45	30	33	26	25	23	20
13	25	33	29	32	32	22	24	29	25	23
14	19	21	35	23	32	27	16	12	20	19
15	34	26	29	32	38	30	28	32	26	33
16	37	47	24	33	36	31	27	19	28	34
17	54	54	42	38	61	52	49	38	53	37
18	170	156	149	142	186	159	208	184	183	181
19	438	524	524	488	602	597	694	580	645	612
20	241	271	316	282	316	327	357	358	363	409
21	269	251	254	263	317	362	298	347	337	388
22	278	267	323	306	393	419	351	400	434	464
23	288	282	294	309	357	379	325	340	414	469
24	253	247	274	283	307	336	270	318	352	341
25	213	203	209	258	259	264	243	246	240	246
26	208	168	198	202	235	228	225	216	217	215
27	192	194	188	200	194	200	214	183	195	204
28	184	168	181	174	189	204	196	176	185	188

2015 MYE estimates of migration flows out of Guildford: 2001-11: males	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10	2010-11
12	50	35	45	34	38	43	29	35	25	40
13	35	40	49	34	55	34	34	26	27	32
14	78	70	104	67	79	61	69	54	38	59
15	31	23	20	25	29	34	15	21	20	16
16	19	25	20	22	23	20	19	12	11	17
17	17	23	29	30	27	29	27	22	27	13
18	64	64	44	73	60	64	59	65	56	71
19	211	216	213	207	222	231	250	242	221	244
20	240	244	220	258	228	229	254	258	237	235
21	212	217	213	228	233	243	242	282	239	212
22	245	275	266	287	304	321	331	346	302	282
23	253	248	263	290	277	354	307	333	315	396
24	247	255	232	215	284	265	275	284	261	263
25	241	233	239	250	237	279	271	248	254	256
26	198	217	226	209	199	261	263	236	217	210
27	200	194	198	198	189	236	228	196	191	186
28	169	187	205	191	169	205	204	191	157	174

For those aged 23 in 2011, the rolled forward estimate is 1184 larger than the 2011 census figure. As the tables show, the flows in and out in the under 18 age groups are relatively small. This means that, without assuming implausibly large percentage errors in the estimated figures, the under 18 flows could not have contributed significantly to UPC – and certainly not at anything like a tenth of the total UPC for this group (i.e. 118 a year). That leaves as the only possible conclusion that flows in the 18+ age group must be the source of the majority of UPC.

For migration flows to have contributed to a rolled forward population estimate that exceeds the 2011 census-based estimate either outflows must have been under-recorded or inflows over-estimated. When the ONS data was drawn largely from GP registrations the under recording of outflows would have been much more plausible that the over-recording of inflows – indeed it would have been difficult to see how over recording of inflows could have occurred. The ONS now uses other datasets as well as GP registrations, but would I be right to assume that the under-recording of outflows (particularly in age groups in which there are large numbers of students) remains inherently more likely?

There are other reasons to be suspicious of the outflows figures in the age groups in which there are likely to large numbers of students. In particular, an examination of the relative size of the international inflows and outflows raises some interesting questions. The next two charts (taken from another piece of work) compare international inflows with outflows three years later – as would be consistent with students coming for a 3-year course and then returning abroad. The first chart is for the first 3-year period given by the 2015 MYE and the second for the last:

Chart 4: Age profile of international inflow 2001-04 and outflow 2004-05

Chart 5: Age profile of international inflow 2011-12 and outflow 2014-15

As can be seen from the charts, during the period covered by the 2015 MYE data, whilst the inflow has grown substantially, the outflow has not only failed to keep pace but has fallen. For the earlier period the outflow aged 21-28 was a little less than 90% of the inflow in aged 18-25 three years earlier. For the later period the outflow was only 30% of the inflow. The charts for the intervening years show a picture that migrates steadily from that shown in the first chart to that in the second. Whilst it is possible that part of that change is attributable to more international students staying on in Guildford or moving elsewhere in the UK, it seems unlikely that this accounts for anything like the full change that the data suggests. The alternative explanation is that data for outflows significantly understates the flows towards the end of the period.

On the basis that students dominate outflows in the age group 22-28, I have explored the possibility that the actual outflows (internal and international) have remained at comparable percentages of the inflows three years which are suggested by the MYE data for the early years of the century and that the outflows of 19 year olds to universities elsewhere have also been underestimated. If the migration outflows are adjusted on this basis the rolled forward population estimate becomes much closer to the 2011-based estimate, both in terms of the total population and the age profile. This involves larger adjustments to the flows in the later years as in those years outflows are a smaller proportion of inflows.

I would also note that a comparison of outflows in the MYE with inflows three years earlier also suggests that the MYE figures for 2011-15 have been under-estimated, not just those in the years between the censuses.

It seems to me that from the above there are some things that are clear and others that are highly likely:

- It is clear the net migration flows have been over-estimated: the concentration of UPC in the ages 21-28 in 2011 is such that census errors could not explain the discrepancies..
- The inaccuracies must be largely in the 18 and over flows as the under 18 flows are too small to account for a significant proportion of UPC without postulating implausible error margins. UPC is likely to be due to the under-recording of outflows rather than the over-estimation of inflows given the methods used to estimate the flows.
- As the flows in the years in question are dominated by students and estimated outflows appear to have fallen relative to inflows during the period 2001-15 it seems likely that the inaccuracies are greater in the later years of the period.

I would very much welcome an expert view on this. Are there key factors I have overlooked or misunderstood or are these reasonable conclusions?

Kind regards,

Neil

Neil McDonald

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<u>Why the SHMA Addendum mistakenly concludes that the 2014-based household projections do not include sufficient additional student households.</u>

1. Having consulted with the University of Surrey and made allowance for the aspirational nature of their growth expectations, the SHMA Addendum assumes that it is appropriate to plan on the basis of 3,800 additional full-time Guildford-based students over the period 2016-34. (See paragraph 7.6) It assumes that 55% of these additional students live in halls of residence, implying that 1,710 live in market housing.

2. The SHMA Addendum's conclusion that a housing need estimate based on the2014 SNHP would not include sufficient homes for students is based primarily on two points:

    a. Paragraph 7.8 notes that the increase in what they take to be the student age group (18-23) is "limited". It is in fact 2,753 people over the period 2015-34 – well below the 3,800 GL Hearn suggest should be planned for. This might seem to confirm that the 2014 SNHP does not provide for sufficient student housing. However, what GL Hearn have overlooked is that the DCLG projections assume that for age groups under 75 the communal population (including students in halls of residence) is unchanged throughout the projection period. This means that all of the additional 2,753 people in the student age group are assumed to live in market housing. Comparing the 2,753 with the 1,710 students that GL Hearn believe need to be accommodated in market housing suggests that the DCLG projections will provide for many more student households in market housing than are likely to materialise, even allowing for a significant increase in the non-student population in this age group.

    b. Paragraph 7.10 and Figure 23 indicate that the 2014 SNPP assumes minimal change in in-migrants to Guildford aged 18-23 over the plan period. What the SHMA Addendum overlooks is that the 2014 SNHP also underestimates outflows in this age group, with the result that the population in this age group grows.

3. Equally surprising, the SHMA Addendum fails to look at what the 2014 SNHP suggests will happen to the number of households of the type that students form in market housing. These are largely "other households" aged 15-24. There is an increase of 579 households in this group over the plan period – well in excess of the 428 extra student households which GL Hearn believe there will be.   This suggest that a housing need estimate based on the 2014 SNHP will provide more than enough market homes for students.