1953 Michael Clary comments

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Summary of comments

Throughout the document there are references to London's population growing to 10.8 million by 2041 but nowhere is there any discussion of the source of these figures, or the weight that should be placed upon them, and no link is given to ONS or GLA population projection sources.

The only nod (and a very tangential one) at all to this is in the Mayor's Introduction, which refers explicitly to the population being **projected** to reach 10.5 million (a slightly different figure) by 2041. Projections are mechanistic calculations based on recent trends, which are far from guaranteed to continue. They exclude, quite explicitly, the effect of policy changes, of which Brexit is just one possible example.

It is not a given that London's population will grow by this much, any more than it was a given in the mid-1980s that London's population would continue to decline. The economic and social background can change and policy can also influence what happens to some degree.

The danger of presenting the projections as almost certain is that decisions may be taken now which increase the availability of "developer-friendly" land, which then gets used first, leaving brownfield sites, say, undeveloped if the population does not grow as much as protected.

An alternative concern would be that building on a really large scale actually attracts additional migration from other parts of the UK, thus the projections become a self-fulfilling prophecy. While there is discussion of getting the right kind of economic growth (to benefit all Londoners) I cannot see any discussion of whether growth in London's GVA which results purely from population growth is the right kind; increasing GVA per head is surely a better aim for London. There is also the national policy question of whether, say, additional growth in London and the South East at the expense of the rest of the country is something that should be discouraged.

There is another link to national policy. The government proposes to set housing targets for individual local authorities based on ONS projections. The smaller the area, the more dangerous it is to rely so absolutely on the projections. There is also a ratchet effect; if an authority has redeveloped a large brownfield area, projecting forward recent trends will lead to even higher targets but such development opportunities may well be unrepeatable. It is unfair that areas which have "done the right thing" should in effect be penalised for doing so.

The nature and limitations of projections

The impression given is that these are forecasts, facts even, and can be safely relied upon. They are not; they are projections, based on recent trends in birth rates, mortality rates, net migration and (when it comes to projecting household numbers) household formation rates. Fairly small changes in the trends projected forwards can substantially affect the projected outcome. For example, the latest ONS population projections for the period are about 2 million lower, simply because two further years' actual date were available.

As I understand it, the ONS projections are entirely mechanistic and I imagine that the same is broadly true of the GLA projections. To quote the statistician's note from the latest ONS release:-

"Population projections are not forecasts and will inevitably differ to a greater or lesser extent from actual future population change. There is already a margin of error in the underlying data – for example, estimates of the current population and past migration flows. In addition, our assumptions about the future cannot be certain as patterns of births, deaths and migration are always liable to change and can be influenced by many factors.

Two factors that may affect future population are political and economic changes but it is not possible to know in advance what impact these will have. On that basis the projections do not attempt to predict the impact of the UK leaving the EU. However, the projections of people of State Pension age do reflect future changes under existing legislation."

So any impact of Brexit, in particular, is not subsumed within the projections. But Brexit is just one example of changes to policy or economic and social change which can affect demographic trends.

ONS does not publish a range of error around its projections. This is as it should be; there is no statistical basis on which to assess the accuracy of the projections; "errors" are likely to be non-statistical in nature.

he lack of awareness that there are even issues here is typified by the choice of subject areas to which commentsd atre supposed to be linked. There are no topics whatsoever relating to population, projections, statistics, data and reliability.

Learning from the mid 1980s

If a London Plan had been in preparation in the mid-1980s, it would have been against a background of long term population decline in London (not just inner London). Population projections at the time would presumably have resulted in the Plan informing us that London's population was set to fall to X million. There were learned conferences at the time about the need to address the flight from the inner cities. We all know what happened next; the trends reversed and London's population began to grow.

The extent to which that reversal was a result of policy changes or wider factors is open to question. But looking back to that period reinforces two points:-

- One of the purposes of projections can be to indicate what could happen if things carry on as they have been and to stimulate discussion of how such outcomes could be avoided. Global warming projections are a prime example.
- It is legitimate to consider how policy changes could result in different outcomes. Policy at national level can have an impact on population growth; sub-national policies can impact on where that population growth is concentrated. In the 1980s the aim would have been to make London relatively more attractive. It is at least arguable that tipping the balance of advantage away from the South East in general (and London in particular) would be beneficial.
- Even if such policy tools thought to be ineffective, the sea on which we are being helplessly tossed must have radically changed nature in the 1980s on its own, so could do again.

None of this should be taken as criticism of the way that either the ONS or GLA has produced its projections. They use accepted methodology and are what they are. The problem comes when their nature and the published caveats are brushed aside and the projections presented as almost inevitable.

Potential consequences of overreliance on projections

Such an unnuanced approach can lead to absolute conviction that unpalatable measures (loss of Green Belt, densification) have to be implemented now in a gung ho approach. Just suppose that the projections turn out to be considerably too high. We may have released so much additional developer-friendly land on to the market that we end up with additional housing on that land and much of the brownfield land still not redeveloped. Or alternatively we might have built on both and created so much new housing that people are attracted to London for that reason alone; in other words the projections would have turned into a self-fulfilling prophecy. Plan on the basis that the projections are fact and you run the risk of blindly building more than is needed, quite likely despoiling some areas in the process and with impacts (welcome to some, unwelcome to others) on the housing market.

I am not suggesting for one moment that the projections are certain not to come be attained; indeed they could be exceeded. However, it seems to me that planning needs to develop in a more cautious fashion, with the less attractive housing options nearer the end of the queue, in case they turn out not to be needed, or at least not needed on the same scale.

The link to national policy proposals

I made many of the above points in my comments on the DCLG Consultation document on assessment of housing need. The excessive weight placed on projections is even more important in that context as targets are supposed to be set centrally using the projections, with incentives for councils to meet those targets.

Furthermore, once you get to local level there is a ratchet effect. Build a lot and the trend growth in population increases, leading to a demand to build still more to maintain the trend. But at local level development is inherently lumpy; you can't readily build a second Thamesmead or Meridian Water in the same local authority area, or if you can it may mean that a neighbouring authority which has a better (or less worse) site does not redevelop that. In other words a sub-optimal result for the wider area.

In my opinion the government's proposals are tantamount to a misuse of statistics.

The right kind of economic growth

While there is discussion of getting the right kind of economic growth (to benefit all Londoners) I cannot see any discussion of whether growth in London's GVA which results purely from population growth is the right kind; increasing GVA per head is surely a better aim for London.

There is also the national policy question of whether, say, additional growth in London and the South East at the expense of the rest of the country is something that should be discouraged. I have experienced apparently serious presentations in which academics have more or less argued that the economic/geographical advantages of the South East are such that it should be concreted over and the rest of the country left to go hang; these leave me concerned about the consequences of leaving everything to the market.

My background

I am a retired government statistician. I used population data but never worked on population projections. I have however worked on regional data and on GVA per head, so I have some experience of the gap in economic performance (in particular GVA per head) between London/South East and the rest of the country.

I would never pretend that my background automatically makes my opinions on statistical matters correct but my opinions and arguments are coming from a certain amount of experience and (I hope) expertise, not out of a vacuum.

Michael Clary