

# **DRAFT SPELTHORNE RETAIL AND OTHER TOWN CENTRE USES STUDY KKG SUBMISSION**

**8 April 2015**

## **Executive Summary**

We welcome this opportunity to submit our comments on the Spelthorne Draft Retail and Other Town Centre Uses Study.

### **In summary:**

- \* The Draft Study assumes a rate of population growth in Spelthorne over the next twenty years of 18%. It accepts this projection without question or enquiry as to its suitability to this Borough.**
- \* Around two-thirds of this projected population growth is made up of net migrants into Spelthorne, overwhelmingly from other parts of England, and mainly from London Boroughs.**
- \* This not an external factor over which Spelthorne Council has no control. Such a large assumed rate of growth should therefore be treated with the utmost caution, particularly as this Borough moves ever closer to full capacity.**
- \* Emphasis should be placed on providing first for the local natural increase in population and locally-based changes in population structure, rather than facilitating further net inward migration.**
- \* Central government guidance allows for these high level population projections to be adjusted to suit local conditions, providing this can be justified on the basis of robust evidence. Further detailed work on population growth and housing need should be completed before accepting the conclusions of this Study.**

**These summary points are discussed in detail in what follows.**

## 1. Population growth assumptions

1.1 There is much of interest in the Study.

However, on page 66 of Volume 1, the following Table 8.1 summarises the population growth assumptions underlying the Study.

**Table 8.1: Comparison of Experian and CLG Population Forecasts**

Year(s)	Spelthorne Core Zones Zones 1, 2, 3, 4, 5, 6 & 11		CLG 2014	
	Population	Growth	Population	Growth
2014	107,682	-	98,400	-
2019	113,042	4.98%	103,100	4.78%
2024	118,321	4.67%	107,800	4.56%
2029	122,691	3.69%	112,100	3.99%
2034	127,664	4.05%	116,200	3.66%
2014-2034	+19,982	18.56%	+17,800	18.09%

Source: Experian Business Strategies (July 2014), CLG 2014

The third and fourth columns are demographic projections published by the Department of Communities and Local Government (DCLG). These DCLG projections are the same (rounded to the nearest 100) as the population projections published regularly by the Office for National Statistics (ONS).

1.2 *“The projections are trend-based, making assumptions about future fertility, mortality and migration levels based on trends in recent estimates, usually over a five-year reference period. They give an indication of what the future population size and age and sex structure **might be if recent trends continued. They are not forecasts** and take no account of policy nor development aims that have not yet had an impact on observed trends.”<sup>1</sup> (Our emphasis in **bold**).*

i.e. the title of Table 8.1 is misleading. The figures are not “Forecasts”, but projections which “take no account of policy or development aims that have not yet had an impact on observed trends”. In this context, these policy and development aims include local policy and development aims.

1.3 The table immediately below is an analysis of the components of demographic change which together make up the population growth projections in columns three and four of Table 8.1.<sup>2</sup> (The total differs from that in Table 8.1 due to the rounding difference.)

<sup>1</sup> Office for National Statistics: Methodology: 2012-based Subnational Population Projections. See <http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/2012-based-projections/rpt-snpp-2012-based-methodology-report.html#tab-conclusions>

<sup>2</sup> Office for National Statistics: Subnational Population Projections, 2012-based projections. See <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-335242>

Spelthorne - Components of population growth			Total 2014 - 2034
Internal migration in	persons	All ages	111,290
Internal migration out	persons	All ages	101,157
<b>Internal migration net</b>	<b>persons</b>	<b>All ages</b>	<b>10,133</b>
Cross border migration in	persons	All ages	2,111
Cross border migration out	persons	All ages	3,170
<b>Cross border migration net</b>	<b>persons</b>	<b>All ages</b>	<b>-1,059</b>
<b>Net intra-UK migration</b>	<b>persons</b>	<b>All ages</b>	<b>9,075</b>
International migration in	persons	All ages	9,688
International migration out	persons	All ages	7,381
<b>International migration net</b>	<b>persons</b>	<b>All ages</b>	<b>2,307</b>
<b>Total migration net</b>	<b>persons</b>	<b>All ages</b>	<b>11,382</b>
Births by age of mother	persons	All ages	24,198
Deaths	persons	All ages	17,874
<b>Natural change - net</b>	<b>persons</b>	<b>All ages</b>	<b>6,325</b>
<b>Population change total</b>	<b>persons</b>	<b>All ages</b>	<b>17,707</b>
<b>Migration as % of total population change</b>			<b>64.3%</b>
o/w intra-uk as % contribution to total population change			51.2%
o/w international as % contribution to total population change			13.0%
<b>Natural change as % of total population change</b>			<b>35.7%</b>

1.4 In the table above:

- “**Internal migration**” is migration to and from other areas in England.
- “**Cross border migration**” is migration to and from Scotland, Wales and Northern Ireland
- “**International migration**” is migration to and from non-UK countries.

As is clear, 10,133 people of the total projected population growth in Spelthorne of 17,707 (some 57%) are assumed to come from net inward migration from other parts of England.

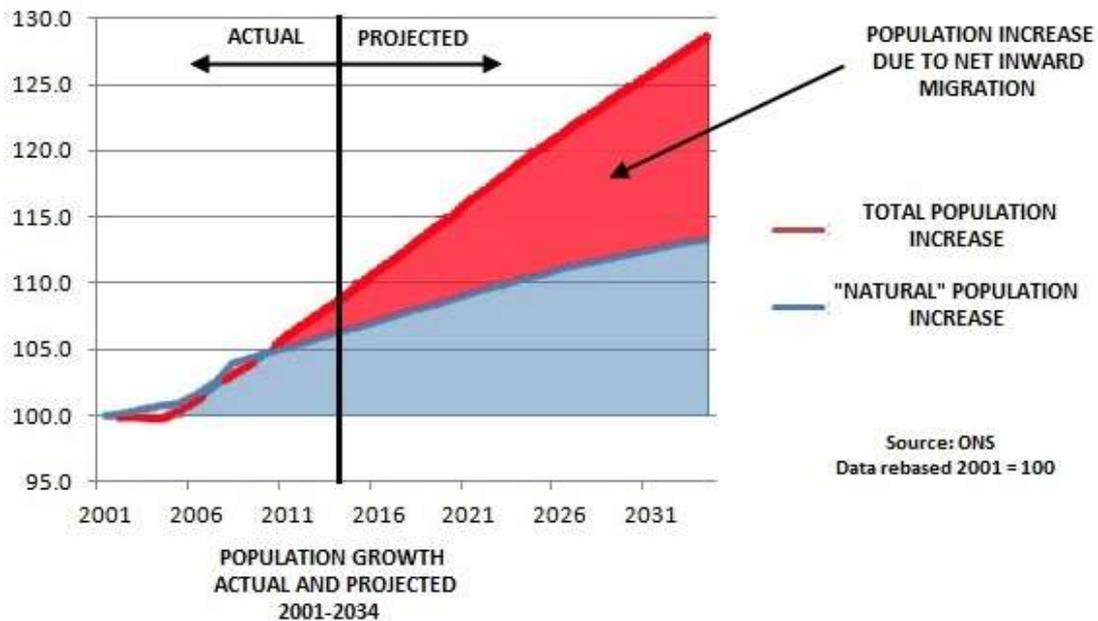
As might be expected, almost 60% of the internal migrants into Spelthorne come from London Boroughs.<sup>3</sup>

Together with a small assumed outflow to other parts of the UK of 1,059 people, and a relatively minor net inflow of 2,307 people from the rest of the world, total migration into Spelthorne is assumed to be **almost two-thirds of the total increase** in population, **with**

<sup>3</sup> Source: ONS Square-Matrices of Internal Migration

**unchanged policy and development aims.** Just over one-third is attributable to the natural growth in Spelthorne's population.

Put another way, if there was no net migration into Spelthorne, the projected increase in the population (i.e. the "natural increase") over the period from 2014 to 2034 would be 6.4%, not 18.0%.



1.5 The projected net inward migration, which forms such a large part of the projected total population growth, is based on the trend over the previous five year period. As the chart above clearly shows, projections calculated on this trend basis a few years ago would have given a completely different result, as the five-year trend would have excluded the recent migration into this Borough. The point is that there is nothing sacrosanct about the projections: who knows whether the most recent net inward migration might reverse – as it has in the not so distant past – radically changing the projections yet again.

Net migration into Spelthorne is only possible to the extent that there is sufficient housing for migrants to move into. It is not an external factor over which a local authority – specifically, Spelthorne - has no control.

This is not in any way meant to cast any negative aspersions on people who come to live in this Borough. But as Spelthorne moves ever closer to full capacity (the infrastructural constraints are well known and need no repeating here) a difficult decision needs to be taken.

Given Spelthorne's limited capacity to absorb further increases in population (without building on Green Belt and other open spaces, and/or sharply increasing population density in the current built-up areas) a political and planning choice will have to be made as to

which population group gets priority: inward migrants, or those with an existing link to this Borough, as represented by the “natural” rate of population growth.

These top-down projections of population growth have been included in the Study without detailed examination. Care should be taken that any component part of the Local Plan does not allow for further unsustainable migration into the Borough simply on the basis that it has happened in the recent past.

## 2. Planning Practice Guidance

2.1 The Planning Practice Guidance (PPG) issued by the DCLG, in its section on the methodology to use when assessing economic development and main town centre uses, says the following:

*“Labour supply models are based on population and economic activity projections. Underlying population projections **can be purely demographic or tied to future housing stock** which needs to be assessed separately. These models normally make predictions for a period of 10 to 15 years. Plan makers should be careful to consider that national economic trends may not automatically translate to particular areas with a distinct employment base.”*<sup>4</sup>

In the closely associated topic of Housing Needs Assessments, the PPG says the following:

*“The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.*

*The household projection-based estimate of housing need **may require adjustment** to reflect factors affecting local demography and household formation rates which are not captured in past trends.”*<sup>5</sup>

2.2 The population growth projections published by the ONS, and the DCLG data based upon them, are therefore not fixed in stone. They can be adjusted at a local level to reflect local conditions and circumstances. The proviso is that:

*“Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence.”*<sup>6</sup>

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<sup>4</sup> PPG: Housing and economic development needs assessments; Methodology: assessing economic development and main town centre uses; paragraph 033

See <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-economic-development-and-main-town-centre-uses/>

<sup>5</sup> PPG: Housing and economic development needs assessments; Methodology: assessing housing need; paragraph 015 See <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/>

### **3. Conclusion**

3.1 The assumed population growth rate underlying the Study is too high. It comprises a very large component of inward migration into Spelthorne, based on recent trends in migration, which has been included in the Study without question as to its applicability.

3.2 Central government guidance allows for these population projections to be adjusted to suit local conditions, providing this can be justified on the basis of robust evidence.

3.3 Spelthorne is fast approaching full capacity. The assumed population growth rate underlying this Study should therefore be treated with the utmost caution, until further detailed work on population growth and housing needs has been completed.

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<sup>6</sup> PPG: Housing and economic development needs assessments; Methodology: assessing housing need; paragraph 017 See <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/>