

## Population Projections and mid-year Population estimates for Coventry

### Issue

Ed and Sir David received a [letter](#), dated 13 Nov 2020, from [REDACTED] [REDACTED] various MPs, Mayor of the West Midlands and [REDACTED] CPRE (a countryside/environmental charity). The letter outlines their concerns regarding ONS's handling of population figures and projections for Coventry:

- They consider the mid-year population estimates and population projections for Coventry are greatly inflated by ONS with inadequate reasons for doing so.
- They request that the UKSA carries out an independent review (citing T4.6) and assert they are not the only local authority to 'disbelieve' the ONS statistics. Reasons given for the review request are i) the complainant feels there is currently no way to challenge the ONS numbers and no appeals process. They have appealed to ONS directly but do not feel ONS has ever provided an adequate response; and ii) the complainant believes that bad decisions are being made on the back of bad data (i.e. building on historic countryside) reducing trust in national statistics and ONS.

The letter has been [reported in the Guardian](#) on the 22<sup>nd</sup> November ("*Tories call for inquiry into 'bad data' to justify rural housebuilding*"), with ONS providing the following lines to take with the media "The Government considers using the 2014-based household projections to be the most appropriate approach for providing stability and certainty to the planning system in the short-term. MHCLG has clearly stated that this decision does not mean that it doubts the methodological basis of ONS's subsequent household projections and that they will be reviewing the local housing need formula over the next 18 months. MHCLG have now published their proposals for the future system which they are consulting on. Any further queries about the use of household projections in calculating local housing need should be directed to MHCLG".

Further coverage has been picked up by the [Coventry Observer](#) on the 24<sup>th</sup> November ("*MPs, West Midlands Mayor and councillors join 7,000 green belt campaigners in calling for immediate Local Plan Review*") Within the article is states "Mr Street said: "The Local Plan was drawn up using a prediction from the Office of National Statistics (ONS) which projected a population increase in Coventry of 31% by 2031, but in fact the rate has slowed massively. In a letter the ONS has confirmed the annual growth rate has in fact slowed to 1.3% – the lowest in ten years. The ONS have told me that the impact of their projections being overstated could mean 5000 homes being included in the Coventry Plan that will not be needed. Instead of providing protection against development to green spaces, the Local Plan leaving swathes of Green Belt defenceless"

We know that the 1.3% growth rate is mentioned in a letter from Ian Diamond to Andy Street (see 'Background' below and comes from the published provisional 2019 mid-year population estimates but we do not know who the ONS spokesperson is who quoted the 5000 homes.

Coverage continued in the [Coventry Observer](#) on the 30<sup>th</sup> November ("*Green belt battle in Coventry rages on as Housing Secretary meeting sought*").

### Background

This has been a long-standing issue for the complainants dating back to July 2016 and the complainants have always found the responses from ONS to be inadequate and unsatisfactory.

Helpfully they have produced a summary of their issues and a timeline of their correspondence with ONS which I have [linked here](#).

This exchange of correspondence includes National Statistician Ian Diamond [writing](#) to the Mayor of the West Midlands, Andy Street, in May 2020 setting out ONS' approach. The letter stated that colleagues from ONS would be happy to speak with Andy Street and that arrangements would be made. **Do we know if this happened and if so, what the outcomes were?**

### Population and Household estimates and Local Housing Need

Population projections are the starting input into the household projections. A summary taken from [ONS methodology documentation](#) for Household Projections (most recent version) is below which shows how the population projections and household projections are linked.



To note - OSR carried out compliance checks of [National Population Projections](#) (2016-based) in March 2019 followed by the [Subnational Population Projections](#) (2016-based) in January 2020 as well as [Household Projections for England](#) (2016-based) in December 2018. **Do we need to include a summary of findings here?**

However, the current Local Housing Need formula uses 2014-based household projections that were produced by MHCLG. Responsibility for producing household projections transferred from MHCLG to ONS in early 2017 however due to the new ONS estimates leading to a significant reduction in the overall numbers generated by the standard method for assessing local housing need, MHCLG continued to use their own 2014-based estimates. **What does this tell us about the value of the ONS projections? Are there still tensions between MHCLG and ONS?**

An additional point to consider in this casework is that there is high profile interest in the current [planning consultation](#) being run by MHCLG which includes proposed changes to the standard method for assessing local housing need (LHN). The proposal recognises the volatility of the household projections and looks to include a percentage of existing housing stock levels to provide more stability and predictability. The consultation is causing a backlash from interested parties due to the initial estimates of housing need being produced and so the latest on this is that MHCLG are revising their proposals in response to the backlash. The HPLS domain have briefed Ed and Sir David on this matter separately after Sir David flagged concerns that this could become an issue like the exams algorithm and so we are monitoring what is happening in this area.

Also as an aside, in March 2021 will be the next census which will provide the most up to date population figures although the results won't be available for some time after that.

#### **Specifics of this latest complaint**

The complainant is stating that parts of the countryside in Coventry and surrounding areas of Warwickshire have been lost due to being allocated to housing. They think this is unnecessary loss as they believe the housing need has been based on over-inflated population projections.

They claim that local councils say they are being forced by government to follow the projections. They feel that the government inspectors who examine the local plans are taking the projections at face value and that they are not inclined to test the meaning and reliability of the projections. **We need to check with MHCLG what the guidance is on local councils using the projections and may be worth finding out if possible, any deviations and what the consequences are. What does this tell us about the value of the projections?**

#### **Estimates of Coventry's population (sense check of the numbers and sources)**

The complainant believes that the input data are wrong and not the model itself.

From the letter - *"The 2011 Population Census provided a reasonably reliable figure of the population of Coventry – some 317,000. ONS have issued mid-year estimates for all subsequent years since then, rising to 371,500 by 2019 – an estimated increase of 54,500 in just 8 years, compared to far smaller growth of only 16,000. In the 10 years from census 2001 to census 2011."*

These numbers have been checked and are correct: From the 2011 census the population of Coventry was estimated to be 316,960 and the 2019 mid-year estimate was 371,521

Need to check birth and death rates and migration figures as well as the confidence intervals for the following claims -

- ONS have **overestimated** the birth rate in the city and underestimated the death rate.
- Based on information from HESA Destinations Surveys, and the Exit Checks data, we believe ONS has seriously underestimated the amount of international emigration from Coventry – particularly migration of students after their courses are completed.
- The 95% confidence interval for the **2017 mid-year estimate** in Coventry is  $\pm 23,500$ . Put differently, ONS is saying that the true net growth of Coventry from 2011 to 2017 is somewhere between 20,454 and 67,454, a difference of **330%**, over just 6 years. This is tantamount to an admission that the mid-year estimate for Coventry is nearly meaningless, so broad is the 95% confidence interval.

**Commented [1]:** I have confirmed the 32% rise quoted in the Warwick letter between 2011 Census and 2031 (mid-2014 projections). The equivalent figure is 33% using the mid-2018 projections. I have also confirmed the rise in births in mid-2014 projections cw birth registrations used in MYE

**Commented [2]:** I've checked the CI file on MYE and it says the 2017 MYE for Coventry was 360,149, with empirical CIs of 342,202 - 389,544 (empirical is the ONS preferred CI; i.e. -17,947 lower; +29,395 upper). The difference with 2011 Census figure is 43,189 (where 2011 Census estimate is 316,960). The CI range seems consistent with the range for other areas with high numbers of students – Newcastle and Liverpool. Not meaningless but indicates breadth of uncertainty around the central estimate given a hard to estimate population. I'm puzzled by another bit of the letter as it says the 2018 MYE is 'circa 335,000' and outside the 95% Cis but the file I have shows it as 366,785 (empirical Cis 346,279 – 406,220)

We also need to look at how ONS communicates the confidence intervals and any uncertainty/limitations around the numbers.

The complainants have done their own analysis, and they say this has been endorsed by 'highly respected demographers' – [REDACTED]

**Commented [3]:** May not be that important but just to flag: 330% is the ratio of 67454/20454 as a percentage. The percentage change is 230% i.e.  $(67454-20454)/20454*100$

Do we need to QA this analysis and see if we agree with ONS comments on it?

Do we need to speak to these individuals to understand more their involvement and views on the issues?

**What can we do in terms of T, Q and V? (drawing on the CES work on the exams review)**

T – There could be a loss of trust in ONS if they cannot properly justify the numbers and are perceived to not be listening to users. Similarly, there could be a loss of trust in OSR if we do not act.

The complainant feels ONS is not being transparent in explaining how the estimates are derived or how they are justifying the numbers? Could ONS be communicating better? Is ONS open to feedback? Are any limitations explained clearly?

Q – ONS recognise that Coventry is an outlier, but have they done anything to explore this further? What QA processes have ONS carried out on the input data and resultant output data? Has ONS been clear on its quality acceptance criteria? Has any external QA of the methodology or the results taken place? Has ONS ensured that the governance and accountability are clear and that the limitations of the model are clearly communicated?

V – Do the statistics meet user need and provide public value? Is ONS open to challenge to ensure they are taking the right approach? Have they collaborated within anyone? Has there been any human validation of the results? Has ONS been clear and transparent on how decisions made by models based on data from the outset can be appealed. Are there any acceptance criteria for

those affected by the statistics (i.e., for example do the LAs have any input based on their own local knowledge?)

#### Proposed next steps

Respond to the complainants saying we will investigate their claims and that due to the complexity of the issue and amount of evidence we need to look at and people we need to speak with, we anticipate this taking several weeks. Would we give a high-level indication of what we'll be doing, and would we say that work is currently underway and that we have a methods expert [REDACTED] joining us shortly?

In terms of what we need to do (needs expanding on):

- The complainant has provided a large amount of evidence to substantiate their claims so all of this will need to be looked at so that we can form our own opinion. There is a possibility we could explore any other data sources that support/refute the claims.
- We will need to look at how the population estimates have been derived including the methodology, a QA of the input data and ONS' processes.
- We are going to formally write to ONS asking them to present their evidence. We will need to think about how we communicate this with ONS given that Ian Diamond has already been involved (although we think the Ian Diamond letter did not really address the complainant's concerns).
- Speak with MHCLG and explore what the policy is with regards to LAs having to use the housing projections.
- Speak with Coventry council to understand their views on the matter and to also determine what the consequences of the population projections are on things like funding/schools/hospitals etc.
- Engage with the complainants
- Look to see if the other UK countries have had similar issues with their housing need and understand how the process works in these countries (HPLS domain had planned to do CC's of the household projections in Wales, Scotland and NI within the next few months – will need to consider the timings on this).
- We should investigate if this is just a 'Coventry' issue – are they mis-using the statistics to blame MHCLG and ONS for houses being built on green belt land.
- Check Coventry's local plan and council meeting minutes to see what has been discussed about building on the green belt.

**Subject:** OSR/ONS Population Projections and mid-year Population estimates for Coventry  
**Location:** Microsoft Teams Meeting

**Start:** Wed 18/11/2020 11:30  
**End:** Wed 18/11/2020 12:00

**Recurrence:** (none)

**Meeting Status:** Meeting organizer

**Organizer:** McGhee, Marie  
**Required Attendees**Robards, James; Park, Neil

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## Microsoft Teams meeting

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[Redacted]

**From:** DG Regulation  
**Sent:** 18 November 2020 17:42  
**To:** McGhee, Marie  
**Cc:** Gregory, Mary  
**Subject:** FW: letter to the UK statistics regulator UKSA  
**Attachments:** Letter to UKSA from CPRE, Mayor West Midlandss, and 4 MPs [Final, UNSIGNED copy] 2020-11-13-1.pdf

Hi Marie,

Some additional info for the casework you're leading. [Redacted] has added to the database for our records.

Thanks,  
[Redacted]

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**From:** Humpherson, Edward [Redacted]@statistics.gov.uk>  
**Sent:** 18 November 2020 16:17  
**To:** DG Regulation <DG.Regulation@Statistics.gov.uk>  
**Subject:** FW: letter to the UK statistics regulator UKSA

A short addition to the Midlands population projections case

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**From:** [Redacted]@parliament.uk>  
**Sent:** 18 November 2020 16:09  
**To:** Norgrove, David [Redacted]@Statistics.gov.uk>; Humpherson, Edward [Redacted]@statistics.gov.uk>  
[Redacted]@castledine.uk>  
**Subject:** RE: letter to the UK statistics regulator UKSA

Dear Mr Norgrove and Mr Humpherson,

Unfortunately [Redacted] missed the opportunity to add his signature to the attached letter from CPRE, but Mark is supportive of the concerns expressed and would be grateful if you could include him in any response,

Kind Regards,  
[Redacted]


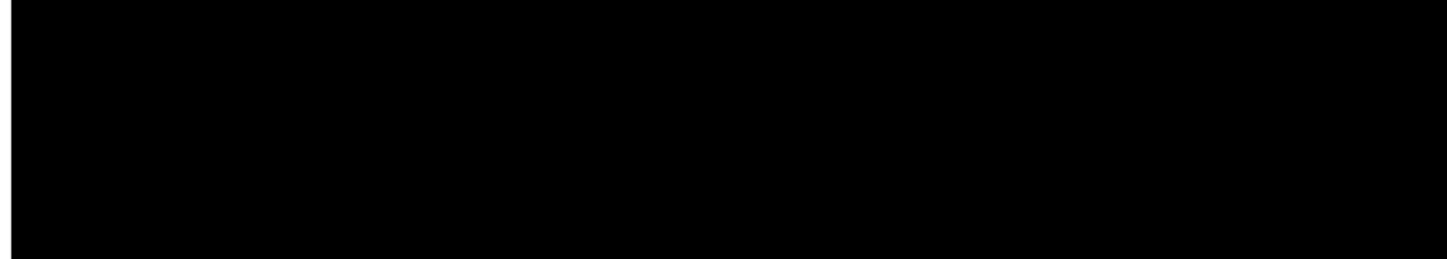
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[Redacted] | House of Commons | London | SW1A 0AA




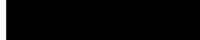
[Redacted]



To Sir David Norgrove  
Chair UK Statistics Authority

Ed Humpherson  
Director General for Regulation,  
Office for Statistics Regulation

1 Drummond Gate  
London SW1V 2QQ

@statistics.gov.uk  
@statistics.gov.uk  
regulation@statistics.gov.uk

Dear Sir David and Mr Humpherson

Re: POPULATION PROJECTIONS AND MID-YEAR POPULATION ESTIMATES FOR COVENTRY

We are writing to lodge a complaint against the Office for National Statistics for its handling of population figures and projections for Coventry. We believe that both the mid-year population estimates and the population projections for Coventry have been very greatly inflated by ONS without adequate justification or good reason. Our evidence for saying this is presented below.

We ask that UKSA carries out an independent review, for 2 reasons:

1. this would be a useful case study of a more general problem – that there is no way of challenging MYEs and SNPP Projections even when there is strong evidence that the method does not fit specific cases well, - because the challenger has to provide an alternative method that could immediately be applied to all areas. Currently there is no way to challenge ONS numbers, and no appeal process. We have appealed to ONS themselves, but do not feel they have ever provided an adequate response.
2. There is grave danger that bad decisions – to irrevocably destroy historic countryside - are being made on the back of bad data – which will reduce trust in national statistics and ONS.

We believe that this may well be a more general problem. Others around the country, disbelieve the mid year estimates and projections in their local authority area. We would be happy to provide contacts if desired.

Formally, we are asking for an independent review under item T4.6 of the Code of Practice for Statistics:



“T4.6 Independent measures, such as internal and external audit, peer review and National Statistics Quality Reviews, should be used to evaluate the effectiveness of statistical processes. Statistics producers should be open about identified areas for improvement “<sup>1</sup>

Because ONS population projections and associated household projections are used as the basis for forward planning by all local planning authorities, the very high figures for Coventry have led that authority and neighbouring Warwickshire authorities to over-allocate land for housing in their local plans. This has resulted in major incursions into the countryside, both in Coventry itself and in those parts of Warwickshire immediately surrounding it. Large amounts of the historic Forest of Arden – precious for history, biodiversity, landscape, heritage, flood control, recreation and providing the green lungs of a crowded urban area - have been removed from green belt in and around Coventry and allocated to unnecessary housing. It is a case of bad data leading to bad decisions.

We understand that the projections, by their nature, are not forecasts or predictions and can be subject to substantial uncertainty, but local councils treat them as if they are reliable predictions of the future, sufficient for making irreversible and highly damaging environmental decisions. They claim that they are “forced” by government to follow the projections, and have no latitude to depart from them. Local plans are examined by government inspectors, but the latter have shown no inclination to test the meaning and reliability of the projections or to hear evidence about them. They simply take them at face value.

### **Estimates of Coventry’s Population**

The 2011 Population Census provided a reasonably reliable figure of the population of Coventry – some 317,000. ONS have issued mid-year estimates for all subsequent years since then, rising to 371,500 by 2019 – an estimated increase of 54,500 in just 8 years, compared to far smaller growth of only 16,000. In the 10 years from census 2001 to census 2011.

We believe that the mid-year estimates for Coventry have been overestimated for the following reasons.

ONS have overestimated the birth rate in the city and underestimated the death rate. Figure 2, shows how this has become more pronounced for births as the years have elapsed since 2011. It affects both the base year estimate of Coventry’s population and the forward projection of the population from that base date.

Births have been declining steadily since 2011 but the 2014-based projections inexplicably have them increasing over time, at a rate faster than that of any other nearby town. The reverse is true of deaths (see Fig 3). More deaths are happening than assumed in the projections, Eight years into the Coventry local plan period which began in 2011, this factor inflates the growth of the city by around 1000/year. ONS has finally (in April 2020) explained their method, which leads to this overestimate, but it still leaves them defending results which are far out of sync with reality. -Later projections continue to embody this problem.

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<sup>1</sup><https://code.statisticsauthority.gov.uk/wp-content/uploads/2018/02/Code-of-Practice-for-Statistics.pdf>

Based on information from HESA Destinations Surveys, and the Exit Checks data, we believe ONS has seriously underestimated the amount of international emigration from Coventry – particularly migration of students after their courses are completed. While no one data source is 100% accurate and reliable, we estimate that this could have the effect of exaggerating the growth in Coventry’s population by up to 60,000 over 20 years (equivalent to 19% of the existing population).

The projections are such an extreme outlier that any valid quality control process would consider the possibility that there is a mistake in the method or the data. To our knowledge, no internal or independent quality assurance has been carried out of the population projections for Coventry.

When a very wide range of administrative data for Coventry is examined, it fails to show any sign of exceptional growth in the city. All the vital signs of the town – births, deaths, voters, cars registered, pensioners, school admissions, houses built, benefits claimed, A&E attendances, gas and electricity used, and domestic waste produced -are completely average for the region. We have drawn the attention of ONS to the administrative data, repeatedly, in ever increasing detail, and for ever increasing time periods, yet ONS has steadfastly refused to engage with this data and its obvious conclusions.

### **ONS’s Response to Our Concerns**

We have raised our concerns about Coventry’s population estimates and projections via correspondence, at a meeting on 23 July 2018<sup>2</sup>, through the [REDACTED] and through local MPs who have supported our concerns. A summary of the issues and concerns raised and ONS’s response to them is attached to this letter [Annex B]. While ONS have responded to our general questions about how population projections are arrived at, they have steadfastly refused to investigate the Coventry projections per se, or to explain why they are so much higher than those of other local authorities in the West Midlands.

ONS repeatedly remind us that the SNPP are projections, not forecasts, that circumstance or policy may change, leading to different outcomes. That is plainly true, but we are not pointing to the unpredictability of time and politics – We are pointing to something different.

It is our view, that the extreme projections for Coventry may have come from errors in the input data –not from the caprices of events or of policy changes. If the wrong data is going into the model, ONS should put it right. If bad data is allowed to go into the projections, it undermines the whole exercise

The graph below (Figure 1), and the longer time series in the Appendix, (figures 5 & 6) show the extent to which Coventry is consistently an outlier among West Midlands authorities as regards projected population growth. Coventry’s projected population growth over a 20 year period, according to SNPP2014, is almost three times that of the West Midlands Region as a whole, over three times that of Warwickshire, almost twice that of Birmingham and between five and six times that of the slowest growing authorities in the region. Nothing in the geography or economy of the city justifies these differences. Coventry is a traditional centre of population and employment that has experienced relatively sluggish growth in recent decades. It is not a new or expanded town

<sup>2</sup> At ONS offices in London, attended by Joanne Harkrader, Neil Park, Andrew Nash, and [REDACTED]

and there is little room for expansion within the city limits. That its population and employment will now suddenly 'take off' defies belief and is against all intuition.

(continues on the next page)



### Percentage Growth, West Midlands Region, 2011-2031

Source: ONS, Census2011 and ONS2014

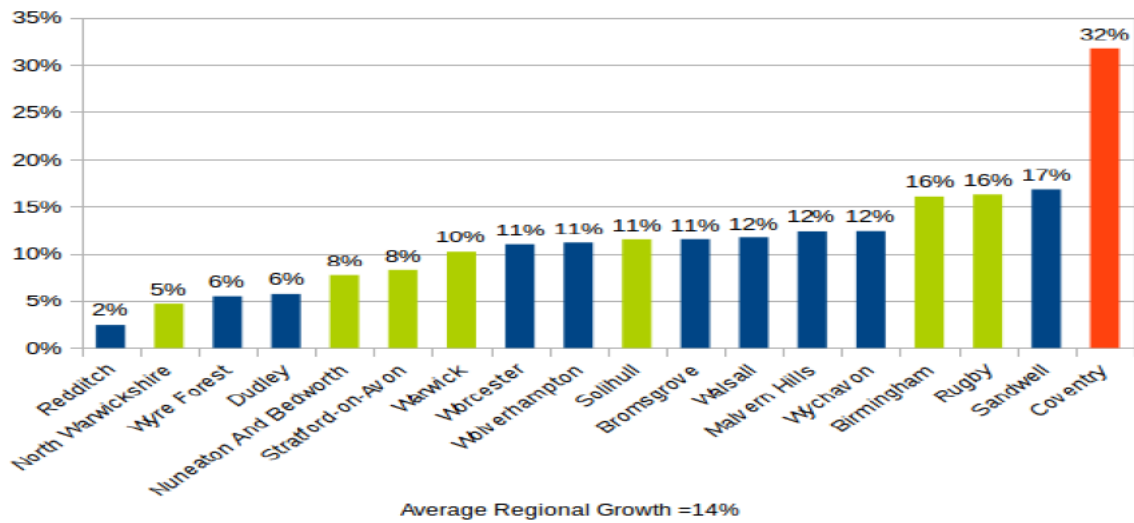


Figure 1

We have looked at this anomaly specifically in the context of the 2014-based population projections because it is those on which the current round of Coventry and Warwickshire local plans are based. However similar issues arise in later population projections and without a reality check the gross discrepancy between projections and reality can be expected to persist. Figures 5 & 6 below, illustrate the persistent nature of the aberrant Coventry projections.

Clearly future projections will need to take into account the impact of the current coronavirus pandemic on a number of factors that underlie the projections. Presumably ONS are already working on these issues, though it is probably too early as yet to judge the overall impact of the pandemic on future population and its growth. But our concerns arose before the pandemic developed and are independent of it.

### Uncertainty

We recognise that all mid-year estimates of population and all population projections are subject to uncertainty. ONS helpfully try to quantify this for particular local authorities. We wish to make the following points:

- a. Coventry's margin of uncertainty (as stated by ONS) is much wider than that of other authorities in the West Midlands. For example the confidence interval as a percentage of the 2019 mid-year estimate is 11.22% in Coventry. For all other local authorities in the West Midlands Region it is between 2 and 6%. This makes the Coventry mid-year estimates unreliable as the basis for the population projections, and hence for forward planning by local authorities.
- b. The 95% confidence interval will reflect sampling errors, whereas in the case of Coventry there are clearly systemic errors that go well beyond those. The Lords Economic Affairs

Committee, in July 2017, called the international migration figures “wholly inadequate” and the UKSA said they were “potentially misleading”.

- c. ONS make the point that our own estimates of Coventry’s population fall within their confidence interval. We do not accept this point. Our most recent best estimate, which we informed to ONS in April 2020, for Mid Year 2018 was circa 335,000 which does not fall within latest ONS 95% confidence intervals for Coventry.
- d. In a letter to [REDACTED] (24 May 2019, attached), Rich Pereira, Deputy Director ONS, states that the 95% confidence interval for the 2017 mid-year estimate in Coventry is  $\pm 23,500$ . Put differently, ONS is saying that the true net growth of Coventry from 2011 to 2017 is somewhere between 20,454 and 67,454, a difference of 330%, over just 6 years. This is tantamount to an admission that the mid-year estimate for Coventry is nearly meaningless, so broad is the 95% confidence interval.

## Summary and Conclusions

In the light of the evidence and argument presented above and in the Annexes, we are calling for an urgent independent review of the mid-year estimates and population projections for Coventry. We note that UKSA has required ONS to downgrade migration data to “experimental statistics”. We ask that the Coventry projections should also be severely qualified and that a public statement should be issued to that effect. Around the country, between 2001 and 2011, no such extreme disparity between one local authority and its near neighbours occurred within a government region, with one exception<sup>3</sup>.

The projections amount to a claim; that a miracle is likely to occur. Any such claim must be justifiable in the real world – ONS mentions the two universities as a driver of growth, but the numbers do not bear this out. Since 2011, the numbers went down, and then back up again but on balance there was little net change (See Figure 7).

This is fundamental to retaining trust in public statistics. If ONS cannot justify its results, and simply shrugs its shoulders when bizarre numbers appear, there is a grave danger that decision makers, interest groups and the general public will lose trust in national statistics. Even more seriously, it undermines the ability of local and central government and their agencies to plan for public services: to have the right number of schools, surgeries, water and electricity supplies, buses and trains, and hospitals, in the right place at the right time.

Our analysis has been endorsed by highly respected demographers: [REDACTED]  
[REDACTED] who described it with words like ‘compelling’.

[REDACTED] wrote:

‘Your PPT’s challenge to the current set of ONS SNPP seems highly valid to me. I am particularly struck by how out of line Coventry’s projected growth is compared to the other LADs in the West Midlands - indeed, one can extend this to the whole country, as in the Table pasted below: Coventry’s projected increase 2014-2039 of 100,300 is exceeded by 3 London Boroughs and 2 other major cities, indeed the latter description applies to all the

<sup>3</sup> There was a large gap between Manchester population growth and it’s neighbours 2001-11. However, that is understandable because there was a boundary change.

top places listed (apart from large unitary of Cornwall). And it is well known that London is a specially dynamic case, and also that the other major cities' large gains actually translate into much lower % rates of growth than Coventry's 32.1%. Coventry would thus appear to be a real - and strange - outlier.'

██████████ of Oxford University writes:

"██████████'s report was very well produced. It shows a thorough knowledge of the data and principles involved and the statistics are well handled. It would not be easy to produce anything better, given the uncertainties in the data themselves". "Your local analysis is as good as it can be, I think. I'd be happy to recommend your study.'

In July 2019, we published a summary of our challenge in the British Society for Population Studies [BSPS] newsletter, and the editor invited ONS to respond. They have not done so. We have twice presented our work at the BSPS annual conference (in 2018 and 2019). ONS did not respond to any of the detail of our work, only giving bland generalisations, in their 5 minutes allotted for rebuttal. We asked for a detailed written explanation of how they had worked out the projections for Coventry. There was no reply other than a reference to their publications, which do not lay out their methods in sufficient detail for us to reproduce them, nor did they deal with the obvious serious inaccuracies in birth, death, and migration numbers.

On 20 July 2020, ONS, finally responded to our slide show presentation. We are very disappointed with their answer – they did not deal with the 3 pillars of our argument.

1. A cause of hyper population growth. There is no identifiable reason why Coventry should suddenly leap into the top league of fast growing areas. In the last census decade, (2001-11) it was the 228th fastest growing local authority.
2. The vital signs of the city, the administrative data, taken cumulatively, show no sign of exceptional population growth. ONS picks at individual datasets as proxies for population, but never examines the heart of the argument: the total lack of any exceptional uplift in any of the Coventry data as compared to its neighbours.
3. The birth, death, and emigration components for Coventry in the MYE and SNPP are grossly in error.

Meanwhile, local governments treat ONS projections as if they are divine prophecies and will not deviate from them. Coventry Council insist that they are 'forced' to use the ONS projections in their planning process. It is urgent. Coventry Council will not budge unless they see ONS revise their projections, or at least see ONS concede that the numbers need revision. If something does not happen, very soon, in the next few months, large pieces of beautiful countryside will be destroyed forever, for no good reason.

For all these reasons we respectfully ask for an independent review of ONS's approach to estimating and projecting the population of Coventry.

Sincere Regards,

*A signed copy of this letter was posted and emailed to  
Sir David Norgrove and Ed Humpherson*

[Redacted]

[Redacted]

[Redacted]

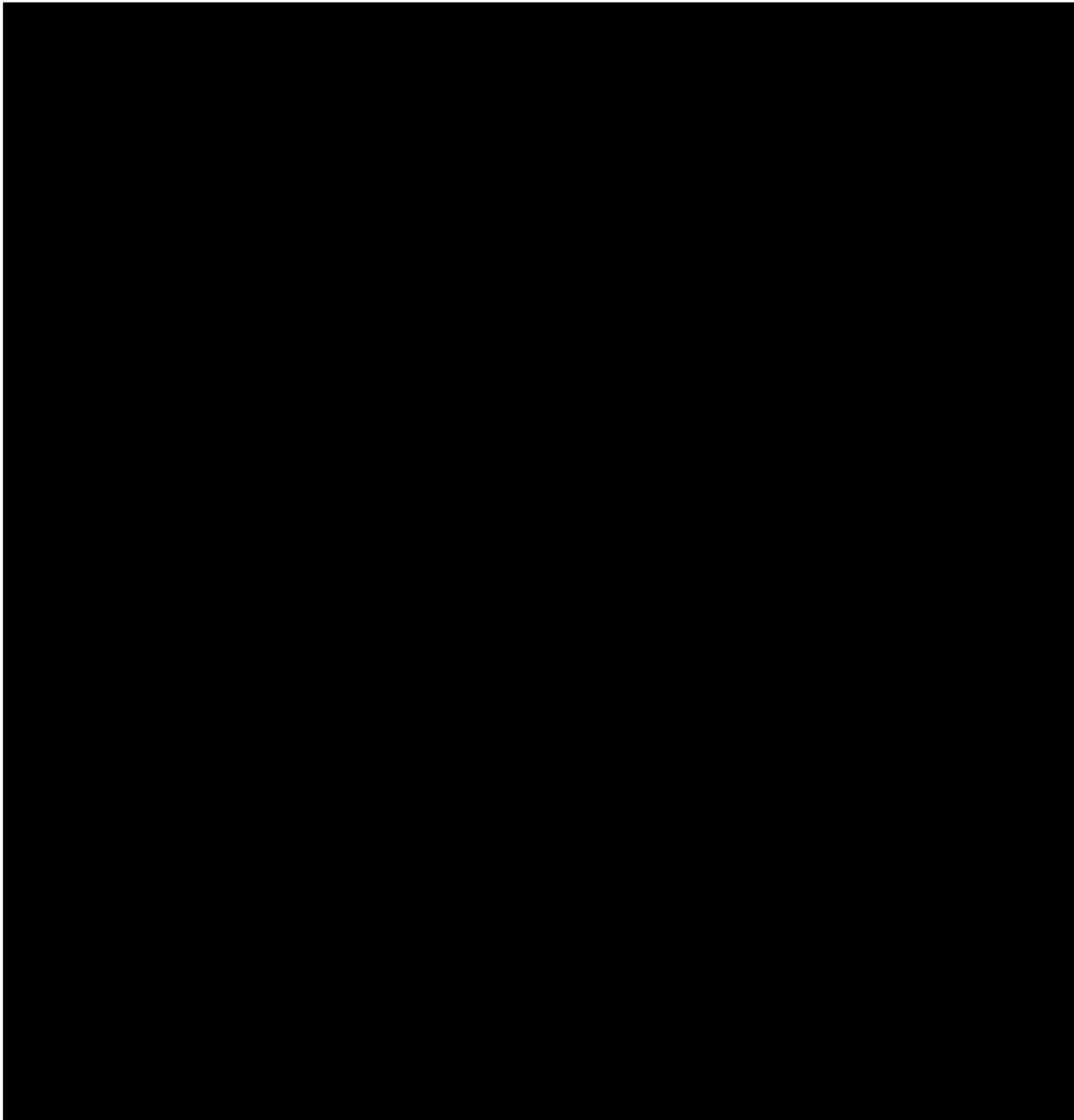
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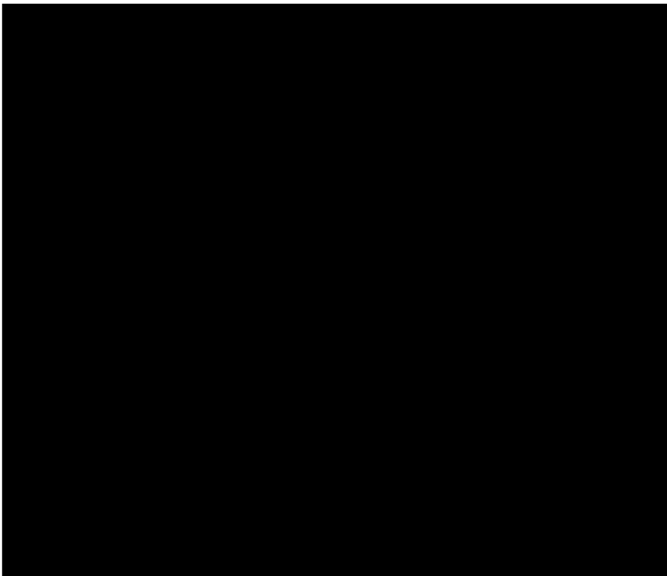


Attachments: Can all be accessed online with this link.

[https://drive.google.com/drive/folders/1BTz8FXzX3L\\_cnvDv5a1LdUOzNjXMHIMV?usp=sharing](https://drive.google.com/drive/folders/1BTz8FXzX3L_cnvDv5a1LdUOzNjXMHIMV?usp=sharing)

1. CPRE Doc 1 Annex B – a timeline and summary of the issues raised and ONS responses.
2. CPRE Doc 2 “Questions for ONS” - put to ONS for the meeting of 23 July 2018
3. CPRE Doc 3 Rich Pereira letter of 30 August 2018, responding to the meeting of 23 July 2018
4. CPRE Doc 4 A Glaring Contradiction – submitted to ONS April 2019
5. CPRE Doc 5 The Article in the British Population Society Newsletter, July 2019 – see page 8 of the newsletter.
6. CPRE Doc 6 Letter from ONS to ██████████ 24 May 2019
7. CPRE Doc 7 Andy Street letter to ONS 20 Feb 2020
8. CPRE Doc 8a & 8b Ian Diamond Reply to ██████████ 14 May 2020 (in 2 jpeg files 8a & 8b)
9. CPRE Doc 9 Steve Smallwood, ONS Letter of 20 July 2020, to ██████████ ██████████ annotated with answering comments from ██████████ ██████████
10. CPRE Doc 10 Slide Show 4.9 (which ██████████ commented on in his letter of 20 July)  
- A Presentation of the Administrative Data– first presented to ONS Sept 2018, .





Office of National Statistics

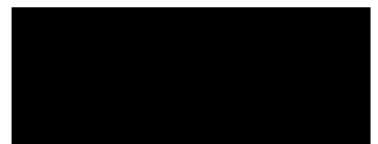
Prof Sir Ian Diamond,

[Redacted],

Steve Smallwood,

Rich Pereira,

Emily Knipe,



**ANNEX A – OVER-ESTIMATION OF COVENTRY’S POPULATION IN MID-YEAR ESTIMATES SINCE 2011**

ONS has had problems estimating the Coventry population. The rolled forward Mid Year Estimates significantly exaggerated the actual population in 2011. The mid year estimate for 2011, was 12-15,000 too large<sup>4</sup>. Since then the gap between estimated and actual population appears to have widened, for the following reasons -

**Births**

Figure 2 below shows how actual births in the city have diverged from estimated births in SNPP2014. Actual births in the city have been falling since 2011 but ONS have projected them to increase from a significantly higher base in 2014 than the actual level of births in that year.

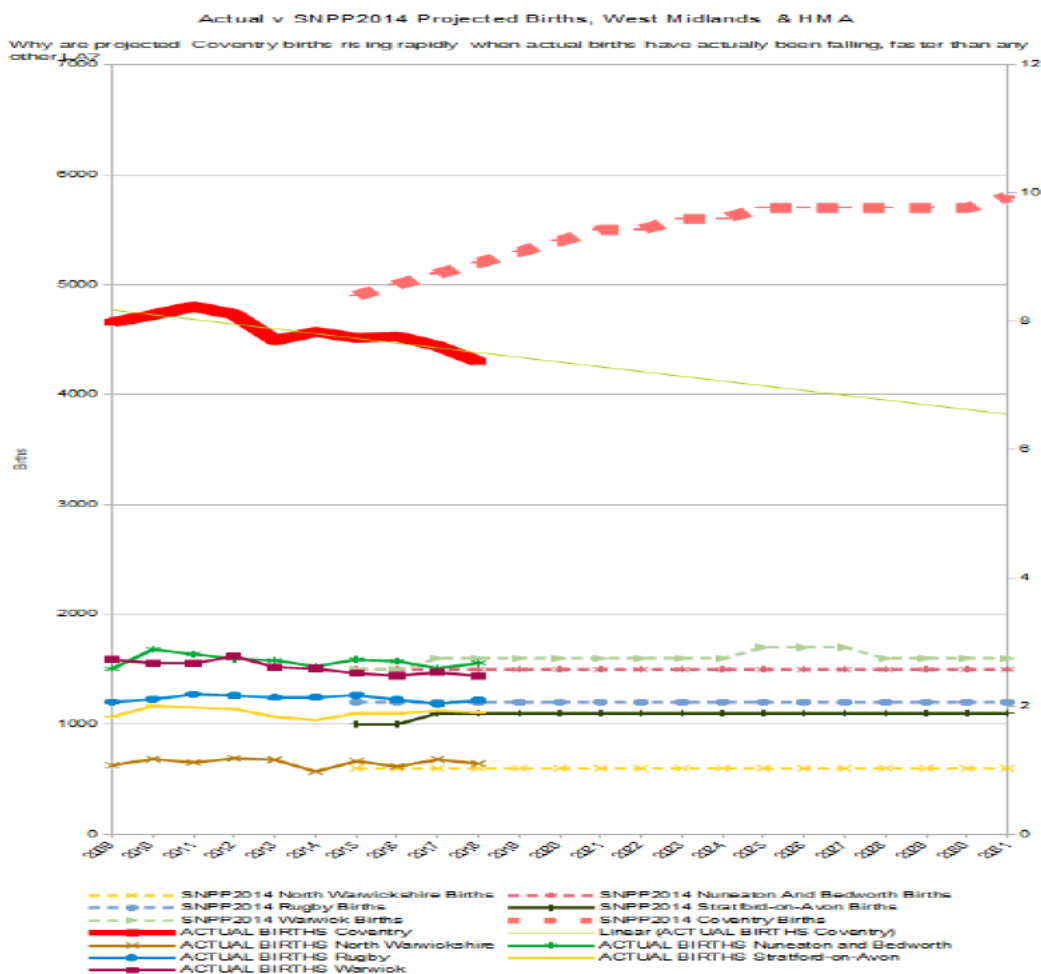


Figure 2 Actual and Projected births, in and around Coventry

<sup>4</sup> See: Examining the difference between the rolled-forward mid-2011 population estimates and the 2011 Census-based MYEs at local authority level. ONS 25v Sept 2012



## Deaths

Actual Deaths have been higher than projected. See below.

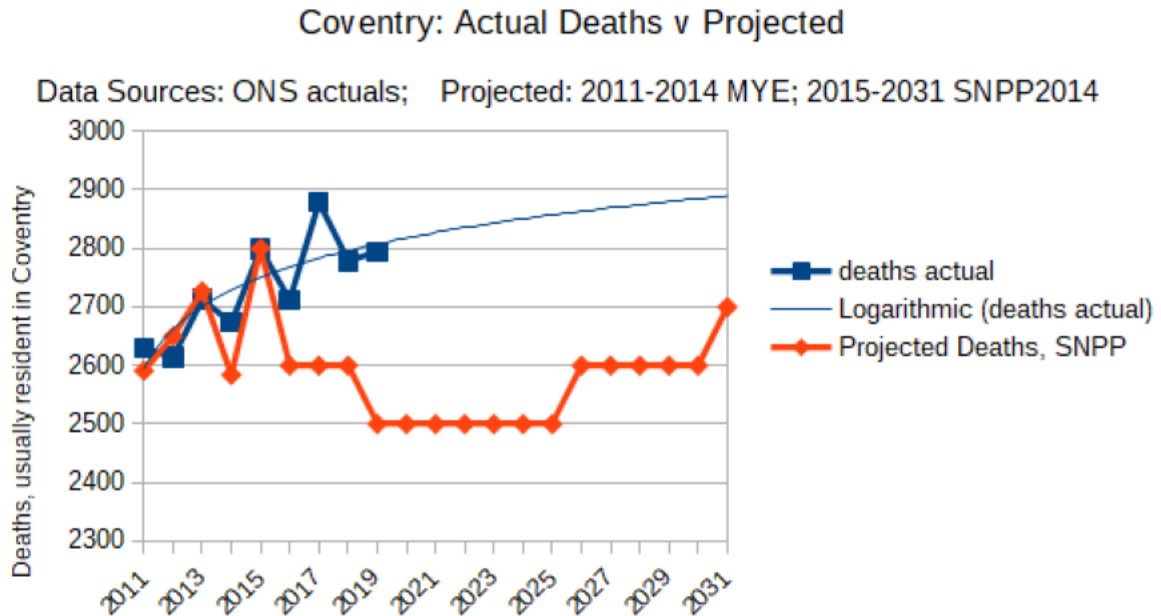


Figure 3

## Migration

- a. ONS has never dealt with our estimate of how many of the international students actually stay in the city after graduation. We do not accept their excuse that they do not count students. There is data available.
- b. Higher Education Statistics Authority (HESA) Destinations Data (the DLHE) and Home Office Exit Checks data shows that the number of international emigrants leaving the city each year is very likely around 6,000, while the 2014-based projections have the number of all international emigrants [students and others] at around 3,000. The number of people leaving the city is seriously underestimated and continues to be so in the 2016- & 2018 based projections. Over 20 years, this factor exaggerates growth by circa 60,000 people.
- c. ONS have told us that they do not consider the HESA Destinations Data to be reliable. We do not understand why the International Passenger Survey, which has been heavily criticised, is to be preferred to student destinations data (the DLHE). The recent Home Office exit checks data, now published by ONS, confirm what we found from the DLHE, that international students very largely leave the city after graduation. There are circa 6,500 non EU international students graduating each year – if 96% emigrate on graduating as suggested by Home Office data, that means international student emigration is going to be around 6,000, at least.
  - a. Some return to the UK, but there is no reason to believe they return to Coventry. According the DLHE & Centre for Cities, Coventry is near the bottom of the league

table for retaining students after graduation<sup>5</sup>. FOI data from Warwick University confirms that few students [of all types] remain in Coventry after graduation

d. Evidence on the subject of internal migration is far from comprehensive or reliable.

However, we do know

- i. That GP registers are used for measuring internal migration. At least one Coventry LSOA [E01009671] has 12000 patients on the GP roll but only 4000 lived in the LSOA at Census 2011. We do not feel that the internal migration estimates can be reliable.
- ii. DLHE data, as above, confirms that very few students, of any kind, remain in Coventry after graduation. They may migrate internationally, or internally within the UK, but they do not stay in Coventry.
- iii. Apart from university ages (19-23) single year of age data, as measured by the 2001 & 2011 census, shows a steady decline over time. If students were at all inclined to stay in the city after graduating, the peak at university age in 2001, would appear as a new peak, in the 2011 census, but 10 years on (ages 29-33) it is not there. -

In contrast, the MYE single year of age figures, have large numbers of young people remaining in the city, after their university years – see the yellow line below. for MYE 2018.

Coventry, Single Year of Age 2001, 2011, 2018

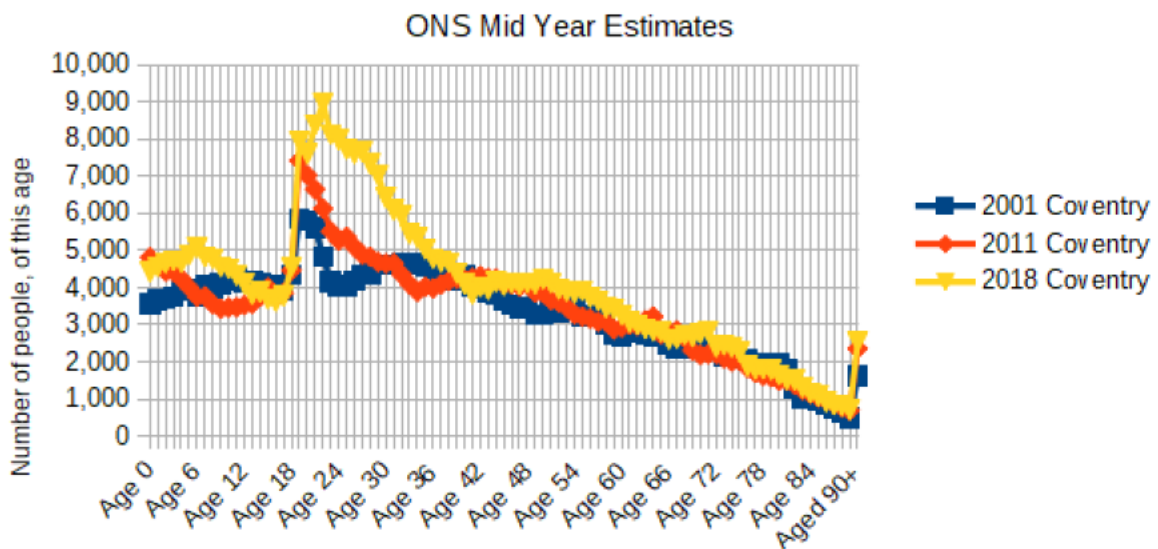


Figure 4

<sup>5</sup>See Figure 14, The great British brain drain: an analysis of migration to and from Coventry <https://www.centreforcities.org/publication/great-british-brain-drain-analysis-migration-coventry/>



e. Administrative Data

- a. Our belief that Coventry's population has been overestimated since 2011 is reinforced by a check on a wide variety of administrative data for the city. This shows that excess population growth is NOT happening in Coventry. Since 2011 there is no spike in gas and electricity use, voters on the electoral roll, pensions claimed, school admissions, job creation, housing starts, cars owned, benefits claimed, A&E attendance, births, or domestic waste produced. ONS has seen this data and argument, in our "Glaring Discrepancy" paper submitted in April 2019<sup>1</sup>, as part of the consultation on Transforming Population and Migration Statistics They finally replied in July 2020, but they did not address our main arguments. They picked at the edges. A full review of the administrative data can be seen in the attached slide show. The July 2020 letter, from Steve Smallwood, with our comments, (in brown) is attached.
- b. House prices in Coventry have stayed low – it is one of the most affordable places in the region to buy a home. If people were flooding in, there would be pressure on the housing market.
- c. Job creation has been mediocre; people are not rushing to Coventry because of a jobs bonanza. Gross Value added has been good but not exceptional.

While no one of these factors can be considered conclusive on its own because an exact correlation with population size cannot be expected, taking all the factors together strongly reinforces our conclusion that Coventry's population has been overestimated in the mid-year estimates and that this over-estimation is likely to have been carried forward into the population projections.

**From:** David Norgrove <[REDACTED]>  
**Sent:** 19 November 2020 10:25  
**To:** Tivey, Ross <[REDACTED]@Statistics.gov.uk" [REDACTED]@Statistics.gov.uk">  
**Cc:** Norgrove, David [REDACTED]@Statistics.gov.uk"  
[REDACTED]@Statistics.gov.uk"; Humpherson, Edward <HYPERLINK  
"mailto:[REDACTED]@statistics.gov.uk" [REDACTED]@statistics.gov.uk">  
**Subject:** Re: Coventry population

It looks on the face of it as though they have a strong case and it is the kind of thing where ONS should be engaging, especially given the weight that MHCLG are putting on these numbers. But I also have a concern that **too** much weight is being put on those numbers even with the change you mention.

I guess the first thing is to ask ONS for their response. Why is the analysis in the letter incorrect?

Depending on the answer I might then reply as a covering letter to a report by OSR.

There's a more general point too. One of the recommendations from the exam algorithm review is that they should have looked at outliers and done a sense check. Should ONS have processes for sense checking these kinds of projections, especially if it looks as though the Coventry concern is justified?

David

## Population Projections and mid-year Population estimates for Coventry

### Issue

[https://officenationalstatistics.sharepoint.com/:b:/r/sites/osrDomain/Pop/Casework/2011\\_Pop\\_Projections\\_estimates\\_Coventry/201113%20Letter%20to%20UKSA%20from%20CPRE,%20Mayor%20West%20Midlands,%20and%204%20MPs%20.pdf?csf=1&web=1&e=AF6gQz](https://officenationalstatistics.sharepoint.com/:b:/r/sites/osrDomain/Pop/Casework/2011_Pop_Projections_estimates_Coventry/201113%20Letter%20to%20UKSA%20from%20CPRE,%20Mayor%20West%20Midlands,%20and%204%20MPs%20.pdf?csf=1&web=1&e=AF6gQz)

Ed and Sir David received a letter (link above), dated 13 Nov 2020, from [REDACTED] [REDACTED] various MPs, Mayor of the West Midlands and Chair of The Warwickshire Branch of CPRE (a countryside/environmental charity). The letter outlines their concerns regarding ONS's handling of population figures and projections for Coventry- they consider the statistics are greatly inflated by ONS with inadequate reasons for doing so. They request that the UKSA carries out an independent review (citing T4.6) and assert they are not the only local authority to 'disbelieve' the ONS statistics.

### Initial thoughts

- I have still to go through the detail of the arguments raised in the letter
- It would not seem unreasonable to commission a review to the benefit of ONS and users although
  - Not sure how quick this could be done or commissioned to meet his needs
  - How much value will be gained. There will be bigger changes on estimates and projections with the ONS transformation programme and also census will rebase in the coming years and should correct if issues
- Should Coventry's estimates/projections retain NS designation? Possibly not. I need to look through all the detail but 1) there could be underlying data quality issues or 2) the data is fine but CI so wide it is not fit for purpose
- Would other LAs also fall into this category?
- On the comms with user side, I have to recognise there is existing tension there. Have ONS done all they can and been as transparent - maybe not from what I have seen so far but this may be a situation where satisfying the user may not be possible

### Recommendations

### Related casework

### Initial chat with ONS

- No recent reviews of estimates/projections. OSR did a CC but not with methods focus
- Are stats of sufficient quality?
  - Different consideration for different stats
  - A lot of work on uncertainty measures undertaken
  - Coventry is problematic given student population
  - Coventry does have wide CI and [REDACTED]'s estimates with that
  - Population of Coventry is growing, maybe not at the rate but it is
- Size of Coventry's confidence interval – is it reliable or appropriate for use
  - Need a method to work across all LAs
  - Issue with stats and messaging on uncertainty given timings for the info being available. Makes advice at LA level of use challenge
- Respond to analysis of other data admin data sources
  - Some of the data sources used by [REDACTED] have quality issues. Have tried to work this through and explain to him
- Engagement with MHCLG on appropriate use for local planning

- It would seem engagement with MHCLG isn't great, they have the impression there were challenges there
- If MHCLG not advising, use of most recent data what does that say about value
  - Not the only users

## **Detail**

### *Data quality concerns*

- Overestimated the birth rate
- Underestimated the death rate
- Underestimated international emigration

For population estimates – census /natural change/migration/special populations

- Births and deaths data no problem
- Migration more challenging. Particularly in LA with high volume of students
- Time from census means not correcting or rebasing given any quality issues on the migration side

For population projections – pop est/local fertility and mortality rates/ migration/ constraint to national projections

- age-specific fertility rates/ age- or sex-specific mortality rates based on five year trend data
- again migration challenging
- time from census is also important as pop ests used a base pop

For household projections

- still relevant even if not focus of the letter given the environmental and planning concerns
- MHCLG do not advise using most recent projections for planning purpose – Value???

### *ONS communication with user*

- Coventry users clearly feels their concerns on heard or acted upon

### *Appropriate use of the statistics*

- CI point relevant here
- challenging ONS position given MHCLG advise



[REDACTED]

---

**From:** Humpherson, Edward  
**Sent:** 23 November 2020 09:55  
**To:** Gregory, Mary; McGhee, Marie; Fox-Tatum, Oliver; [REDACTED]  
**Cc:** Tivey, Ross; DG Regulation  
**Subject:** RE: Coventry population

Mary

Thank you, all sounds good

Ed

---

**From:** Gregory, Mary [REDACTED]@Statistics.gov.uk>  
**Sent:** 22 November 2020 21:46  
**To:** McGhee, Marie [REDACTED]@statistics.gov.uk>; Humpherson, Edward [REDACTED]@statistics.gov.uk>;  
Fox-Tatum, Oliver [REDACTED]@Statistics.gov.uk>; Rankin, Gail [REDACTED]@Statistics.gov.uk>; [REDACTED]  
[REDACTED]@statistics.gov.uk>  
**Cc:** Tivey, Ross [REDACTED]@Statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>  
**Subject:** RE: Coventry population

Hi all,

Just a quick update, primarily for Ed's benefit.

We are planning to do a review of the issues (which may be a little broader than the casework itself, but will incorporate that).

[REDACTED] is going to lead the review with [REDACTED] helping once she joins from 1 Dec and Marie and Oliver will input as needed (but hopefully just expertise and not too much time!).

We will aim to have done sufficient work this week to go back to the relevant people and say what the scope of our review will be (at a high level) and approximately how long it will take. I suggest we send a formal response at that point rather than wait until we have done the review so they know we are taking it seriously.

[REDACTED] Marie and I are catching up in the middle of the week to see where we are.

At the moment, most likely I will be SRO so that Gail can retain focus on the Exam review, but will confirm if that changes!

Mary

---

**From:** McGhee, Marie [REDACTED]@statistics.gov.uk>  
**Sent:** 19 November 2020 12:11  
**To:** Humpherson, Edward [REDACTED]@statistics.gov.uk>; Fox-Tatum, Oliver [REDACTED]  
[REDACTED]@statistics.gov.uk>  
**Cc:** Gregory, Mary [REDACTED]@Statistics.gov.uk>; Tivey, Ross [REDACTED]@Statistics.gov.uk>; DG Regulation  
<DG.Regulation@Statistics.gov.uk>  
**Subject:** RE: Coventry population

**From:** McGhee, Marie  
**Sent:** 25 November 2020 10:53  
**To:** [REDACTED]  
**Subject:** RE: Further press coverage on Coventry

Think the 1.3% was mentioned in the Ian diamond letter

Not sure about the second bit

**Marie McGhee** | Office for Statistics Regulation | [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)  
Website: [Office for Statistics Regulation](https://www.statistics.gov.uk) | Twitter: [@StatsRegulation](https://twitter.com/StatsRegulation) | [OSR LinkedIn](https://www.linkedin.com/company/osr)

You can access the **Code of Practice for Statistics** [here](#).

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**From:** [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)>  
**Sent:** 25 November 2020 10:18  
**To:** McGhee, Marie [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)>  
**Subject:** Further press coverage on Coventry

Hi Marie,

I'm not sure if you've seen this in today's press briefing <https://coventryobserver.co.uk/news/mps-west-midlands-mayor-and-councillors-join-7000-green-belt-campaigners-in-calling-for-immediate-local-plan-review/>

It says

[REDACTED] said: "The Local Plan was drawn up using a prediction from the Office of National Statistics (ONS) which projected a population increase in Coventry of 31% by 2031, but in fact the rate has slowed massively.

"In a letter the ONS has confirmed the annual growth rate has in fact slowed to 1.3% – the lowest in ten years.

"The ONS have told me that the impact of their projections being overstated could mean 5000 homes being included in the Coventry Plan that will not be needed. Instead of providing protection against development to green spaces, the Local Plan leaving swathes of Green Belt defenceless"

Do you know anything about the letter or who the ONS person is?

Many thanks!

[REDACTED]

---

**From:** Humpherson, Edward  
**Sent:** 27 November 2020 17:03  
**To:** [REDACTED]; Gregory, Mary; Fox-Tatum, Oliver  
**Cc:** [REDACTED]  
**Subject:** Coventry

Hi all

I had a general catch up with Ian Diamond earlier. On the issue of the Coventry casework, he said his initial reaction was that the people who'd written to us had raised a good point. We didn't go into much further detail, but I thought this high level comment would be helpful,

Ed

[REDACTED]

---

**From:** Humpherson, Edward  
**Sent:** 01 December 2020 20:58  
**To:** Gregory, Mary; [REDACTED]; DG Regulation  
**Cc:** [REDACTED]  
**Subject:** RE: Draft response for Coventry casework

I agree

---

**From:** Gregory, Mary [REDACTED]@Statistics.gov.uk>  
**Sent:** 01 December 2020 14:51  
**To:** [REDACTED]@statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>  
**Cc:** Humpherson, Edward [REDACTED]@statistics.gov.uk>; [REDACTED]@Statistics.gov.uk>  
**Subject:** RE: Draft response for Coventry casework

I'm not sure who is thinking to respond on the questions, but my view is yes to sharing with MHCLG and ONS and scheduling for publication this week. Thursday may be good as we've just moved the letter/statement that was going to go then.

Thanks!

Mary

---

**From:** [REDACTED]@statistics.gov.uk>  
**Sent:** 01 December 2020 09:47  
**To:** DG Regulation <DG.Regulation@Statistics.gov.uk>  
**Cc:** Humpherson, Edward [REDACTED]@statistics.gov.uk>; Gregory, Mary [REDACTED]@Statistics.gov.uk>; [REDACTED]@Statistics.gov.uk>  
**Subject:** RE: Draft response for Coventry casework

[REDACTED]

Am I ok to share with ONS and MHCLG and then schedule for publication later this week?  
Do we know if the complainant is happy for us to publish their incoming letter as well?

Thanks,  
[REDACTED]

---

**From:** DG Regulation <DG.Regulation@Statistics.gov.uk>  
**Sent:** 30 November 2020 17:43  
**To:** [REDACTED]@statistics.gov.uk>  
**Cc:** Gregory, Mary [REDACTED]@Statistics.gov.uk>; McGhee, Marie [REDACTED]@statistics.gov.uk>; [REDACTED]  
Tatum, Oliver [REDACTED]@Statistics.gov.uk>; Humpherson, Edward [REDACTED]@statistics.gov.uk>  
**Subject:** RE: Draft response for Coventry casework

Hi [REDACTED]

I've formatted the letter into Ed's template for you –

[https://officenationalstatistics.sharepoint.com/:w:/r/sites/osrDomain/ layouts/15/Doc.aspx?sourcedoc=%7B4486DB54-C26F-47D6-9F45-5128CD30713F%7D&file=Ed\\_Humpherson\\_to\\_Sir\\_Andrew\\_Watson.docx&action=default&mobileredirect=true](https://officenationalstatistics.sharepoint.com/:w:/r/sites/osrDomain/ layouts/15/Doc.aspx?sourcedoc=%7B4486DB54-C26F-47D6-9F45-5128CD30713F%7D&file=Ed_Humpherson_to_Sir_Andrew_Watson.docx&action=default&mobileredirect=true)

It's saved in the same folder as the draft versions.

Thanks,

---

From: Humpherson, Edward [redacted] <[redacted]@statistics.gov.uk>

Sent: 30 November 2020 14:55

To: [redacted] <[redacted]@statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>

Cc: Gregory, Mary [redacted] <[redacted]@Statistics.gov.uk>; McGhee, Marie [redacted] <[redacted]@statistics.gov.uk>; Fox-Tatum, Oliver [redacted] <[redacted]@Statistics.gov.uk>

Subject: RE: Draft response for Coventry casework

Hi

Definitely share with ONS and MHCLG (for information, not for clearance).

One addition – can we add in the offer to meet [redacted] and colleagues as part of the review?

Ed

---

From: [redacted] <[redacted]@statistics.gov.uk>

Sent: 30 November 2020 12:33

To: Humpherson, Edward [redacted] <[redacted]@statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>

Cc: Gregory, Mary [redacted] <[redacted]@Statistics.gov.uk>; McGhee, Marie [redacted] <[redacted]@statistics.gov.uk>; Fox-Tatum, Oliver [redacted] <[redacted]@Statistics.gov.uk>

Subject: Draft response for Coventry casework

Hi Ed,

Please see the attached draft response for the Coventry casework following discussions with Mary, Marie and Oliver.

Would you be able to confirm if you'd like [redacted] from MHCLG copied in and we also need to confirm who the response should be addressed to as the email came from [redacted] on behalf of their chairman [redacted]

If we are copying in [redacted] can we let them know in advance the letter is coming, and also when Marie and I spoke briefly with ONS (James Robards and Neil Park) they asked if they could see a copy of the letter before it gets published. Is this ok?

Many thanks,

[https://officenationalstatistics.sharepoint.com/:w:/r/sites/osrDomain/Pop/Casework/2011\\_Pop\\_Projections\\_estimates\\_Coventry/Draft\\_response\\_letterv2.docx?d=wa959787f56b44f58992b6cff15671f3d&csf=1&web=1&e=SDmwvV](https://officenationalstatistics.sharepoint.com/:w:/r/sites/osrDomain/Pop/Casework/2011_Pop_Projections_estimates_Coventry/Draft_response_letterv2.docx?d=wa959787f56b44f58992b6cff15671f3d&csf=1&web=1&e=SDmwvV)

[REDACTED]

---

From: Gregory, Mary [REDACTED]@Statistics.gov.uk>

Sent: 30 November 2020 00:24

To: [REDACTED]@Statistics.gov.uk>; McGhee, Marie [REDACTED]@statistics.gov.uk>; Fox-Tatum, Oliver [REDACTED]@Statistics.gov.uk>

Subject: RE: Draft response for Coventry

Hi [REDACTED]

Well done, I think you've done a really good job on this letter. I've added a few comments, they're all relatively minor, and generally aimed at clarifying scope rather than anything else. Very happy to have a chat about it if helpful, otherwise feel free to tidy up and share with Ed when you are ready.

Thanks!  
Mary

---

From: [REDACTED]@statistics.gov.uk>

Sent: 26 November 2020 17:41

To: Gregory, Mary [REDACTED]@Statistics.gov.uk>; McGhee, Marie [REDACTED]@statistics.gov.uk>; Fox-Tatum, Oliver [REDACTED]@Statistics.gov.uk>

Subject: Draft response for Coventry

Hi all,

Please see my first draft of a response letter attached.

I know we haven't scoped out the finer details of the review yet but I hope this letter gives a high-level idea of what we're planning to look at.

[https://officenationalstatistics.sharepoint.com/:w:/r/sites/osrDomain/Pop/Casework/2011\\_Pop\\_Projections\\_estimates\\_Coventry/Draft\\_response\\_letter.docx?d=w95251b1973a44cfd8c19bd89cf62b17e&csf=1&web=1&e=wqy9zL](https://officenationalstatistics.sharepoint.com/:w:/r/sites/osrDomain/Pop/Casework/2011_Pop_Projections_estimates_Coventry/Draft_response_letter.docx?d=w95251b1973a44cfd8c19bd89cf62b17e&csf=1&web=1&e=wqy9zL)

Looking forward to the comments and discussion!

Thanks,  
[REDACTED]

[REDACTED]

---

**From:** Humpherson, Edward  
**Sent:** 22 December 2020 16:14  
**To:** Gregory, Mary; [REDACTED]; Fox-Tatum, Oliver; DG Regulation  
**Subject:** Letter from [REDACTED]  
**Attachments:** IMG\_1313.jpg

Dear all

I've had a parallel letter to the [REDACTED] letter from [REDACTED]

I've attached a photo - unfortunately it was forwarded to my home address from Drummond Gate so I don't have an electronic copy.

[REDACTED] wants is to confirm that our review will focus on Coventry. I guess our answer is that we want to focus on the overall approach, drawing on the experience of Coventry and other areas. If you agree can you draft a reply for me?


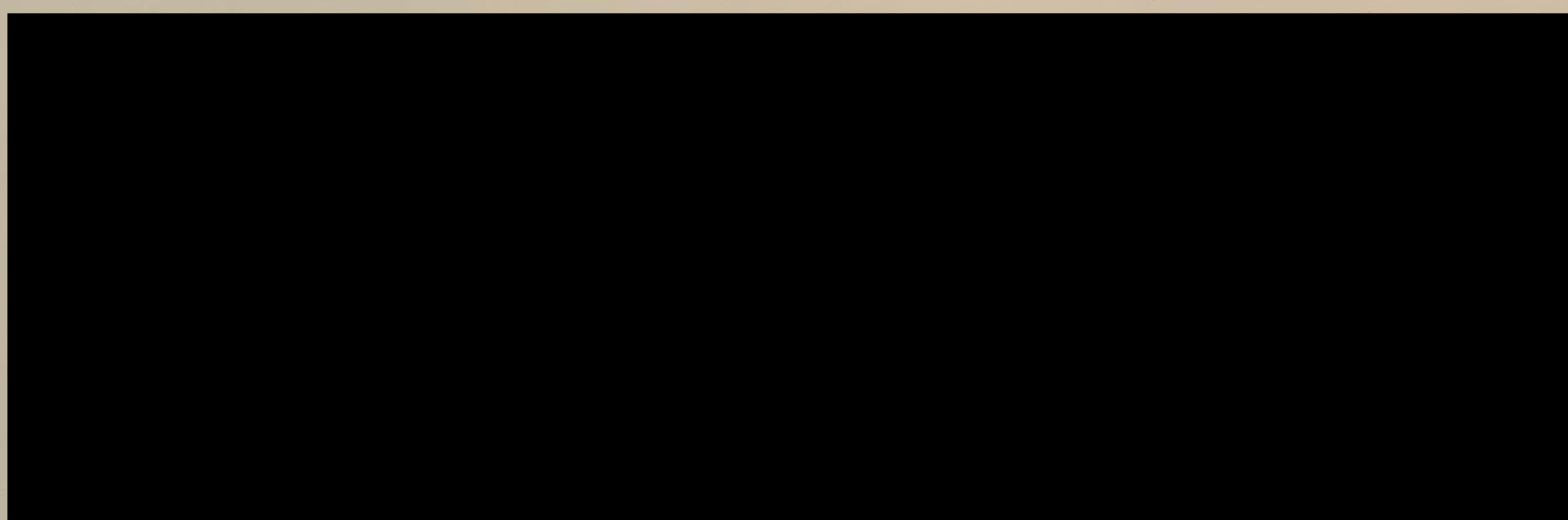
It'd also be a good idea to offer to meet [REDACTED] in the New Year.

Ed

---

Sent from [Workspace ONE Boxer](#)

[REDACTED]



9<sup>th</sup> December 2020

Ed Humpherson  
Director General for Regulation  
Office for Statistics Regulation  
1 Drummond Gate  
London  
SW1V 2QQ

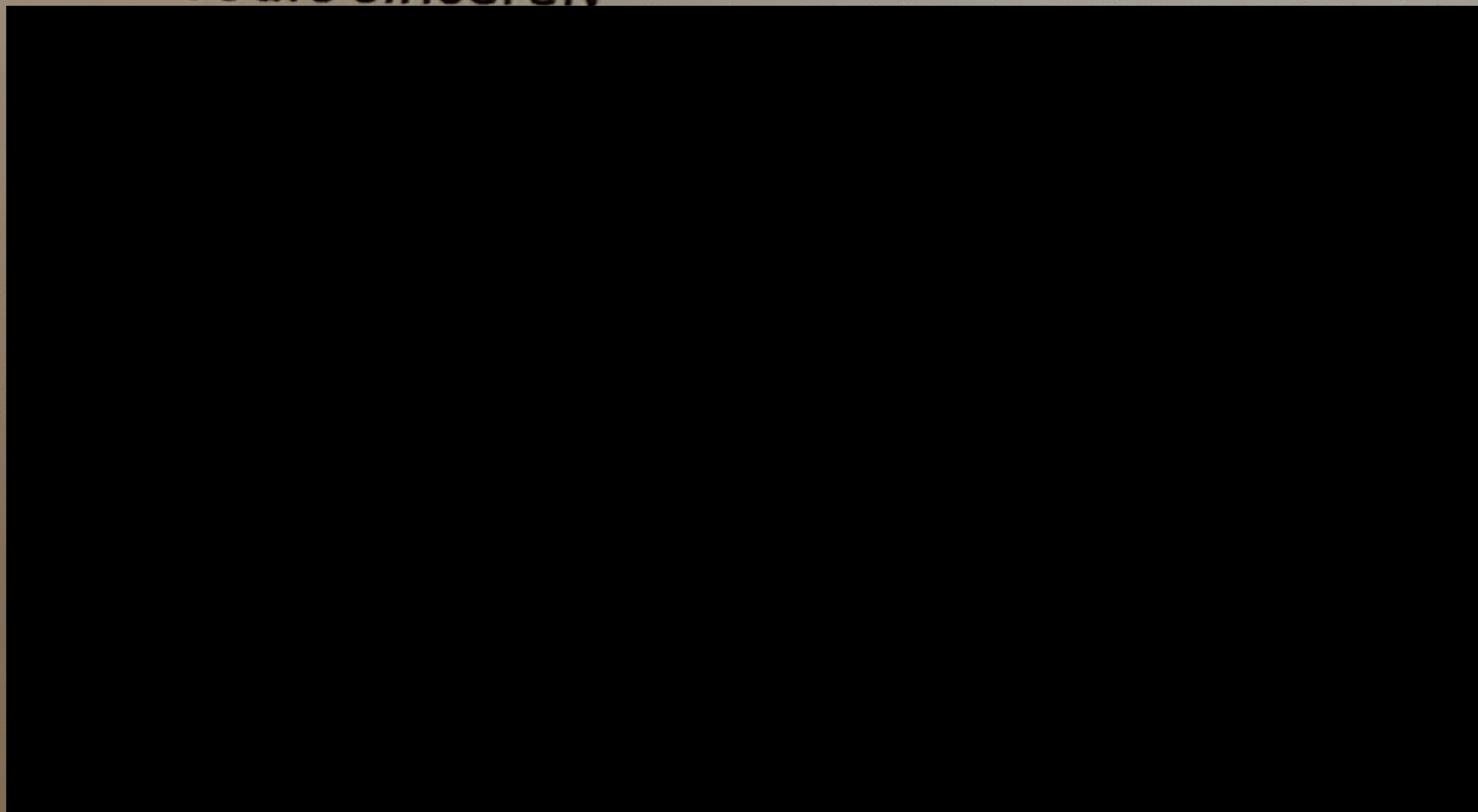
Dear Mr Humpherson.

We are obviously very appreciative of your decision to undertake a review of the population projections and population estimates produced by the Office for National Statistics (ONS) and how they are used.

Whilst understanding that the scope of your review may go further afield, may I confirm that the immediate focus of your review will centre upon Coventry and the estimates used by the ONS in reaching their household projections and housing needs of the city.

Of course we look forward to meeting you and assisting in any way we can.

Yours sincerely



09 December 2020



[REDACTED]

---

**From:** Halls, Suzanne  
**Sent:** 15 January 2021 13:21  
**To:** [REDACTED] Gregory, Mary; DG Regulation; Tivey, Ross  
**Cc:** [REDACTED]  
**Subject:** RE: Times newspaper enquiry

Will do, I'm guessing the reply will be along the lines of we are looking at this, will check with Ed  
Suze

**Suzanne Halls | Office for Statistics Regulation | UK Statistics Authority**  
1 Drummond Gate, London, SW1V 2QQ | [REDACTED]  
[REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk) | Web: [Office for Statistics Regulation](https://www.statistics.gov.uk) | Twitter: [@StatsRegulation](https://twitter.com/StatsRegulation) [Code of Practice for Statistics](https://www.statistics.gov.uk/practice-for-statistics)

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**From:** [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>  
**Sent:** 15 January 2021 12:24  
**To:** Halls, Suzanne [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; Gregory, Mary [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; DG Regulation [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; Tivey, Ross [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>  
**Cc:** [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>  
**Subject:** FW: Times newspaper enquiry

Hi Suz,

Do you want to get back to the person below on the population review mentioned in Eds letter <https://osr.statisticsauthority.gov.uk/correspondence/ed-humpherson-response-to-sir-andrew-watson-population-projections-and-mid-year-population-estimates-for-coventry/>

[REDACTED]

---

UK Statistics Authority | Swyddfa Ystadegau Gwladol  
[REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk) |

**From:** [REDACTED] [@thetimes.co.uk](mailto:[REDACTED]@thetimes.co.uk)>  
**Sent:** 14 January 2021 17:40  
**To:** Press <[press@statistics.gov.uk](mailto:press@statistics.gov.uk)>  
**Subject:** Re: Times newspaper enquiry

Hi someone called about this last week,

We are doing the story for Saturday's paper so could we get a response. Campaigners have carried out further studies and now believe the projections for 16 towns could be wrong.

Thanks,

[REDACTED]

On Tue, 22 Dec 2020 at 14:44, [REDACTED] <[\[REDACTED\]@thetimes.co.uk](mailto:[REDACTED]@thetimes.co.uk)> wrote:

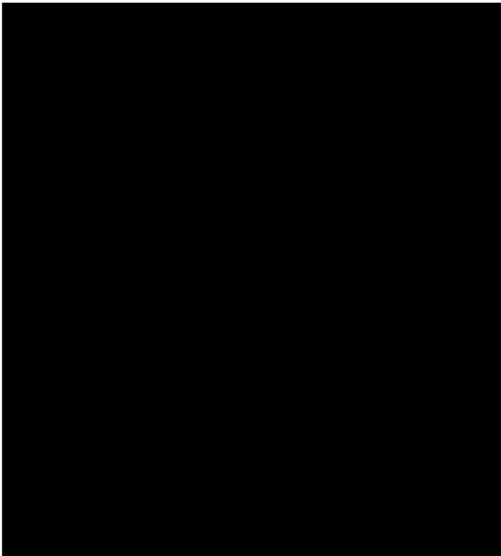
Dear Press Office,

Last month you wrote a letter to campaigners stating that you are carrying out a review of population forecasts used around Coventry which had been used to justify building on the greenbelt.

In relation to this campaigners have expanded their study from just Coventry and now believe they have identified similar issues with data used to support population forecasts in Guildford, the Wirral and Canterbury, based on detailed studies by local campaigners there. Like Coventry, they argue the cities' vital signs show the population is not growing as fast as predicted.

They have also produced a less detailed study which they say shows that there is already a gap in houses being built and the number that would be needed already according to the population forecasts, which they argue could be an indicator the forecasts are too high.

Is your review only looking at the use of the forecasts around Coventry or will it look at the use of forecasts nationally and concerns they may be a wider problem with forecasts?



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"Please consider the environment before printing this e-mail"

This e-mail and any attachments are confidential, may be

[REDACTED]

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**From:** Humpherson, Edward  
**Sent:** 11 February 2021 12:46  
**To:** Gregory, Mary  
**Subject:** RE: Pop projections

Thanks – as I said, good update with Elise earlier.

I think update meeting after the Coventry focus group is best

---

**From:** Gregory, Mary <[REDACTED]@Statistics.gov.uk>  
**Sent:** 11 February 2021 11:16  
**To:** Humpherson, Edward <[REDACTED]@statistics.gov.uk>  
**Subject:** RE: Pop projections

So the short summary is, the team are in the midst of talking to key stakeholder. The meetings have been really useful and we should be on track for some findings in March (if we decide that timing is OK given census). The initial thought is that there are some problems. These are in part because of the way the statistics and policy interact (and it doesn't quite work as it should in terms of appeals). We have focus group meetings with groups from Coventry and the Wirral over the next couple of weeks which will be really valuable (e.g. Coventry have also invite oxford who say they have similar problems).

We'll set up a quick chat to talk you through in a bit more detail, do you want that now or in a week and a half once we've had the Coventry meeting?

Thanks,  
Mary

---

**From:** Humpherson, Edward <[REDACTED]@statistics.gov.uk>  
**Sent:** 11 February 2021 09:31  
**To:** Gregory, Mary <[REDACTED]@Statistics.gov.uk>  
**Subject:** Pop projections

Hi Mary

Could I get an email upate, or oral upate if easier, on where we've got to with the Coventry/pop projections work?

Ed

**Minutes – OSR Meeting on the ONS’ population estimates and projections  
19<sup>th</sup> February 2021**

**██████████ - Coventry, Warwick DC, Nuneaton and Bedworth**

1. Work has been carried out to find alternative data sources to dispute ONS’ figures but these sources have been ignored. ONS has failed to engage with Coventry.
2. Responses from ONS and Sir Ian Diamond have only included generalities.
3. Population forecasts continue to be allowed to stand unchallenged.
4. They don’t have high hopes for ONS transformation programme – no improvements will happen in a timely way.
5. ONS have the data to correct the 2014 projections but they won’t do this.
6. When they do a 2012 re-run with accurate births, deaths and migration – variants are not relevant as don’t address bad data going into the models.
7. OSR’s review feels like the final opportunity to seek a resolution to this issue.
8. Written submission to follow about other uses of projections.

**██████████ - West Midlands**

9. Noted that this issue also effects urban regeneration as well as the greenbelt.

**██████████ – West Midlands**

10. It is in the public interest for this to be right – ONS commands respect of the public.
11. When they take housing inspectors through figures, they are met with blank faces.
12. ONS figures can never be questioned, however cogent the argument.
13. The use of this data has transformed Coventry – removed large parts of cities.
14. Issue is ignored by councillors too as the idea of challenging ONS is out of question.
15. Impacts go beyond housing – e.g. health bodies sustainability and transformation plan and local health community plan relies on knowing what population there will be to provide right level of services, doctors, nurses etc. Same applies to thinking about schools (new and extensions).
16. Criticism of ONS population projections has grown due to apparent failure to absorb or reflect local admin data.
17. We have no idea about the modelling and data used by ONS – lack of transparency.
18. Not confident about the transformation programme. Most foreign students leave and ONS won’t adjust to reflect that fact.
19. Communications with ONS has not been good. Detailed exchanges as listed by ██████████ Confidence in ONS has been dented to such a degree.
20. ONS ignores the fact that all the figures point in one direction. Nobody has questioned accuracy of ██████████’s figures.

**██████████ - Coventry, Nuneaton and Bedworth**

21. Estimates look different when you separate for over and under 18 population. The under 18s group has an overestimate compared with schools’ figures and over 18s is just unreasonably large.
22. ONS don’t know what’s happening to the 19-year-old group, which are the largest population, and so keep it in the population estimates and roll forward.
23. Data on voting shows the number of adults that can vote has barely changed.

24. Building 2000 new homes in 2000 – very recently ramped up to 4000 in Warwickshire but it is based on huge inaccuracies. Assume that a 4-student block is converted into 1 household. Population expansion has been overstated.
25. Extra homes are being built at a greater rate than there are people to fill them. Number of empty homes rising.
26. Birth rates have been going down for a decade yet each time ONS project that the birth rate is going to go up. They think there are more females in their 20s who aren't there. Birth rate shows these mothers aren't around giving birth.
27. Total Fertility Rate – number of children a woman will have in fertile life has been declining in Coventry and elsewhere. In the last few years, it has plummeted in Coventry so error in female population. Suddenly people aren't having children.
28. ONS picking up population increases in surrounding places but not picking up lower populations for Coventry.
29. Massive cohort between ages 29 and 35 who should be on electoral roll, using electricity etc. but they're not there in the data.
30. International emigration is the problem. Subtract student population – roll forward without student population then add back in.

#### ██████████ - Wirral

31. Referred to a cross-section study which will be discussed at the meeting on the 26<sup>th</sup> – number of students and 2014 population growth rate projected. Plotted 2014 population growth rates against student numbers and found a very high correlation.
32. 81% of variation in population growth can be simply explained by student numbers, due to the way in which students are carried forward.
33. Plotted age distribution against proportion of city size – high correlation coefficient.
34. Top 20 towns/cities – big cities so took some of smaller student cities like York and they fitted regression too.
35. The Wirral is just across water from Liverpool which has a huge market for student accommodation – building student blocks. The cheap housing in Birkenhead has become a dormitory town for Liverpool.

#### ██████████ - Guildford

36. Modest town with a large university who have experienced the same issue.
37. Guildford is an extreme outlier in net international migration – even if half the size suggested by ONS was right then it would still be an outlier. Doesn't seem plausible.
38. University of Surrey in Guildford has a lot of sandwich students – ONS said (from 2014 correspondence) that the estimates will reflect them for full of 4 years.

#### ██████████ - Guildford

39. Echoed ██████████'s points about Guildford.
40. This doesn't only affect local plans as it puts pressure on Councils too. They are always behind on 3-year supply. Pressure is on planning department to approve even more housing.
41. They already have way above what is needed but must keep on approving more and more and planners just keep going. Issue gets compounded due to 'false figures.

#### ██████████ – West Midlands

42. He has been supporting CPRE Leicestershire and others.
43. To what extent is this issue impacting on areas that don't have the resources to investigate it in the way that Coventry have and have been forced to rely on ONS figures.
44. ONS 2014 figures – neither 2016/2018 included a shortfall for housing in Leicester.
45. Top 20 cities are having an extra 35% added in - a further 10,000 homes.
46. Local planning are using all sorts of figures. In Wyre Forest, they are using 2016 figures – higher so council happy. In Wiltshire – using figures is based on an average of projections by the lower Oxford Economics and the much higher Cambridge Econometrics. The average is significantly above ONS.
47. Issue of not having resources to do this analysis in-house, so a wide number of figures being produced and used. Some don't even know if they have a problem.
48. Brown field land – large amounts of allocation in countryside too so there is a knock-on effect in other areas too.

#### ██████████ – Canterbury

49. Canterbury has huge imbalance as it has 3 large universities – 36,000 intake and population of the town is 42,000. Increasing in houses but don't have the space.

#### ██████████ – Oxfordshire

50. Another university town. Just north of Oxford – coping with high exaggerated unmet housing need in the green belt.
51. An observation on methods – ONS might be trying to achieve the impossible. National coherence/consistency whilst also realistic for all local authorities. Almost an impossible exercise.
52. It could be as good as it could be but nevertheless the outputs aren't suitable for the intended purpose of assessing housing need at local level. A chasm exists between the people generating the projections and the actual use of it in practice by local authorities and central government (MHCLG).
53. Even ONS put quite serious caveats on the data. But MHCLG etc. take it as gospel. Local authorities no longer have the expertise in-house. Local demographers in County Councils are a thing of the past.
54. LAs are told by MHCLG they have to use these figures (as a minimum) and are fearful to do otherwise and anyway don't have internal expertise. Bridge the gap between producers and users of the data and a better communication between the two.
55. In Oxfordshire – concerns started 7 years ago with a Strategic Housing Market Assessment (SHMA). This said need was much higher, well over double the projections, – especially for Oxford. The SHMA was based on ONS 2014-based projections. ██████'s group was aware of problems with the projections themselves but did not question these as they were effectively mandated by Govt. And also, the main problem in Oxfordshire was the large uplifts that were applied in the SHMA.
56. Referred to submitted paper which makes four main points. **First point:** ONS projections change dramatically from one iteration to the next especially when

looking at marginal change (rather than absolute values). SHMA was based on household projections that are effectively 4 iterations out of date.

57. Takes a long time to prepare a plan – maybe 4/5 years and it is supposed to last for 15 years. It can't be right to be based on one set of household projections when they are so unstable over time. Maybe need a rolling average of several. New projections came out at least twice during the plan preparation process.
58. **Second Point:** Projections build in past policy. For example, a policy to build more housing than justified by local need can result in migration. This is then projected forward and seen as 'need' in the future – but actually represents a perpetuation of the past growth policy.
59. Hence there is a need to understand the data and have local people understanding and interpreting the data so that it is not used blindly if, for example, an authority does not want to continue a previous growth policy. Thinks that ONS recognises this but not recognised (or at least allowed for) at local and central Gov (MHCLG) level – needs to be communicated.
60. **Third Point:** Similar problems to those demonstrated by ██████ in Coventry can be seen in Oxford, though not as extreme. Presumably this happens elsewhere too reinforcing need for local interpretation.
61. **Fourth Point:** ONS say household projections are not for forecasting future housing need, rather they should be used as a “starting point”. Would actually say it could be one of several starting points and shouldn't be seen as the only one. Also, this is ambiguous because starting points can be taken to mean a minimum – don't think ONS meant this but others (MHCLG in particular) are taking it as this.
62. Impossible to overstate the importance of these projections locally – loss of environmental quality, increases in traffic, impacts on local services can have dramatic effect on people's quality of life.
63. Hope the review address the disconnection between users and producers. Submitted paper makes four suggestions to the review (based on the four points above). Very much endorse the recommendations made by ORS in their submitted paper.

#### ██████████ - Coventry, Nuneaton and Bedworth

64. Looked into this and these university towns have very low fertility rates – must use average household size and fertility rate. If you don't the problem is compounded as got the incorrect mid-year estimate – the larger population – doesn't match the household size – the models should be consistent.
65. SHMA ignores what ONS says about birth rate and household size – contradict with population getting bigger. Applying their assumptions to rapidly falling birth rates and incorrect population size – inconsistent.

#### ██████████ - Demographic Support for the Public Sector

66. Policy issues with MHCLG insisting on sticking with 2014 – very frustrating.
67. Inspectors won't listen to anything other than the datasets that are in their remit - flies in the face of what ONS says.

68. Starting point using ONS projections – if one local authority is growing, it needs to be offset in another local authority. Net flows (for UK migration) are 0 so can't all be using the extra population as it doesn't add up.

██████████ – Warwick District Council

69. They have been struggling with planning system for quite a few years. Inspectors are unwilling to examine these figures – should be a process for objections.

70. Inspectorate accept ONS figures as gospel. No scrutiny of ONS figures – they are just accepted.

71. Warwickshire take the overspill from Coventry – far from developing a city. Housing for Coventry population is being built in Warwickshire.

72. Local Government Officers don't have the expertise to deal with statistics in the way that ONS think they do.

██████████ – Opinion Research Services

73. He has not been involved in Coventry case – independent. Evidence presented shows that Coventry has serious errors is correct – 20 to 34 years olds are clearly being overcounted.

74. Student areas break demographics. Anywhere with military, holiday caravans, transient population etc. are most challenging for estimating population. Can go either way – some areas will be underestimated.

75. Table 1 of submission – projections in 2010 compared to Census.

76. Table 2 of changes 2011-2016 – part of improvement programme. If a local authority is at an extreme, these will be problematic for population data. None of the fixes that have been introduced are in 2014 based projections so they keep on being carried forward.

77. Darlington are extremely underestimating the population currently.

78. ONS will know it's the students that are problematic and are working on it – what they say in private and public is different.

79. No real way to approach them and say we think the data is wrong – passed off and not dealt with. No framework for discussion.

80. MHCLG policy interpretation of this – ONS has improved and MHCLG have said use old data which is a very fundamental gross misuse of data.

81. You can challenge the ONS data, but it is not easy and very time consuming, expensive and risky. Average local planning costs 3 million pounds – so if we come along with a local plan and the planning inspectorate didn't like it then we have lost all the money.



[REDACTED]

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**From:** Baseley, Elise  
**Sent:** 01 March 2021 10:45  
**To:** Babb, Penny; [REDACTED]; McGhee, Marie; [REDACTED]  
**Cc:** [REDACTED]; Gregory, Mary  
**Subject:** FW: Minutes from meeting on 19th - OSR review of population statistics  
**Attachments:** 2021 02 25 Population estimates for Coventry City.pdf

Hello,

An additional submission from ORS that is definitely worth having a read through when you get a chance (I'll save it on sharepoint with the other submissions). Their analysis points to the Census underestimating Coventry's population in the first place which has meant the initial jump in mid-year estimates post Census has led to the trajectory being inflated as the increase from Census to MYE has been carried through each year. Very interesting angle!

Thanks,  
Elise

[Elise Baseley](#) [REDACTED] | [Office for Statistics Regulation](#) | [UK Statistics Authority](#)  
[REDACTED] [@statistics.gov.uk](#)  
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

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**From:** [REDACTED] [@ors.org.uk](#)>  
**Sent:** 26 February 2021 16:10  
**To:** Baseley, Elise [REDACTED] [Statistics.gov.uk](#)>  
**Subject:** RE: Minutes from meeting on 19th - OSR review of population statistics

Dear Elise,

I don't know if you want to see even more data on Coventry, but our thoughts are attached. We initially didn't plan to write anything about Coventry because we haven't worked in the area, but given we have created a methodology for assessing population projections we thought we would do this. It is a longer document than we planned to write when we started looking at this, but we think that the position in Coventry is very complex and the local representors have missed some of these points.

If you would like a summary, we think that the 2011 Census probably under-estimated Coventry's population and this doesn't seem to have been picked up by anyone else. This means in turn that the population in the period back to 2006 would have been much higher than the current ONS estimates for that time. This would mean that the population growth between 2006 and 2016 would have been lower, which would have significantly lowered the trajectory of population growth. If this is correct, the reason that the growth rate for Coventry is so high in the 2014 based projections (and also the 2012 based and 2016 based projections) is the starting point for the projections is too low. However, there are also post 2016 problems with the data which are still affecting more up to date numbers, but these seem to be reducing.

Regards

[REDACTED]

[REDACTED]

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**From:** Baseley, Elise [redacted] [Statistics.gov.uk](mailto:Elise.Baseley@statistics.gov.uk)>  
**Sent:** 24 February 2021 12:22  
**To:** [regulation@statistics.gov.uk](mailto:regulation@statistics.gov.uk)  
**Subject:** Minutes from meeting on 19th - OSR review of population statistics

Dear All,

Thank you for attending the meeting last week and for all of the interesting and informative contributions. We look forward to hearing from some of you again at the meeting this Friday.

In the meantime, please find attached the minutes from last week's meeting. Please do get in touch if anything has been misrepresented or if you have any questions.

Kind regards,  
Elise

**Elise Baseley** [redacted] | Office for Statistics Regulation | UK Statistics Authority  
[redacted] [statistics.gov.uk](mailto:Elise.Baseley@statistics.gov.uk)  
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

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# Population Estimates for Coventry City

*A summary of the evidence with comments  
to help inform the OSR review of population  
projections & estimates*

February 2021

# Population Estimates for Coventry City

## *A summary of the evidence with comments to help inform the OSR review of population projections & estimates*

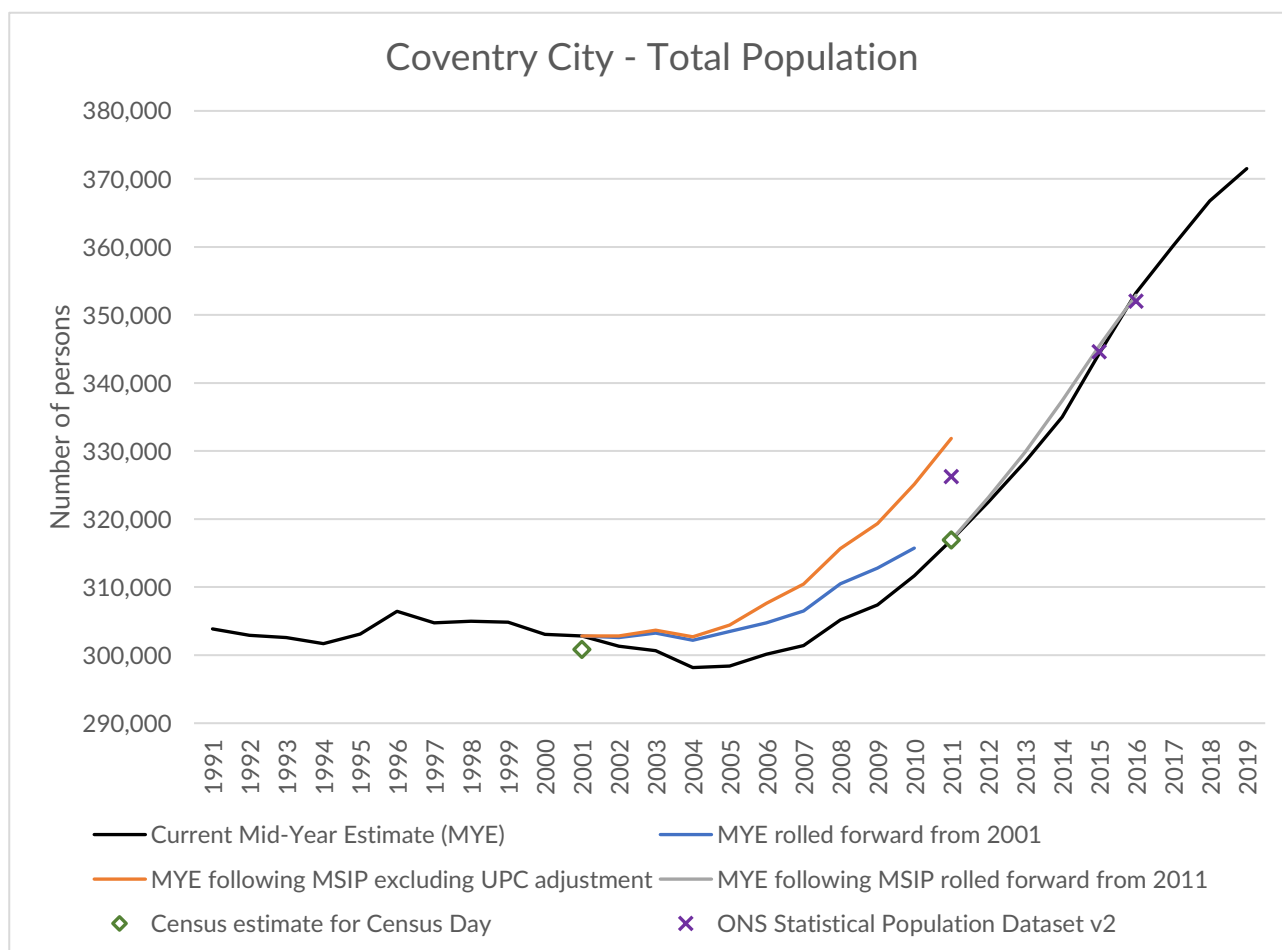
1. Opinion Research Services (ORS) is a social research consultancy that has built up extensive experience of assessing housing need over many years. Our approach is evidence-based, and our assessments have routinely provided a sound basis for Planning policy. Much of this evidence relies on developing robust household projections, which in turn depend on accurate population projections and estimates.
2. This independent paper has been prepared in response to the Office for Statistical Regulation (OSR) review of population projections and estimates. Whilst ORS has previously submitted a separate paper to the OSR review setting out our general concerns about the official population projections and estimates in the context of assessing housing need, this further submission specifically considers the population estimates for Coventry City, given that these form a particular focus for the review.
3. Before setting out the evidence, it is important to note that this paper has been prepared at short notice on a pro bono basis. ORS has no vested interest as to whether the data published for Coventry City is accurate or not, and we are not seeking to advocate any position. Our short narrative simply aims to summarise what we would consider to be key information or points of particular interest, with a focus on those figures which appear to show inconsistencies or anomalies within the data.
4. The information presented is all taken from data published by the Office for National Statistics (ONS). We recognise that the Census estimates and current ONS Mid-Year Estimates (MYE) provide the only official population estimates; however, given the context of the OSR review, it is evident that this data should not be accepted at face value or afforded additional weight based only on its classification.
5. On that basis, we have considered the official figures alongside the superseded MYE and the latest outputs from the ONS Statistical Population Dataset (SPD). Whilst the SPD is only an experimental statistic that is known to overestimate some parts of the population (in particular males of working age) it provides a legitimate and useful point of comparison for the official population estimates.
6. Finally, we would note that it is primarily the total population estimate that has been considered with a high-level review of the gender-age structure. Only limited further analysis has been undertaken, and therefore any comments have been provided on that basis.

██████████  
██████████, Opinion Research Services

## Estimates of total population

7. The following chart sets out the various population estimates that the ONS has published for Coventry City. These include:

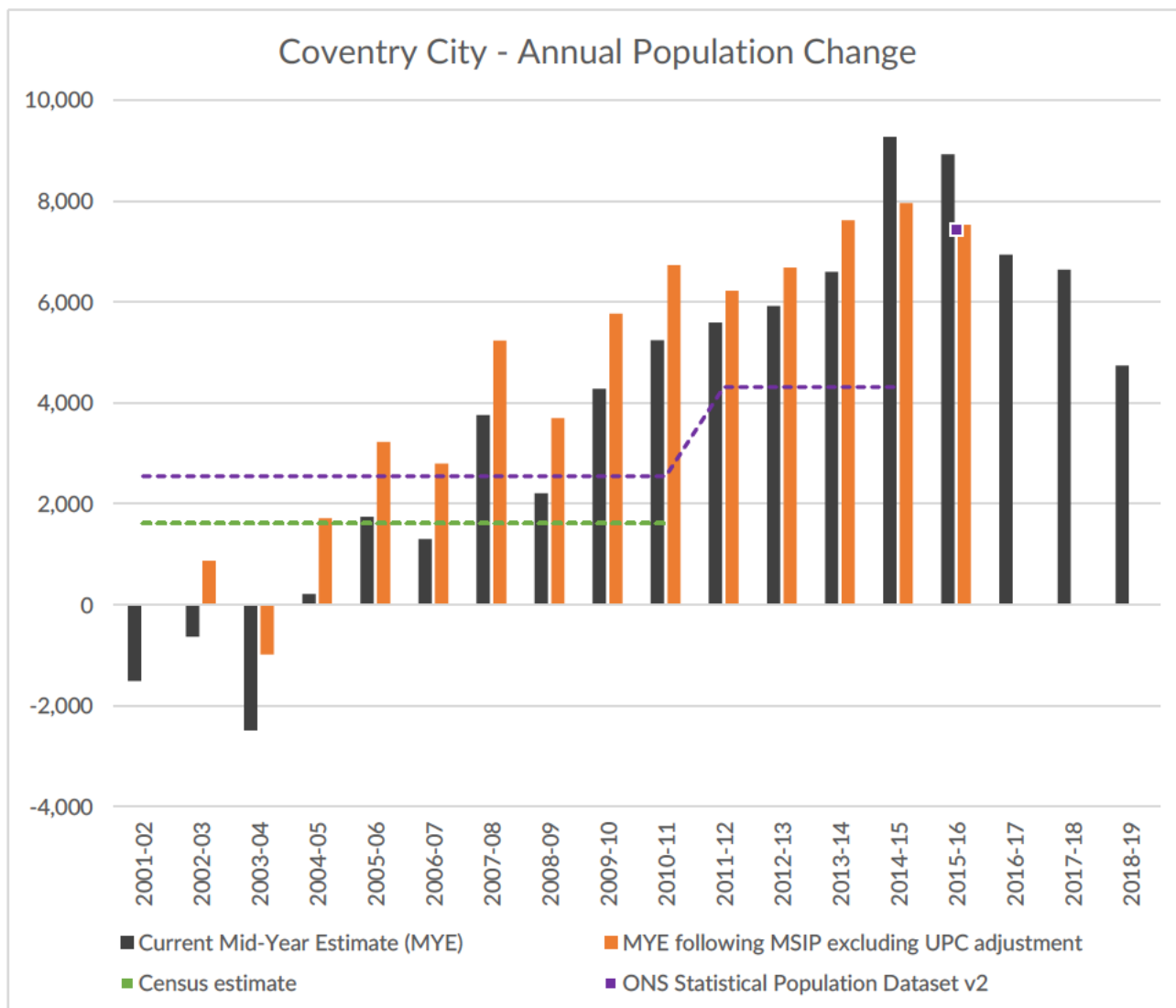
- The current Mid-Year Estimates (MYE) for each year (the black line on the chart)
- Previous MYE figures that have since been superseded, including:
  - Mid-2002 to Mid-2010 estimates based on a legacy methodology, with components of population change applied to data rolled-forward from the previous year and the 2001 Census providing the original baseline (the blue line on the chart)
  - Mid-2012 to Mid-2016 estimates based on the MSIP methodology, with components of population change applied to data rolled-forward from the previous year and the 2011 Census providing the original baseline (the grey line on the chart)
- The current MYE figures for Mid-2002 to Mid-2011 excluding the adjustment for Unattributable Population Change (UPC) (the orange line on the chart)
- Estimates from the 2001 and 2011 Census (the green diamonds on the chart)
- Estimates from the ONS Statistical Population Dataset v2 (which is a research project and not an official population estimate) (the purple crosses on the chart)



8. When considering estimates of total population, the published data for Coventry City shows:
- The current official estimates (the black line on the chart) show that the population was relatively stable from 1991 (303,871 persons) to 2001 (302,804 persons)
  - The original estimates rolled forward from 2001 (the blue line on the chart) showed limited change over the period to 2005 (303,483 persons) followed by an increase by 2010 (315,739 persons)
  - The MSIP revisions (the orange line on the chart) had limited impact on the initial period, with only a marginal increase in the estimate for 2005 (304,406 persons); but there was a significant impact on later years, with an increase of 9,390 persons in the revised estimate for 2010 (325,129 persons)
  - The MSIP revisions led to an estimate for 2011 (331,861 persons) that was 14,901 persons higher than enumerated by the 2011 Census (316,960 persons)
  - This led to a UPC reduction of 14,946 persons being incorporated into the official estimate for 2011 (316,915 persons)
  - The UPC reduction was apportioned over the ten years from 2001 to 2011 which led to the official estimate for 2005 (298,386 persons) being 6,020 persons lower than the MSIP estimate, and 4,418 persons lower than the official estimate for 2001
  - The latest revisions have had only limited impact on the estimate for 2016 (353,215 persons) when compared to the MSIP estimate (the grey line on the chart) for 2016 (352,911 persons)
  - Data from the ONS Statistical Population Dataset v2 now provides an alternative estimate for Census Day 2011 (326,279 persons) which is 9,319 persons more than enumerated by the 2011 Census
  - Using the same methodology, SPD v2 estimates for 2015 and 2016 (344,612 and 352,051 persons) are comparable with the official estimates for the same years (344,288 and 353,215 persons) in terms of the total population, although there are notable differences in the gender-age structure which are considered further below

## Estimates of annual population change

9. The following chart sets out the estimates of annual population change based on data that the ONS has published for Coventry City. These include:
- The current Mid-Year Estimates (MYE) for each year (the black bars on the chart)
  - Previous MYE figures that have since been superseded based on the MSIP methodology, excluding the adjustment for Unattributable Population Change (UPC) that was applied to the data for 2001-02 to 2010-11 (the orange bars on the chart)
  - Population change between the 2001 and 2011 Census shown as an annual average for the 10-year period (the green dotted line on the chart)
  - Population change between the 2001 Census, the SPD v2 estimate for 2011 and the SPD v2 estimate for 2015 shown as annual averages for the respective periods (the purple dotted line on the chart), and the 2015-16 change (the purple square dot)



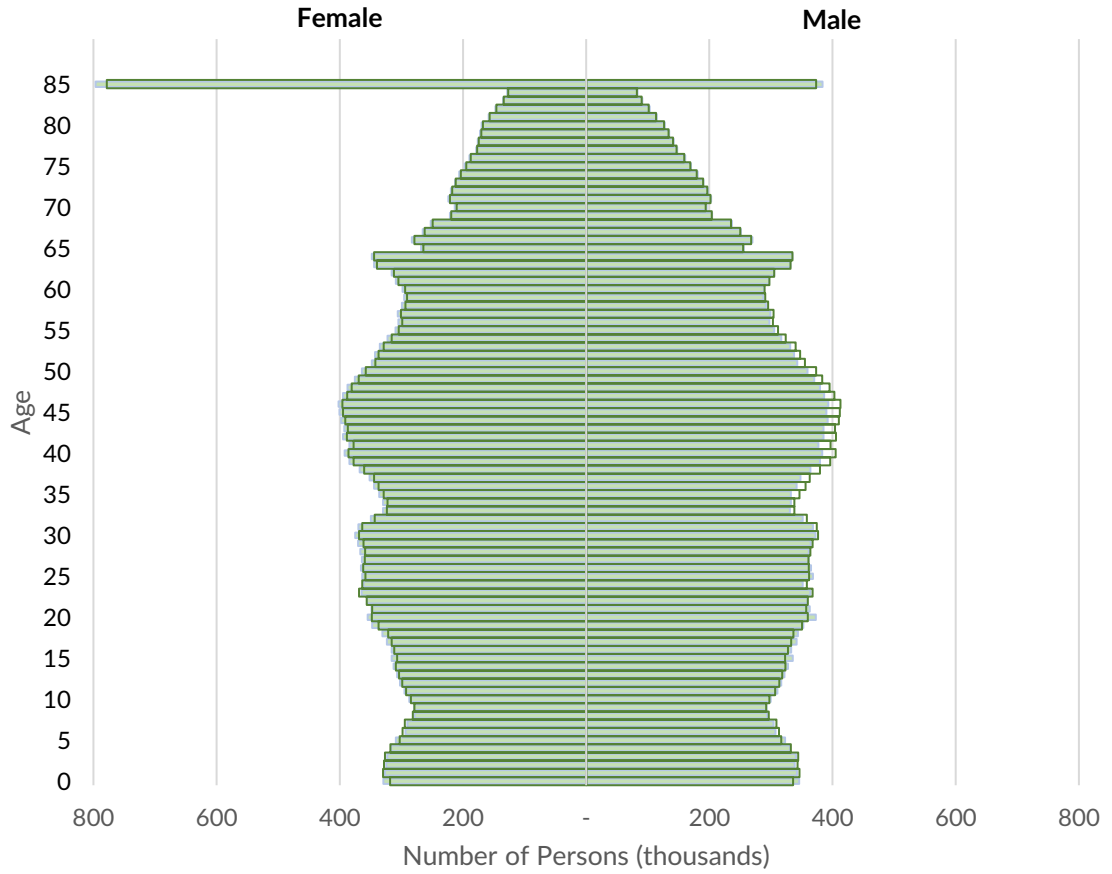
10. When considering annual population change, the published data for Coventry City shows:
- The population increased by an average of 1,613 persons per year between 2001 and 2011 based on Census estimates
  - The increase between the 2001 Census estimate and the SPD v2 estimate for Census Day in 2011 is an average of 2,545 persons per year
  - The current official estimates show an average increase of 1,411 persons per year over the decade, but this comprises an average loss of 1,105 persons per year from 2001-02 to 2004-05 followed by annual population gains increasing from 1,743 persons in 2005-06 to 5,241 persons in 2010-11
  - When UPC is excluded from these figures, there is an average gain of 2,906 persons per year overall, comprised of an average increase of 401 persons per year from 2001-02 to 2004-05 followed by annual gains of 3,227 persons in 2005-06 increasing to 6,732 persons in 2010-11
  - The MSIP estimates showed an average gain of 6,838 persons per year from 2011-12 to 2013-14 which reduced to an average gain of 6,034 persons per year over the same period when the estimates were reissued; however, the revised data was higher than the MSIP estimates for 2014-15 and 2015-16, with the annual average increasing from 7,742 persons to 9,099 persons
  - The ONS 2014-based sub-national population projections were largely informed by trends over the 5-year period 2009-2014 based on the MSIP estimates excluding UPC, which identified population growth at an average of 6,603 persons per year
  - The SPD v2 estimate identifies an average increase of 4,314 persons per year from March 2011 to June 2015 and an annual increase of 7,439 persons in 2015-16
  - The current estimates for the most recent years identify increases of 6,934 and 6,636 persons in 2016-17 and 2017-18 respectively, with a gain of 4,736 persons in 2018-19

## Estimates of population by gender and age

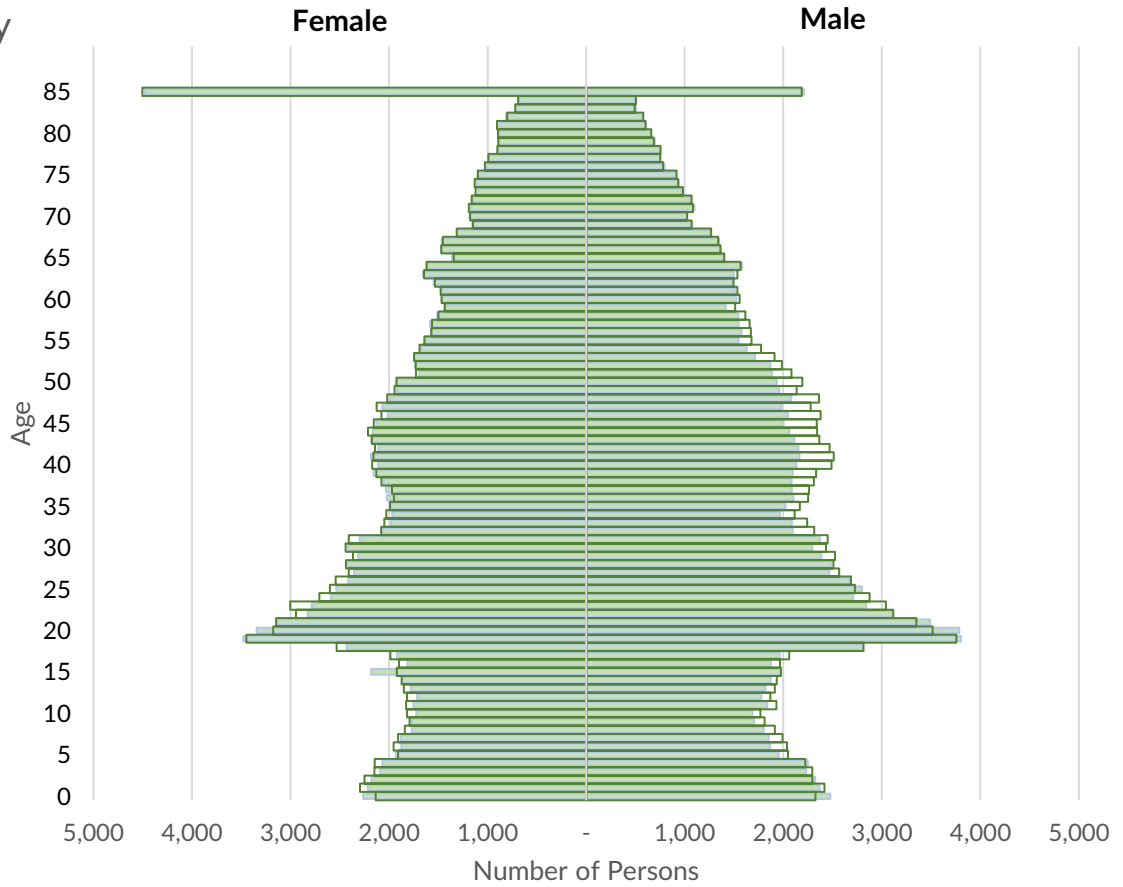
11. The charts overleaf set out the estimates of population by gender and single year of age for Census Day 2011 and for Mid-2016. The data includes:
- The population enumerated by the 2011 Census (the light green bars on the charts)
  - The Statistical Population Dataset v2 estimate for Census Day 2011 (the bars with a dark green outline on the charts)
  - The current Mid-Year Estimates for Mid-2016 (the light blue bars on the charts)
  - The Statistical Population Dataset v2 estimate for Mid-2016 (the bars with a dark blue outline on the charts)
12. The charts present data for England as well as for Coventry City in order to illustrate the way in which the SPD v2 figures compare to the official estimates at a national level, as this provides a useful context when considering data for local areas.



England  
2011



Coventry  
City  
2011

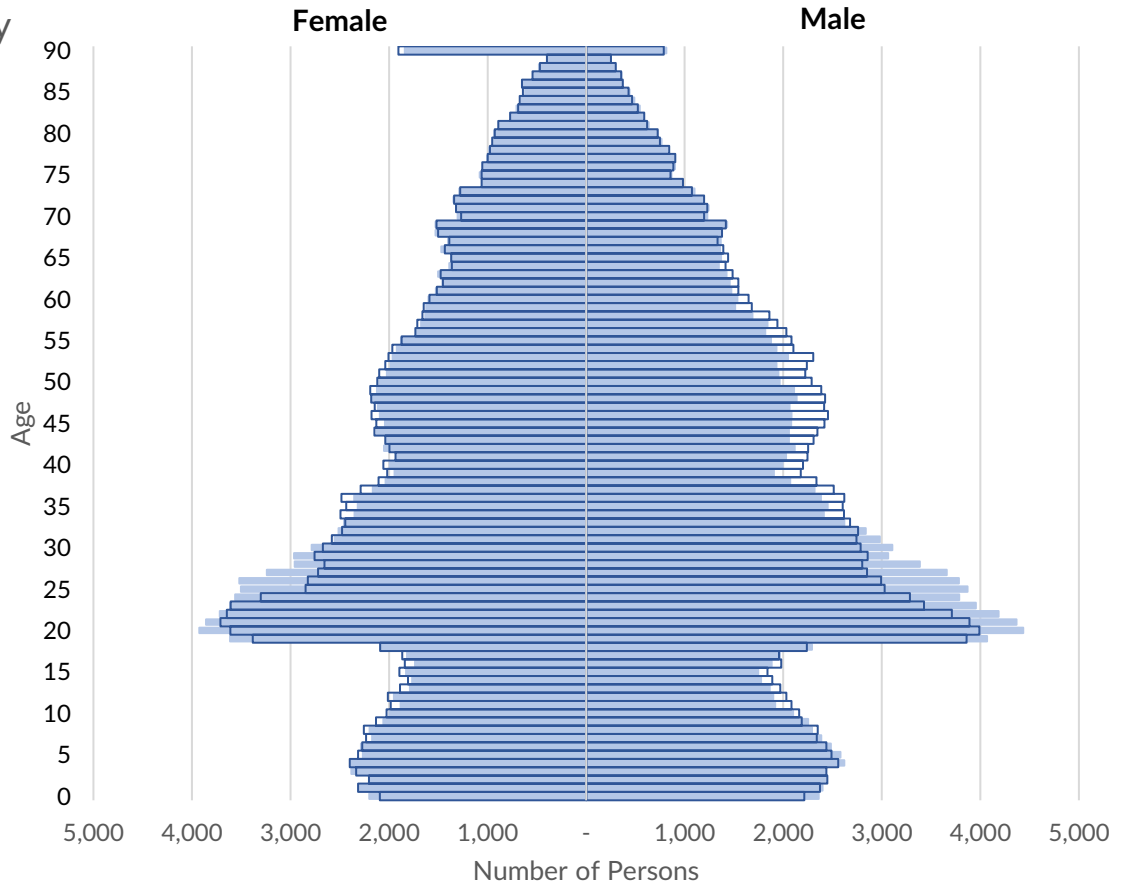


■ Census 2011    □ ONS Statistical Population Dataset v2

England  
2016



Coventry  
City  
2016



■ Current Mid-Year Estimate    □ ONS Statistical Population Dataset v2

13. When considering the estimates of population on Census Day 2011 by gender and age, the data published for Coventry City shows:
- The administrative data used to inform the SPD identified 6,075 more males aged 30 to 59 than were enumerated by the Census
  - This is equivalent to 10.4% of the population that was counted in this group
  - This group is also over-represented nationally, but at a national level the difference is equivalent to 3.5% of the population
  - On that basis, either the administrative data is identifying that more of this group were resident in Coventry than actually lived in the city, or the Census did not enumerate some of the population in this group (or a combination of the two)
  - The SPD also identified 906 more females aged 22 to 31 than were enumerated by the Census, equivalent to 3.6% of the population in this group for Coventry; the equivalent national figure was 1.0%
  - The SPD identified 2,107 more persons aged 1 to 18, equivalent to 3.0% of the population in this group for Coventry; whereas this group is under-represented nationally by 0.5%
14. When considering the estimates of population for Mid-2016 by gender and age, the data published for Coventry City shows:
- The administrative data used to inform the SPD identified 6,467 more males aged 35 to 64 (the population cohort that would have been aged 30 to 59 in 2011) than estimated by the MYE for Mid-2016
  - This is equivalent to 11.2% of the current population estimate for this group
  - This group also remains over-represented nationally, but at a national level the difference is equivalent to 4.2% of the population
  - On that basis, there are three possibilities:
    - (i) the administrative data continued to identify more of this group resident in Coventry than actually lived in the city
    - (ii) the MYE components of population change have failed to capture enough of the group moving to the area
    - (iii) the Census-based estimate for 2011 (which provides the starting point for the rolled-forward MYE) does not include enough people in this group
  - The SPD identifies 10,024 fewer persons aged 19 to 31 than estimated by the MYE for Mid-2016, equivalent to 10.2% of the population in this group for Coventry
  - The differences are particularly large for males aged 25-29 and females aged 25-26, with between 17.3% and 22.1% fewer persons in each individual gender-age group
  - This suggests that there are 10,024 persons aged 19 to 31 that are included in the Mid-2016 population estimate for Coventry who do not appear in the administrative data used to inform the SPD (HMRC data about taxpayers, DWP data about claimants and HESA data about students)

## Summary

15. Whilst it is difficult to draw definitive conclusions given the inherent uncertainties in the data, on the basis of all of the evidence that has been published we would suggest that:
- On balance it seems unlikely that the population declined between 2001 and 2005
  - Over this period, the population was probably stable, consistent with both the original MYE rolled forward from 2001 and the MSIP estimate excluding UPC
  - The UPC adjustment should ideally have only been apportioned over the period 2005 to 2011, which is the period which was affected by the migration improvements that MSIP introduced
  - On this basis, the population would have been larger in 2005 than the current official estimates suggest, and as a consequence the growth between 2005 and 2011 was probably lower than the estimates show
  - Whilst the SPD is an experimental statistic which does not provide official estimates and is known to overestimate some parts of the population, this data would appear to suggest that the Census under-enumerated the population to some extent
  - This probably included many working aged males, as well as young adult females and children to a lesser extent
  - If the Census did under-enumerate the population, that would at least partially explain why such a large UPC adjustment was needed
  - Given that the MSIP estimate excluding UPC for 2011 was still higher than the SPD v2 estimate it is likely that a downward UPC adjustment was still justified, albeit much smaller
  - The likely impact of this can be visualised on the first chart by taking the orange line and reducing the rate of growth (and therefore the gradient of the orange line) between 2005 and 2011 such that the total population in 2011 was below (but probably close to) the SPD estimate
  - That would suggest that population growth averaged around 3,600 persons per year from 2005 to 2011
  - Given the consistency between the current estimates and the SPD for 2015 and 2016, it seems likely that the figures are close to being right, although the total estimates do mask notable differences in the gender-age structure of the population
  - The current MYE probably includes around 10,000 too many young adults, but this is likely to be largely offset against not enough persons of older working ages that were not captured by the Census – mainly males, but also females to some extent
  - It seems very unlikely that the “missing” 10,000 young adults are actually resident in Coventry given that they are not identified by any of the administrative data sources – they are not employed and paying tax, they are not claiming benefits and they are not registered students, as all of these groups are captured by the administrative data used by ONS to compile the SPD
  - On balance, it seems likely that they are counted erroneously in the MYE

- However, even if the MYE figures for 2015 and 2016 are broadly correct in terms of the total population, the rate of growth since 2011 will be overstated given the earlier conclusion that the MYE for 2011 is probably too low
  - If the MYE rate of growth from 2011 to 2016 is overstated, this is likely to be due to a systemic problem with the methodology which will continue to affect the growth estimated for later years – so even if the population estimates are broadly correct for 2015 and 2016, it is likely that 2017 onwards will be overestimated
16. We recognise that it would be very useful to consider the likely impact of students on the trends, given that a substantial amount of population growth can be attributed to increased student numbers at the two universities that are based in the area. However, it is important to recognise that Coventry University does have a number of campuses elsewhere, so not all of the registered students will be resident locally.
17. Considering the above conclusions in the context of the 2014-based projections:
- When considering the 5-year trend period that largely informed these projections, it seems likely that a more realistic level of annual growth from 2009-11 was around 3,600 persons (based on the above conclusion for the period 2005 to 2011) and around 4,300 persons each year from 2011-14 (based on growth identified by SPD for the period 2011 to 2015)
  - This would yield an overall growth of around 20,000 persons over the 5-year period equivalent to an overall average of 4,000 persons per year – notably lower than the growth of 6,603 persons identified by the MSIP estimates excluding UPC, which formed the aggregate basis for the trends that informed the 2014-based projections
  - Furthermore, if the number of women of childbearing age was an underestimate at the time of the 2011 Census, then the 2014-based population projection would probably have been based on overestimated fertility rates
  - These rates would then be applied to the number of women of childbearing age, and if the MYE components of change are not fully capturing those young women leaving the area then the projected number of young females would also be an overestimate
  - If this was the case, then the number of births being projected by the 2014-based population projection would inevitably be too high, given the compound impact of applying overestimated fertility rates to an overestimated number of young women
18. It is also important to recognise that any growth in student numbers that occurred during the period used for the projection would be assumed to continue, given that the projections are trend-based and assume that any change that has happened in the past will be mirrored in the future.
19. Taking everything into account, it seems very likely that there are problems with the official population estimates for Coventry City and the figures should not be relied upon uncritically. Correcting the historic trajectory of past trends based upon reasonable judgements would be an essential step prior to producing any reliable assessment of Local Housing Need (LHN).
20. We would strongly encourage either Coventry City Council, as the local planning authority, or the West Midlands Combined Authority, as an important stakeholder for Local Plans across the region, to consider the evidence and challenge the LHN derived from the Government's "Standard Method" likely to be caused by problems with the 2014-based data.

## Maw, Annie

---

**From:** Babb, Penny  
**Sent:** 04 March 2021 15:14  
**To:** [REDACTED] Baseley, Elise; McGhee, Marie; [REDACTED]  
**Subject:** RE: Coventry etc.

This article accompanies that dataset:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/understandingtownsinenglandandwalespopulationanddemographicanalysis/2021-02-24#data>

This seems to be the main publication for smaller area pops:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualsmallareapopulationestimates/mid2019>

It says they use a ratio change approach and constrain the LA level mid-year pop estimates.

From a quick look at the spreadsheet [REDACTED] linked, Coventry pop for 16-24 years comes out with high pop change – particularly when looking at the change from 2011 (ignoring City of London), only Islington had a higher pop change for the age group at 26% with Coventry at 21%. The next highest areas like Westminster and Brighton were at 15% and Nottingham at 12%.

Penny

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**From:** [REDACTED]@Statistics.gov.uk>  
**Sent:** 03 March 2021 12:59  
**To:** Baseley, Elise <[REDACTED]@Statistics.gov.uk>; Babb, Penny [REDACTED]@Statistics.gov.uk>; McGhee, Marie [REDACTED]@statistics.gov.uk>; [REDACTED]@Statistics.gov.uk>  
**Subject:** Coventry etc.

Hi all,

I was just having a read through the extra information that ORS sent through and based on that, I've compared 3 lots of estimates that ONS produce for 2015 for Coventry (see below). Also, this publication was released last week which is interesting for the review

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/understandingtownsinenglandandwalespopulationanddemographicanalysis/2021-02-24#data>

I'm not sure on what data it is based but maybe the SAPE estimates?

354,729 (data used in publication above)  
344,612 (SPD)  
344,288 (latest MYE)

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Website: <https://osr.statisticsauthority.gov.uk/>  
Twitter: [@StatsRegulation](https://twitter.com/StatsRegulation)

I think they have tried to explain the position, maybe not in as detailed a way as the complainants would like.

See attached a letter from Ian Diamond to [REDACTED] (one of the people linked to the letter to us) setting out some of the position.

Marie

**Marie McGhee** | Office for Statistics Regulation | [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)  
Website: [Office for Statistics Regulation](https://www.statistics.gov.uk) | Twitter: [@StatsRegulation](https://twitter.com/StatsRegulation) | [OSR LinkedIn](https://www.linkedin.com/company/osr)

You can access the **Code of Practice for Statistics** [here](#).

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**From:** Humpherson, Edward [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)>  
**Sent:** 19 November 2020 11:18  
**To:** Fox-Tatum, Oliver [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)>  
**Cc:** Gregory, Mary [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; Tivey, Ross [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; DG Regulation <[DG.Regulation@Statistics.gov.uk](mailto:DG.Regulation@Statistics.gov.uk)>; McGhee, Marie [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)>  
**Subject:** RE: Coventry population

Thanks Oliver

Marie – did ONS give any rebuttal to the criticisms?

Ed

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**From:** Fox-Tatum, Oliver [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>  
**Sent:** 19 November 2020 10:42  
**To:** Humpherson, Edward [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)>; [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)>  
**Cc:** Gregory, Mary [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; Tivey, Ross [REDACTED] [@Statistics.gov.uk](mailto:[REDACTED]@Statistics.gov.uk)>; DG Regulation <[DG.Regulation@Statistics.gov.uk](mailto:DG.Regulation@Statistics.gov.uk)>; McGhee, Marie [REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)>  
**Subject:** RE: Coventry population

Hi

I believe Marie has already been in contact with ONS about this, I think they let her know this case was coming in advance.

On that basis I think ONS have previously engaged, though the complainants are clearly not happy about the outcomes of those discussions.

Oliver

**Oliver Fox-Tatum** | Office for Statistics Regulation

[redacted] [@statistics.gov.uk](mailto:[redacted]@statistics.gov.uk) | Website: [Office for Statistics Regulation](https://www.statistics.gov.uk) | Twitter: [@StatsRegulation](https://twitter.com/StatsRegulation)

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From: Humpherson, Edward [redacted] [@statistics.gov.uk](mailto:[redacted]@statistics.gov.uk)>

Sent: 19 November 2020 10:32

To: Rankin, Gail [redacted] [@Statistics.gov.uk](mailto:[redacted]@Statistics.gov.uk)>; [redacted] [@statistics.gov.uk](mailto:[redacted]@statistics.gov.uk)>; [redacted] [@Statistics.gov.uk](mailto:[redacted]@Statistics.gov.uk)>

Cc: Gregory, Mary <[redacted] [@Statistics.gov.uk](mailto:[redacted]@Statistics.gov.uk)>; Tivey, Ross [redacted] [@Statistics.gov.uk](mailto:[redacted]@Statistics.gov.uk)>

Subject: FW: Coventry population

[redacted], Oliver

See initial thoughts from David N on the Coventry population thing. He thinks this may require a fuller report than a standard piece of casework briefing. But the first step is for us to get ONS's take – are they aware of these concerns and do they have a response to them?

Can you contact the ONS team?

Thanks

Ed

---

From: David Norgrove [redacted] [@me.com](mailto:[redacted]@me.com)>

Sent: 19 November 2020 10:25

To: Tivey, Ross [redacted] [@Statistics.gov.uk](mailto:[redacted]@Statistics.gov.uk)>

Cc: Norgrove, David [redacted] [@Statistics.gov.uk](mailto:[redacted]@Statistics.gov.uk)>; Humpherson, Edward

[redacted] [@statistics.gov.uk](mailto:[redacted]@statistics.gov.uk)>

Subject: Re: Coventry population

It looks on the face of it as though they have a strong case and it is the kind of thing where ONS should be engaging, especially given the weight that MHCLG are putting on these numbers. But I also have a concern that too much weight is being put on those numbers even with the change you mention.

I guess the first thing is to ask ONS for their response. Why is the analysis in the letter incorrect?

Depending on the answer I might then reply as a covering letter to a report by OSR.

There's a more general point too. One of the recommendations from the exam algorithm review is that they should have looked at outliers and done a sense check. Should ONS have processes for sense checking these kinds of projections, especially if it looks as though the Coventry concern is justified?

David

On 18 Nov 2020, at 20:43, Tivey, Ross [redacted] [@Statistics.gov.uk](mailto:[redacted]@Statistics.gov.uk)> wrote:



Here's that letter to you and Ed from a Coventry green belt protection charity, signed by [REDACTED] and various local MPs. OSR have sent a holding response and are already looking into it, but in the meantime Ed wondered whether you had an early preference on how to handle. I haven't had chance yet to speak to ONS about the engagement they have already had with this campaign, but my initial thoughts were:

- Given the signatories, OSR clearly need take this seriously, maybe with a fuller report than they would usually do.
- Though not directly our concern, it's interesting that this should come in as we're discussing the new housing formula recently consulted on. Some aspects of that Govt proposal might partially address the charity's concerns. The new method relies less heavily on ONS subnational population projections, by mixing them with a measure of affordability.
- The first census population estimates for LAs aren't due until March 2022, so we have one more year of intercensal mid-year estimates left to go before rebasing.

---

Ross Tivey | [REDACTED], Sir David Norgrove  
UK Statistics Authority | 1 Drummond Gate, London SW1V 2QQ  
[REDACTED] [@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)

<Letter to UKSA from CPRE, Mayor West Midlands, and 4 MPs [Final, SIGNED] 2020-11-13.pdf>

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 March 2021 14:04  
**To:** Baseley, Elise  
**Subject:** RE: Population review catch up

Great, thanks Elise and I agree about the timing.

[REDACTED]

[REDACTED] Office for Statistics Regulation  
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Twitter: [@StatsRegulation](https://twitter.com/StatsRegulation)

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**From:** Baseley, Elise [REDACTED] Statistics.gov.uk>  
**Sent:** 17 March 2021 13:59  
**To:** [REDACTED]@Statistics.gov.uk>  
**Subject:** RE: Population review catch up

Thanks [REDACTED] – these are all really good points. I've added a quick couple of notes in the doc as a reminder to cover this stuff too.

On the last two points, I think [REDACTED] is hopefully dialling in to the meeting today so it would be good to hear from her what the housing domain are planning to do. I've also put down that we should discuss publishing after Easter, to allow ONS time to review our letter etc before we publish, which I think people will agree is the right thing to do but we will need to manage the expectations of the complainants if we do that.

Thanks,  
Elise

[Elise Baseley \(she/her\) | Office for Statistics Regulation | UK Statistics Authority](#)  
[\[REDACTED\]statistics.gov.uk](#)  
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

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**From:** [REDACTED]@Statistics.gov.uk>  
**Sent:** 17 March 2021 13:52  
**To:** Baseley, Elise <[REDACTED]Statistics.gov.uk>  
**Subject:** RE: Population review catch up

Thanks Elise,

That looks great – I had a few other additional thoughts to bring out in the meeting –

Coventry - in reading through [REDACTED] document – the Coventry systematic error seems to be on account of 2 'things' – the first is the inability of ONS to delve into what's driving the Unattributable Population Change when comparing the MYE with the Census. They took the decision when they rebased the estimates in 2011, not to build in the UPC and the same problems

seems to have arisen again. The second thing is the inability to estimate outward migration of students and although slight improvements after HELM (for within UK migration) and moving from Poisson regression to Linear regression to model international outward migration flows, the issues don't seem to be resolved. If the Census 2021 does reveal a problem with the population estimates for 2012-2019 that have been based partly on admin data (notably for migration) that are intended to replace the traditional Census, then this could constitute a serious setback for the proposal that the 2021 Census.

HH Projections – I think the Housing domain are going to look at Scotland and Wales HH projections but we probably need to speak to them? Also – are we interested in whether the issues that Coventry are seeing – also happen in other UK countries?

How do we follow-up with ONS (and potentially other departments) on any recommendations that we might have in the review.

Just thoughts really but thought I'd jot them down.

See you soon

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From: Baseley, Elise ██████████@Statistics.gov.uk>  
Sent: 17 March 2021 13:35  
██████████@Statistics.gov.uk>; McGhee, Marie ██████████@statistics.gov.uk>; ██████████  
██████████@Statistics.gov.uk>; ██████████@statistics.gov.uk>; Gregory, Mary  
<██████████@Statistics.gov.uk>  
Subject: Population review catch up

Hello,

Ahead of our meeting at 3:30, I've [put together a doc](#) with the things we should try and cover.

Thanks,  
Elise

**Elise Baseley** (she/her) | Office for Statistics Regulation | UK Statistics Authority  
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[REDACTED]

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**From:** DG Regulation  
**Sent:** 25 March 2021 12:46  
**To:** Baseley, Elise; Gregory, Mary; DG Regulation  
**Cc:** Halls, Suzanne; [REDACTED]  
**Subject:** RE: Review of ONS projections

Thanks Elise,

If you're happy to add [REDACTED] to your list of interested stakeholders and respond directly with the below, that would be great, thank you.

Best

[REDACTED]  
Office for Statistics Regulation | UK Statistics Authority

[REDACTED]  
[@StatsRegulation](#) | [osr.statisticsauthority.gov.uk/](https://osr.statisticsauthority.gov.uk/)

---

**From:** Baseley, Elise [REDACTED] <[REDACTED]@Statistics.gov.uk>  
**Sent:** 25 March 2021 10:21  
**To:** Gregory, Mary [REDACTED] <[REDACTED]@Statistics.gov.uk>; DG Regulation <DG.Regulation@Statistics.gov.uk>  
**Cc:** Halls, Suzanne [REDACTED] <[REDACTED]@Statistics.gov.uk>; [REDACTED] <[REDACTED]@statistics.gov.uk>  
**Subject:** RE: Review of ONS projections

Hi,

I sent an email last week to everyone who has been in touch with us about the review to update them on timescales but I've never heard from the contact below. Our website says Spring 2021 so we are still within our commitment. I've copied the email we sent round to them below, if you're happy to tweak it slightly to reply to the individual. Happy to respond myself if you'd prefer.

"Dear All,

We are writing to you as someone who has directly contributed to/expressed an interest in our [review of the population projections and estimates](#) produced by the Office for National Statistics, to provide an update on the progress of our review.

There has been a lot of interest in the review which has resulted in us receiving more submissions than we had anticipated. The breadth of evidence has been extremely helpful for our research and we are grateful for all the contributions to date. Whilst our public commitment is to publish our findings in Spring 2021, we had hoped to publish our initial conclusions by the end of March. However, we have decided to delay publication until the end of April so that we can run our findings through our Non-Executive Directors before publication. We hope that in delaying the publication, we are better able to do the findings justice and provide recommendations which will enhance the public good of these statistics.

We hope this update does not cause any inconveniences. Please do get in contact if you have any questions.

Thanks,  
OSR”

**Elise Baseley** (she/her) | Office for Statistics Regulation | UK Statistics Authority  
[redacted]@statistics.gov.uk  
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](#) | [OSR LinkedIn](#)

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**From:** Gregory, Mary [redacted]@Statistics.gov.uk>  
**Sent:** 25 March 2021 10:13  
**To:** DG Regulation <[DG.Regulation@Statistics.gov.uk](mailto:DG.Regulation@Statistics.gov.uk)>; [redacted]@statistics.gov.uk>  
**Cc:** Halls, Suzanne [redacted]@Statistics.gov.uk>; Baseley, Elise [redacted]@Statistics.gov.uk>  
**Subject:** RE: Review of ONS projections

Hi,  
  
It's actually Elise leading this now.  
  
So copying her in for initial response.

Thanks!  
Mary

---

**From:** DG Regulation <[DG.Regulation@Statistics.gov.uk](mailto:DG.Regulation@Statistics.gov.uk)>  
**Sent:** 25 March 2021 10:11  
**To:** [redacted]@statistics.gov.uk>  
**Cc:** Gregory, Mary [redacted]@Statistics.gov.uk>; Halls, Suzanne [redacted]@Statistics.gov.uk>  
**Subject:** FW: Review of ONS projections

Hi [redacted]  
  
Would you like me to respond to [redacted] If so, a couple of lines would be helpful. Copying Mary and Suz as well for your thoughts.  
  
Given this is going to RC in a few weeks, we probably don't want to pre-empt their discussion and should probably keep the response high level as possible?

[redacted] – would be really helpful to catch up soon.

Best  
[redacted]

[redacted]  
Office for Statistics Regulation | UK Statistics Authority  
[redacted]  
[@StatsRegulation](#) | [osr.statisticsauthority.gov.uk/](https://osr.statisticsauthority.gov.uk/)

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**From:** [redacted]@coventry.gov.uk>  
**Sent:** 25 March 2021 08:01  
**To:** DG Regulation <[DG.Regulation@Statistics.gov.uk](mailto:DG.Regulation@Statistics.gov.uk)>; [redacted]@statistics.gov.uk>  
**Subject:** FW: Review of ONS projections

Good morning both,

I was wondering whether it was possible to have an update regarding the progress of the review? I was anticipating a draft report some time soon, and it would be good to understand when that might be and how you will be communicating with interested parties.

Many thanks

[REDACTED]

[REDACTED]

---

**From:** DG Regulation <[DG.Regulation@Statistics.gov.uk](mailto:DG.Regulation@Statistics.gov.uk)>  
**Sent:** 07 January 2021 15:22  
**To:** [REDACTED] <[\[REDACTED\]@coventry.gov.uk](mailto:[REDACTED]@coventry.gov.uk)>  
**Cc:** [REDACTED] <[\[REDACTED\]@statistics.gov.uk](mailto:[REDACTED]@statistics.gov.uk)>  
**Subject:** RE: Review of ONS projections

Hi [REDACTED],

Following our phone conversation, my understanding is that the scope of the review is projections and estimates for the country as a whole, using Coventry as a specific example. I have copied in my colleague [REDACTED] who is working on this review and can correct me if this is wrong when she is back in the office!

Kind regards,  
Anna

**Anna Price** | [REDACTED]  
Office for Statistics Regulation | UK Statistics Authority | Website:  
<https://osr.statisticsauthority.gov.uk/> | [@StatsRegulation](https://twitter.com/StatsRegulation)

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**From:** [REDACTED] <[\[REDACTED\]@coventry.gov.uk](mailto:[REDACTED]@coventry.gov.uk)>  
**Sent:** 07 January 2021 13:56  
**To:** [regulation@statistics.gov.uk](mailto:regulation@statistics.gov.uk)  
**Subject:** Review of ONS projections

Hi,

I have a very quick question regarding the review of ONS projections etc, as detailed in the attached letter.

Please could you confirm whether the review that is taking place is looking at solely the projections related to Coventry or at the projections for the country as a whole?

Many thanks

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 23 April 2021 15:36  
**To:** Baseley, Elise  
**Subject:** Pop Estimates and Projections

Hi Elise,

[REDACTED]

Varying degrees of progress in terms of the population estimates and projections work:-

1. Still no response from ONS that I have seen but you'll have seen the high-level heads up from Ed following his chat with Liz McKeown. I did have a discussion with Penny about it and we thought that although ONS have made effort and spoken to Coventry on many occasions – they have really failed to understand the impact of the systematic bias that existed in Coventry's stats. When we spoke to them, they seemed to know already there was a real problem with student emigration but didn't really seem to have taken on board the impact of the issue and also they didn't investigate if this affected other similar cities etc. Anyway, we're kind of second guessing what they're going to say and as Ed advised – we're just waiting for their response.

2. ONS releases on international migration came on 16<sup>th</sup> April as planned. The modelling around the international migration is pretty complex but I had a go at updating [the Review](#) to reflect the updates that ONS plan to make. I've left them as tracked changes as you may have other ideas.

3. Letters to complainants – put together drafts of the letters to Coventry and Guildford ([in folder](#)). Reply to [REDACTED] is of course much more problematic. You'll have seen Oliver's response to my query about what they were planning to do. However, we have said that something further will be done in the household space. Anyway, in my chat with Penny, as always, she has come up with some very valid points. Firstly, in terms of ONS – if MHCLG, who would appear to be the key users of the household projections are not using them (as they continue to use the 2014 projections) then why do ONS continue to produce them – who are the users and what is the value? Secondly, in terms of MHCLG, should we (OSR) not be challenging their use of statistics – they are choosing to use a set of statistics that is 7 years out of date – so effectively they are ignoring a more accurate methodological approach etc. and more recent source figures in favour of a very out of date set of statistics because it fits their policy intention. Where we can't comment on policy decisions, we can challenge cherry-picking and selecting to use very out of date statistics.

Additionally, on the housing projections space, there is the circularity issue around the plateauing of the previously falling household size – is it real or is it a response to lack of housing etc. Also, some of the other evidence locally collected by Wirral (or others) doesn't match the published statistics.

[REDACTED]

I think that's a summary of the progress – will catch up when I'm back.

See you soon,



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## **Briefing – Meeting with the complainants about the review of population estimates and projections produced by ONS**

### Purpose of the meeting

1. The meeting has been arranged to talk through our findings with those who submitted the original complaints to OSR. We should set out our expectations for how any information we share in the meeting is used prior to the publication of the report on the 10<sup>th</sup> May.
2. The meeting will be attended by Ed Humpherson, Elise Baseley, [REDACTED]  
[REDACTED]

### Original casework

3. [REDACTED] wrote to OSR in November 2020 regarding the population projections and mid-year population estimates for Coventry. His concerns centred around the perceived inaccuracies of the population estimates on which the household projections and subsequent housing need are based.
4. [REDACTED] then wrote to you in December 2020 to raise concerns about the household projections specifically, from the viewpoint of the Wirral.

### Scope of the review

5. We chose to focus our review on the population estimates and projections to understand whether the perceived inaccuracies affected other areas of local planning beyond housing need. In an email to [REDACTED] we said we would consider the need to conduct a further review of household projections upon completing this review.
6. This review has solely focused on the population estimates and projections in the context of the principles in the Code of Practice for Statistics. We have made it clear throughout this review that it is not within our remit to regulate operational or policy decisions made by government or local authorities.
7. Our report has been written without reference to the specific areas which raised concerns to OSR. However, we will be publishing letters to each of the complainants setting out our findings in response to their concerns. Our findings around Coventry are also included in the cover letter to ONS.
8. We may need to clarify OSR's role in the meeting. [REDACTED] has asked whether we will be publishing the corrected figures for Coventry, which we are of course unable to do. We have not proposed ONS revise the timeseries for Coventry, given the move to an admin-based approach, but we will probably be asked about this.

### Findings

9. We found that the population estimates for Coventry did seem to be higher than local evidence would suggest. This also appeared to be the case in a number of smaller cities with large student populations. The student issue was less clear for the Wirral. We found that ONS did not adequately address the issue given the long-term consequences of the way these data are used and that more needs to be done to investigate the scale of the issue.
10. ONS's approach to population estimates and projections is generally seen as fit for purpose and is highly regarded internationally. One area of challenge has been migration, where there are limitations in the data available. ONS is very aware of this challenge and has recently shared its progress in developing admin-based estimates and its use of statistical modelling for international migration.
11. ONS has a number of methods for quality assuring the statistics, including deep dives, triangulation of data it holds and comparisons against historic data. We recommend that more should be done to incorporate local insight and evidence as part of its deep dives and that its approach to quality assurance could be enhanced by carrying out sensitivity analysis.
12. We also suggest that ONS should develop case studies of how the variant projections are being used in practice to promote their use more widely, as we found that some users involved in local planning decisions lack the confidence to use the variants as they are not seen as akin to the principal projection.
13. ONS engages regularly with experts, academia and other users, and participates in relevant events and conferences. We found that while ONS is good at sharing its work outwardly, there is room for improvement in the way it takes on board feedback and handles challenge.
14. ONS produces statistics with integrity and impartiality. It is not the role of ONS to regulate how the statistics are used to inform policies, but it is its role to advocate for the appropriate use of the data. We recognise that ultimately ONS cannot control the decisions of policy makers but ONS should be vocal in speaking up against those who choose not to use the most up to date and comprehensive figures, where there is not a reasonable argument for them to do so. We recommend that ONS collaborates with experts to frame the statistics for different audiences and scenarios, presenting appropriate use cases of the data.

#### Next steps for OSR

15. We are expecting ONS to report back to us in July 2021 with its plans for addressing our recommendations. We recommend that ONS should focus on determining whether the issues raised here have an impact on other official statistics.

16. OSR has imminent compliance checks of household projections in Scotland and Wales. The household projections for England were reviewed only a couple of years ago after they transferred over to ONS from MHCLG. We do not feel there is value in reviewing ONS's household projections for England as they are not used to inform housing demand, which is at the root of these concerns.
17. It is difficult for us to intervene in the MHCLG issue as its use of data is a policy decision. We would prefer it if MHCLG was transparent in saying its policy is designed to maximise house building, rather than raising questions about its rationale for using outdated data.
18. Our view is that MHCLG should be using the most up to date data where possible, particularly given we are at the furthest point away from Census 2011. The Census may provide an opportunity for MHCLG to review its approach and consider moving away from its 2014 based model. We will work with ONS to understand what it is doing to encourage MHCLG to use its data.

## **Annex A: Summary of recommendations**

### **Improving methods**

- ONS needs to investigate the root and scale of the issue associated with cities with large student populations and communicate its findings publicly, to support the appropriate use of the existing data.
- ONS needs to integrate a more flexible and responsive approach to methodological changes in its design for admin-based population estimates, working with its external partners, so that improvements are more timely.
- ONS should collaborate with others to incorporate local insight and carry out sensitivity analysis to enhance its approach to quality assurance.

### **Enhancing communication**

- ONS should determine a short-term solution to bridge the gap of migration data until the administrative data alternative has been fully created or otherwise make it clear to users why a short-term solution is not practical.
- ONS should provide more specific guidance on interpreting the levels of uncertainty associated with the population estimates and projections, to help support the appropriate use of the statistics.
- ONS should develop case studies of where the variant projections have been used in practice and beneficial to users, to support their use more widely.

### **Embracing challenge**

- ONS should take a more open and constructive approach to user engagement, by improving its complaints procedure and viewing challenge as an opportunity to improve the statistics and outputs.
- ONS should be a vocal advocate for the appropriate use of the statistics and collaborate with experts to frame the statistics for different audiences and scenarios.

### West Midlands, Percent Growth 2011-2031

Data Census 2011, SNPP2014,2016,2018

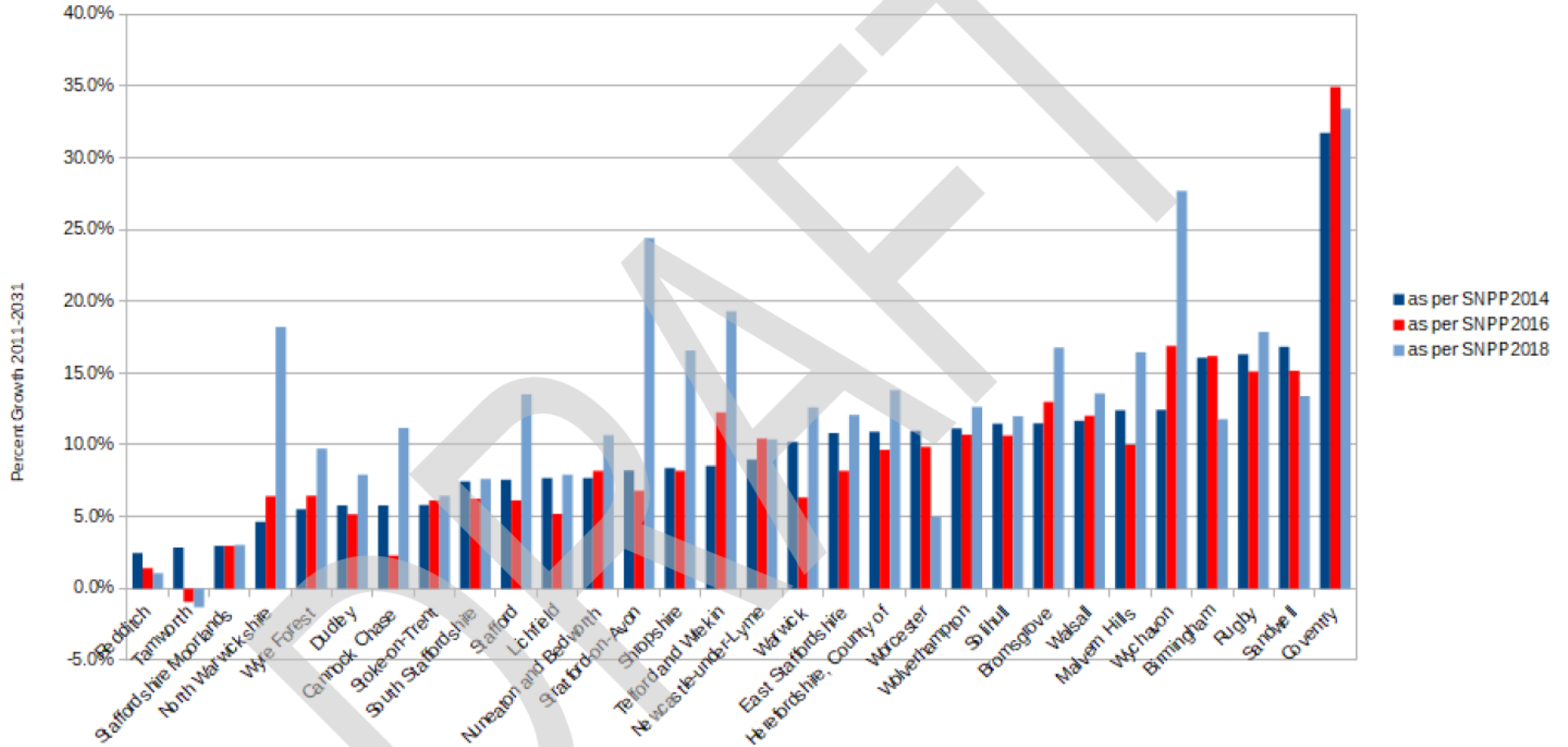
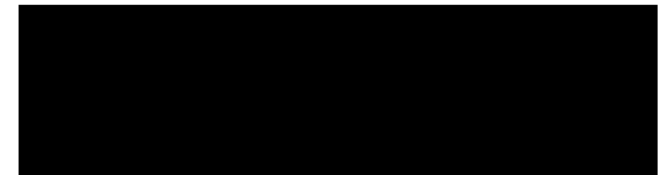


Figure 5: A detailed regional view, of how Coventry consistently is an extreme outlier, across multiple SNPP



### Percent Growth, 2011-2031, Coventry vs West Midlands Region

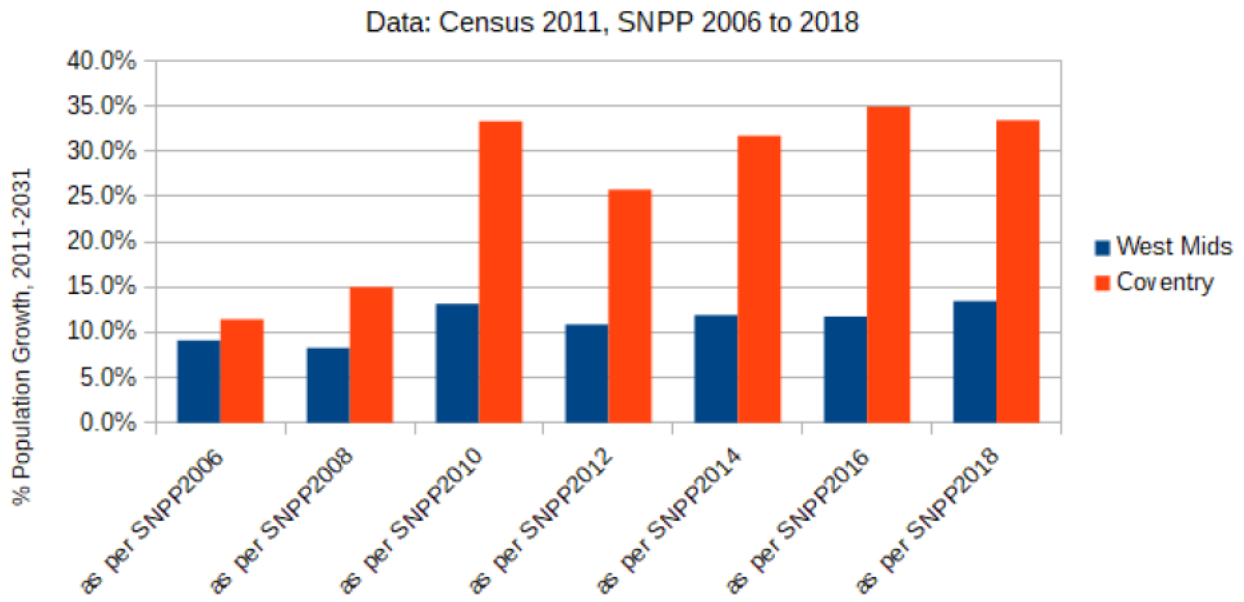
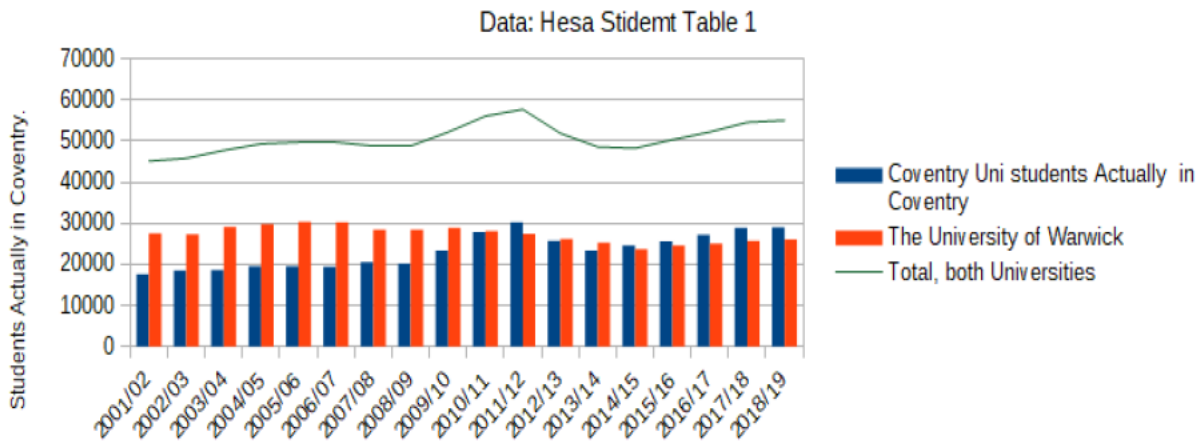


Figure 6: A Broad view over time. Compared to the region, Coventry has been an extreme outlier since SNPP2010

### Students at Coventry and Warwick Universities, (full & Part time)



Note: Warwick Univ is in Coventry, despite its name

Figure 7 The total for Coventry Univ has been reduced to account for the approx 6000 students at the Scarborough and London Campuses

