

# **TOWN AND COUNTRY PLANNING ACT 1990**

## **(as amended)**

Section 106B Appeal by Hodson Developments (Ashford) Ltd; Chilmington Green Developments Ltd; Hodson Developments (CG ONE) Ltd; Hodson Developments (CG TWO) Ltd; and Hodson Developments (CG THREE) Ltd

**Land at Chilmington Green, Ashford Road,  
Great Chart, Ashford, Kent,**

**EDUCATION MATTERS**

**Section 106 Planning Obligation Requirements**

**Kent County Council (“KCC”)**

**STATEMENT ON ONS PROJECTIONS**

**Ben James Hunter**

BA DipMS

PINS Reference:

APP/W2275/Q/23/3333923

APP/E2205/Q/23/3334094

Date: 18<sup>th</sup> March 2025

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## 1.0 Introduction

- 1.1 My name is Ben James Hunter. My experience and qualifications are detailed in my Proof of Evidence dated 5<sup>th</sup> February 2025.
- 1.2 The purpose of this document is to respond to the statements made about Office of National Statistics (“ONS”) population projections (CD9/15) referenced to and relied upon by David Adams in his Proof of Evidence at paragraph 67 onwards.

## 2 ONS Projections

- 2.1 David Adams states in his Proof of Evidence at paragraph 67 the following:

*However, the Office for National Statistics (ONS) produce Sub-national Population Projections [CD9/15]. Produced in 2018, these cover the period to 2043. ONS Subnational population projections for England “indicate potential future population size of English local and health authorities. These are widely used in planning - for example labour market, housing, health and education”. The graph below is a ONS’s birth number forecast for Ashford Borough. It suggests birth numbers will rise steadily in the medium to long term, throughout the 2030s and into the 2040s.*

- 2.2 KCC’s Opening Statement to the Inquiry (CD14/3) states the following at paragraph 29:

*Mr Hunter, based on no evidence, no modelling and only on unevidenced assertions directly conflicting with the expert analysis of the ONS, assumes the continuation of the current “trend” to show a very steep decline in primary student numbers over the build-out period to 2048. That flies in the face of all the evidence. First, part of the current “trend” is explicable by one off factors (a bulge in births now working its way through the school system)- there is no evidence those will repeat. Second, and more importantly, when looking into the medium term, it is always the case that - by definition - projections are required. In that regard, there is a well-established, nationally adopted ONS methodology for looking further ahead – and is used for long term planning of public service provision (as here). The ONS provided borough*

*specific projections to 2043 in 2018 [DAP/67]. That shows the births in Ashford staying broadly flat in the short term before increasing from 2030 – the opposite of what Mr Hunter assumes: see SoCG para 3.2 bullet 8. There is no warrant to adopt his approach. He focusses on the supposed uncertainty in the ONS work (especially on future fertility) but produces no evidence in support his view which is the direct opposite of what the ONS has modelled. Most recent (2025) ONS data overall (not borough specific) shows a 6% reduction in primary pupil numbers over the relevant time frame – compared to his (incredible) 53%. His assumption (and that is all it is) is implausible and no possible basis for amending the s.106 now.*

- 2.3 What these two paragraphs demonstrate is the reliance on ONS Projections for establishing whether the quantum of Primary School provision currently agreed maintains robust. However, what is important to highlight to the Inquiry is the inadequacy of these projections, and the historic issues that ONS have had in correctly identifying birth trends.
- 2.4 As stated by Mr Adams, the ONS Projections were produced in 2018. This means that we have data for 2019-2023 (5 years) to compare the ONS's projections to actual birth data, to see if this is a reliable source for looking forward to the 2040's and beyond.
- 2.5 As detailed in CD9/15, the projected birth's in Ashford are compared to the actual birth numbers for the five years that the data is available. This is shown in the table below:

| Year         | ONS Projections | Actual Births | Difference (%) |
|--------------|-----------------|---------------|----------------|
| <b>2019</b>  | 1,445           | 1,378         | -67 (5%)       |
| <b>2020</b>  | 1,460           | 1,423         | -37 (3%)       |
| <b>2021</b>  | 1,458           | 1,415         | -43 (3%)       |
| <b>2022</b>  | 1,453           | 1,441         | -12 (1%)       |
| <b>2023</b>  | 1,452           | 1,349         | -103 (8%)      |
| <b>TOTAL</b> | 7,268           | 7,006         | -262 (4%)      |

Table 1: Birth Projections Versus Actuals (via ONS)

2.6 What the above demonstrates is that while ONS has been reasonably accurate in a few years looking forward, in others they have dramatically over-forecast, especially in the most recent year for which data is available. An error of 8% is considerable, and would have significant implications for school place planning.

2.7 As discussed in my Proof of Evidence, the ONS places a warning on their projections, saying:

*National population projections are not forecasts and do not attempt to predict potential changes in international migration. Migration assumptions do not directly account for recent and future policy or economic changes. Demographic assumptions for future fertility, mortality and migration are based on observed demographic trends.*

2.8 ONS have addressed this matter on 28<sup>th</sup> January 2025<sup>1</sup>, where they state:

*For the UK and its constituent countries, the gap between projected and actual births generally widens as time goes on, showing that we have overprojected the number of births.*

2.9 The graph below, produced by ONS, shows that the projections assumed the future increase in births in the early 2000's, and the difference between the various projections and the actual. This is a stark demonstration of the unreliability of ONS projections:

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<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/comparingnationalpopulationprojectionstoestimatesreport>

### Births estimates compared with projections for the UK and constituent countries, 1971-based to 2022-based projections

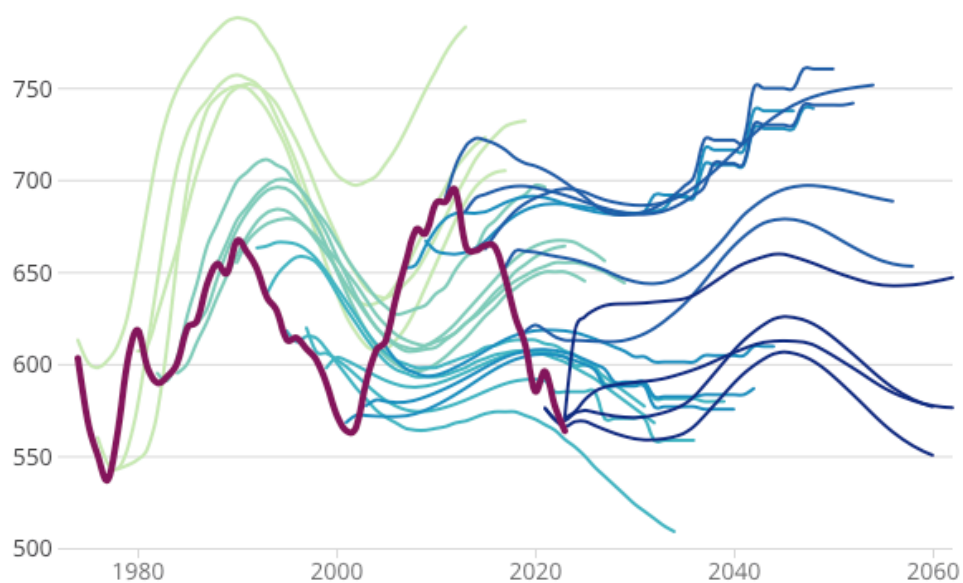
England ▼

Select a projection to highlight ▼

Base year of projection:

- 1970s
- 1980s
- 1990s
- 2000s
- 2010s
- 2020s
- Births

Number of births (thousands)



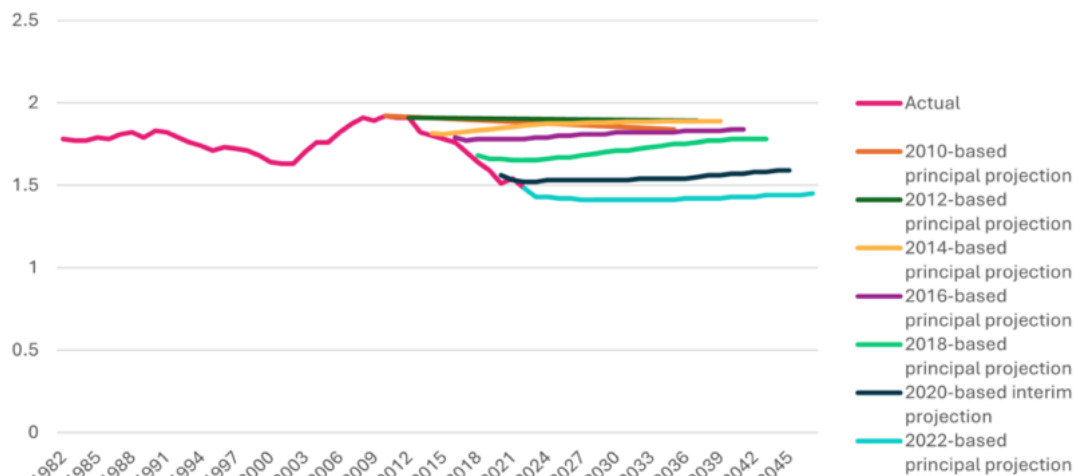
Source: Vital statistics in the UK: births, deaths and marriages and national population projections from the Office for National Statistics

Graph 1: Birth Estimates (via the ONS)

2.10 The Social Market Foundation<sup>2</sup> (a cross-party think tank) also addressed the ONS's optimistic projections in January 2025, where they state:

*Since 2010, the ONS has been persistently forecasting that fertility would remain stable. In fact, fertility has fallen dramatically, as the figure below shows.*

<sup>2</sup> [https://www.smf.co.uk/commentary\\_podcasts/the-ons-uk-demographic-challenge/](https://www.smf.co.uk/commentary_podcasts/the-ons-uk-demographic-challenge/)



- 2.11 The Social Market Foundation summarises the impact on schools of the errors in projections as follows:

*The ONS' misses on fertility in their previous forecasts have seismic implications for planning in the U.K. Schools planning their entering cohorts of 5 or 6 year olds based on these data would have found fully one-in-five of expected incoming children to be missing.*

- 2.12 The ONS state that fertility rates may decline in periods of high unemployment or economic uncertainty. It is well established that what drives low fertility is poor economic outcomes, and the cost of living, amongst other factors. The question that cannot be answered at present is whether economic outcomes will improve for young people in England, or keep getting worse.

### 3 Summary and Conclusions

- 3.1 The ONS are very clear about the fact that they have consistently overprojected the number of births in England.
- 3.2 On that basis, assuming that birth numbers will stabilise from 2034-35 onwards, as Mr Adams has done so in his Proof of Evidence, cannot be relied upon.



Signed:

A handwritten signature in black ink, appearing to read 'Ben Hunter', is positioned below the 'Signed:' text.

**Ben Hunter**

Associate Director – Education and Social Infrastructure

EFM

18<sup>th</sup> March 2025