



Office of  
the Schools  
Adjudicator

## Determination

**Case references:** VAR2625, VAR2626

**Admission Authority:** Surrey County Council for The Grange Community Infant School

**Date of advice:** 28 August 2025

### Determination

**In accordance with section 88E of the School Standards and Framework Act 1998, I approve the proposed variation to the admission arrangements determined by Surrey County Council for The Grange Community Infant School for September 2025. I determine that the published admission number, for admissions to the Reception Year in 2025, shall be 60.**

**I do not approve the proposed variation to the admission arrangements determined by Surrey County Council for The Grange Community Infant School for September 2026. The published admission number, for admissions to the Reception Year in 2026, shall remain at 90.**

### The referral

1. Surrey County Council (the Admission Authority or the Local Authority) has referred to the adjudicator proposals for variations to the admission arrangements for The Grange Community Infant School (the School) for September 2025 and 2026 (the Arrangements).
2. The School is a community school for children aged four to seven in Surrey. It is a co-educational school with no designated religious character. The School was judged to be 'Good' by Ofsted at its last inspection in June 2024.
3. The proposed variations are that the published admission number (PAN) of the School, which applies to admissions to the reception year (Year R), be reduced from 90 to 60 for September 2025 and 2026.

## Jurisdiction and procedure

4. Section 88E of the School Standards and Framework Act 1998 (the Act) makes provision for variations to determined arrangements. Paragraphs 3.6 and 3.7 of the School Admissions Code (the Code) say (insofar as is relevant here):

“3.6 Once admission arrangements have been determined for a particular school year, they cannot be revised by the admission authority unless such revision is necessary to give effect to a mandatory requirement of this Code, admissions law, a determination of the Adjudicator or any misprint in the admission arrangements. Admission authorities may propose other variations where they consider such changes to be necessary in view of a major change in circumstances. Such proposals **must** be referred to the Schools Adjudicator for approval, and the appropriate bodies notified. Where the local authority is the admission authority for a community or voluntary controlled school, it **must** consult the governing body of the school before making any reference.

3.7 Admission authorities **must** notify the appropriate bodies of all variations”.

5. The Arrangements for 2025 were determined by the Local Authority on 30 January 2024. The Arrangements for 2026 were determined by the Local Authority on 28 January 2025.
6. The Local Authority has provided me with confirmation that the appropriate bodies have been notified of the proposed variations in line with the Code, and that the governing body of the School has been consulted on the proposed variations.
7. I find that the appropriate procedures were followed, and I am satisfied that the proposed variations are within my jurisdiction.
8. In considering the variation requests, I have had regard to all relevant legislation and the Code.
9. The information I have considered in reaching my decision includes:
- the referral from the Admission Authority, received on 24 July 2025, and supporting documents;
  - the determined Arrangements for 2025 and 2026, and the proposed variations to those Arrangements;
  - responses from the Local Authority and the School to my requests for further information;

- maps, including Google Maps and those showing the location of the School; and
  - information available on the websites of the Department for Education (DfE) (including the 'Get Information About Schools' (GIAS), the School Capacity (SCAP) Survey, and 'Financial Benchmarking and Insights Tool' (FBIT) websites), the Local Authority, the School, and Ofsted.
10. There is no formal consultation required for a variation and so parents and others do not have the opportunity to express their view. Clearly it is desirable that changes to arrangements are made via the process of determination following consultation as the consultation process allows those with an interest to express their view. It also allows for objections to the adjudicator. None of this is afforded by the variation process.
  11. If I agree to the Local Authority's request to vary the Arrangements for 2025 and 2026 by reducing the PAN as proposed, this will have the effect of fixing the number of places the School would have to admit to Year R in 2025/26 and 2026/27 at 60. If I do not agree the variations, the School would have to admit any applicant to Year R in 2025/26 and 2026/27 until the PAN of 90 is reached, including in-year applicants.
  12. Any determination to reduce the PAN to 60, or to leave it at 90, has no effect in 2025/26 or 2026/27 on any cohort of students other than Year R. The offering of places in other year groups depends on the number of students in each cohort and the organisation of classes, and the degree to which admitting an additional student would prejudice the provision of efficient education or the efficient use of resources or breach the School Admissions (Infant Class Sizes) (England) Regulations 2012.
  13. These requests are being addressed in this single determination because some of the issues needing consideration are common to both. Furthermore, a determination on one request will materially impact on the other. As the arrangements were determined, the PAN for 2026 is 90. If this remains the case, and the variation for 2026 is not agreed, then a change for 2025 from 90 to 60 for 2025 affects that year alone, with no consequence for subsequent years. Importantly however, should I agree to the request for 2026, it will have the effect of forming the "baseline" for subsequent years. Should I approve a reduction in the PAN for 2026, there would be no need for the Local Authority to consult on such a reduction in 2027 as a PAN of 60 could be carried forward from the varied arrangements for 2026.

## Consideration of proposed variations

14. The Local Authority has proposed that the PAN of the School is reduced from 90 to 60 for entry to Year R in September 2025 and 2026. The governing body of the School supports the proposals.

15. Paragraph 3.6 of the Code (as above) requires that admission arrangements, once determined, may only be revised, that is changed or varied, if there is a major change of circumstance or in certain other limited and specified circumstances.
16. The major change in circumstances relied upon by the Local Authority is summarised as follows:

“There have been several significant changes in both pupil demand and forecasting methodology that now necessitate a variation to this school’s Published Admission Number (PAN). While previous forecasts had indicated a rising demand for school places within the planning area, actual pupil numbers at the school have been steadily declining, with fluctuations observed across all year groups. Recent projections now indicate an increasing surplus of places in the area...

This revised outlook is the result of improved forecasting methods. In collaboration with local district and borough councils, we have refined our housing trajectory assumptions, leading to more realistic and locally informed projections. Additionally, the integration of GP registration data into our forecasting model has begun to embed more reliable trends, offering a more accurate reflection of local population changes. These improvements in methodology provide a more robust evidence base for future demand and highlight the need to adjust the PAN accordingly.

By adjusting the PAN in line with falling rolls, the School will be better positioned to manage its resources efficiently, reducing financial pressure and supporting the delivery of a high-quality education. The change will help stabilise staffing structures and avoid the need to run underfilled classes, which are financially unsustainable.

Furthermore, the reduction will contribute to the overall balance of provision within the Addlestone & Ottershaw planning area, and surrounding planning areas too. It will support the long-term sustainability of the local education system by helping to address surplus capacity across the area, ensuring that available places are matched more closely to actual need.”

17. I have considered the latest available data to form a view about the sufficiency of school places in the local area if the PAN of the School is reduced from 90 to 60 for 2025 and 2026. I have also considered the demand for places at the School, the reasons given for the change in demand, the potential effect of the proposed PAN reductions on parental preference, and whether the proposed reductions are justified taking into account all relevant circumstances.
18. The Local Authority has a duty to ensure that there are sufficient places for the children in its area. To fulfil this duty the Local Authority assesses the likely future number of places needed and plans to meet that need. The Local Authority uses planning areas, which are geographical areas each containing a number of schools, for this purpose.

The School is based in the planning area of Addlestone and Ottershaw, and I have considered the data that the Local Authority has provided for that area.

19. In the planning area there are seven schools, including the School, for which the usual year of entry is Year R. The data set out in Table 1 show the number of Year R places and the number of pupils admitted or to be admitted to, or forecast to require a place at, those schools. Table 1 also demonstrates the effect of the proposed PAN reductions for the School on surplus places in the planning area.

**Table 1: Places available at schools within the planning area, and the number of children admitted or to be admitted to, or forecast to require a place at, those schools**

	2024	2025	2026	2027
<b>Number of places in Year R at schools in the planning area (with a PAN of 90 at the School)</b>	330	330	330	330
<b>Number of children admitted (2024), to be admitted (2025), forecast to require places (2026 and 2027)</b>	285	296	319	308
<b>Vacant places</b>	45	34	11	22
<b>Vacant places as a percentage</b>	13.6	10.3	3.3	6.7
<b>Number of places in Year R if variations approved (with a PAN of 60 at the School in 2025, 2026 and onwards)</b>	NA	300	300	300
<b>Vacant places if variations approved</b>	NA	4	-19	-8
<b>Vacant places as a percentage if variations approved</b>	NA	1.3	NA	NA

*Note: Figures for 2025 are adjusted with reference to the latest vacancy data provided by the Local Authority as of 19 August 2025.*

20. The current forecasts, provided by the Local Authority, show that the surplus of Year R places in the planning area in each of the years 2026 and 2027, if the School's PAN remains at 90, is fewer than 30 places. However, the Local Authority is requesting the reduction of the School's PAN for 2026 by a total of 30 places.
21. I asked the Local Authority to explain whether it is able to fulfil its duty to ensure that there are sufficient places for children seeking Year R places in this planning area for

2025, 2026 and beyond. The Local Authority stated, in its reply of 19 August 2025, that –

“The Local Authority remains confident in its ability to meet its statutory duty to ensure sufficient Reception places for 2025, 2026, and beyond. While the proposed reduction in the school’s PAN would remove 30 places, the Local Authority has considered the distribution of surplus capacity both within this planning area and in adjacent planning areas and is satisfied that sufficient alternative places exist to meet anticipated demand. This approach will also help to balance pupil numbers across the wider area, making effective use of surplus capacity in neighbouring schools and planning areas, and supporting the financial sustainability of all schools in the locality. Therefore, this reduction will not compromise the availability of places or limit parental preference”.

22. The DfE document, “Basic need allocations 2025-26: Explanatory note on methodology”, refers to the need for two per cent surplus capacity “to provide an operating margin for local authorities. This helps to support parental choice, pupil population movement, and general manageability of the system”. As far as admissions in September 2025 are concerned, a reduction of the School’s PAN by 30 places will only leave four vacant Year R places in the planning area for any late or in-year applicants. This is below the two per cent buffer according to the DfE guidance. However, for admissions to Year R, the Local Authority assures me, via its reply of 19 August 2025, that there are currently nine vacant places at Byfleet Primary School, and ten vacant places at St. Mary Church of England Primary School in Byfleet; and that both schools are in the neighbouring planning area of Woking, and are within 2.5 miles of the School. These nearby vacancies may help accommodate any in-year applicants seeking Year R admissions to schools within the planning area of Addlestone and Ottershaw, as and when necessary.
23. At this point in the year, all children whose parents are seeking a Year R place for September 2025 have been allocated a school place. I am satisfied that if the PAN of the School were to be reduced to 60 for September 2025, and after taking into account some vacant places in the neighbouring planning area(s), there would be sufficient places for any further children who might be seeking a Year R place in the local area in which the School is located.
24. As for admissions in September 2026, I note that when the Local Authority determined the 2026 Arrangements for the School alongside all other relevant schools, the following reasons were recorded at the minutes of the Local Authority at the cabinet meeting held on 28 January 2025:  
  
“Recommendation 4: That the Published Admission Numbers (PANs) for September 2026 for all other community and voluntary controlled schools (excluding Year 3 at Reigate Priory and Reception at Earlswood Infant School, which are covered by

Recommendations 1 and 3) are determined as they are set out in Appendix 1 of Annex 1 [of the relevant document for that discussion].

#### Reasons for Recommendation

- Most other PANs remain as they were determined for 2025 which enables parents to have some historical benchmark by which to make informed decisions about their school preferences for 2026 admission.
- The PANs provide for the sufficiency of places at community and voluntary controlled schools.
- The Education Place Planning team supports the PANs.
- Each community and voluntary controlled school were given the opportunity to comment on the proposed PAN if they wished.”

25. The Local Authority did not elaborate on the change of ‘forecasting methodology’, which it mentioned in its referral form dated 23 July 2025, and which may have been implemented since the Local Authority’s determination of the 2026 Arrangements earlier this year. While the Local Authority seeks to rely on such a change to the forecasting methodology to justify the variation proposal for the reduced PAN of the School for September 2026, it does not explain cogently, with the assistance of its forecast data, how this reduction is proportionate to the fall in the overall demand for Year R places within the planning area in the next few years. The data provided by the Local Authority in Table 1 show that, should the reduction of the School’s PAN by 30 places for September 2026 be approved, there is a forecast of an excess and unmet demand of 19 Year R places, which have to be accommodated otherwise by schools in surrounding planning area(s) and may therefore add to the pressures on those schools.
26. Despite the Local Authority’s assurance cited above I am not convinced that, if the PAN reduction were agreed for September 2026, there would be sufficient capacity in the local area to meet the demand for Year R places in 2026/27.
27. I turn now to the demand for places at the School. Table 2 shows the number of children admitted to the School last year, the number of children to be admitted in 2025, and the forecast numbers for 2026 and 2027. This table uses the proposed PAN of 60 for 2025 onwards.

**Table 2: The number of children admitted to the School in 2024 and to be admitted in 2025, and the forecast number of places required in 2026 and 2027**

	2024	2025	2026	2027
The PAN for the School	90	60	60	60
Number of children admitted (2024), to be admitted (2025), forecast to require places (2026, 2027)	56	61	74	73
Surplus places	34	-1	-14	-13

28. For admissions in September 2025, I note that 77 children were originally offered places at the School, on National Offer Day in April 2025. However, subsequent declines of the offers made, due to a host of different reasons, have resulted in only 61 children being expected to be admitted to Year R at the School in September 2025. The proposed variation will have no effect on parental preference as all applicants to Year R in September 2025 (including those who have not had a higher preference met) will be accommodated. Furthermore, if the proposed PAN reduction is approved for September 2025, any parents unable to secure an in-year place at the School will be able to secure a place for their child at an alternative local primary school, including any of the five schools (including schools in the adjacent planning areas) which are within three miles of the School and now altogether have some 20 vacant places available in Year R for September 2025. For these reasons, I am satisfied that any adverse effect on late and in-year applicants for 2025/26 seeking admissions to the School will be minimal.
29. For admissions to the School in September 2026, the Local Authority’s latest forecast is that 74 places would be required. The Local Authority added that,
- “Whilst the School was forecasted to have 80 pupils for the upcoming September 2025’s intake, there are currently only 61 allocated (correct at time of writing [on 19 August 2025]). Applying a similar variance to future forecasts indicates that projected pupil numbers are likely to be considerably lower than forecasted”.
30. I appreciate that it is difficult for local authorities to forecast precisely the number of school places required for a particular school, or in an area. And the variance relied on by the Local Authority as cited above could be a rule of thumb – but this may or may not materialise. If the PAN of the School is reduced to 60 for September 2026, there will be a shortfall of over 10 Year R places, according to the Local Authority’s own latest forecast in Table 2. I am not convinced that any frustration of parental preference, as far as the School is concerned, will comfortably be mitigated by the availability of places at other local schools with vacant Year R places in 2026/27 and beyond, as analysed in Table 1 and explained above.

31. I will now consider the impact on the School of my approving, or not approving, the proposed variations.

32. According to the Local Authority in its reply of 19 August 2025,

“The [School] currently has 61 accepted offers for Reception in September 2025, with no further children waiting for a place. I can confirm that no offer holders would be turned away. The School will initially run three classes in order to comply with infant class size legislation but, as pupils leave and if the variation is approved, they hope to eventually operate with just two classes of 30 pupils.

“Following the recent Ofsted Inspection in 2024, [the School] is continuing with a comprehensive school improvement plan linked to the recommendations. A permanent reduction in PAN will support the plans and activity in place to achieve this by providing stability in curriculum and long term, staff resource planning.”

33. The request for the variations refers to financial pressures faced by the School and the wish to align class organisation and staffing to the number of children. The situation the Local Authority and the School wish to avoid is staffing classes of a size that are not financially viable. The FBIT website shows that for the financial year ending March 2024, the School had an in-year balance of £13K and a revenue reserve figure of £69K.

34. The Local Authority notes that,

“The School currently holds some reserves, which are projected to be fully utilised by March 2027. Without intervention, the school anticipates moving into deficit at that point. Reducing the PAN to 60 pupils from September 2025 would help mitigate this risk, given the current low pupil numbers, so that the School is able to adjust staffing and resources accordingly. Due to the constraints of infant class size legislation, the School could be obliged to employ three teachers if numbers exceed 60, even if they remain substantially below 90, creating further budgetary pressure.

If the PAN remains at 90, despite incoming Reception allocations currently being one form of entry (1FE) below this, the 2026/27 budget would show a significantly larger projected deficit. The 2025/26 budget submission assumed an intake of 70 pupils, reflecting the allocation at the time, but current numbers indicate 60 pupils, as more places are being declined. Maintaining a PAN of 90 in these circumstances will result in the deficit increasing year on year. By 2027/28, the projected deficit is forecast to be at a level that would seriously jeopardise the School’s ability to operate sustainably.”

35. The School stresses, in its reply of 30 July 2025, that -

“Since recruitment the numbers fell to 63 so there are still three Reception classes

supported by [the Local Authority's] falling roll funding. One of the teachers has a temporary contract so if the numbers fall below 63 by the September 2026, we will run two classes or look at mixed classes if required. We are however looking at the numbers dropping further as we do every year with in-year transfer of pupils to schools closer to their homes as many tend to be on waiting lists. I already have a parent saying they are on the waiting list for another school as we are not local to them.

We have had to apply for falling roll funding as we were unable to fund for three small classes, which was granted for the September 2025 cohort as a one-off payment, but is not sustainable. We will not be continually eligible for this funding. We have also had to reduce the number of TAs in School and hence support for our high needs pupils and interventions putting more pressure on our current staff. We cover all absences internally, putting pressure on other areas of the curriculum. We have also had to cover PPA for the teachers separately as we are now unable to provide this to the teachers together as we did previously to support collaboration. Our September 2025 Year 1 cohort is also less than 60, which shows there are not enough children in the area for our School to sustain a 90 PAN.

The concerns from [the full governing body] (FGB) was the sustainability of the PAN at 90 and the need to secure falling roll funding as a rolling support for the cohort rather than a one-off payment as suggested. This will help maintain the three classes if the numbers stay above 60 in the cohort. The FGB understands the critical condition the School is in if the PAN is kept at 90 as this will not be sustainable. The FGB is also open to a bulge class in the future if required by [the Local Authority] due to increase in the number of children in the area.”

36. Having considered all the matters above, my reasoning can be summarised as follows.

#### **VAR2625 – PAN reduction for 2025**

- If the proposed variation is approved, there will be no impact on all those for whom the School was their highest available preference as they have been offered a Year R place at the School for September 2025. The School has its planning in place to run three classes or arrange some form of mixed-class teaching if the actual number of pupils to be admitted to Year R in September 2025 is slightly over 60. Some frustration may potentially arise as the reduced PAN may result in detriment to the children whose parents make a late or in-year application for entry to the School, although the Admission Authority may always admit above the PAN through in-year admissions in accordance with paragraph 1.4 of the Code. In any event, if any parents are unsuccessful in securing a place for their child at the School in 2025/26, they will likely be able to secure a place at one of the local schools nearby given the availability of vacant Year R places there.

- If the proposed variation is not approved, the School would be obliged to offer a Year R place up to the existing PAN of 90 for late and in-year applicants during the rest of the 2025/26 academic year. If a third Year R class is required long term, this will require substantial cost to employ a teacher.

#### **VAR2626 – PAN reduction for 2026**

- The Local Authority has not been able to provide data-based evidence to show convincingly that, if the proposed variation is approved, there will be adequate places to accommodate the projected number of applicants for Year R places at the School and nearby schools in the planning area for September 2026, despite its view about the downward trends of the local birth rate or housing developments. While there is compelling evidence that a reduction in the PAN to 60 would, in the longer term, improve the School's financial position, it remains unclear whether such a reduction may or may not compromise the Local Authority's ability to provide for a two per cent surplus capacity at the planning area to support parental choice, pupil population movement, and general manageability of the system, as is required under the DfE document, "Basic need allocations 2025-26: Explanatory note on methodology".
- If the proposed variation is not approved, the School would be obliged to offer a Year R place up to the existing PAN of 90 for any applicant in 2026/27, according to the 2026 Arrangements determined by the Local Authority in January 2025. While the Local Authority seeks to justify the variation with its recent changes to the forecasting methodology, the data from that methodology which go with the referral do not support its intended conclusion, and in any event I am conscious of the challenges facing the Local Authority in forecasting pupil numbers. I also acknowledge that the School wishes to secure its level of staffing and its budget position beyond 2025/26. I therefore wish to make it clear to the Local Authority that it would be open to it to re-apply next year for a PAN reduction for 2026/27 (as it is now doing for 2025/26), when it has more precise information about the number of actual applications for Year R places at the School for September 2026. Importantly, if a fresh referral comes after National Offer Day in April 2026, the School would still have time to make any necessary changes to their staffing and class organisation to accommodate the allocated pupils for September 2026. Furthermore, the Local Authority would, by then, have been able to consult on a PAN reduction for 2027 following the normal procedures for making changes to admission arrangements under paragraphs 1.45 to 1.48 of the Code (see paragraph 10 above). I stress that my determination here has no bearing on any process of consultation or the PAN that is to be determined by the Local Authority for the School for 2027/28.

37. Taking everything into consideration, I find that:

- the variation for 2025 is justified by the circumstances, and I approve the proposed reduction of the PAN to 60 for September 2025; and
- the variation for 2026 is not justified by the circumstances, and the PAN of the School for September 2026 remains at 90 as the Local Authority determined so earlier this year.

## Other matters

38. In the interest of dealing speedily with this and the other requests for variations for schools, I have not considered other aspects of the Arrangements. Therefore, nothing in this determination should be taken as indicating that other aspects of the Arrangements do or do not conform with the requirements relating to admissions.

## Determination

39. In accordance with section 88E of the School Standards and Framework Act 1998, I approve the proposed variation to the admission arrangements determined by Surrey County Council for The Grange Community Infant School for September 2025. I determine that the published admission number, for admissions to the Reception Year in 2025, shall be 60.
40. I do not approve the proposed variation to the admission arrangements determined by Surrey County Council for The Grange Community Infant School for September 2026. The published admission number, for admissions to the Reception Year in 2026, shall remain at 90.

Dated: 28 August 2025

Signed:

Schools Adjudicator: Jackie Liu