



Office of
the Schools
Adjudicator

Determination

Case reference: ADA4473 Queen Elizabeth's School

Objector: Devon County Council

Admission authority: Ted Wragg Multi Academy Trust for Queen Elizabeth's School, Crediton

Date of decision: 27 August 2025

Determination

In accordance with section 88H(4) of the School Standards and Framework Act 1998, I do not uphold the objection to the admission arrangements for September 2026 determined by the Ted Wragg Multi Academy Trust for Queen Elizabeth's School, Crediton, Devon.

By virtue of section 88K(2) the adjudicator's decision is binding on the admission authority.

The referral

1. Under section 88H(2) of the School Standards and Framework Act 1998, (the Act), an objection has been referred to the adjudicator by Devon County Council (the objector, the LA) to the admission arrangements (the arrangements) for Queen Elizabeth's School (the school), a non-selective secondary academy school for children aged 11-18 for September 2026.
2. The objection is to the admission authority's reduction to the published admission number (PAN) for the school from 210 to 180 for the school year commencing in September 2026. The objector, LA suggests the reduced PAN of 180 will negatively impact on the LAs ability to meet its statutory duty under section 14 of the Education Act 1996, The is a duty upon local authorities to secure that sufficient school places for primary education and secondary education are available for their area (the area in question being the area of the local authority.)

3. The local authority (LA) for the area in which the school is located is Devon County Council. The LA is the objector in this case. Other parties to the objection are the school and the trust.

Jurisdiction

4. The terms of the Academy agreement between the multi-academy trust and the Secretary of State for Education require that the admissions policy and arrangements for the academy school are in accordance with admissions law as it applies to maintained schools. These arrangements were determined by the academy trust, which is the admission authority for the school, on that basis on 12 February 2025. The objector submitted their objection to these determined arrangements on 15 May 2025. I am satisfied the objection has been properly referred to me in accordance with section 88H of the Act and it is within my jurisdiction.

Procedure

5. In considering this matter I have had regard to all relevant legislation and the School Admissions Code (the Code).

6. The documents I have considered in reaching my decision include:

- a. a copy of the determined arrangements and details of when they were determined;
- b. the objector's form of objection dated 15 May 2025 and supporting documents including communication between the trust and LA;
- c. the trust's response to the objection dated 11 July 2025, supporting documents and additional information provided in response to my enquiries.
- d. the local authority's basic needs analysis for places required to support admission to year 7;
- e. maps of the area identifying relevant schools, catchment areas and other information; and
- f. confirmation of when consultation on the arrangements last took place

The Objection

7. The objection is to the reduction of the PAN from 210 to 180 in the admission arrangements determined for 2026. The LA believes that the reduction of 30 places will not meet the needs of the school's local community, as defined by the school's catchment area and as evidenced by previous admission rounds.

8. The LA notes that the Trust has been open and co-operative in all its discussions with the LA and consulted publicly on the proposed PAN reduction, alongside the LA's public consultation.

Background

9. Queen Elizabeth's School became an Academy in April 2011. It joined the Ted Wragg Multi Academy Trust in 2021. The school's capacity is 1650 pupils with 1130 on roll in July 2025 as shown on the gov.uk "Get information about schools" website.
10. The school is in Crediton, a market town in Devon that is a popular commuter town for people working in Exeter.
11. Most pupils (70%) of the school's intake live within 5 miles of the school, although 30 per cent travel from further away, which is a significant proportion. Students in the 2025/26 will travel up to 6.7 miles to attend the school which is in line with previous year groups based on mapping data from Locrating website. The nearest alternative secondary schools are approximately 6 miles to the southeast in Exeter. Schools to the north of Crediton are further away.
12. The school is currently located on two separate campuses: Western Road Campus and Barnfield Campus. The school had state boarding provision on site until 2019. In 2025, building condition assessments have led to the closure of approximately 12000 square metres of space for use by staff and pupils on one of the campuses due to concerns about the safety of the building.
13. The school was judged by OFSTED to be good for all key judgements in its most recent inspection in May 2022. Most recent inspection judgments illustrate improvement since the school's previous inspection prior to joining the trust.
14. The Ted Wragg Multi-Academy Trust was established in 2013. The trust mission is "to transform lives and strengthen our communities to make the world a better place". There are currently 18 schools in the trust with more than 15000 children aged between two and eighteen years old.
15. Admission arrangements for the school were determined in February 2025 and contain oversubscription criteria that, in summary, are:
 - a) Looked after children and those who were previously looked after.
 - b) Children who have an exceptional social or medical need (or whose parents have such a need).
 - c) Children living within the catchment area who are siblings of children on roll at the school.
 - d) Other children living within the catchment area, on roll at a named linked school.
 - e) Other children living within the catchment area.
 - f) Other children living outside the catchment area who are siblings of children on roll at the school.

- g) Other children living outside the catchment area, on roll at a named linked school.
- h) Other children living outside the catchment area, on roll at a named linked school.
- i) Children of members of staff employed at the school.
- j) Other children.

A child whose Education, Health and Care Plan (EHCP) names the school will be admitted without regard for these criteria.

16. The trust works closely with Devon County Council to support the determination of admission arrangements to ensure compliance with the Code. The trust and LA have provided evidence of consultation about the determined arrangements for 2026 that met the requirements of the Code.

17. The most recent consultation took place during the period 8 November 2024 to 10 January 2025. The duration and timing of the consultation period met the requirements of paragraph 1.46 of the Code. Throughout the consultation period the LA made it clear to the trust their objection to the proposed reduction in PAN.

18. The LA are concerned that reducing the PAN by 30 places from 210 to 180 for Year 7 from 2026 will result in a long-term reduction in capacity in the catchment area and will “not meet the needs of its local community”. Under current legislation, the LA has no mechanism to require the trust to increase the PAN in future should there be a need for more places, and alleges that this will therefore impede the LAs ability to meet their statutory place planning responsibilities.

19. The trust remain committed to serving the Crediton community and working closely with stakeholders, including the LA. They present a case that they can only do this sustainably through the execution of a one-site solution in the town, at least for the medium term.

20. In July 2024, an objection to the trust seeking to reduce the PAN from 210 to 150 was upheld by the OSA. However, it was noted that the circumstances were finally balanced between the needs of local community and challenges faced by the trust.

21. The LA and trust have consistently emphasised their commitment to work collaboratively to meet the needs of the local community and the trust has agreed to admit a number of children above the PAN should this prove necessary. Both the LA and trust recognise that this agreement is not binding. If the objection is not upheld for 2026 arrangements then, although not yet determined, the school will be able to include a PAN of 180 going forward and no-one could object.

Consideration of Case

22. I will first consider whether a PAN of 180 will meet the needs of the local community as defined by the school's catchment area and evidence from previous admissions rounds. I will also consider information provided during the school's 2024 adjudicator's determination where objection to a PAN reduction from 210 to 150 was upheld.

23. Table 1 shows the number of children in each existing cohort in the school (including the September 2025 intake) who are known to live in the catchment area of the school alongside the number on roll.

Table 1: Historic need analysis – the number of children living in the school's catchment area between 2020/21 and 2025/26. Data provided by LA in July 25.

Year 7 intake in	25/26	24/25	23/24	22/23	21/22	20/21
NCY 2024-25	Y6	Y7	Y8	Y9	Y10	Y11
<i>In Area Cohort 2024</i>	267	273	299	330	308	281
In Area Cohort 2025	273	277	304	329	313	294
Current NOR	201 ¹	183	195	221	211	195
QE PAN / AN	210 ¹	210	210	240	210	210
Proportion of 25 In Area cohort admitted	74%	66%	64%	67%	67%	66%

Notes:

¹ Number of pupils offered places in March 2025.

² Number provided by LA based on return from school in Spring 2025.

³ PAN was determined at 150 but reverted to 210 following ADA4313 in Summer 2024.

24. Table 1 illustrates that in the five years up until 2025 intake, the number of children admitted to the school is consistently above the proposed 180 PAN and the number on roll in each year group remains above 180. The minimum proportion of children in the "in-area cohort" who have been admitted to the school was 64% in 23/24. The maximum proportion is 74% in 2025/26 when the "in-area cohort" fell to the lowest level to date.

Table 2: Future basic needs analysis – the number of children living in the school's catchment area in each year group from 2026/27 until 2031/32. Data provided by the LA in July 25.

Year 7 intake in	31/32	30/31	29/30	28/29	27/28	26/27
NCY 2024-25	R	Y1	Y2	Y3	Y4	Y5
<i>In Area Cohort 2024 was²</i>	217	244	261	230	260	250
In Area Cohort 2025	223	257	266	243	259	244

Year 7 intake in	31/32	30/31	29/30	28/29	27/28	26/27
Number if 64% of children admitted. (Minimum)	143	165	170	155	166	156
Number if 74% of children admitted. (Maximum)	165	190	197	180	192	181

25. Table 2 illustrates variation over a 12 month period in the data provided by the LA, however the overall trend in “in-area cohort” is downward. In four of the next six years, if the maximum proportion of “in-area cohort” seek places at the school, then the determined PAN of 180 would not fully meet the needs of the local community. However, this level of application has only been reached once in five years. If the average (around 67%) apply for places at the school, the 180 PAN would be sufficient to accommodate the number of children required and if only the minimum number of applications for places are made, the school would then be faced with a significantly lower intake than the PAN, which is likely to create additional challenges in terms of the financial sustainability of the school.

26. I note that the LA argue improved educational standards in the school are leading to improved perception amongst potential applicants and increased popularity of the school in the local community, This in turn is said to be leading to increased proportions of children from local primary schools applying. This is evident in 2025 when 85.8% of pupils in the 13 linked primary schools outlined in the arrangements applied to the school which is a substantially higher proportion than in 2024 (62.4%) and 2023 (67.2%). However, the popularity of one school does not impact on the overall number of places available at other schools in the area and overall the number of pupils in the cohort appears to be falling which means places will be available in alternative schools.

27. In July 2025 the largest cohort over the next three years of pupils in the linked primary schools was stated as 245 pupils in the current year 4 cohort. So if 85.8% of the cohort seek places at the school, 210 places would be needed to meet the demand. If the lowest proportion of 62.4% seek places, then 153 pupils would need places. I also note that a number of children historically join the school from other primary settings. This means that the proposed PAN of 180 could be argued to be too high or too low depending on the number of applications. However, as stated previously, the total number of places will be reduced by 30 (if PAN at the school is reduced) at a time when the overall cohort reduces, for example, from 1422 to 1344 next year.

28. The LA and trust agree that the number of applications in 2025 was higher than anticipated. This indicates the significant challenge in reliably projecting the number of places needed. A PAN of 180 pupils in Yr7 equates to 73% of the largest upcoming cohort in linked primary schools. Given that this is a significantly higher proportion than has been admitted in all but 2025, my view that that, on the balance of probabilities, it is likely that 180 places will be sufficient to meet the needs of the local community. Catchment arrangements and feeder (linked) school arrangements offer a degree of priority to certain applicants. Those arrangements must be clear, reasonable and fair, but there is no

requirement in the Code that there should be sufficient places for all pupils in those categories in the School.

29. I note that both the LA and school stated their support for a PAN of 180 in 2024 when the objection to a reduction to 150 was upheld (ADA4313).

30. The LA projections indicate a worst case scenario where up to 30 pupils seeking a place at the school would require alternative allocation if the PAN is reduced to 180. However, LA data also indicate that if numbers are at their lowest possible projections (as shown in Table 2), the trust could be faced with rolls falling by more than 60 pupils below the current PAN of 210, whilst still having to maintain two sites.

31. I will now consider the availability and accessibility of alternative secondary education places.

32. In 2025, the closest alternative school, although small, was not oversubscribed. The picture is similar for a number of other schools in the area. Other schools remain oversubscribed, but saw levels of oversubscription decrease between 2024 and 2025. LA data shows the school catchment cohort falling from 273 to 244 in 2026. The trust provided information that the overall cohort for Exeter schools in 2026 will fall from 1422 to 1344 in 2026. Fewer pupils in the wider area will increase capacity in alternative schools alongside the fall in the catchment area cohort which will mean that it is unlikely that 180 places will be insufficient to meet local need for places.

33. The LA state that “early age cohorts have grown year on year with inward migration”, however, data in table 1 and table 2 provided by the LA illustrates a more stable picture with an arguably downward trend in overall numbers.

34. A reduced PAN of 180 potentially means there is a possibility that a group of pupils who wish to attend the school could have to travel to a different school. Any potential disadvantage to the group of pupils affected needs to be balanced against the needs of the trust in ensuring that provision within the school is safe and sustainable for all pupils attending the School.

35. The LA state that:

“where local (in-catchment) children are refused admission, the LA may be obliged to provide free travel to an alternative school at public expense. This could mean that local children are transported out of their communities to an alternative school for up to 5 academic years, against parental preference. Where siblings are on roll at Queen Elizabeth’s, this would mean families being split for their education, again, against parental preference”.

36. Over 30% of pupils admitted to the School in 2024 lived more than 4.53 miles from the school and so would be eligible for school transport provision if the School was their nearest school or if no place was available for them at their nearest school. It is not clear that within the context of a rural catchment, requiring those pupils to travel to an alternative

school which, in some cases, may be closer to home would likely increase LA costs. Indeed, it is possible that some pupils would have a shorter journey to other schools, for example, children in the South West of the Catchment area travelling to schools in Exeter.

37. The trust do not agree with the LA statement, although do recognise that there is a need to work collaboratively with the LA and other stakeholders to maintain adequate provision for the school's local community if and when populations increase as a result of, for example, longer term plans for additional house building. Schools determine their admission arrangements on an annual basis and my jurisdiction is restricted to determining an objection to the 2026 arrangements. Even if I were to uphold this objection, it would still be open to the trust to reduce, or indeed increase, the school's PAN in future years. The school is able to increase its PAN at any time.

38. Additionally, oversubscription criteria give preference to siblings within catchment above distance to school therefore this means "families being split" is unlikely.

39. I will now consider the financial implications for the school should the PAN not be reduced.

40. The schools financial benchmarking website indicates that in the financial year September 2023 to August 2024 the school ran an in-year budget deficit of £767,357 with financial reserves of £867,833. This clearly indicates the financial challenges faced by the school within current organisational arrangements. Notably, based on information on the gov.UK Financial benchmarking for schools website, the school spending on premises staff and services is 80% higher than similar schools, whereas educational ICT spend supporting curriculum delivery is less than 92% of similar schools. In my view, the need to spend such a high proportion of funding on premises and staff, as opposed to ICT and curriculum resource is likely to have implications for quality of education provided at the school.

41. Information provided by the trust indicates that despite measures to reduce costs, in the 2024/25 financial year, the school has run an in-year deficit of £646k. The trust estimate that closing one site for from Sept 2028 would lead to in-year savings of around £500k which makes balancing the in-year budget more achievable.

42. As school funding is based primarily on pupil numbers, a reduction of over 30% in planned pupil numbers in any year group, as outlined in paragraph 29 above, would place significant financial challenges on the school impacting on long term sustainability. Although the PAN reduction of 30 pupils has the potential to decrease overall funding, there is significant likelihood that a PAN of 210 will not be reached and the school would be faced with having to teach smaller classes. In these situations, per pupil funding income is insufficient to cover the costs of providing these classes, which leads to greater uncertainty underpinning financial planning.

43. The trust have provided substantial information about the programme of investment required at the School to sustain quality of education and a safe estate. They are committed to working with the LA to ensure the school can "confidently educate and meet the needs of Crediton and its surrounding areas". The trust recognises that the existing legal framework

means the LA could not mandate to increase the PAN again in future years. However, they argue that the timeline of, for example, future housing development is unclear and that to maintain sustainable and sufficient provision for existing pupils the PAN reduction in the 2026 arrangements is necessary.

44. The trust have committed substantial capital resources (£1.5m) and trust reserves (£2m) to support the school but remain concerned that the level of funding is less than half of the amount required (an additional £8.5m) to make the split site safe, maintain and run the estate.

45. The LA argue that the school's capacity is 1650 based on a PAN of 270 as it was when the school joined the trust. However, the reduction in pupil numbers and the need to close 12,111m² of the school site means that the current estimated school capacity is substantially higher than the school's true capacity.

46. I note that there is an existing strong working relationship between the trust and LA and therefore anticipate both parties continuing to work in good faith to ensure adequate provision for families in Crediton.

47. The LA state that they "need to protect the capacity as per its (the school's) funding agreement to appropriately support the local basic need for secondary phase education provision. The LA understands that significant capital works are required to appropriately facilitate this".

48. The trust have developed a coherent plan for the long term, sustainable development of the School on one site with alternative options for expansion on either one or two sites when the need is unquestionable. This aligns with the LA's recognition of the need for "significant capital works".

49. It is possible but not certain that the school will need to accommodate more pupils in September 2026 if there are insufficient places available locally, as they have agreed to do. This possibility needs to be balanced against the certainty that the current financial position of the school is unsustainable and has the potential to impact the quality of education and sustainability of provision for all children attending the school.

Summary of Findings

50. The admission authority (the trust) have determined the admission arrangements for the school in 2026 following appropriate consultation and engagement with stakeholders including the LA, as is required by the Code paragraphs 1.45-1.53.

51. The LA objected to the reduction of the school's PAN from 210 to 150 last year principally on the basis that it could impact on their potential to provide sufficient secondary school places in the local area. Although it is clear that unusually high numbers of applications in 2025 present a possible challenge if these numbers are repeated in 2026, data presented by both the LA and the trust suggest that it is likely a PAN of 180 would be sufficient to meet the needs of the local community.

52. The trust argue that maintaining a PAN of 210 would require the retention of two sites, and prohibitive capital investment to secure a safe estate which would place the school, and trust, in an unsustainable financial position potentially risking the sustainability of the existing school.

53. The arguments for and against the reduction in the PAN are finely balanced. It is my judgment based upon the evidence presented to me that the PAN of 180 is likely to be sufficient to meet local needs. It is likely that the movement to a single site will place the school in a stronger more sustainable financial position that will positively impact on the quality of education for existing pupils and those in the local area who join the school.

54. It is clear that the existing strong working relationship between the trust and the LA means that they will continue to work closely together to secure the capital investment needed to expand provision in the school if and when it is more certain that such expansion is required.

Determination

55. In accordance with section 88H(4) of the School Standards and Framework Act 1998, I do not uphold the objection to the admission arrangements determined by the Ted Wragg Multi Academy Trust for the Queen Elizabeth School in Crediton, Devon.

56. By virtue of section 88K(2), the adjudicator's decision is binding on the admission authority.

Dated: 27 August 2025

Signed:

Schools Adjudicator: Phil Lloyd