



Office of
the Schools
Adjudicator

Determination

Case references:	VAR2708 and VAR2755
Admission Authority:	Limpsfield Church of England Infant School
Local Authority:	Surrey County Council
Date of decision:	21 July 2026

Determination

In accordance with section 88E of the School Standards and Framework Act 1998, I do not approve the proposed variations to the admission arrangements determined by Limpsfield Church of England Infant School, for 2026/27 entry and 2027/28 entry.

The referral

1. The Governing Body (the Admission Authority) has referred to the adjudicator a proposal for variations to the admission arrangements for Limpsfield Church of England Infant School (Limpsfield, the School) for both 2026 and 2027 (the Arrangements).
2. The School is a voluntary aided school for children aged three to seven in Oxted. It is a non-selective school with a Church of England religious character. The School is in a small town on the eastern edge of Surrey.
3. The Admission Authority for the School is the Governing Body of the School and I will use the terms interchangeably.
4. The religious character of the School is Church of England. The religious authority for the School is the Diocese of Southwark (the Diocese).
5. Parties to the request are the School, Surrey County Council (the local authority or LA), and the Diocese.
6. The proposed variations are that the published admission number (PAN) for the School be reduced from 60 to 30 for both 2026/27 entry and 2027/28 entry.

Jurisdiction and procedure

7. 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”.

8. The 2026 Arrangements were determined by the Admission Authority on 30 January 2024. The 2027 Arrangements were determined on 12 February 2026.

9. The Governing Body has provided me with confirmation that the appropriate bodies have been notified of the proposed variations in line with the Code. There has been extensive deliberation in the School as to what would be an optimal number of children to admit in 2026 and 2027, and the ideal future provision of the School. There has also been discussion of what the optimal primary school provision for Oxted might be by the end of the decade, and the timescale of consultation needed to establish that.

10. I find that the appropriate procedures were followed, and I am satisfied that the proposed variation is within my jurisdiction.

11. In considering the variation request I have had regard to all relevant legislation and the Code.

12. The information I have considered in reaching my decision includes:

- the referral for a variation to the 2026/27 Arrangements from the Governing Body dated 23 February 2026 and supporting documents, which was updated by the Governing Body on 25 June 2026 to include an identical request for PAN variation for the 2027/28 arrangements;
- the determined Arrangements for 2026 and 2027 entry and the proposed variations to those Arrangements;
- minutes of a Governing Body meeting on 28 October 2025 discussing the three-year strategic plan for the School;

- responses from the LA, the School and the Diocese 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 .gov.uk. (including the 'Get Information About Schools' (GIAS) and 'Financial Benchmarking and Insights Tool' (FBIT) websites, the LA and the School and Diocese for the School, and Ofsted;
- information I received during a meeting I convened on 11 June 2026 at the School. This was attended by the Headteacher, the Chair of the Governing Body, and representatives of the LA and Diocese. These were the Assistant Director, Southwark Diocesan Board of Education and the Service Manager for Education Place Planning at Surrey County Council;
- the Department for Education guidance, "Basic need allocations 2026-27: Explanatory note on methodology."

13. I would like to extend my thanks to the School, the LA and the Diocese for their responses to my requests for further information. Contributions at our meeting were especially useful.

14. I have been provided with a substantial amount of information / data by the LA, the School and the Diocese. I have referred only to that which has a bearing on my determination.

15. There is no formal consultation required for a variation and so parents and others do not have the opportunity to express their views. 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 views. It also allows for objections to the adjudicator. None of this is afforded by the variation process. It has been explained by all parties that going to consultation on arrangements was considered at some length by parties but not undertaken due to the particular geography and school organisation of the area. I judge that this was a reasonable decision.

16. I note here that the Arrangements for 2028 have not been determined. This means that if I agree to the request to vary the Arrangements for 2027 by reducing the PAN to 30 as proposed, that would have the effect of forming the 'baseline' for subsequent years.

Consideration of proposed variation

17. 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 certain other limited and specified circumstances. I judge that the proposed variation is justified by the circumstances. The progressive demographic change in the town has come to bear particularly and unhelpfully on the School, making reconsideration of its capacity necessary.

18. The Governing Body has requested that the PAN for admission to Reception at the school be reduced from 60 to 30 for both 2026 and 2027. This is to sustain the economic viability of the School at a time of progressively reducing applications for admission to the School and within the Oxted and Limpsfield admissions planning area.

The need for places in Reception classes in the Oxted and Lichfield planning area.

19. I shall consider firstly the current availability of places in Reception in Oxted and Limpsfield, and whether the School can legitimately assert there would be sufficient capacity in Reception classes in the area for children needing admission in either or both 2026/27 and 2027/28.

20. Oxted and Limpsfield is a community whose primary education needs are met by four schools, none of them foundation or community schools. Three of these schools admit children to Reception, these being St Mary's Church of England Primary School (St. Marys's), Hurst Green Infant School and Nursery (Hurst Green), and St Peter's Church of England Infant School (St. Peter's). St Mary's is a voluntary aided school whose governing body is the admission authority, admitting a PAN of 60 children to Reception each September. Hurst Green School is an infant school academy, and its admission authority is the Tandridge Learning Trust. St Peter's Infant School is a voluntary aided school, with its governing body as admissions authority, admitting children to Reception. That school is also voluntary aided with its governing body as admissions authority.

21. The School sits on the eastern edge of Oxted. There are no suitable alternative school places within two miles to the east in rural Kent. To the north is the M25, with few access paths through it, and few alternative school places beyond it.

22. Both the Diocese and the LA understand the request made by the School. In terms of provision of faith-based education, the Diocese has stated that even if the variation is agreed there would still be adequate provision in the area for parents seeking a school with a faith link to the Church of England. The Diocese has, however, generally discouraged the School from consulting on a reduction in PAN during the determination process.

23. The LA has no power to direct admission arrangements in any of these four schools, bar intervening if it perceives a failure to comply with or apply the Code.

24. The relationship between the need for places in Reception in the admissions planning area and places available is tight. According to the School there is a clear excess of available places compared to the currently determined PAN of 60 for 2026/27 and 2027/28, but that excess bears unevenly on the School, and its effects are unhelpful.

Table 1: Preferences expressed and places allocated in Oxted and Limpsfield, 2026/27.

School Name	1st Pref	1st Pref	1st Pref	2nd Pref	2nd Pref	2nd Pref	3rd Pref	3rd Pref	3rd Pref	Total Surrey Pref Offers	Total Offers for Surrey Schools 2026	PAN
	Surrey offers	Out of County offers	Total offers	Surrey offers	Out of County offers	Total offers	Surrey offers	Out of County offers	Total offers			
Hurst Green Infant School	28	0	28	1	0	1	0	0	0	29 +1	30*	30
Limpsfield C of E Infant School	22	0	22	7	2	9	2	0	2	31 +2	33	60
St Mary's C of E Primary School	60	0	60	0	0	0	0	0	0	60	60	60
St Peter's C of E Infant School, Oxted	25	1	26	2	0	2	1	0	1	28 +1	29	30
Oxted & Limpsfield total	135	1	136	10	2	12	3	0	3	148	152	180

This table indicates that in 2026/27 the three other schools have admitted close to or at their PAN. There were 135 offers made to families resident in Surrey which met that family's first preference. It indicates that second and third preference offers, out of county applicants and a centrally directed allocation to Hurst Green* brought the ultimate number of offers in the planning area above 150 to 152. The School took most of its second and third preference applicants from those who had applied to St. Mary's as first preference, but who had not been allocated a place at that school.

25. The table shows the level of preferences expressed and offers made, not the number of places now known to have been accepted. Initially 33 places were offered at the School. The number of places accepted for September 2026 Reception entry at the School has progressively increased from 27 to a current figure of 30.

26. The number of places now allocated in the area for September 2026 would be well below the current determined sum of the PANs of 180 but only just below the sum of the PANs of 150, were this proposal to be approved. It is clear that almost all of those allocated places come from within Oxted and Limpsfield.

27. The situation in 2026/27 comes following a period of rapid decline in need for Reception places.

Table 2: Number of children admitted each year, or for 2026/27, sum of places accepted to Reception in admission planning area schools, School figures.

	PAN	2022/2023	2023/2024	2024/2025	2025/2026	2026/27
St Peter's C of E Infant School	30	30	29	30	29	29
Hurst Green Infant School	30	30	30	30	29	30
St Mary's C of E Primary School	60	61	60	60	60	60
Limpsfield C of E Infant School	60	49	56	46	34	30
Places allocated compared to PAN of 180		170 (10 below PAN)	175 (5 below PAN)	166 (14 below PAN)	152 (28 below PAN)	149 (31 below PAN)

28. In the view of the Governing Body, this table shows a clear and significant trend of reduced need. The LA agrees.

29. In the referral, the Governing Body has also contended that the pattern of reduced demand is forecast by the LA to continue.

Table 3: expected need for Reception places in Oxted and Limpsfield, LA figures:

School Year	Year R places available if proposed variation is agreed	Forecast Year R demand
2026/27	150	142 predicted, 149 allocated
2027/28	150	146
2028/29	150	146
2029/30	150	148
2030/31	150	150

30. As an additional check, I have reviewed the pattern of allocation of Reception places in the other three schools in the last three years.

Table 4: The criteria of allocation and distance from school of the final allocated place in Reception classes, 2024, 2025, and 2026 entry, LA data.

School	2024/25	2025/6	2026/27
St Peter's C of E Infant	Criterion 8, distance, 2.1 miles	Criterion 8, distance, 3.9 miles	Criterion 8, distance, 4.5 miles
St Mary's C of E Infant*	Criterion 4, Siblings 1.8 miles	Criterion 4, Siblings, 7.2 miles	Criterion 8, distance, 1.6 miles
Hurst Green	Criterion 5, Distance, 1.7 miles	Criterion 5, Distance, 0.5 miles	Criterion 5, Distance, 0.9 miles

*Note that St. Mary's C of E school has admitted all children in its associated Church parish ahead of siblings (Criterion 3) in these years.

31. My judgement is that table 4 demonstrates a slightly reducing demand for places into these schools from children in the immediate locality. It has continued to be the case that applicants expressing a first preference for Hurst Green, St. Peter's, and the School are allocated places at their chosen school. St Mary's has always been over-subscribed on first preferences, but any trend in the scale of over-subscription has been only marginally downwards, with places in the School as a lower preference.

32. However, with a PAN reduced to 30, that "spare" capacity is completely eliminated at the School the start of the Reception year.

33. I have therefore considered to what degree space capacity for admission to Reception classes may be found in other neighbouring planning areas. I have found that there is very limited spare capacity in the admissions planning areas neighbouring Oxted and Littlefield. There are ten primary schools within five miles of the School, two of which are in Kent. All of these schools are effectively at capacity. It is not easy, therefore, to see the way re-allocation of children would be completed if capacity at the School is completely filled. I am minded of Department for Education guidance suggesting that a journey of two miles might be seen as a maximum distance of travel from home to school for infant children unless transport is provided.

34. In summary, therefore, the number of first preference applications in Oxted and Limpsfield is well below the collective determined PAN of 180. Thirty-three offers were made to applicants for places at the School in Reception for September 2026 start. The number of acceptances has risen from 27 at the start of the process of considering revision, to 30 places currently accepted.

35. I find that 150 school places, the sum of the PANs if the variation were to be agreed, would almost exactly align with current need, but with almost no flexibility or capacity for in-year admission to Reception classes in the admission planning area. There would be very little over-spill capacity nearby.

36. In the course of the consideration of the request, the admission authority came to a position of making a second variation request to also reduce the PAN to 30 for 2027/28, mindful that there was no data indicating a return to higher levels of demand for places at the School. The level of demand is predicted to be unhelpfully static in the rest of the decade at or just below 150 places.

37. Should the variation be agreed, the number of available places in the four relevant schools in the admission planning area projected for 2026 entry to Reception will be only one. This is a significant detriment to families being able to move into the community and secure a place in a Reception class in-year.

38. I further note the Department for Education document, "Basic need allocations 2026-27: Explanatory note on methodology", which 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". The data above suggests that if the variations are approved there may not be the surplus capacity needed in the area to make allocation of places appropriate and manageable in 2026/27 and 2027/28.

39. There is therefore a fine balance in the admission planning area between availability of places in Reception classes and demand. If I agree the variations, there would be 150 school places and this only barely meets required need. There would be below the normally accepted level of spare capacity. It is possible to view the representations of the School regarding an overall lack of need in the admission planning area as narrowly true; but also to view the margin as too small for parental preferences to be adequately met.

Impact of the referral for variation on outcomes for the School.

40. I have also had to consider the impact of decreasing admission numbers on the School's finances. The consequence of not agreeing to the variation is potentially greater than constrained choice for in-year admission. Insufficient demand may lead the School to cease to be a going concern in its current form as an infant school. This would have serious consequences for the School and local community.

41. In 2025 the School admitted only 34 children to Reception. The School is subject in all classes to The School Admissions (Infant Class Sizes) (England) Regulations 2012 (the Infant Class Size Regulations). These require that infant classes (those where the majority of children will reach the age of five, six or seven during the school year) must not contain more than 30 pupils with a single qualified school teacher except in specific exceptional circumstances. The Infant Class Size Regulations apply to reception year, year 1 and year 2, which is the entirety of the School. These forced the School to set up a school organisation which was manifestly inefficient. It has two more years to manage that inefficient cohort size.

42. If the request were to be granted and the PAN is set to 30 for 2026/2027 entry, there would be an exact match in the School between the number of Reception places available, and the current demand for those places as measured by the number of offers currently accepted. This would be highly efficient, but create vulnerability in 2026/27 should an additional child need in year admission.

43. If the PAN for the School remains at 60, the School would be required to admit a 31st child should one apply in 2026/27. Infant Class Size Regulations would require either the provision of a second Reception class, or the provision of a second qualified teacher to co-teach a single class with 31 or more students. In my view, it is not appropriate to consider the emergence of a 31st child as so exceptional that it could be allowed within Infant Class Size Regulations and in paragraph 2.16 of the Code regulation.

44. I have considered the impact of decreasing admission numbers on School finances balanced against the impact reducing the School's PAN will have on meeting parental preference. Parents have a right to express a preference as to where their children go to school. However, admission authorities cannot give any guarantee that preferences will be met. Additionally, infant class sizes are limited to 30 (as set out in). The cost of a teacher and the resources necessary for an infant class, when compared to, say, a junior or secondary school teacher / class (where numbers are not limited), has to be borne by proportionately smaller income from the children admitted to infant classes. The 180 places for 2026 are excessive, especially where one infant school shoulders almost all the burden of unused capacity. However, 150 places would only barely meet required need. There would be below the normally accepted level of spare capacity.

45. I have tried to ensure that I have considered the competing needs of providing the school places that parents want for their children and the financial viability of the School in terms of pupil/teacher ratio.

46. A further factor is that a reduction in the PAN of the School to 30 would leave a substantial proportion of the buildings not utilised by 2028. This makes possible a re-organisation of the School towards the end of the decade as a primary school educating children of age three to eleven years old, as the School is considering; or a facility with linked nursery provision. Agreement would also affirm that stakeholders did try to explore the process of consulting on a new PAN as detailed in the Code, through consultation, but were ultimately overtaken by the pace of change and nature of local circumstances. They also considered and applied other mechanisms to try to promote application, sadly to insufficient effect.

47. I have also considered the partnership arrangement of the School with St. Marys School, with a single Executive Head leading both schools and a common Diocesan link, may make pursuing a new model for the town viable. I note also the positive view of reformative change taken by the Governing Body of the School, and the LA and the Diocese.

48. At the same time, the evidence presented regarding School re-organisation and finance is detailed and concerning. The reduction in demand for places in Reception classes has been rapid and may not change in this decade. An infant school with children only in three year groups has minimal flexibility to respond.

49. Should the number of children in Reception remain at 30, the School has provided the following information on the consequences of agreeing or declining to agree the requested variations. Should the number of children admitted remain at 30 or below, the School organisation would progress as follows:

50. Table 5: School organisation, in 2025/26 and predicted onwards, by the School

2025/26	Reception	Year 1	Year 2	Total
	17	22	26	-
	17	23	28	-
	34	45	54	133

2026/27	Reception	Year 1	Year 2	Total
	30 accepted places	17	22	-
	0	17	23	-
	30	34	45	109

2027/28	Reception	Year 1	Year 2	Total
	30	30	34*	
	0	0	0	
	30	30	34	94

*this would be a large class with a second qualified teacher for one year only

51. The School has stated that this structure would avoid mixed aged teaching groups.

Mixed aged teaching is seen by the School as problematic. They have raised issues of:

- “Different learning levels: Younger and older students may be at very different academic stages, making it harder for teachers to pitch lessons appropriately.
- Curriculum challenges: Teachers often need to plan for multiple year groups at once, which can increase workload and reduce time for individual support.
- Assessment difficulties: Comparing student progress can be more complex when students are working on different expectations and curricula. Especially so with EYFS following a distinct curriculum.
- Resource demands: Effective mixed-age teaching often requires specialized training and carefully designed materials.
- Parental preferences: Many parents are against mixed age teaching and so this may have a detrimental impact on the attractiveness of Limpsfield as a school.
- Long term options are as yet unknown, however as Limpsfield is considering becoming a through 1 form entry primary, mixed classes would not benefit this transition.”

52. Moreover in terms of finance, if the School continues to have to operate two classes in Reception, with a number of children in the low thirties continuing up through the School, the finances of the School deteriorate rapidly due to consecutive in-year deficits.

Table 6: impact of not agreeing both variations on School budget, School figures

	Balance
End of Year 2025-26	£113,348
End of Year 2026-27	£78,015
End of Year 2027-28	£42,142
End of Year 2028-29	£-31,425

53. While these sums appear small, in the context of an infant school they are not sustainable in the long term.

54. In my judgement, the school has made a viable and persuasive case why its admission numbers into Reception should be at thirty or below to make the school viable and cost effective. The revisions requested would achieve this. However, this has to be balanced with meeting of local need. I sought to clarify issues further at the meeting I called of stakeholders on 11 June 2026.

55. No minutes of the meeting were taken, but an informal set of notes taken by a clerk recorded:

“The Executive Headteacher advised that the situation has changed slightly as the numbers for September are now known. The group (School, LA, and Diocese) has become more coordinated and the disconnect between all parties has been recognised. The LA, Diocese and school met last week and have come to more of an agreement to get the best of both worlds which will allow the school to manage financially and to accommodate the LA responsibility to supply places. Twenty-seven pupils (at the point of the meeting) have accepted places for September 26. The LA representative noted the disconnect between the LA requirement on offer day to fulfil their statutory duty and the reality of pupil numbers in September. On offer day, the LA needed thirty places, but there are now no outstanding applications in this area for the year group, and the reality is that below thirty places were needed.

The LA representative noted that these are the first couple of years where numbers have dropped significantly, there is no trend so far. In the past, numbers have been in the 50s – only a recent change. Last year they reached thirty-three / four which is over thirty but nowhere near the PAN of sixty. She added that some alternative options had been discussed at the meeting last At no point in the meeting did the LA representative express opposition to the School plan to extend the request by asking that it also apply to 2027/28. The LA representative did not share details of how the declining local demand might otherwise be dealt with. In my judgement, the LA position was one of lukewarm support for the variation.”

56. The LA stated that its prediction difficulties are increased by a number of factors. The LA representative stated they included:

- Projecting demand from children yet to be born.
- A mixed local model of schooling of infant, all through primary, and junior complicating allocation and movement.
- Predicting the impact of new housing on the need for Reception places.
- The slow tempo for full consultation on future arrangements required in the Code to take effect.
- Impossibility of creating a bulge class for two or three children.
- Inability to predict which children might forego an offered place to enter fee-paying school

57. The balance of competing arguments is tight. However, the determining factor in judgement must be ensuring adequacy of supply of school places in the area. While the status of Department for Education documents as guidance allows some consideration of local circumstance and context, I judge that to agree either variation would eliminate excess capacity essential to adequately meeting parental preferences in the area. The margin of excess places is too small, and there is evidence that predictions do not hold adequate certainty

58. My overall judgement is that even with reducing demand for Reception places, there would be no excess capacity at the School if the referral for 2026/7 is agreed. There would be only one surplus place in the sum of the PANs of the admissions planning area, and little capacity beyond that.

59. For 2027/28, the predicted need for the admissions planning area is still only four places below the requested PAN. In 2026, the prediction fell short of required need, with 149 places required instead of the LA predicted 142. The LA has been candid about its difficulty in making secure predictions. I therefore cannot feel satisfied that there will be adequate places in the School in 2027/28 with a PAN of 30.

60. I cannot therefore approve the requests for variation for 2026/27 or 2027/28. Regrettably, parties will need to explore alternative pathways to effectively balance needs. This might, in due course, include a new referral for a variation should the local context and data support such a move.

Determination

In accordance with section 88E of the School Standards and Framework Act 1998, I do not approve the proposed variations to the admission arrangements determined by Limpsfield Church of England Infant School, for 2026/27 and 2027/28.

Dated: 21 July 2026

Signed:

Schools Adjudicator: Patrick Storrie