

For the Attention of:

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Trustees, Coastal Learning Partnership:

- Mr. Martin Copsey, Chairman of the Board of Trustees
- Mr. Les Lane, Vice-Chair
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Regarding the Coastal Learning Partnership's "Consultation on a proposal to secure a high-quality primary education experience for the children of Langton Matravers, Herston, Swanage and surrounding villages for years to come."

Thank you for your letter of 2nd June, 2026 and the Consultation Information Summary provided on the same date.

St. George's Primary and Pre-School ("St. George's") sits within the parish of Langton Matravers, and Langton Matravers Parish Council ("LMPC") is the relevant local government body which represents the interests of this community. LMPC meets on the second Thursday of each month and therefore has taken the opportunity to discuss this consultation at the meeting held on 11th June, 2026. This meeting was addressed in public session by a large number of grand-parents, parents past and present of pupils at St. George's School as well as concerned residents. With the benefit of these statements

and the ensuing discussion, Council resolved to send this Open Letter to you as CEO of the Coastal Learning Partnership ("CLP").

LMPC welcomes the stated ambition of the consultation *"to ensure that our children in Langton Matravers, Herston, Swanage (and surrounding areas) continue to have access to a local primary school which can always provide a high quality, rich educational experience"* and welcomes the opportunity to participate in any meaningful consultation.

However, LMPC is extremely concerned with respect to several aspects of the consultation, how the consultation is being managed and calls on the CLP to correct and or clarify these aspects before proceeding any further with the consultation. LMPC considers that unless the CLP takes these necessary steps, the result will be a deeply flawed process which is already having a severely negative impact on St. George's and damaging the reputation of the CLP.

LMPC notes that CLP is attempting to remedy the failings of the original consultation document through the issuance of "Frequently Asked Questions (FAQ)" statements which are in reality correction and clarification statements which have been circulated selectively to parents and carers and are eventually available on the CLP website. While these clarifications are helpful, LMPC notes that in the 9 days after the consultation was announced there have been no less than three such attempts to correct or fill the information gaps in the Consultation Document itself. Information critical to the consultation is now spread across five documents from CLP as well as various Government Sources, not all of which has been shared by the CLP on a timely basis. LMPC is firmly of the view that it is preferable to have all the information in one place and on a consistent basis – as is generally the case with consultations – rather than drip feed information to different recipients in response to miscellaneous questions.

In this the CLP fails to observe two of the four Gunning Principles (provide enough reasons and information for consultees to provide an "intelligent consideration" and response & provide sufficient time for consultees to properly consider the proposals and formulate their responses). If the information is now considered relevant to the consultation it should have appeared in a single consultation document at the outset. If it is relevant then it should not just be made available if someone cares to ask, and then only part way through the designated consultation period and on a selective basis.

This mismanagement of the consultation process is sufficient to support a case for restarting the entire process when CLP has adequately prepared itself to embark on a consultation. However, LMPC has also identified several areas of concern with respect to the approach taken by CLP which should also be remedied in any new or re-launched consultation.

Issues of Concern:

St. Marks is very undersubscribed, but the consultation does not discuss the reasons

Of particular concern to LMPC is that the consultation reveals a very evident but unexplained underperformance of St. Mark's Church of England Primary School, in terms of academic measures and expected pupil numbers. Without allowing consultees to have the benefit of CLP's informed views on the reasons for and the strategic plans the CLP has developed to address this underperformance it is impossible for any consultees to understand the implications of the proposed amalgamation with St. George's.

The consultation document cites national birth-rate trends and national trends as a possible cause for undersubscription at St. Mark's, but the undersubscription level is far in excess of the implied levels if only this factor was at play. Moreover, this undersubscription only becomes more pronounced over the forecast period when a stand-alone St. Mark's is projected to have pupils at ~20% of its capacity of 210 pupils.

LMPC notes that the information lacuna with respect to St. Mark's undersubscription has already fuelled suspicions that a comparatively successful school (St. George's) is being sacrificed to save a school in the same MAT which suffers from "attractiveness" issues which are projected to become much more serious over the ensuing decade. In absence of any discussion of the reasons for St. Mark's underperformance, or presentation of a plan to address same, LMPC has some sympathy with these suspicions.

Furthermore, should the proposed amalgamation not be sufficient in itself to address whatever issues are causing the underperformance at St Marks, the proposed amalgamation risks jeopardising the future of both schools. It appears from the consultation documentation that this risk has not been considered at all, when it should feature prominently. This is a serious omission which compromises the integrity of the consultation.

Capacity numbers at St. George's are critical to the Consultation's Conclusions but Confused

LMPC also has issues with the data used to analyse the options. For example, St. Mark's capacity is identified throughout CLP and Government statistical documentation at 210 pupils, with 120 pupils at present and a forecast September, 2026 intake of 77 pupils. In contrast, St. George's has a stated capacity in Government statistical documentation of 120 pupils¹, a planned capacity of 127 statutory school age places in the age range 4-11 plus 20 nursery places in the supplemental funding agreement entered into between the

¹ This appears to mistakenly reflect Paragraph 2B of Schedule 1 of the unamended St. George's SFA (see below)

DfE and CLP with respect to St. George's² yet is implied to be approximately 110 pupils in the analysis presented by the CLP in the consultation documentation.

The discrepancy is important since CLP makes the twin argument that (a) a merger must take place before September, 2027 (when the two schools are projected to have a combined 141 pupils) and (b) that St. George's cannot accommodate the projected pupil population of both schools until 2031. Depending on the pupil capacity number at St. George's the correct answer to that date could be September, 2028, September 2029, or September 2031 as the CLP states without supporting references. It is also well known that the rebuilding of St. George's completed in 2014 was carried out in such a manner as to easily facilitate physical expansion on the first floor, providing scope for additional capacity which is not taken into account anywhere in the consultation documentation.

Neither the consultation document, nor the three subsequent clarification documents references a definitive source for the pupil capacity number at St. George's. However, simply based on the capacity number agreed with the DfE less than 2 years ago it appears that the CLP errs in underestimating the capacity of the St. George's site, and misrepresents the case for siting a proposed merged school on the St. Marks site (preferred Option B1) on the grounds of capacity constraint at the St. George's site. This appears to be such a serious flaw that the consultation should be suspended.

Financial data is inadequate, inconsistent and do not allow comparisons

The consultation document provides various Operational Deficit figures (e.g. -£500,000 per year equating to -£3,000,000 (*sic*) over ten years if no further action is taken; -£150,000 per year for Option A (which absent further detailed explanation seems to be nearly identical to the status quo); -£130,000 for Option C; "a further-£200,000" for B2) without any attempt to reconcile them in a way that shows how they relate to each other.

It should be noted that subsequent the clarification statements have provided more detailed financial information, which partially address some of the financial issues but certainly not entirely. These begin to explain some points of confusion and in particular correct the misleading claim that "*Each year, the schools would add around -£500,000 to the deficit*" so it should now be read as "*the schools would add £500,000 in year ten based on the CLP forecasts.*". Those consultees who have kept abreast of the regular correction and clarification statements issued by the CLP will be aware of this change, but others will not be which again points to a severe flaw in the process.

Moreover, it is unclear which figures are specific to the two schools separately or together and whether or not they include wider trust level impacts. There is no side by side 5–10 year projection for each option using an identifiable set of stated assumptions or inputs. The second clarification statement contains a table of annual operating deficits for each

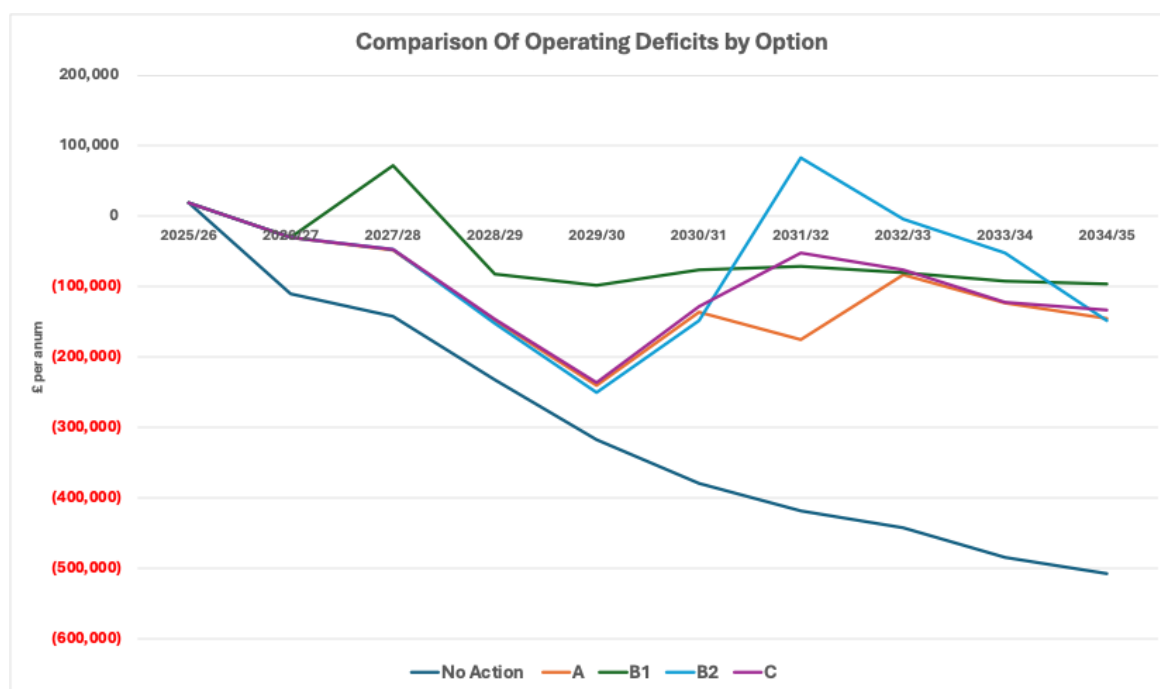
² Paragraph 2B of Schedule 2 of the St. George's SFA dated 28th August, 2024, reflecting the amended SFA. Note that the deed states "*The Secretary of State and the Company agree that with effect from the date of this Deed, the Existing SFA shall be amended and re-stated in the form of the Amended SFA set out in Schedule 2 (the "Amended SFA")*"

option for each school year out to 2024/35, but there is no attempt to disclose what the main drivers are behind each of these annual operating deficits.

Without such analysis, it is impossible for parents, staff and the wider community to understand the real financial trade offs between A, B1, B2 and C or to understand CLP's operational motivation in promoting Option B1.

LMPC finds this very concerning since Option B2 (amalgamating both schools on the St. George's site) is rejected by CLP not only on capacity grounds (see above) but because too much investment is required although no figures are provided for the level of investment. The consultation document then states that the costs of keeping both schools operational until 2031 is £200,000 of “accumulating deficits” but there is no indication as to how this number is derived and it does not reconcile to the figures disclosed in the second clarification statement.

In fact, the Operating Deficits disclosed in the second clarification statement distributed on 9th June, show very odd, unexplained and against trend positive movements for B1 in 2027/28 (+£72,400) and for B2 in 2031/32 (+£82,994) and a surprising degree of volatility for both these options which beg a more detailed explanation (perhaps this is



what is referred to in the third clarification statement distributed on 11th June when it states “*timing delay as one element of each school’s funding income (the ‘primary lump sum’) falls away gradually over a three-year period but cost reductions associated with being on one site are felt immediately*”.)

Option C is rejected since the CLP “*would still have to bear the costs of running two separate sites... with an annual operating deficit of around -£130,000*” but the 10 year average Operating deficit disclosed in the second clarification statement is £95,500. There is insufficient detail on Option C or how consultees might evaluate something similar to Option C (e.g. different grade levels at different sites). Nor is it clear why CLP

insists that “*an education based partner*” is required for Option C, and none can be found.

LMPC finds it odd that the consultation provides a specific if unsupported operational deficit for B2 but with respect to the preferred B1 it provides no comparable figure, simply stating “*the school will be more financially stable. It may still experience operational deficits, but these will be considerably more manageable within the trust overall.*” Later it is said that under the B1 Option “*The school would be financially viable with any ongoing deficit within acceptable limits*”. LMPC and all consultees are left to guess what that “*acceptable limit*” might be. However, it appears to be biased, inconsistent and is certainly unclear why the CLP feels that maintaining a larger more complex site has financial benefits over merger onto the smaller site..

LMPC also finds it odd that Option B2 is rejected in the main for financial reasons but also the highly inconsistent rationale that “*A bigger concern is that St. George's could not provide opportunity for future expansion.*” This seems a bizarre statement to make in a document which is only being produced to outline practical solutions to the opposite problem, and yet apparently a rising school population is a “*bigger concern*”.

Summary

LMPC finds a great deal which is inadequate in the current consultation both in terms of how it has been conducted to date and in the information provided. Regrettably it seems this process has been launched without the necessary rigour in preparation or oversight in conduct leading to flaws, errors and misrepresentations which the CLP is struggling to address with new communications every other day.

LMPC urges the CLP take a step back, work through the analysis more carefully and present it in a single coherent consultation document which addresses all the issues thoroughly. Ideally such a document observes the Gunning Principles closely and provides enough information in one place for all consultees to make an informed judgement on the best outcome and one which is in line with your stated objectives.

In addition, and reflecting the concerns voiced by parents and residents at the LMPC meeting of 11th June, we urge the CLP to take every step to ensure that parents and other consultees are convinced that any consultation is genuine and that the preferred option has not already been settled on. In particular, more complete disclosure of financial case developed for each option would go a long way to dispelling the prevalent suspicions that a third Gunning Principle (that the consultation is genuinely at a formative stage and that the decision has not yet been determined) is not being infringed in this case.

Yours Sincerely –

On behalf of Langton Matravers Parish Council