

## COPY OF DEVELOPMENT PROPOSAL SUBMISSION

### Cover Note

<b>DP No.</b>	DPs 710-712	
<b>School</b>	Ballytrea Primary School and Stewartstown Primary School	
	<p><b><u>DP 710</u></b>  <i>Establish a new controlled primary school in the Stewartstown area (being in effect an amalgamation of Ballytrea Primary School and Stewartstown Primary School) with effect from 1 September 2025, or as soon as possible thereafter. The school will have an admission number of 20 and an enrolment number of 140.</i></p> <p><b><u>DP 711</u></b>            Ballytrea Primary School will discontinue with effect from 31 August 2025, or as soon as possible thereafter (predicated upon the approval of Development Proposal Nos 710 and 712).</p> <p><b><u>DP 712</u></b>            Stewartstown Primary School will discontinue with effect from 31 August 2025, or as soon as possible thereafter (predicated upon the approval of Development Proposal Nos 710 and 711).</p>	
<b>Minister's Decision</b>	Approved	
<b>Date of Decision</b>	6 January 2025	
<b>Minister's Comments</b>	Content	
<b>Additional notes</b>		
<b>Information redacted</b>	Some information and personal data may have been removed in line with the principles of the Freedom of Information and Data Protection Act.	
	<b>Key</b>	<b>Details</b>
	■	redaction
	*	refers to less than five cases where data is considered sensitive
	#	means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure

From: ELAINE ARMSTRONG  
Area Planning Policy Team (South-West Region)

(Cleared by Eamonn Broderick– 29 July 2024)  
(Cleared by Suzanne Kingon – 29 July 2024)

Date: 29 July 2024

To: PAUL GIVAN MLA  
Minister of Education

Copy distribution below

**DEVELOPMENT PROPOSALS (DPs) 710-712 – AMALGAMATION OF BALLYTREA PRIMARY SCHOOL (PS) AND STEWARTSTOWN PRIMARY SCHOOL AND ESTABLISHMENT OF A NEW CONTROLLED PRIMARY SCHOOL IN THE STEWARTSTOWN AREA**

Issue: To decide on the following (linked) Development Proposals (DPs):

**DP 710**

*Establish a new controlled primary school in the Stewartstown area (being in effect an amalgamation of Ballytrea Primary School and Stewartstown Primary School) with effect from 1 September 2025, or as soon as possible thereafter. The school will have an admission number of 20 and an enrolment number of 140.*

(This proposal should be read in conjunction with Development Proposal Nos 711 and 712.)

**DP 711**

**Ballytrea Primary School will discontinue with effect from 31 August 2025, or as soon as possible thereafter (predicated upon the approval of Development Proposal Nos 710 and 712).**

(This proposal should be read in conjunction with Development Proposal Nos 710 and 712.)

**DP 712**

**Stewartstown Primary School will discontinue with effect from 31 August 2025, or as soon as possible thereafter (predicated upon the approval of Development Proposal Nos 710 and 711).**

(This proposal should be read in conjunction with Development Proposal Nos 710 and 711.)

**Timescale:**

**Routine**

**Financial /  
Resource  
Implications:**

**Resource:**

**Capital** – The EA will seek capital investment for refurbishment/extension minor works for the amalgamated primary school. A feasibility study will be conducted to determine the most suitable site and associated costs.

**Staffing** - Teaching and non-teaching staff are afforded employment protection under their respective School Re-organisation Agreements and are eligible for redeployment under transfer redundancy procedures. Staff unsuccessful in gaining redeployment or employment will be treated as supernumerary and a Centre cost.

Day One costs for Principal (Designate) will be required for the new amalgamated primary school.

**Transport** – Any transport arrangements will be in accordance with transport policy.

**Finance** - A deficit held by a school will be met by Education Authority (EA) Centre funds.

As of 31 March 2024, Ballytrea Primary School held a provisional deficit of **£167,445**.

As of 31 March 2024, Stewartstown Primary School held a provisional deficit of **£23,461**.

**FOI Implications:**

The content of this submission is likely to be fully disclosable.

**Statutory Duty  
Implications:**

The Rural Needs Act (NI) 2016

Article 44 of the Education and Libraries (NI) Order 1986

Shared Education Act (NI) 2016

Section 75 of the Northern Ireland Act 1998

**Presentational  
Issues:**

It is likely that there will be local media, political and stakeholder interest in your decision. In the event of any queries arising, Press Office can refer to this submission and liaise with officials. (Cleared with the Press Office.)

**Recommendation:**

It is recommended that you:

- (i) Approve DP 710 to:

***Establish a new controlled primary school in the Stewartstown area (being in effect an amalgamation of Ballytrea Primary School and Stewartstown Primary School) with effect from 1 September 2025, or as soon as possible thereafter. The school will have an admission number of 20 and an enrolment number of 140.***

- (ii) Approve DP 711:

**Ballytrea Primary School will discontinue with effect from 31 August 2025, or as soon as possible thereafter (predicated upon the approval of Development Proposal Nos 710 and 712).**

- (iii) Approve DP 712:

**Stewartstown Primary School will discontinue with effect from 31 August 2025, or as soon as possible thereafter (predicated upon the approval of Development Proposal Nos 710 and 711).**

- (iv) Agree that in informing the EA of your decision on the proposals, that officials request a longitudinal evaluation of this amalgamation.

- (v) Agree that this submission (with appropriate redactions) can be published on the Department's website once the EA and the schools have been informed of your decisions.

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### **Appendices (attached separately)**

#### **Appendix A: Copy of Published Development Proposals (DPs) :-**

- (i) DP 710**
- (ii) DP 711**
- (iii) DP 712**

#### **Appendix B: Case for Change - DPs 710-712**

#### **Appendix C: Statutory Two-Month Objection Period**

- Summary of Objections received during the Statutory Objection Period for DPs 710-712
- Bespoke Responses
- Response from Controlled Schools Support Council

#### **Appendix D: Sustainability Assessment – Ballytrea PS**

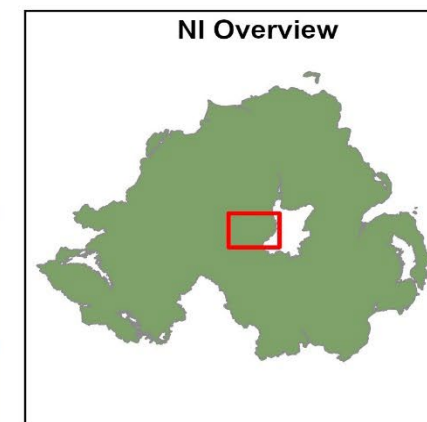
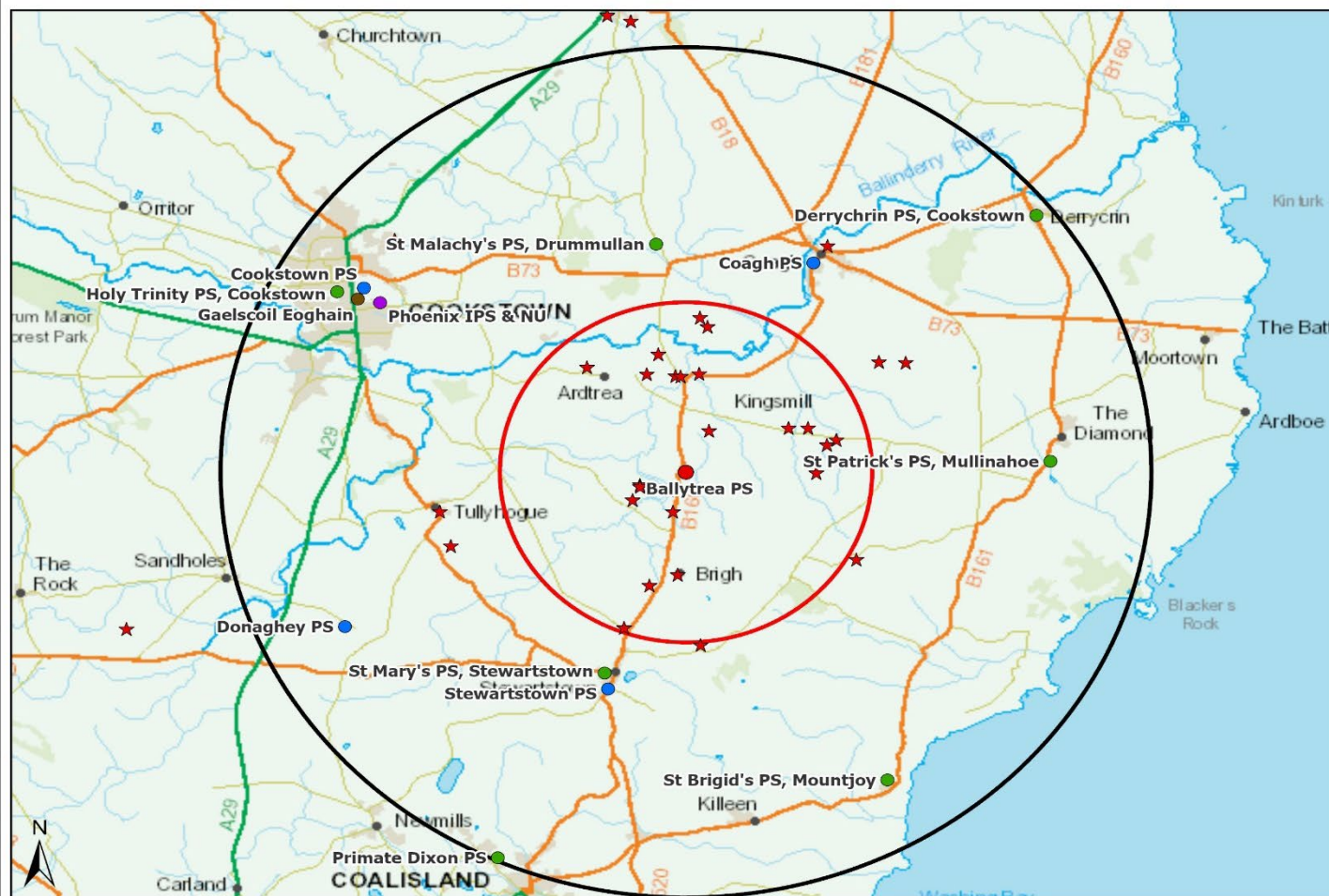
#### **Appendix E: Sustainability Assessment – Stewartstown PS**

**Appendix F: Copy of Equality and Human Rights Screening Template – DPs 710-712**

**Appendix G: ETI Commentary Paper – DPs 710-712**

**Appendix H: Department of Education (Policy Team) Comments – DPs 710-712**

# Ballytrea Primary School - Neighbouring Primary Primary Provision - 5 Miles Radius



- Ballytrea Primary School, Stewartstown
- ★ Ballytrea Primary School Pupils
- Catholic Maintained
- Controlled
- GMI
- Other Maintained
- 2 Mile Buffer Around Ballytrea PS
- 5 Mile Buffer Around Ballytrea PS

**Supporting Information**  
 Base mapping was derived from OSNI Fusion. Data used : NISRA/DENI School Census Datasets 23/24  
 Note: There is 1 pupil from Ballytrea Primary School are found outside the map extent.

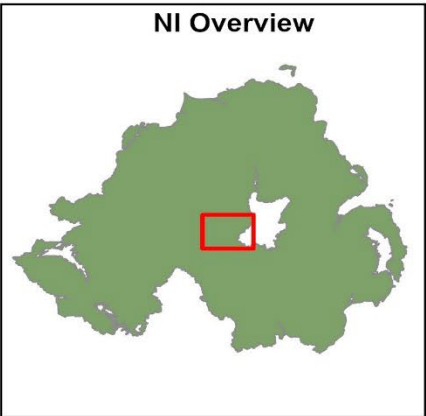
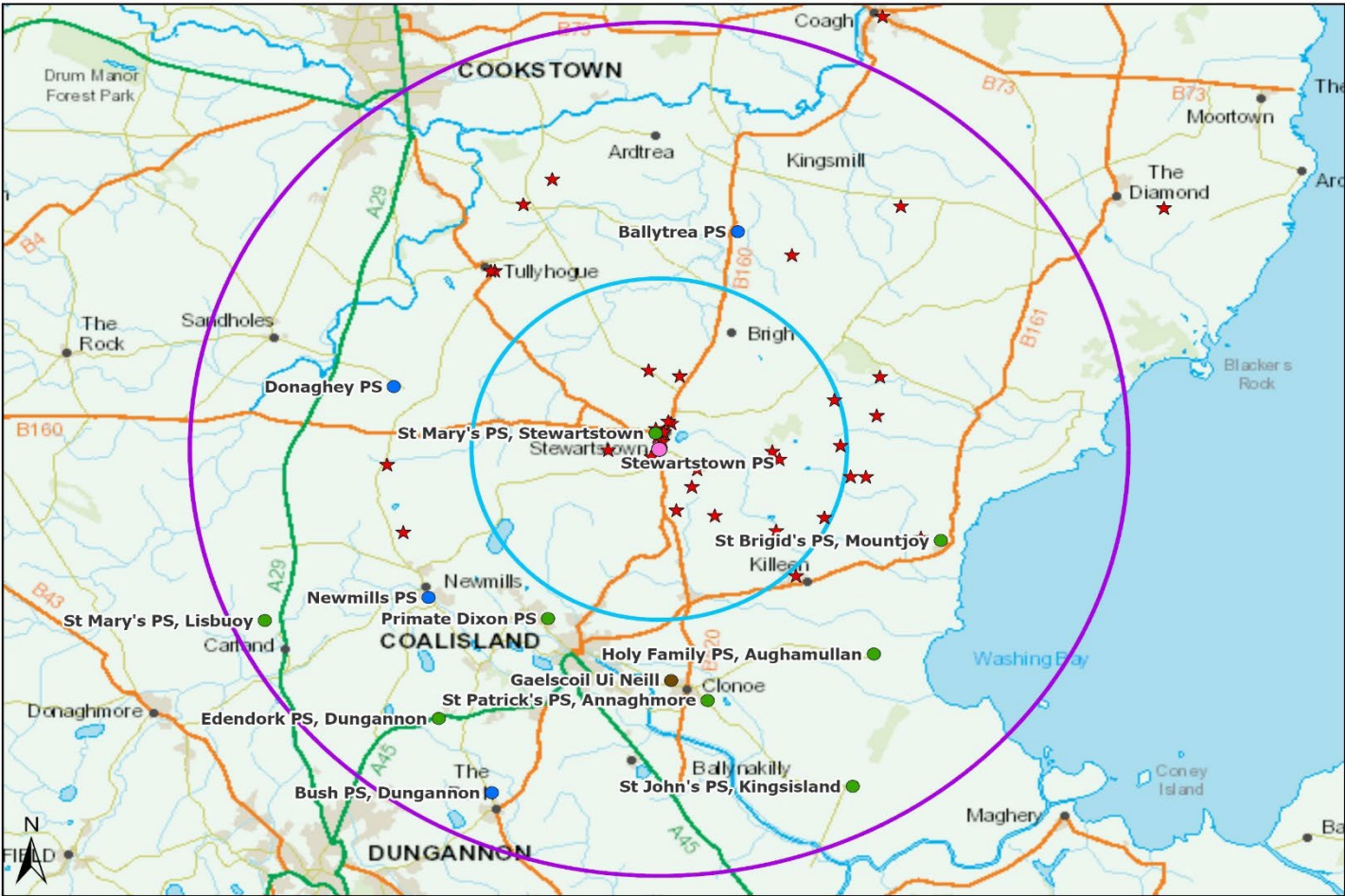


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# Stewartstown Primary School - Neighbouring Primary Primary Provision - 5 Miles Radius



- Stewartstown Primary School
- ★ Stewartstown Primary School Pupils
- Catholic Maintained
- Controlled
- Other Maintained
- 2 Mile Buffer Around Stewartstown PS
- 5 Mile Buffer Around Stewartstown PS

**Supporting Information**

Base mapping was derived from OSNI Fusion. Data used : NISRA/DENI School Census Datasets 23/24  
 Note: There is 1 pupil from Stewartstown Primary School are found outside the map extent.

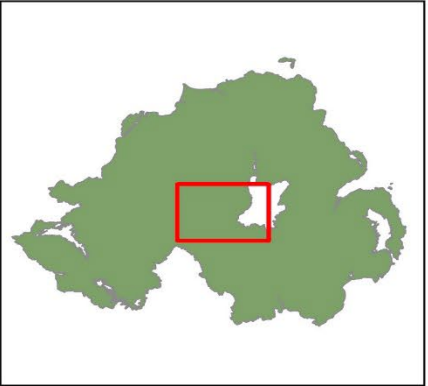
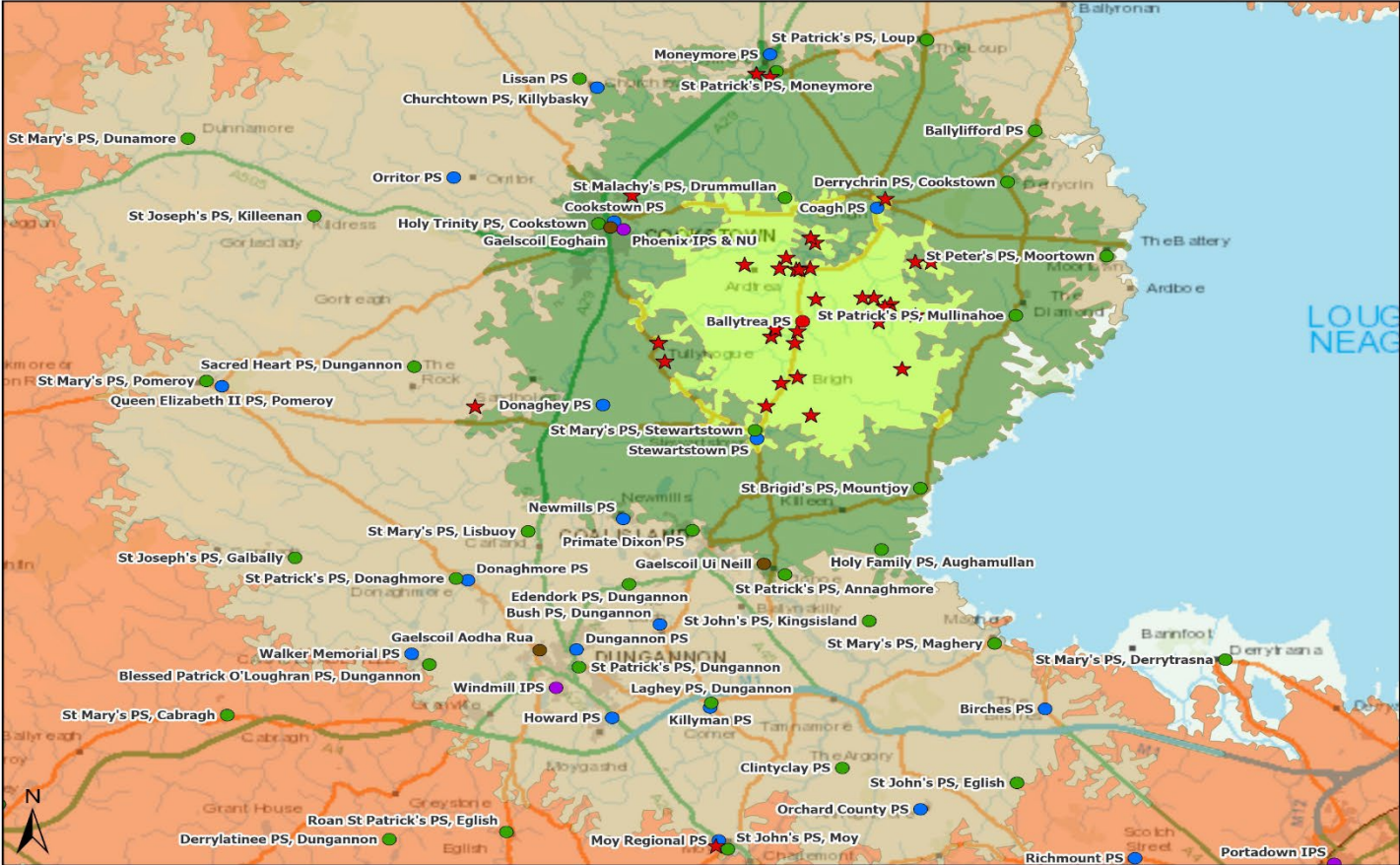


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### Ballytrea PS and pupil locations - up to 30 minutes drive time



- Ballytrea PS
  - ★ Ballytrea PS pupils
  - Catholic Maintained
  - Controlled
  - GMI
  - Other Maintained
- Up to 30 minutes drive time
- 0-5 minutes
  - 5-10 minutes
  - 10-20 minutes
  - 20-30 minutes

**Supporting Information**



The dataset used in this analysis has been derived from OSNI Fusion. Drive times are approximations estimated using Road Classification and settlement limits and do not use actual speed limits. Local variations regarding Speed Limits can exist within the terms of the Road Traffic (Speed Limits) Bill 2015

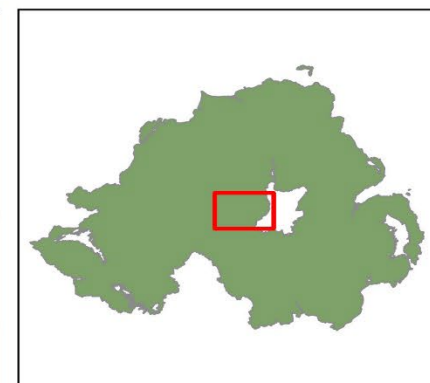
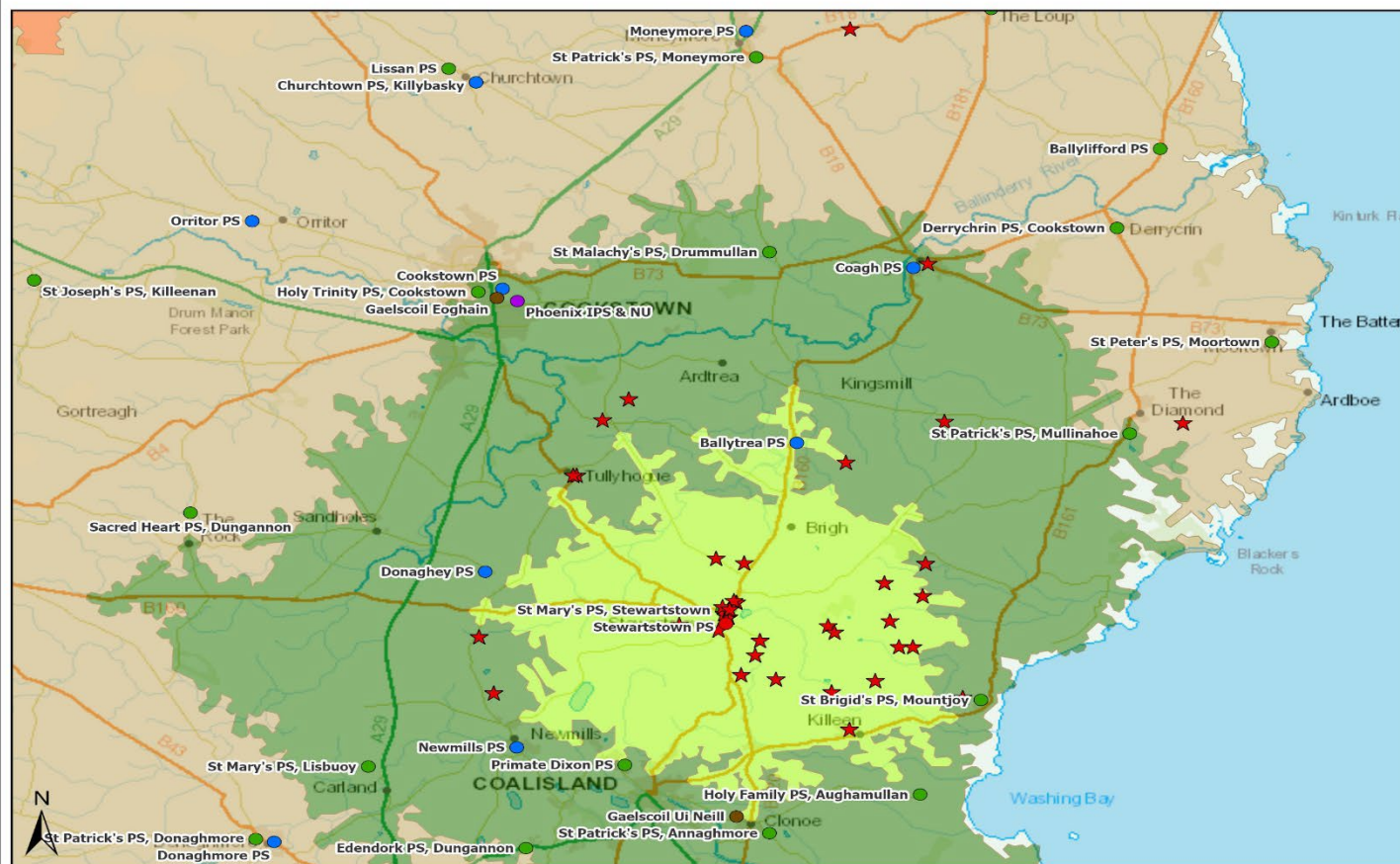
Base mapping also derived from OSNI Fusion.  
School & pupil data : NISRA/DENI School Census Datasets 23/24

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## Stewartstown PS and pupil locations - up to 30 minutes drive time



- Stewartstown\_PS
  - ★ Stewartstown PS pupils
  - Catholic Maintained
  - Controlled
  - GMI
  - Other Maintained
- Up to 30 minutes drive time
- 0-5 minutes
  - 5-10 minutes
  - 10-20 minutes
  - 20-30 minutes

### Supporting Information



The dataset used in this analysis has been derived from OSNI Fusion. Drive times are approximations estimated using Road Classification and settlement limits and do not use actual speed limits. Local variations regarding Speed Limits can exist within the terms of the Road Traffic (Speed Limits) Bill 2015

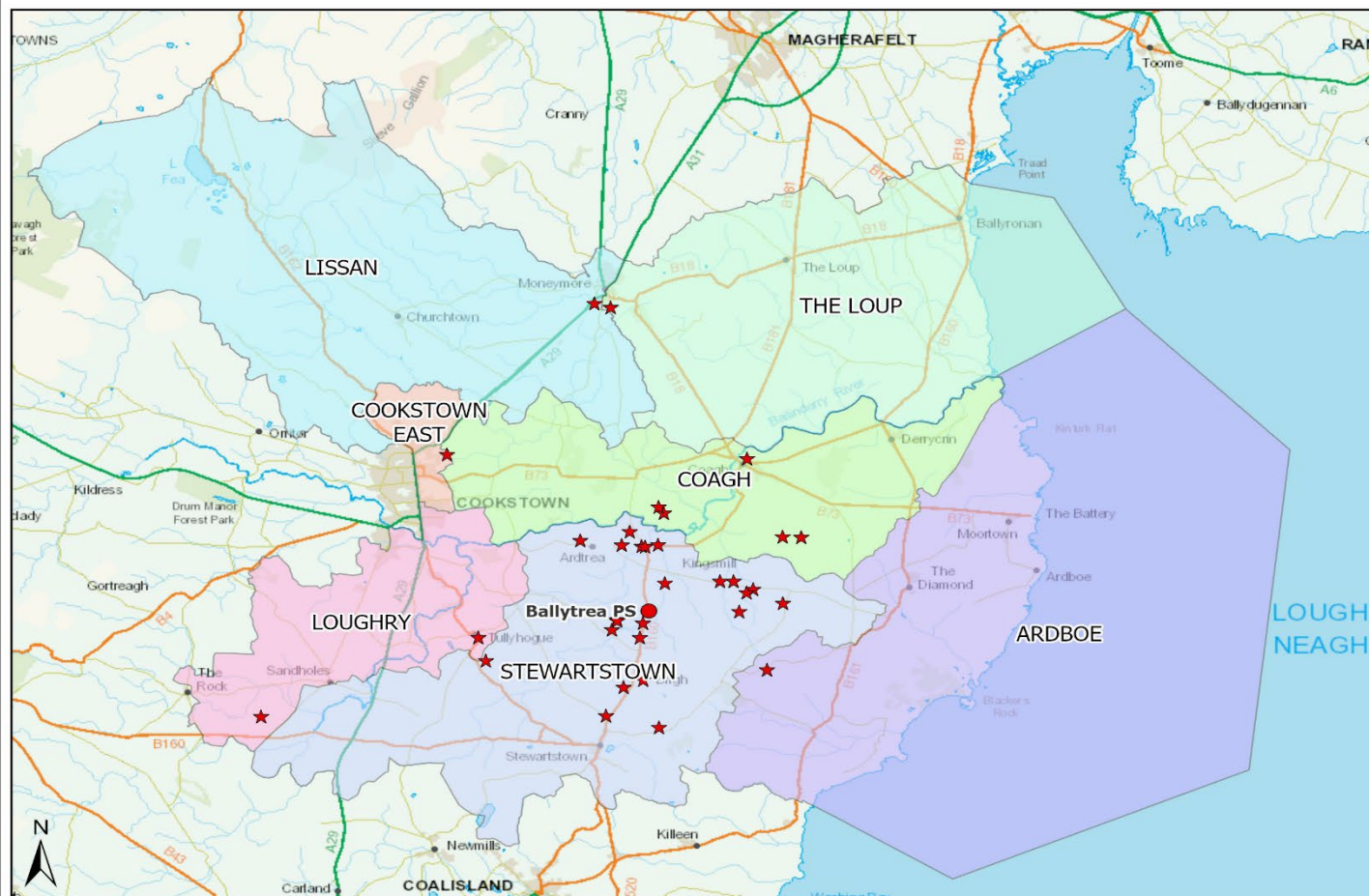
Base mapping also derived from OSNI Fusion.  
School & pupil data : NISRA/DENI School Census Datasets 23/24

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### Ballytrea Primary School & Pupil Locations - Wards



- Ballytrea Primary School, Stewartstown
  - ★ Ballytrea Primary School Pupils
- Wards that Contain Ballytrea PS**
- ARDBOE
  - COUGH
  - COOKSTOWN EAST
  - LISSAN
  - LOUGHRY
  - MOY
  - STEWARTSTOWN
  - THE LOUP

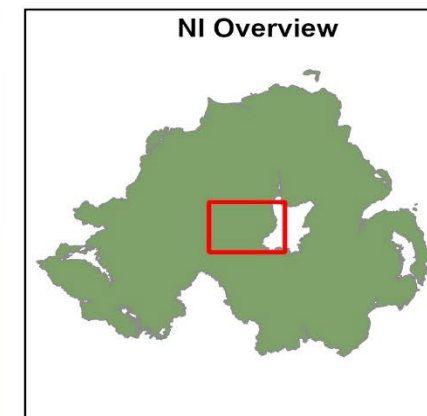
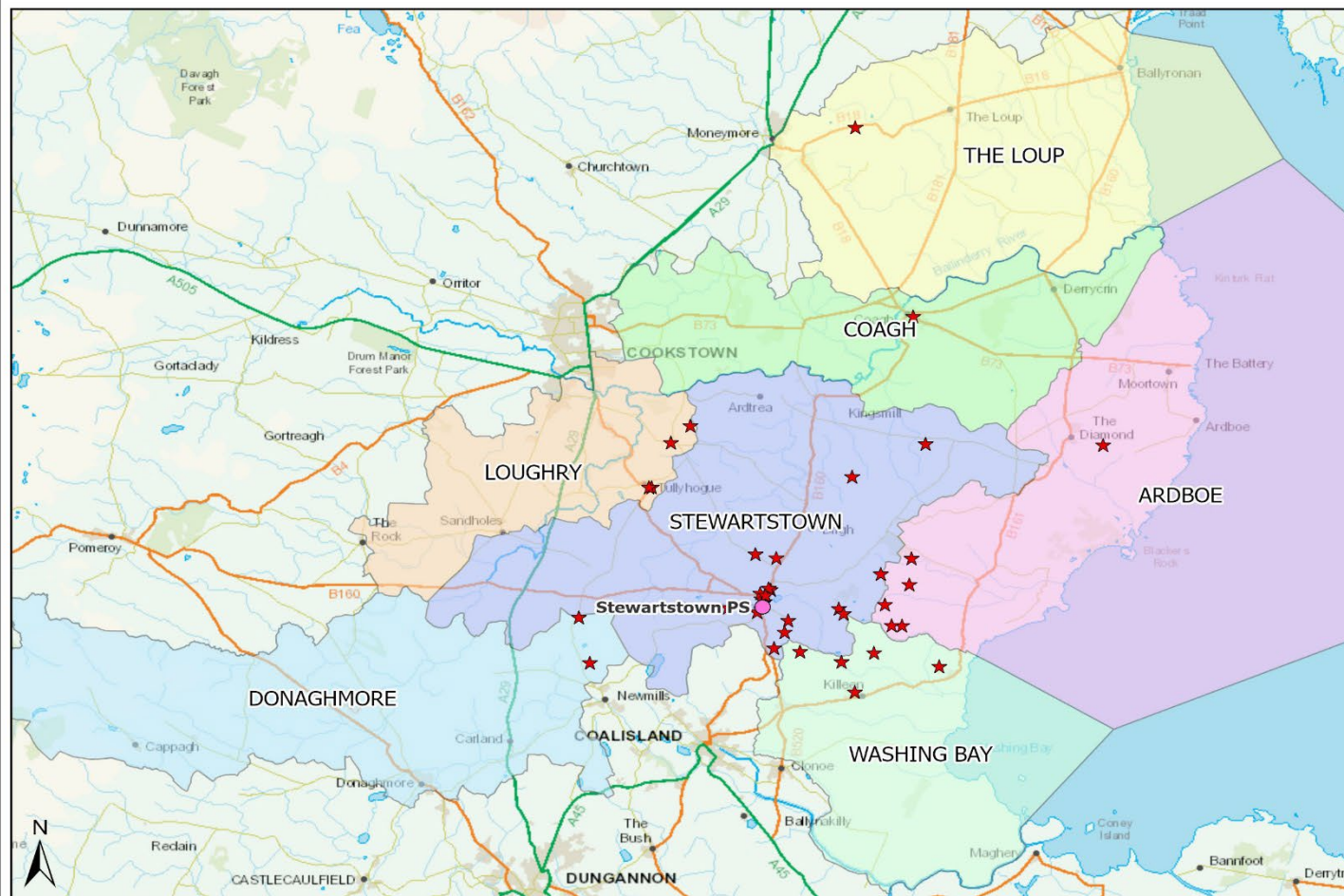
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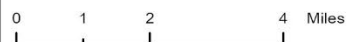
# Stewartstown Primary School & Pupil Locations - Wards



- Stewartstown Primary School
  - ★ Stewartstown Primary School Pupils
- Wards that Contain Stewartstown PS
- ARDBOE
  - COAGH
  - DONAGHMORE
  - LOUGHRY
  - STEWARTSTOWN
  - THE LOUP
  - WASHING BAY

**Supporting Information**

Base mapping was derived from OSNI Fusion. Data used : NISRA/DENI School Census Datasets 23/24  
 Note: There is 1 pupil from Stewartstown Primary School are found outside the map extent.

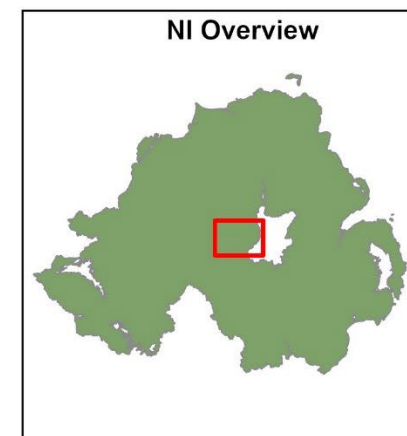
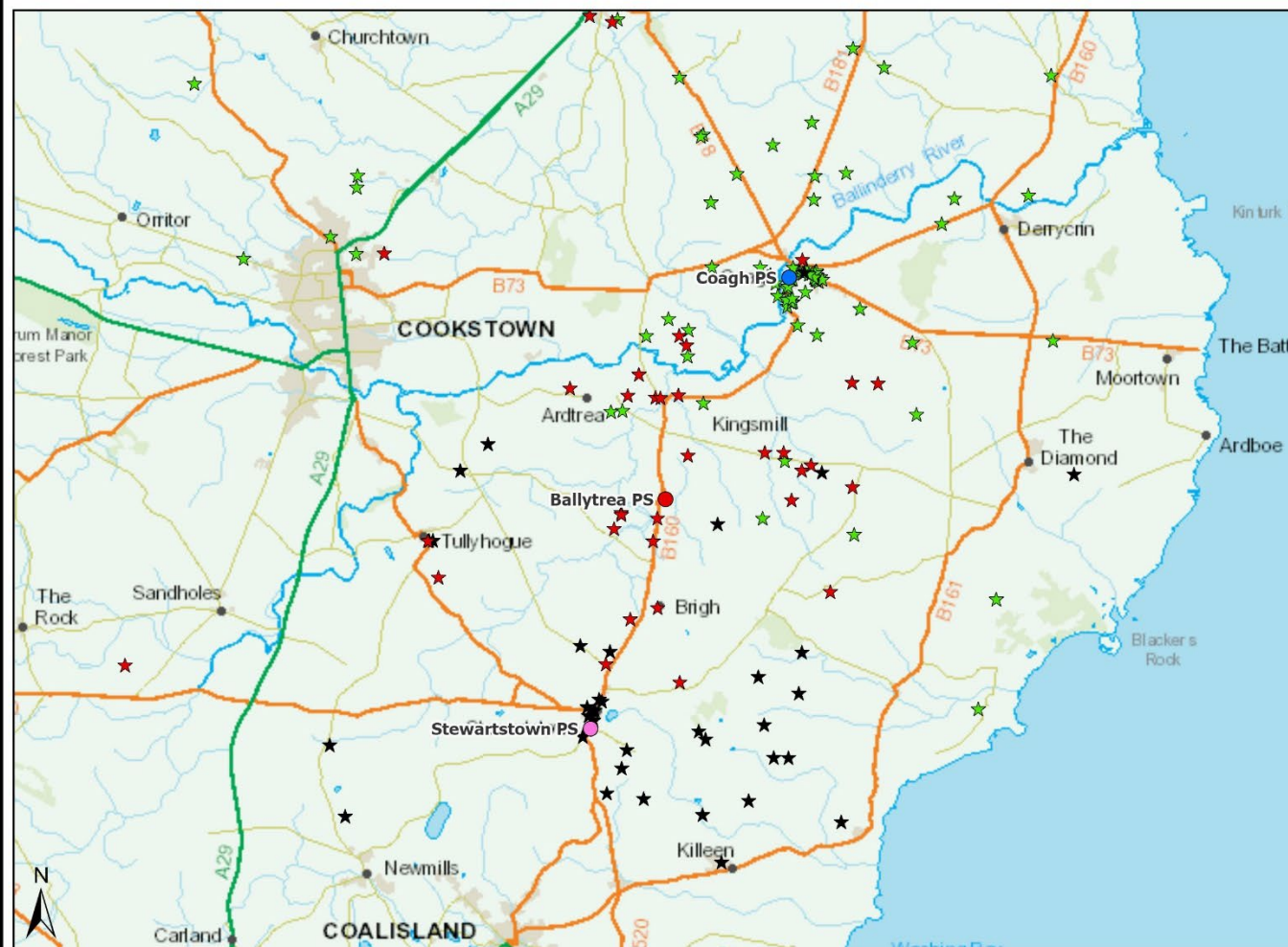


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Ballytrea Primary School, Stewartstown Primary School and Coagh Primary School & Pupils - 5 Miles Radius



- Ballytrea Primary School, Stewartstown
- ★ Ballytrea Primary School Pupils
- Stewartstown Primary School
- ★ Stewartstown Primary School Pupils
- Coagh Primary School
- ★ Coagh Primary School Pupils

Supporting Information

Base mapping was derived from OSNI Fusion. Data used : NISRA/DENI School Census Datasets 23/24  
 Note: There is 1 pupil from Ballytrea Primary School, 1 pupil from Stewartstown Primary School and 6 pupils from Coagh Primary School are found outside the map extent.



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## INTRODUCTION

1. On 12 April 2023, the Education Authority (EA) published linked Development Proposals (DPs) involving two primary schools in the Stewartstown area as follows:-

***DP 710: Establish a new controlled primary school in the Stewartstown area (being in effect an amalgamation of Ballytrea Primary School and Stewartstown Primary School) with effect from 1 September 2025, or as soon as possible thereafter. The school will have an admission number of 20 and an enrolment number of 140. (This proposal should be read in conjunction with Development Proposal Nos 711 and 712.)***

***Ballytrea Primary School will discontinue with effect from 31 August 2025, or as soon as possible thereafter. (This proposal should be read in conjunction with Development Proposal Nos 710 and 712.)***

***Stewartstown Primary School will discontinue with effect from 31 August 2025, or as soon as possible thereafter. (This proposal should be read in conjunction with Development Proposal Nos 710 and 711.)***

2. The statutory two-month objection period for all three proposals ended on 19 June 2023.
3. A copy of the published proposals (DPs 710-712) and the proposer's supporting Case for Change (CfC) for the three proposals are reproduced respectively at Appendices A and B.

## BACKGROUND

4. The Department's Sustainable Schools Policy (SSP – Schools for the Future: A Policy for Sustainable Schools (2009)) is being implemented through the Department's Area Planning process. The SSP recommends a minimum enrolment of 105 pupils for a sustainable rural primary school (and 140 pupils for a sustainable urban primary school). The DP affected schools are classified as "rural"<sup>1</sup> in accordance with the NI Research and Statistics Agency (NISRA) definitions.
5. The SSP contains a number of criteria and associated indicators to highlight whether or not action is required to address sustainability issues and places the educational needs and wellbeing of pupils at the forefront of any related considerations. Proposals for (significant) changes to education provision must be brought forward through the statutory DP process (The Education and Libraries (NI) Order 1986: Article 14 refers).

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<sup>1</sup> **Urban:** schools are defined as urban if they are located in settlements with a population greater than or equal to 5,000 people (NISRA Bands A-E); and **Rural:** schools are defined as rural if they are located in settlements with less than 5,000 people (NISRA Bands F-H).

6. These proposals have been progressed by the EA to address sustainable school provision in the Coagh/Stewartstown area. The CfC states that *‘the EA published Providing Pathways Strategic Area Plan for School Provision 2017-2020 Annual Action Plan for Primary, Post-Primary and Special Schools, April 2019–March 2021<sup>2</sup> [later extended to 2022] and within the actions for the Mid Ulster Local Government District (LGD), the EA included the following, as set out in Table 1 below: -*

**Table 1: Extract From the Extended Annual Action Plan 2019-2022<sup>3</sup>**

Primary School	Key Issue	Action
Coagh/Stewartstown Area:  Ballytrea PS 52 Gortnaskea Road Stewartstown Dungannon BT71 5NY  Coagh PS 31 Urbal Road Cookstown BT80 0DW  Stewartstown PS 33 Hillhead Stewartstown BT71 5HY	Ensure school places are located as required and address school provision where sustainability is an issue	Managing authority to consult on options for future provision of Ballytrea PS, Coagh PS and Stewartstown PS by September 2020

7. The EA, in addressing sustainable school provision in the Coagh/Stewartstown area, engaged with the Board of Governors (BoG) of Ballytrea PS, Coagh PS and Stewartstown PS and undertook an analysis of the area. The proposals are a result of two years of discussion. The CfC specifies that in the past Ballytrea PS and Stewartstown PS shared a joint BoG. It also states that the schools have a shared catchment area and Map 2 in particular, would indicate that there are a significant number of Stewartstown PS pupils in the vicinity of Ballytrea PS and this is further illustrated by Map 7.
8. The CfC states that the EA, in identifying the sustainability and catchment area of Coagh PS, *‘disconnected Coagh Primary School from the Annual Action Plan action’*.
9. The CfC asserts that the proposals will ensure sustainable Controlled provision in the wider Stewartstown area and maintain the current sustainable provision within Coagh PS.

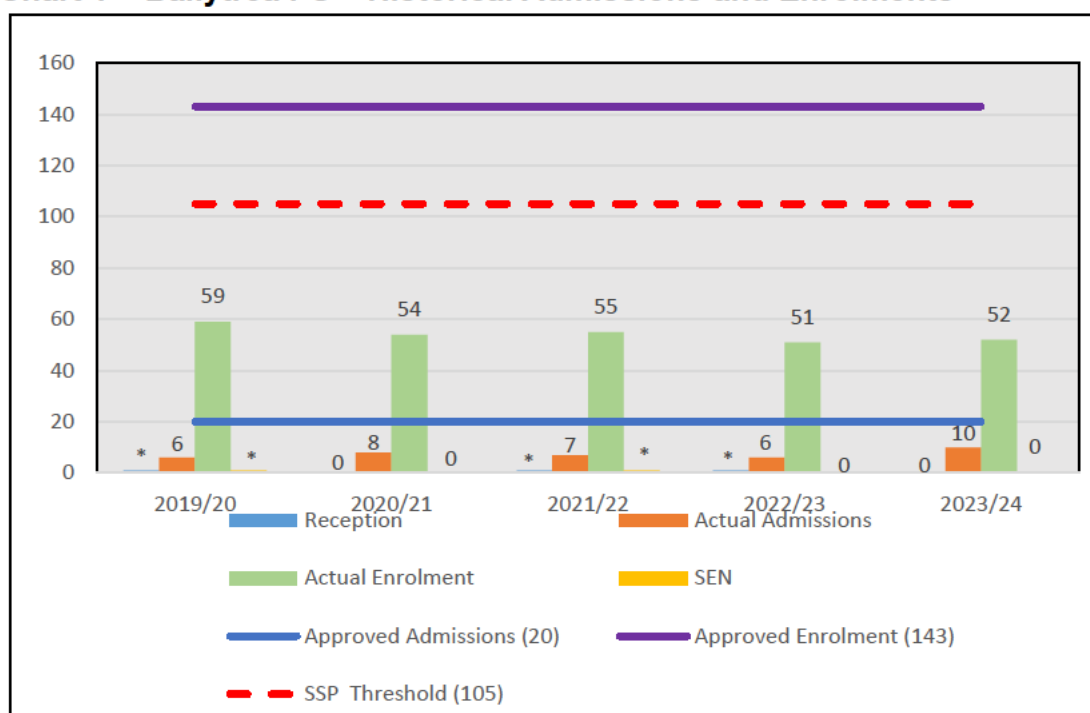
<sup>2</sup> <https://www.education-ni.gov.uk/articles/area-planning-overview>

<sup>3</sup> <https://www.eani.org.uk/school-management/area-planning/annual-action-plans>

## **Ballytrea Primary School (PS)**

10. Ballytrea PS is a Controlled primary school located approximately 2.8 miles from Stewartstown PS. It has approved admissions and enrolment numbers of 20 and 143 respectively. School census data set out in Chart 1 below illustrate Ballytrea PS' actual admissions and enrolment trends over the last five years and show that the school's enrolment has declined from 59 pupils in 2019/20 to 52 pupils in 2023/24. Admissions to Year 1 have also fluctuated between six and ten pupils. In 2023/24, Ballytrea PS has 91 available places that pupils could apply for through the competitive admissions process. EA data at the conclusion of the primary schools' admissions process for 2024/25 show the school received 12 first preference applications and a total of 23 applications. The school accepted 12 applications to Year 1.
11. Ballytrea PS operates a reception class and in 2023/24 no children were enrolled. However, at the end of the EA's admissions process for 2024/25, eight applications were accepted for its reception class.
12. Ballytrea PS' actual admissions and enrolment numbers have been significantly below its approved admissions and enrolment numbers and below the threshold of 105 for a sustainable rural primary school under the SSP.

**Chart 1 – Ballytrea PS – Historical Admissions and Enrolments\***



\*Includes Pupils with a Statement of SEN

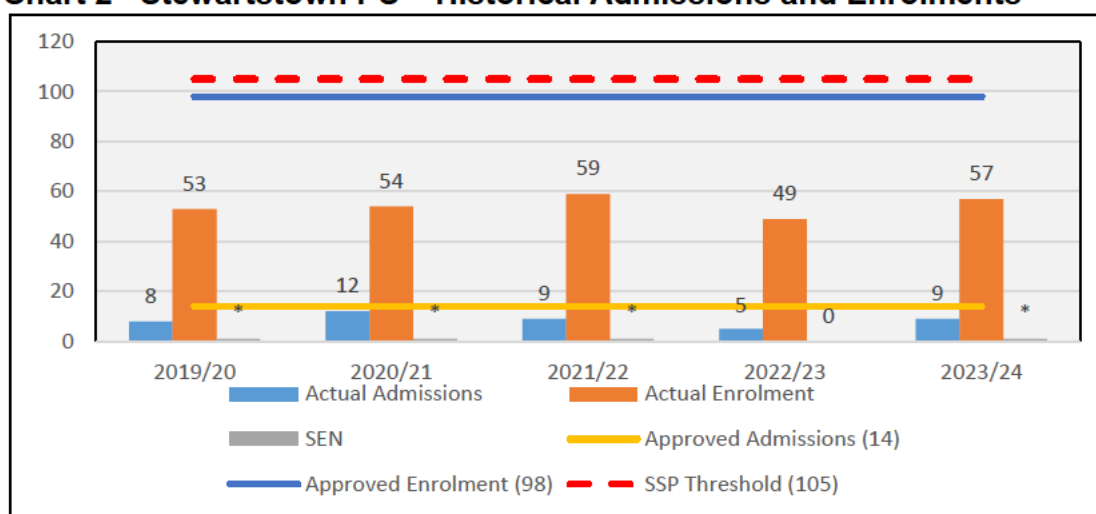
## **Stewartstown PS**

13. Stewartstown PS is a Controlled primary school situated in the village of Stewartstown which is approximately five miles from Cookstown. Stewartstown PS has approved admissions and enrolment numbers of 14 and 98 respectively.

Census data set out in Chart 2 below illustrate Stewartstown PS' actual admissions and enrolment trends over the last five years and show that the school's total enrolment has fluctuated between 49 and 59 pupils and the highest intake was 12 pupils in 2020/21. In 2023/24, there were 42 available places that pupils could apply for through the competitive admissions process.

14. For 2024/25, EA data at the conclusion of the primary admissions process show the school received \* first preference application and a total of 19 applications, however, only \* application was accepted.
15. In 2023/24, Stewartstown PS' actual admissions (9) and enrolment (57) are significantly below its approved admissions and enrolment number and below the threshold of 105 for a sustainable rural primary school under the SSP.

**Chart 2 –Stewartstown PS – Historical Admissions and Enrolments\***



\*Includes Pupils with a Statement of SEN

## AREA CONTEXT

16. Ballytreah PS and Stewartstown PS are located within the Mid Ulster Local Government District (LGD). On the Northern Ireland Multiple Deprivation Measure 2017, Stewartstown Super Output area (SOA), within which both schools are situated, is ranked 408 out of 890 (1 being most deprived and 890 least deprived).
17. In 2023/24, nine pupils (17.3%) were entitled to Free School Meals (FSM) at Ballytreah PS and 10 pupils (17.5%) were entitled to FSM at Stewartstown PS.
18. NISRA projections for the former Cookstown LGD, the smallest geographical area for which a breakdown of population projections is available and in which the schools are located, provides an estimate of population numbers as set out in Table 2 below. The table shows the predicted increases and decreases in the various age groups for the periods 2018-2028 and 2018-2043.

**Table 2 - 2018-Based Population Projections for the former Cookstown LGD**

Age	2018	2019	2020	2028	2043
0-4	2,798	2,784	2,725	2,395	2,431
5-9	2,878	2,866	2,889	2,586	2,366
10-14	2,600	2,697	2,771	2,855	2,363

Source: <https://www.nisra.gov.uk/publications/2018-based-population-projections-areas-within-northern-ireland>

19. Table 3 below shows significant reductions in the 0-4 and 5-9 age groups to both 2028 and 2043, with a minimum reduction of 10.2% and a maximum of 17.8%. There is an increase of 9.8% for the 10-14 age group to 2028 however, a reduction of 9.1% to 2043.

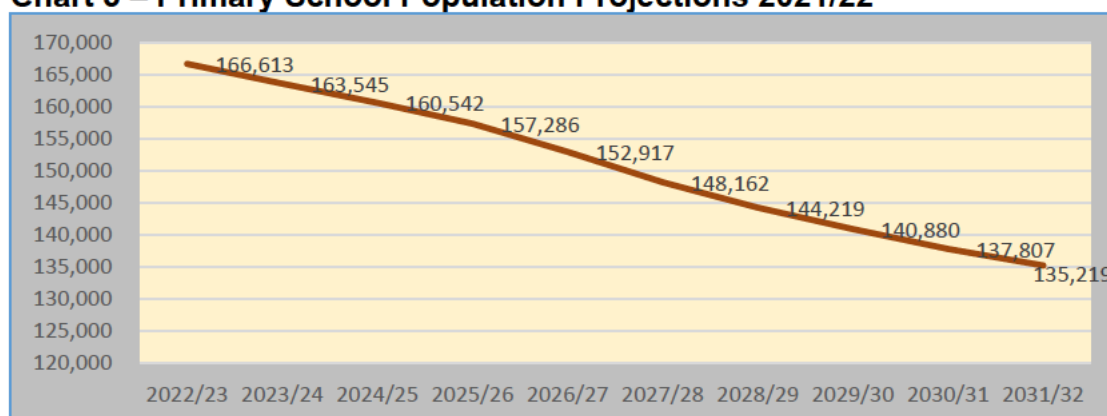
**Table 3 – Population Change by Age Group**

Age	2018 to 2028		2018 to 2043	
	Individuals	Percentage	Individuals	Percentage
0-4	-403	-14.4%	-367	-13.1%
5-9	-292	-10.2%	-512	-17.8%
10-14	255	9.8%	-237	-9.1%

Source: <https://www.nisra.gov.uk/publications/2018-based-population-projections-areas-within-northern-ireland>

20. On 1 September 2022, the EA published its Operational Plan 1 2022-2024 (OP1) which includes charts for the Mid Ulster LGD of birth statistics and school phase projections. The OP1 states that the '*downward trend is projected to continue for primary and post primary age pupils*'.
21. The declining trend in the primary school population is also supported by school phase projections (2021/22) produced by the Department, as set out in Chart 3 below:

**Chart 3 – Primary School Population Projections 2021/22**



22. Chart 3 illustrates a decline of almost 19% at primary school level only, across Northern Ireland, until 2031/32.

## Alternative Primary Provision

23. Maps 1 and 2 illustrate all alternative primary provision within a five-mile mapping radius of both Ballytrea PS and Stewartstown PS, although distances by road may exceed this, as well as the locations of both schools' pupils. In addition, a snapshot of total provision in the area, detailing the admissions and enrolment data and the latest Education and Training Inspectorate (ETI) inspection assessment of each school is provided below in Table 4.

## Alternative Controlled Primary Provision

24. There are five alternative Controlled primary schools within a five-mile mapping radius of Ballytrea PS and Stewartstown PS. The nearest alternative Controlled provision to Ballytrea PS, apart from Stewartstown PS, is Coagh PS (3.5 miles). The school has approved admissions and enrolment numbers of 15 and 106 respectively. Table 4 below shows that in 2023/24 Coagh PS has an actual enrolment of 118 pupils and an intake of 15, including \* pupils with a Statement of SEN. There were no available places. The school's enrolment is above its approved enrolment number and also above the SSP recommended minimum threshold of 105 for a sustainable rural primary school. At the conclusion of the EA's primary admissions process for 2024/25, data show the school accepted a total of 13 applications; all of which were first preference. There were two available places.
25. An inspection by the Education and Training Inspectorate (ETI) in September 2019, although very dated, assessed the quality of education at Coagh PS as '*very good*'.
26. Table 4 below shows that the closest alternative Controlled provision to Stewartstown PS is Donaghey PS (3.5 miles) and Newmills PS (3.7 miles). Donaghey PS and Newmills PS have approved admissions and enrolment numbers of 20 and 142 and 16 and 113 respectively. In 2023/24, these two schools' actual enrolments are 105 and 108 with intakes of 14 and 12 pupils respectively. Donaghey PS had 38 available places and Newmills PS had seven available places.
27. Donaghey PS' enrolment is below its approved enrolment number and just below the recommended minimum SSP threshold for a sustainable rural primary school when pupils with a statement of SEN are excluded while Newmills PS' enrolment is above the recommended minimum SSP threshold. For 2024/25, EA data show that Donaghey PS and Newmills PS received nine and six first preference applications respectively at the conclusion of the primary admissions process.
28. ETI inspection evidence in relation to the quality of education provided by Donaghey PS and Newmills PS shows each school has the '*Capacity for sustained improvement*'.
29. The remaining two Controlled schools within a five-mile mapping radius, i.e. Cookstown PS and Bush PS are significantly above the SSP threshold for an urban and rural primary school respectively.

30. Table 4 below shows that for 2023/24, the alternative Controlled primary schools offered 1,175 places with 984 pupils enrolled and there were 265 available places. At Year 1, there were 167 approved places and 122 pupils admitted for 2023/24. For 2024/25, there were 102 first preference applications at Stage 1 of the primary admissions process.
31. In the Controlled sector, as evidenced in Table 4, there were a significant number of available places (398 - including Ballytrea PS and Stewartstown PS) in this area in 2023/24.

#### Alternative Catholic Maintained Provision

32. There are 12 alternative Catholic Maintained primary schools within a five-mile mapping radius of Ballytrea PS and Stewartstown PS as illustrated on Maps 1 and 2. Table 4 below shows that the closest alternatives to Ballytrea PS are St Mary's PS, Stewartstown (2.7 miles) and St Malachy's PS, Drummullan (3 miles). In 2023/24, St Mary's PS and St Malachy's PS have enrolments of 92 and 50 pupils respectively with a combined total of 80 available places. Both schools are below their approved numbers and also below the sustainability threshold for a rural primary school. For 2024/25, the EA data show St Mary's PS and St Malachy's PS received 12 and \* first preference applications respectively at the conclusion of the primary admissions process.
33. Table 4 below shows that St Mary's PS is also the nearest Maintained school to Stewartstown PS at 0.3 miles. St Mary's PS was included in the DE Resetting Exercise for 2022/23 with the school's approved admissions and enrolment numbers revised to 15 and 105.
34. In total, four out of the 12 Catholic Maintained schools within a five-mile mapping radius are below the recommended minimum SSP threshold for a sustainable rural primary school. For 2023/24, the Maintained sector offered 3,044 places with 2,654 enrolled and there was a total of 621 available places.
35. The quality of education provided by the 12 Maintained schools ranged from Outstanding, Very Good, Good and Capacity for Sustained Improvement, however, many of the ETI inspection reports are very dated.

#### Alternative Grant-Maintained Integrated Provision

36. There is one Grant Maintained Integrated (GMI) primary school within a five-mile radius of Ballytrea PS and Stewartstown PS, i.e. Phoenix Integrated Primary School (IPS). The enrolment of Phoenix IPS is well above the SSP recommended minimum SSP threshold for a sustainable urban primary school, with an actual enrolment of 195 and 16 available places in 2023/24. Although now very dated, the ETI assessed the quality of education provided by the school as 'Good' in December 2014.

### Other Maintained Provision

37. There are two Irish-medium (IM) primary schools in the area, i.e. Gaelscoil Eoghain at 5.3 miles from Ballytrea PS and 6.4 miles from Stewartstown PS. In 2023/24, the school had an actual enrolment of 107 pupils and is below its approved numbers and significantly below the SSP threshold for a sustainable urban primary school. In November 2012, although very dated, the ETI assessed the quality of education at the school as 'Good'.
  
38. Gaelscoil Ui Neill is six miles from Ballytrea PS and 3.2 miles from Stewartstown PS. In 2023/24, the school had an actual enrolment of 104 pupils and is just below the SSP sustainability threshold for a rural primary school. An ETI inspection in October 2017 assessed the quality of education as 'Good'.

**Table 4 – Ballytrea PS and Stewartstown PS - Alternative Primary Provision within a Five-Mile Radius**

DE Ref Number	School Name & Postcode	Urban / Rural	Distance in Miles from Ballytrea PS as per Google maps	Distance in Miles from Stewartstown PS - as per Google maps	2023/24 & 2024/25 Approved Enrolment Numbers	2021/22 Actual Enrol Y1-Y7 (incl. Supernumerary pupils)	2022/23 Actual Enrol Y1-Y7 (incl. Supernumerary pupils)	2023/24 Actual Enrol Y1-Y7 (incl. Supernumerary pupils)	2023/24 Supernumerary pupils	2023/24 Available Places	2023/24 Actual Y1 Admissions (incl. Supernumerary pupils)	2023/24 & 2024/25 Approved Admissions Numbers	2024/25 Total Y1 1st Pref Apps Stage 1	2024/25 Over/Under Subscribed at Y1 - 1st Pref. Applications	ETI reports - Date of Inspection / Overall Assessment
<b>DP Affected Primary Schools</b>															
<b>Controlled</b>															
5012615	Ballytrea Primary School BT71 5LN	Rural		2.8	143	54	50	52	0	91	10	20	12	U8	March 2012- Good (Short Inpection)
5012643	Stewartstown Primary School BT71 5HY	Rural	2.8		98	59	49	57		42	9	14		U13	Sept 2019- ASOS Sept 2016- Capacity to identify and bring about improvement
<b>Subtotal</b>					<b>241</b>	<b>113</b>	<b>99</b>	<b>109</b>	<b></b>	<b>133</b>	<b>19</b>	<b>34</b>	<b>13</b>		
<b>Controlled</b>															
5012649	Coagh Primary School BT80 0DW	Rural	3.5	6.3	106	110	115	118		0	15	15	13	U2	Sept 2012- Very Good (Short)
5012726	Cookstown Primary School BT80 8PF	Urban	5.4	6.7	616	514	484	474	53	195	55	88	52	U36	Jan 2017- ASOS May 2010- Very Good (Focused
5016224	Donaghey Primary School BT71 4DA	Rural	5.9	3.5	142	111	102	105		38	14	20	9	U11	Jan 2020- Capacity for sustained improvement Jan 2017- ASOS
5012719	Newmills Primary School BT71 4DX	Rural	6.6	3.7	113	114	111	108		7	12	16	6	U10	Jan 2020- ASOS Nov 2016- Capacity for sustained improvement
5016391	Bush Primary School BT71 6QU	Rural	8.3	4.7	198	180	183	179	6	25	26	28	22	U6	Oct 2017- ASOS Jan 2012- Very Good
<b>Subtotal</b>					<b>1175</b>	<b>1029</b>	<b>995</b>	<b>984</b>	<b>66</b>	<b>265</b>	<b>122</b>	<b>167</b>	<b>102</b>		

5032692	St Mary's Primary School, Stewartstown BT71 5HT	Rural	2.7	0.3	105	91	90	92	5	18	10	15	12	U3	Jan 2018- Capacity for sustained improvement March 2007- Very Good (Short)
5036057	St Malachy's Primary School, Drummullan BT45 7XR	Rural	3	5.7	109	46	47	50	█	62	7	16	█	U13	Nov 2017- ASOS Sept 2011- Good (Short)
5032717	St Patrick's Primary School BT71 5AU	Rural	4.9	7.6	284	237	234	229	9	64	25	41	32	U9	April 2019- ASOS Nov 2012- Good
5036590	Primate Dixon Primary School BT71 4NW	Urban	5.5	2.7	610	506	527	540	60	130	73	87	80	U7	May 2019- ASOS Nov 2012- Outstanding
5032698	St Brigid's Primary School BT71 5DY	Rural	5.6	4	161	126	128	121	7	47	17	23	13	U10	Oct 2013- Very Good
5036567	Holy Trinity Primary School BT80 8AG	Urban	5.6	7	630	605	619	614	70	86	82	90	72	U18	May 2017- ASOS May 2014- Outstanding
5036047	St Patrick's Primary School BT71 4QZ	Rural	6.1	3.3	259	175	182	196	22	85	38	37	12	U25	Nov 2018- ASOS March 2012- Very Good
5032714	Holy Family Primary School, Aughmullan BT71 5DR	Rural	6.2	3.4	92	67	57	66	6	32	12	13	11	U2	Oct 2018- ASOS Feb 2012- Very Good
5032713	Derrychrin Primary School BT80 0BX	Rural	6.3	9	206	182	172	164	8	50	23	29	25	U4	Oct 2019- ASOS Sept 2016- Capacity for sustained improvement
5032585	Edendork Primary School BT71 4DP	Rural	7.8	4.3	320	294	287	284	6	42	38	46	42	U4	May 2018- ASOS Nov 2011- Outstanding
5032729	St John's Primary School BT71 4QN	Rural	8	5.2	191	212	222	221	9	0	33	27	38	O11	April 2019- ASOS Feb 2013- Outstanding (Short)
5032592	St Mary's Primary School BT70 3LH	Rural	9	6.1	77	78	78	77	5	5	9	11	8	U3	Feb 2018- ASOS Oct 2011- Very Good (Follow up)
<b>Subtotal</b>					<b>3044</b>	<b>2619</b>	<b>2643</b>	<b>2654</b>	<b>211</b>	<b>621</b>	<b>367</b>	<b>435</b>	<b>348</b>		

GMI															
5066657	Phoenix Integrated Primary School, Cookstown BT80 8QF	Urban	4.8	6.1	203	197	196	195	8	16	29	29	33	O4	Nov 2018- ASOS Dec 2014- Good
<b>Subtotal</b>					<b>203</b>	<b>197</b>	<b>196</b>	<b>195</b>	<b>8</b>	<b>16</b>	<b>29</b>	<b>29</b>	<b>33</b>		
Other Maintained															
5046699	Gaelscoil Eoghain BT80 8QD	Urban	5.3	6.4	135	106	110	107	█	29	17	21	21		June 2019- ASOS Nov 2012-Good (Short Inspection)
5046637	Gaelscoil Uí Neill BT74 4PU	Rural	6	3.2	185	120	110	104	█	83	13	29	20	U9	Oct 2022- Good (follow-up) March 2019- ASOS Oct 2017- Areas for improvement
<b>Subtotal</b>					<b>320</b>	<b>226</b>	<b>220</b>	<b>211</b>	<b>█</b>	<b>112</b>	<b>30</b>	<b>50</b>	<b>41</b>		
<b>Grand Total</b>					<b>4983</b>	<b>4184</b>	<b>4153</b>	<b>4153</b>	<b>289</b>	<b>1147</b>	<b>567</b>	<b>715</b>	<b>537</b>		

ASOS - Action Short of Strike

The actual enrolment and admissions numbers include supernumerary pupils, however, exclude reception pupils (as per annual Census information).

The 1st preference applications do not include reception or statemented pupils - position at the start of the EA Primary School Admissions Process, info provided by the EA on 6.2.2023.

DP 263 - Gaelscoil Uí Neill - Increase Enrolment - Approved 28/07/11

DP 269 - Primate Dixon PS - Open Nursery Unit - Not approved 19/06/12

DP 293 Bush PS - Open Nursery Unit - Approved 16/01/14

DP 301 - Open Nursery Unit - Approved with Modification 11/07/14

DP 302 - Gaelscoil Eoghain - Open Nursery Unit - Approved with Modification 11/07/14

DP304 - Phoenix IPS - Open Nursery Unit - Approved 11/07/14

The school listed below are included in the DE Resettling Exercise for 2022/23 School Year (reduction in numbers took effect from September 2022)

5032692 - St Mary's PS - Revised admission and Enrolment 15 & 105

5036567- Holy Trinity PS - Revised Admission and Enrolment 90 & 630

## **SPECIAL CONSIDERATIONS**

### **Rural Needs Act (NI) 2016**

39. Rural proofing has been a requirement for all Government departments in Northern Ireland since 2002 and has been an integral part of the policy development process. In 2016, the commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (NI) 2016 ('The Act'). The Act places a duty on Government departments to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans and when designing and delivering public services. It came into operation for Government departments and District Councils (DCs) on 1 June 2017 and applied to public authorities from 1 June 2018.
40. Ballytrea PS and Stewartstown PS are located in the Stewartstown area of County Tyrone and in the Stewartstown SOA are defined as rural under the NISRA definitions.

### **Effective and Efficient Use of Public Funds**

41. The Department of Education (the Department) must also be mindful of its duty under Article 44 of the Education and Libraries (NI) Order 1986 and under Managing Public Money to ensure effective and efficient use of public funds.

### **Shared Education Act (NI) 2016**

42. The Shared Education Act (NI) 2016 makes legislative provision in relation to Shared Education. It provides a definition of Shared Education and confers a duty on the Department of Education to encourage, facilitate and promote Shared Education and a power on relevant arms-length bodies to encourage and facilitate Shared Education.
43. Shared Education is not a type of school; rather it encourages all types of schools to collaborate with other schools to provide opportunities for pupils from different religious and socio-economic backgrounds to be educated together. Schools retain their individual ethos collaborating together in partnership for the benefit of their pupils.
44. While any Shared Education programme must initially meet the Shared Education definition<sup>4</sup> set out in the Shared Education (NI) Act 2016, each programme is unique to the needs of the partner schools. Hence Shared Education provision in partnerships in a local geographical area can differ across partnerships.
45. The CfC states there is a Shared Education partnership between Ballytrea PS and St Mary's PS, Stewartstown and between Stewartstown PS and Holy Family

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<sup>4</sup> The education together of (a) those of different religious belief, including reasonable numbers of both Protestant and Roman Catholic children or young persons and (b) those experiencing socio-economic deprivation and those who are not.

PS and that both partnerships engage in shared educational experiences and in promoting cross-community links.

### **Section 75 of the Northern Ireland Act 1998**

46. Section 75 of the Northern Ireland Act 1998 requires public authorities designated for the purposes of the Act to comply with two statutory duties. The first duty is the equality of opportunity duty, which requires public authorities in carrying out their functions relating to Northern Ireland to have due regard to the need to promote equality of opportunity between the nine equality categories of persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; men and women generally; persons with a disability and persons without; and persons with dependants and persons without. The second duty requires that public authorities have regard to the desirability of promoting good relations between persons of different religious belief, political opinion and racial group.

### **CASE FOR CHANGE (CfC)**

47. The CfC sets out the EA's rationale for DPs 710-712, as follows:-

- Ballytrea PS and Stewartstown PS have always been small primary schools with a current combined enrolment of 99 pupils.
- Both schools have experienced low enrolment numbers, and this will continue to place increased pressure on the already strained financial resources of both schools and on the teaching staff.
- The proposed amalgamated school will be a sustainable school in accordance with the SSP; the newly established school will have an enrolment of 99 pupils. This will alleviate both teaching and financial pressures and ensure that no more than two-year groups will be in a composite class. The proposed amalgamation will consolidate Controlled primary school provision within the area.
- The proposal will meet the outcomes for all, including additional support to those who require it, ensuring those children with Special Educational Needs (SEN) realise their full potential. Pupils with SEN will continue to have their special educational requirements met within the newly established school, supported by the Education Authority's Children and Young People's Services.

### **Alternative Options**

48. The CfC details the following alternative options which the EA explored with stakeholders and these are summarised below:-

- Do Nothing  
With the low enrolment numbers and the financial position of both Ballytrea PS Stewartstown PSs – do nothing is not an option.

- Shared Education  
Given the size and proximity to other schools, a shared solution would not improve the sustainability of Ballytrea and Stewartstown PSs.
- Federation  
In considering a federation, the sustainability of a federated school within the local area would not provide for sustainable provision and would not improve the financial position of both schools.
- Discontinue  
It was noted that the discontinuance of one or both schools would not best serve the communities of either school. The fragmentation of Controlled provision within the Ballytrea/Stewartstown community would be detrimental to primary provision in the area. In bringing forward area planning activity for either school this will ensure that provision is more sustainable to provide for the educational needs of all current and future pupils from the Ballytrea and Stewartstown areas.
- Transformation to Integrated Status  
The BoG for Ballytrea PS advised that they had met with representatives from the Northern Ireland Council for Integrated Education (NICIE) however, the BoG did not feel this was an option for Ballytrea PS.
- Other Options  
The BoG of Ballytrea PS outlined a five-year plan as an option. However, with this option, sustainability in terms of enrolment and admissions would not be achieved. It was considered that this option would not provide a pathway for a sustainable provision to meet the needs of the area.
- Amalgamation  
Sustainability was identified and acknowledged by the BoG as an issue. Within each BoG, there was disappointment that the work of the governors could not provide a sustainable solution for the school. The EA recognises the commitment of the governors but the current circumstances would not provide for educationally or financially sustainable schools.
- In the CfC, the EA comments that while individually sustainability is an issue, the BoG of both Ballytrea PS and Stewartstown PS, in discussion with the EA, realise the strength in the joining of both schools to provide a more educationally and financially sustainable school which would not only meet the needs of the current pupils at both schools but would consolidate and ensure future Controlled primary educational provision for the wider area.
- Both Ballytrea PS and Stewartstown PS support the proposal for an amalgamation as both schools serve the wider Ballytrea/Stewartstown

area and a newly amalgamated school would build on the strengths of both schools.

49. Responses received during the statutory objection period commented that the BoGs were never given any other options despite having a list of five options to help improve the school and were refused the option to change Ballytrea PS to Integrated status and bring the whole community together.
50. The CfC states the EA, Ballytrea PS and Stewartstown PS believe that an amalgamated school will enhance sustainability, meet the Sustainable Schools criteria and provide opportunities for children and young people in the Ballytrea/Stewartstown area.
51. The CfC for DPs 710-712 is reproduced in full at Appendix B.

## **STATUTORY DP PROCESSES**

### **Pre-publication Consultation**

52. The CfC confirms that the pre-publication consultation for DPs 710-712 commenced on 14 November 2022 and closed on 23 January 2023. Staff, governors, parents/guardians were notified of the launch of the pre-publication consultation on the EA's website with the publication of a suite of documents including a consultation document: narrated powerpoint presentation and video and response form. On 17 November 2022, virtual pre-publication consultation meetings were held with staff, BoG and parents/guardians at Ballytrea PS and Stewartstown PS.
53. In accordance with Article 14 of the Education and Libraries (NI) Order 1986 the EA, before submitting a proposal to the Department, is required to consult with the BoG, teachers and parents/guardians of any school or schools which could, in the opinion of the EA, be affected by the proposals. 53 potentially affected schools were notified of the pre-publication consultation.
54. The EA received a total of 148 responses of which 68 agreed with the proposals and 78 disagreed. Political representative, Keith Buchanan, MLA and the Controlled Schools Support Council (CSSC) neither agreed nor disagreed with the proposals. As set out in the CfC, issues raised in the pre-publication consultation were both in support and objection to the proposals. A significant number focused on the proposed location of the amalgamated school.
55. Support for the proposals included:
  - Amalgamation is better than closure of the schools.
  - the new school would require adequate funding to ensure it meets its full potential.
  - provision of Controlled education within the village helps maintain religious balance in Stewartstown.

- Ballytrea is too close to Coagh PS catchment area as it is without sending more children in that direction.
  - Ballytrea PS parents are less likely to go to an amalgamated site at Stewartstown PS.
  - the best location for the school is within the village, particularly with the proposed development of over 200 houses.
  - Ensure the Cypres Trust Fund attached to Stewartstown PS continues to benefit the pupils from Stewartstown.
56. Objection to the proposals included:
- Cannot agree with the amalgamation of Ballytrea PS and Stewartstown PS as we do not know which site will be used for the new school.
  - removing Stewartstown PS from the town will result in a religious imbalance.
  - Ballytrea PS could accommodate 105 pupils easily and the building will need minimal work/additional buildings.
57. Other responses received noted the proposals and comments included: *'The proposal to close a site and amalgamate both schools is something that appears to be suggested given the low enrolment number at both schools. Imperative that this decision is not taken lightly as the consequences of closing either school will have a lasting impact in the area. Closing either school will impact other schools and support and resources may be needed in other schools in the area. Hope that there will be open dialogue with both schools and parents in each circumstance and the decision is made with the best intentions'*.

### EA Comments

58. The CfC states that while the effective date for the amalgamation is 1 September 2025, the EA is not taking forward the amalgamation of both schools in advance of accommodation on a single site. The amalgamation will not operate as a split site campus.
59. The CfC states that during consultations with governors, staff, parents/guardians the following recurring themes emerged:-
- (a) Location of the Amalgamated School
  - (b) Pastoral Care
  - (c) Availability of Places and Accommodation
  - (d) Children with Special Education Needs
  - (e) Transport Arrangements for the Pupils
60. The detailed comments on each of the themes are set out in the CfC at Appendix B.

## Two-Month Statutory Objection Period

61. The two-month statutory objection period for DPs 710-712 commenced on the date of publication and ended on 19 June 2023. During this period, the Department received a total of 86 responses. Of these, 49 responses objected to the closure of Ballytrea PS and Stewartstown PS and 37 responses supported an amalgamation. However, many respondents also indicated their preferred location for a new amalgamated school should DP 710 be approved, i.e. 49 supported a Ballytrea site and 19 supported a Stewartstown site.
62. Responses in support of the Ballytrea site received included correspondence from the Principal and BoG of Ballytrea PS, Councillor Eva Cahoon (Cookstown District Electoral Area (DEA)), and Principal of Craigavon Senior High School, parents and grandparents of pupils, former and teaching staff and past pupils.
63. Of the nineteen responses received in support of the new school being located on a Stewartstown site, comments were received from the Principal and the BoG of Stewartstown PS; a teacher; parents and grandparents of pupils; past pupils; Stewartstown Harps GAA Club; BoG of Coagh PS including a parent.
64. A response from the Principal of Holy Family PS, Aughamullan was received outside of the statutory objection period.
65. A summary of the responses received during the statutory objection period is contained in Appendix C together with key bespoke responses reproduced in full.

## **SUSTAINABILITY ASSESSMENTS**

66. The Department's SSP sets out six criteria supported by quantitative and qualitative indicators which provide the framework for consideration of a school's longer-term sustainability. There are neither formula nor weightings attached to the criteria or indicators. The primary objective of the policy is to ensure that all children and young people receive a high quality education in schools that are educationally and financially viable in the longer term. Assessments of Ballytrea PS and Stewartstown PS against the six sustainability criteria and their associated indicators are set out in Appendices D and E respectively. A summary of each school's sustainability is set out below.

### **Ballytrea PS - Sustainability Summary**

67. Although very dated, evidence shows that the quality of education provided at Ballytrea PS was assessed by the ETI in March 2012 as 'good' and that *'The school is meeting effectively the educational and pastoral needs of the children and has demonstrated its capacity for sustained self-improvement'*. The school operates with three composite classes; two classes with two year groups and one class with three year groups. The SSP states that there should

be no more than two composite year groups in a single classroom at primary school level. The school employs 3.2 full-time equivalent teachers which includes a teaching Principal and is below the recommended four teachers for a primary school, as set out in the SSP.

68. Ballytrea PS is not meeting the SSP minimum enrolment requirements having historically low admissions and enrolment numbers which have declined from 59 pupils in 2019/20 to 52 pupils in 2023/24. However, for 2024/25 the school has accepted eight applications to its Reception class. Although this is a considerable increase, one year cannot be taken in isolation as evidence of demand for future years and there is no guarantee that all children will continue their education into P1 at Ballytrea PS. The school is operating in a continuing financial deficit position. The CfC confirms that the school currently does not operate within its in-year budget. The school's provisional deficit for 2023/24 (-£167,445) exceeds the +/-5% (72%) or £75k range for deficits as stipulated by the Department in LMS guidance.
69. There is no up to date information evidencing the strength of leadership and management at the school and there are no apparent sustainability issues in relation to links with the local community. The school is accessible to all of its pupils; however, there are other alternative primary schools within a five-mile mapping radius that are accessible, with available places that the pupils at Ballytrea PS could attend if the school was to discontinue. However, Coagh PS the nearest alternative at 3.5 miles had no available places in 2023/24. EA data for 2024/25 show two available places at the end of the primary admissions process.
70. The ETI Inspection Report of March 2012 states '*It will be important that the employing authority, school governors and the staff plan for, and manage, issues related to the sustainability of the school provision and school budget, in order to address the current and future needs of the children and the staff. In addition, the negative impact of the enrolment of reception children throughout the year on the children, the staff and the funded provision from which the children are drawn needs to be reviewed*'. There is no demonstrable evidence showing that such a plan was developed and put in place to address and recover the sustainability issues that have existed at the school.
71. In conclusion, Ballytrea PS is currently not meeting the sustainability criteria in full in relation to Quality of Education, i.e. composite classes and staff numbers; Stable Enrolment Trends and Sound Financial Position. Although Reception numbers have significantly increased for 2024/25 there is no guarantee that this trend will continue and that the children will transition into P1 at Ballytrea PS. Declining enrolment numbers has put pressure on the school's financial resources and the evidence points to an unsustainable provision with little prospect of sustainability being achieved in the future.

### **Stewartstown PS Sustainability Summary**

72. Although dated, evidence shows that the quality of education at Stewartstown PS was assessed by the ETI in September 2016 as 'very good'. However, the

school has been operating with three composite classes, one of which comprises three-year groups and the school employs 3.40 full-time equivalent (FTE) teachers including a teaching Principal. The SSP states there should not be more than two years groups in a composite class and recommends a minimum of four teachers at primary school level.

73. The school's enrolment has fluctuated between 49 and 59 pupils in the last five years. In 2023/24, the school has an enrolment of 57 pupils and is significantly below its approved numbers and the recommended SSP threshold for a sustainable rural primary school. Although Stewartstown PS had been operating in a surplus budget position, the CfC states that the school is projected to be in a deficit position of **-£12,455** by the end of the 2022/23 financial year but this was not the case as the school had a surplus of £25,585 as at 31 March 2023. However, the school's provisional financial position as of 31 March 2024 shows a deficit of **-£23,461**.
74. There is no up-to-date information evidencing the strength of leadership and management at the school; there are no concerns in relation to links with the local community. The school is accessible to all of its pupils; however, there are other alternative primary schools within a five-mile radius and within reasonable travel time that are accessible with available places if Stewartstown PS was to discontinue.
75. The ETI Inspection Report of September 2016 states '*It will be important that the employing authority, school governors and the staff plan for, and manage, issues related to the sustainability of the school provision and school budget, in order to address the current and future needs of the children and the staff*'. There is no demonstrable evidence showing that such a plan was developed and put in place to address and recover the sustainability issues that have existed at the school.
76. In conclusion, the available evidence demonstrates that Stewartstown PS does not meet the criteria and indicators of the SSP in full, particularly in relation to Quality Educational Experience, i.e. composite classes and the number of teachers and Stable Enrolment Trends. The evidence points to an unsustainable provision with little prospect of sustainability being achieved in the future.

## **ASSESSMENT OF SPECIAL CONSIDERATIONS**

### **Rural Needs Act (NI) 2016**

77. The Rural Development Council's (RDC) '*Striking the Balance*' report highlights the importance of rural proofing so that regard is given to the impact of a particular policy on rural populations (in comparison to those living in urban areas) and to help identify adjustments which might be made to reflect rural needs and ensure that services are accessible to rural communities on a fair basis. A central concern is the quality of education provided to pupils.

78. The SSP policy was assessed against the RDC rural proofing checklist (Striking the Balance, Annex 1) and no adverse impact was identified. The SSP recognises the needs of rural communities and this is reflected in the lower enrolment threshold for rural primary schools, the accessibility criterion which provides guidance on home-to-school travel times and the criterion strong links with the community also recognises the central place a school has for many communities (urban and rural).
79. The Government's commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (NI) 2016 (The Act). The Act requires public authorities to have 'due regard' to consciously consider the needs of people in rural areas when developing policies, strategies and plans and when designing and delivering public services. It defines 'rural needs' as "*the social and economic needs of rural areas*".
80. The former Minister, Peter Weir, MLA (now Lord Weir of Ballyholme), gave approval to redefine the SSP urban and rural definitions from 1 September 2022 by adopting the NISRA default definition of urban and rural settlement sizes. Under the revised definition, Ballytrea and Stewartstown PSs are still defined as rural schools.
81. In former Minister Michelle McIlveen's Written Statement to the NI Assembly on 9 August 2021, she commissioned officials to develop a programme to support sustainable education provision in rural areas. The statement further advised that the SSP is not regarded as a policy for the closure of schools and collaboration within and across sectors is a means of delivering a quality educational experience for all our children and young people in sustainable settings. Although the EA, along with the BoG from both schools, considered other options they believe that an amalgamated school will enhance sustainability, meet the SSP criteria and provide opportunities for children and young people in the Ballytrea/Stewartstown area.
82. The SSP states that '*strong, sustainable schools providing quality education and access to the full curriculum are central to the achievement of the educational vision*'. One of the objectives of the SSP is to ensure that the excellent quality of education available to some young people is made available to all, in both urban and rural settings.
83. Ballytrea and Stewartstown PSs are defined as rural under the NISRA definitions and the CfC advises that the areas from which the schools attract pupils are, according to the Inter Departmental Urban-Rural Definition Group, defined as rural. Responses received during the two-month objection period included:-
- I do not feel our children 'miss out' due to attending a smaller rural school and being taught in composite classes.
  - A rural education setting should not be discounted because of size or finances and instead should be afforded greater support because of the vital role it plays in the community.

84. Comments received during the pre-publication consultation and statutory objection period also referred to research carried out by Queen's University 'Small School Rural Community Study' and to the importance of these types of schools being a choice for parents.
85. The Queen's University study can be accessed at the following weblink:- [https://pureadmin.qub.ac.uk/ws/portalfiles/portal/381685562/Final\\_report.pdf](https://pureadmin.qub.ac.uk/ws/portalfiles/portal/381685562/Final_report.pdf)
86. The CfC confirms that the statutory requirements of the Rural Needs Act (NI) 2016 (where appropriate) have been considered. A Rural Needs Assessment carried out by the EA is included in the Equality and Human Rights Screening of the proposal and is reproduced at Appendix F. It details the positive and negative impacts of the proposals as follows:-
- The positive impact for rural pupils will be parity of access for all to appropriate pathways through the operation of a new sustainable Controlled primary school.
  - The establishment of a new school (being in effect the amalgamation of Ballytrea Primary School and Stewartstown Primary School) in the wider Stewartstown area will improve the sustainability of Controlled primary school provision in the area.
  - An amalgamated school will provide for the minimum threshold enrolment of 105, as required by the SSP.
  - The negative impact on rural areas will be a potential increase in transport times for some pupils. Home to school transport arrangements will be in accordance with transport regulations.
87. The Equality Screening states the EA is aware of the important community role both primary schools play and with the improved sustainability of the proposed amalgamated school this will build on the strengths and community links of both schools.
88. In the CfC it is asserted that '*The discontinuance of Ballytrea Primary School and Stewartstown Primary School will have an impact on the local area. However, the establishment of a new school in the wider Stewartstown area will retain controlled provision in the area, which will be sustainable*'.

### **Effective and Efficient Use of Public Funds**

89. In discharging its duties, the Department must seek to avoid unreasonable public expenditure and to make the best use of resources available to it. The assessment of Ballytrea PS and Stewartstown PS against the criteria and indicators of the SSP demonstrates that both schools are not meeting the sustainability criteria in full. As of 31 March 2024, both Ballytrea PS and Stewartstown PS are operating in a deficit position, both schools per capita costs, i.e. Ballytrea PS at £4,665 and Stewartstown PS at £4,549, are well above the average for all primary schools at £3,492.
90. Ballytrea PS and Stewartstown PS, as small schools, with only 52 pupils and 57 pupils enrolled in 2023/24 respectively, receive the maximum amount of

Small Schools Support funding of £51,829 as well as £16,420 in respect of Primary Principals' Release Time in 2023/24.

91. The financial implications associated with the proposals are detailed below in paragraphs 103-107 The main financial implication is in relation to capital investment for refurbishment/extension minor works required for the new amalgamated primary school. A feasibility study will be carried out by the EA to determine the site and associated costs.
92. The CfC asserts a newly amalgamated school at 140 pupils would receive £41,490 in Small School Support and as a sustainable school would be able to achieve financial sustainability and live within its in-year budget. For 2024/25, a school would receive £41,463 for its Small Schools Support factor.
93. Unsustainable schools do not represent the best use of resources. The proposed amalgamated school with a combined enrolment number will maximise resources and ensure sustainability however, the capital/minor works investment required for the new amalgamated school needs to be taken into consideration.

### **Shared Education**

94. The Shared Education Act (NI) 2016 makes legislative provision in relation to Shared Education. It provides a definition of Shared Education and confers a duty on the Department of Education to encourage, facilitate and promote Shared Education and a power on relevant arms-length bodies to encourage and facilitate Shared Education.
95. Shared Education is not a type of school; rather it encourages all types of schools to collaborate with other schools to provide opportunities for pupils from different religious and socio-economic backgrounds to be educated together. Schools retain their individual ethos collaborating together in partnership for the benefit of their pupils.
96. While any Shared Education programme must initially meet the Shared Education definition<sup>5</sup> set out in the Shared Education (NI) Act 2016, each programme is unique to the needs of the partner schools. Hence Shared Education provision in partnerships in a local geographical area can differ across partnerships.
97. Ballytrea PS is involved in a mainstreaming partnership with St Mary's PS, Stewartstown and Stewartstown PS is currently involved in a Collaboration and Sharing in Education project (CASE) with Holy Family PS, Aughamullan.

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<sup>5</sup> The education together of (a) those of different religious belief, including reasonable numbers of both Protestant and Roman Catholic children or young persons and (b) those experiencing socio-economic deprivation and those who are not.

98. The CfC asserts that in a newly amalgamated schools these links will continue and further strengthen in a more financially and educationally sustainable school.

### **Section 75 of the Northern Ireland Act 1998**

99. The CfC states that 64 responses commented on Section 75 and all were taken into account when assessing the equality impact of the proposal.

100. A full summary of the emerging themes is set out in the CfC and reproduced at Appendix B.

101. A number of responses received during the two month statutory objection period also made similar comments in relation to Section 75, with examples as follows:

- Stewartstown village has a declining Protestant population, approx. 25% at last census. We have concerns that the decision on the location may be politically based as Stewartstown is the only Protestant school in the village and feel that this is very inappropriate if Stewartstown were to be favoured for that reason.
- To remove a school from Stewartstown village impacts on religious harmony in the area and potential growth and development of the village and surrounding area.
- Easy access is critical for additional needs pupils and moving the school outside of the town would make this more difficult.
- The provision of Controlled education within the village helps maintain religious balance in Stewartstown, which is a predominately Catholic village.
- We believe that if the primary school were to close that there may be a reduction in the Unionist community to the detriment of the current healthy relationships.

102. The comments echo those made in the pre-publication consultation and have therefore already been taken into consideration in the assessment of the equality impact of the proposals.

## **OTHER CONSIDERATIONS**

### **Financial Implications**

#### **Staffing**

103. The EA will meet with staff to discuss options should the DPs be approved, an action plan implemented for the discontinuance of both schools and the establishment of a new school.

104. The teaching staff are afforded employment protection under the School Re-organisation Agreement 2013/2 for two years. The non-teaching staff will be afforded employment protection for one year under the Collective Agreement (JNC Circular 224).

105. The staffing complement of the new school will be determined through need following the establishment of an Interim BoG and appointment of a Principal (Designate). Day One costs for Principal (Designate) will be required.

### Transport

106. The CfC states any transport arrangements will be in accordance with transport regulations. Given that the majority of pupils live within five miles of alternative primary provision, the financial implications for the transport budget would not be significant.

### Accommodation

107. The CfC states that an amalgamation would not require a new build and would be proposed to be situated in one of the two existing sites. A feasibility study would be required to determine which site would be more suitable and any additional accommodation requirements needed. It specifies that substantial capital investment will be required to provide additional accommodation and refurbish existing provision to establish the amalgamated school. Any minor works would be subject to available capital budget at that time.

### Housing Developments

108. Responses received during the EA's pre-publication consultation commented: *'Believe the best location for the school is within the village, particularly with the proposed development of over 200 houses'*. It was also raised during the statutory objection period, i.e. *'There are plans passed for building additional housing within the village of Stewartstown'*.

109. Housing development will not, of itself, necessarily translate into reliable evidence of the need for school places, as matters such as age demographics of those who may move into a development and expressions of parental preference for particular types of education provision will have a bearing on demand.

### Cy-près Trust Fund

110. One of the responses received during the pre-publication consultation states *'Ensure the Cypres Trust Fund attached to Stewartstown PS continues to benefit the pupils from Stewartstown'*.

111. An explanation of the Cy-près Doctrine is set out below:-

- As near as possible (from the old French, literally "near to"). In the context of charities, the cy-près doctrine allows the wishes of a donor to charity to be carried out even if the original purpose of the gift has failed.
- When a private trust fails, remaining funds revert to the settler on resulting trust; when a charitable purpose fails, remaining funds may instead be applied by cy-près.

- Funds which are applied 'cy-prés' are directed by the court or Charity Commission to a charitable purpose analogous to the original, failed, charitable purpose.

### **Area Planning Impact**

112. The CfC references the SSP in which it states *'In rural areas where it is practical and possible to replace small schools with better facilities, this can be a key factor in retaining rural populations and encouraging rural development. At the core of the issue of sustainability, is the need to find the most effective way of providing significantly improved educational opportunities for children within the context of their local and wider community. Amalgamation can provide a positive outcome for rural communities. Effective communication and collaboration, together with good leadership and management are central to achieving a positive outcome from a situation where amalgamation is determined to be the best option.'*
113. The EA, in taking forward the Action Plan for Primary, Post-primary and Special Schools April 2019–March 2021 [later extended to 2022], identified a key issue for Ballytrea PS, Coagh PS and Stewartstown PS, i.e. *'Ensure school places are located as required and address school provision where sustainability is an issue'* with the associated action *'Managing authority to consult on options for future provision of Ballytrea Primary School, Coagh Primary School and Stewartstown Primary School by September 2020'*.
114. The CfC asserts that discussions were held with the BoG of all three primary schools following which, the EA, in identifying the sustainability and catchment area of Coagh PS, disconnected Coagh PS from the Annual Action Plan.
115. Ballytrea PS and Stewartstown PS are located in rural areas and are approximately 2.8 miles distance apart. Many of the pupils come from the same area as illustrated on Maps 1 and 2. The snapshot shows that the nearest alternative Controlled provision with sufficient available places is located over five miles distance. In 2023/24, Cookstown PS has 195 available places. Maps 3 and 4 illustrate that drive times to this school are 10 minutes from Ballytrea and Stewartstown PSs, which is well within the SSP guidance on maximum travel times.
116. The EA, along with the BoGs from both schools, believe that an amalgamated school will enhance sustainability, meet the SSP criteria and provide opportunities for children and young people in the Ballytrea/Stewartstown area.
117. The CfC states the discontinuance of Ballytrea PS and Stewartstown PS will have an impact on the local area. However, the establishment of a new school in the wider Stewartstown area will retain Controlled provision in the area which will be sustainable.

## **Educational Impact**

118. In the CfC, the EA cites the SSP that there should be no more than two composite year groups in a single classroom. The CfC also refers to the Chief Inspector's Report of 2014-16 which stated that it is more difficult for a teacher to ensure adequate learning progression and meet all learners' needs in composite classes spanning more than two year groups. The Chief Inspector's Report of 2016-18 also noted that too many schools are too small to provide adequately for their pupils, particularly primary schools with more than two year groups in composite classes. In 2023/24, both Ballytrea PS and Stewartstown PS operated with three year groups in a single composite classroom.
119. The EA considers that an amalgamation of Ballytrea PS and Stewartstown PS will provide places for pupils ensuring access to the Northern Ireland Curriculum in a more sustainable primary school. It would mean the pupils from Ballytrea PS and Stewartstown PS would be taught in classes with an adequate number of peers and this will allow for improved social interaction between the pupils.
120. The EA states that an amalgamated school, based on the enrolment figure for 99 pupils, will have approximately 28 pupils in each class. This will allow for a range of different peer groups and additional opportunities for group tasks and roles preparing pupils as they progress to larger post-primary setting. With additional staff in the amalgamated school there will be a more sustainable spread of responsibilities which should allow for increased and sustainable extra-curricular provision.
121. In relation to teaching Principals, the EA advises that whilst the amalgamated school will have a teaching Principal, based on the enrolment figure for 99 pupils, there will be four other teachers to share workload associated with responsibilities for curriculum areas such as literacy and numeracy and other co-ordinator roles such as SENCO and Shared Education. Staff may also benefit from professional learning opportunities with other staff members, greater staff interaction, and mutual support.
122. The ETI update of 26 April 2023 states children may benefit from access to a larger number of teaching and support staff. The pooling of staff experience and expertise has the potential to enhance the curriculum and extra-curricular activities provided for the children. A larger staff may facilitate a wider distribution of roles and responsibilities.
123. Consideration has been given to those pupils from both primary schools who have special educational requirements, and these will continue to be met within the local schools and supported through the EA's Children and Young People's Services.

## **Implementation – Next Steps**

124. The CfC states, if the proposals are approved, the EA officers will work collaboratively with both schools to take forward an Implementation Plan which will be aligned to DE's circular 2018/15. The circular can be accessed at the following weblink: [Circular 2018/15 - Guidance on Implementation of Approved Development Proposals for School Amalgamations | Department of Education \(education-ni.gov.uk\)](https://www.education-ni.gov.uk/circular-2018-15-guidance-on-implementation-of-approved-development-proposals-for-school-amalgamations)
125. The CfC states that the first action will be the establishment of an Interim BoG which will be made up of equal representation from Ballytrea PS and Stewartstown PS. The Interim BoG will take forward the appointment of a Principal (Designate) who will, upon appointment, work with the Interim BoG, the EA and CSSC to take forward the new school and commission a Feasibility Study to determine the most suitable and strategic location of the amalgamated school.
126. The CfC asserts that in planning for the new school, the focus will be on meeting the needs of all pupils with the Interim BoG and the Principal (Designate) putting pastoral care at the forefront. This will be achieved through working with the pupils and staff of the two schools working together. This is supported by the implementation time that has been built in to allow for these arrangements to be put in place.

## **CONCLUSION**

127. The Department's Corporate Plan Every Child 2023-2028 sets out the Department's vision that '*Every child and young person is happy, learning and ready to succeed*'. All Departmental policies and processes, including Area Planning, contribute to the delivery of that vision and all have, as a central tenet, the educational well-being of children and young people.
128. A central aim of Area Planning is to achieve a network of viable and sustainable schools that are of the right type, right size, located in the right place and have a focus on raising standards. All DPs coming forward must be set in the strategic context and take account of provision and places within the wider area and against Ministerial priorities that have been set out.
129. Area Planning relates to the needs of children, rather than institutions, and the SSP clearly highlights the benefits of school amalgamations which include the fact that these help to address future sustainability, educational and financial issues and provide the opportunity for a better curricular offer to pupils and spread of teacher expertise as well as greater opportunities for teachers to interact with colleagues and pupils with their peers.
130. These proposals have both potential benefits but also a number of issues that are apparent from the analysis above. There is very strong evidence to support the closure proposals in regard to both schools. The SSP, implemented through Area Planning, is clear that the core issue for a school's sustainability must be the continuing provision of a high-quality education for

the children. Generally, it is acknowledged that as numbers in a school decline, the challenges it must overcome in order to provide a high-quality education increase.

131. Based on the evidence provided in this submission, it is clear that the actual admissions and enrolments at both schools are low. The actual enrolment of Ballytrea PS has been declining and it is projected that enrolments at Stewartstown PS are not expected to increase significantly.
132. The SSP states that ideally a primary school should have at least seven classrooms (one for each year group), no more than two composite year groups in a single classroom and a minimum of four teachers. The former Minister's statement in August 2021 setting out priorities for the regional Area Plan also stated that *'it is incumbent upon the managing authorities and sectoral body representatives to scope and bring forward proposals to address the issue of primary pupils being taught in composite classes of more than two year groups'*. The inspection reports for both Ballytrea PS (Inspection Report of March 2012) and Stewartstown PS (September 2016) reported ETI's concerns regarding each school's sustainability.
133. School census data for 2023/24 shows that both Ballytrea PS and Stewartstown PS are operating with composite classes comprising of more than two-year groups. Both schools' teaching complements are less than the SSP recommended minimum of four teachers. Both schools have been assessed as not meeting the criteria of the SSP in full particularly in relation to Quality Educational Experience (due to composite classes and teaching complements) and Stable Enrolment Trends. This suite of proposals would help to address such issues, class sizes would effectively double, there would be improved deployment of teachers and opportunities for more effective use of school resources.
134. Ballytrea PS also does not operate within its in-year budget and the school's deficit has increased from **-£93,614** in 2022/23 to a provisional deficit of **-£167,445** in 2023/24. The financial deficit of the school is projected to escalate in future years if enrolments continue to decrease and with no prospect of recovery. Although Stewartstown PS was operating with a surplus of £25,585 in 2022/23, the provisional position of the school as of 31 March 2024 shows a projected deficit of **-£23,461**.
135. The evidence set out above shows that the per capita costs of £4,665 for Ballytrea PS and £4,549 for Stewartstown PS are well above the average for all primary schools at £3,492.
136. **It would represent an inefficient use of public funds to continue sustaining both these primary schools in their current form when they have serious deficiencies when assessed against the criteria of the SSP.**
137. In relation to any potential negative impact which these closures may have on pupils and the local community, the EA asserts it has given due regard to this through their application of Section 75 of the Northern Ireland Act 1998 and the

Rural Needs (NI) Act 2016. The CfC acknowledges that the discontinuance of Ballytrea PS and Stewartstown PS will have an impact on the local area, however, the establishment of the new school in the wider Stewartstown area will retain Controlled provision in the area which will be sustainable.

138. The evidence in regard to amalgamating the two schools to create a new Controlled primary school is more balanced, as there is some uncertainty as to whether it will create provision that is sustainable in the longer term and other potential area solutions have not been explored fully.
139. On the one hand, the CfC states that the proposal aligns with the key themes of Area Planning. The Area Plan aims to ensure that all pupils have access to a broad and balanced curriculum that meets their needs in sustainable schools within a diverse system of education. The CfC for DPs 710-712 states that *'The proposed new controlled primary school will have a Year 1 admissions number of 20 pupils and approved enrolment number of 140 pupils. This will provide a more sustainable school to meet the needs of current and future pupils for the area'*.
140. These are currently two unsustainable schools with enrolments around half the minimum sustainability threshold for a rural primary school and the proposal has the potential to create one potentially sustainable school. Based on the combined enrolments of Ballytrea PS and Stewartstown PS for 2023/24 (109 pupils), a newly amalgamated primary school has the potential to meet the SSP criteria for a sustainable rural school in the Stewartstown area. This approach would implement the EA's preferred area solution set out in the proposals as presented, retain a Controlled rural primary school in this area and be in line with the SSP. The amalgamation would allow for a range of different peer groups and with additional staff there would be a more sustainable spread of responsibilities which should allow for increased and sustainable extra-curricular provision. The CfC details a number of options which were considered; however, it was determined by EA that there was no evidence that any of the alternative options other than an amalgamation of the two schools could provide sustainable provision.
141. It is notable that both Ballytrea PS and Stewartstown PS support the proposal for an amalgamation as both schools serve the wider Ballytrea/Stewartstown area and a newly amalgamated school would build on the strengths of both schools.
142. On the other hand, there are a number of uncertainties in regard to the long-term sustainability of the amalgamated school. The demographic picture set out at paragraphs 18-22 above and particularly the decline projected in the primary school population across Northern Ireland would suggest that there is not the number of children and young people to support and occupy primary schools in the way all communities and areas would want. This could potentially impact on the amalgamated school.
143. The EA has however, examined the live birth registers for the electoral wards from which the majority of the pupils of Ballytrea PS and Stewartstown PS are

drawn – they demonstrate that whilst there is some fluctuation, the birth rates remain fairly constant. This would enable the amalgamated school to have, as its baseline, a combined enrolment number from Ballytrea PS and Stewartstown PS which could further increase following the proposed amalgamation. There is however no guarantee. Analysis of the former Cookstown LGD (NISRA Projections) shows significant reductions in the 0-4 and 5-9 age groups projected to both 2028 and 2043, with a minimum reduction of 10.2% and a maximum of 17.8%. There is an increase of 9.8% for the 10-14 age group to 2028 however, a reduction of 9.1% to 2043. As these are ‘projections’, it is difficult to say with any degree of accuracy just what will be the actual level of decline or impact on the areas around Ballytrea and Stewartstown and what will be the specific impact on the schools in this particular area.

144. It is also notable that the statutory objection period to this suite of proposals generated 86 responses; 49 objected to the closure of Ballytrea PS and Stewartstown PS and 37 supported an amalgamation. There was a theme among a number of responses both for and against the proposal which acknowledged the amalgamation was a sensible, sustainable and logical way forward; but it was clear that each school favoured their own site as being the preferred site for the amalgamated school.
145. Should you decide to approve these proposals, a feasibility study will determine the most appropriate site for the proposed amalgamation. The feasibility study will, however, not bring community buy-in and should parents not opt for the newly amalgamated school, the likelihood of the proposals achieving a sustainable school is reduced. It would have both been preferable and advantageous to have consulted with school communities as to the site and location of the amalgamated school.
146. The risk can in part be mitigated by the EA developing an effective implementation plan which supports the respective school communities to accept the outcome of the proposal. If the proposals were approved, the first action following the approval is for the establishment of an Interim BoG. The Interim BoG would have equal representation from the BoGs of Ballytrea PS and Stewartstown PS. Thereafter an appointment of a Principal (Designate) will be made who will, upon appointment, work with the Interim BoG, EA and CSSC to take forward the new school. In planning for the new school, the focus must be on meeting the needs of all pupils with the Interim BoG and the Principal (Designate) putting pastoral care at the forefront of planning for the new school. This will be achieved through the two schools working together. This would be supported by the implementation time that has been built in to allow for the necessary arrangements to be put in place. Such actions may serve to demonstrate that the Interim BoG, EA and CSSC would work constructively to bring both school communities on board. There does seem to be recognition by both schools of their respective (un)sustainability and agreement that it makes sense to amalgamate.
147. Paragraphs 24-31 above examine the level of Controlled provision in the area – notably, they demonstrate that the alternative Controlled primary schools offered 1,175 places with 984 pupils enrolled and there were 265 available places; for

example, Cookstown PS has 195 available places (2023/24) which could easily accommodate all of the children from Ballytrea PS and Stewartstown PS (if parents so preferred.) It is arguable that DP 710 for the amalgamation should not be approved as there are sufficient available places which are accessible to the children and young people that currently attend Ballytrea PS and Stewartstown PS. Such a decision would lower capital and resource costs in the longer term. However, capital costs will be controllable following the outcome of the feasibility study – only the minimum works will be carried out to meet day one requirements. Further, such an approach would result in the removal of Controlled provision from this immediate area and primary school children potentially travelling up to 6.7 miles (depending on their home location and parental preference) to alternative schools, such as Cookstown PS.

148. It is notable that the EA opted not to include Coagh PS in the proposed area solution and its inclusion could have produced a more optimal sized school in the longer term, however, the EA engaged with the BoGs of all three primary schools and undertook an analysis of the area considering: pupil distribution, location of schools, finances and availability of places, on an individual school basis and on an area basis. The EA concluded that Coagh PS was a sustainable (rural) school (in its own right) with its catchment area showing the majority and concentration of pupil distribution from the immediate village and surrounding area. The EA noted at September 2022, Coagh PS had an enrolment of 115 pupils. The EA has also stated that Coagh PS over the last eight years has experienced an increase in its enrolment numbers and for the last three years the school's enrolment has achieved over the DE SSP criteria for a rural school (105). It was on such an analysis that the EA decided to just proceed with Ballytrea PS and Stewartstown PS. In 2023/24 Coagh PS had no available places.
149. The proposal is not a complete area solution as there are several Maintained schools as displayed in Table 4 (illustrating alternative primary provision within a five-mile radius of Ballytrea PS and Stewartstown PS) that have enrolments significantly below the threshold for a sustainable rural school. This is a missed opportunity for the EA and CCMS, and other Area Planning stakeholders who could have come together and collaborated to produce a more comprehensive area solution.
150. The issues highlighted above create a level of uncertainty in regard to the long-term sustainability of the amalgamated school and that the opportunity to create a more optimal solution for the area may not have been taken. Nonetheless, it is considered that DPs 710, 711 and 712 represent a localised rural area solution for the Controlled sector in this area – helping to ensure that education provision remains in this rural area in a more sustainable fashion. There is support from both schools and the proposals represent an opportunity to move forward.
151. SSP states that *“in rural areas where it is practical and possible to replace small schools with better facilities, this can be a key factor in retaining rural populations and encouraging rural development. At the core of the issue of sustainability, is the need to find the most effective way of providing significantly improved*

*educational opportunities for children within the context of their local and wider community. Amalgamation can provide a positive outcome for rural communities. Effective communication and collaboration, together with good leadership and management are central to achieving a positive outcome from a situation where amalgamation is determined to be the best option.”* The proposed amalgamation will produce a school with enrolments that were above the SSP minimum threshold in 2023/24, will reduce the number of composite classes and provide a larger teacher workforce.

152. The closure of any school is a difficult decision however, the evidence of sustainability issues impacting on both Ballytrea PS and Stewartstown PS is indisputable and the intention for the amalgamation of the two schools is to provide for a more educationally and financially sustainable school to meet the needs of current and future pupils in this (rural) area.
153. In light of the uncertainties outlined above, it is recommended that should you be content to approve the proposals as published, officials will request the EA, as proposer, to submit a long-term longitudinal evaluation of this amalgamation in bi-annual intervals over the next ten years. The proposals aim to keep and maintain Controlled rural provision in this area. The proposed evaluation will provide the Department with information regarding the new school’s sustainability, determine whether the proposals were successful and enable all Area Planning stakeholders to draw learning from it to inform future proposals.

## **RECOMMENDATION**

154. Based on the evidence detailed above, it is recommended that you:

- (i) **Approve** DP 710 to:

*Establish a new controlled primary school in the Stewartstown area (being in effect an amalgamation of Ballytrea Primary School and Stewartstown Primary School) with effect from 1 September 2025, or as soon as possible thereafter. The school will have an admission number of 20 and an enrolment number of 140.*

- (ii) **Approve** DP 711:

*Discontinue Ballytrea Primary School with effect from 31 August 2025, or as soon as possible thereafter (predicated upon the approval of Development Proposal Nos 710 and 712).*

- (iii) **Approve** DP 712:

*Discontinue Stewartstown Primary School with effect from 31 August 2025, or as soon as possible thereafter (predicated upon the approval of Development Proposal Nos 710 and 711).*

- (iv) Agree that in informing the EA of your decision on the proposals, that officials request a longitudinal evaluation of this amalgamation.

- (v) Agree that this submission (with appropriate redactions) can be published on the Department's website once the EA and the school have been notified of your decision.

155. The following appendices are attached for your consideration:

**Appendix A: Copy of Published Development Proposals (DPs) 710-712**

**Appendix B: Case for Change - DPs 710-7012**

**Appendix C: Statutory Two-Month Objection Period**

- Summary of Objections received during the Statutory Objection Period for DPs 710-712
- Bespoke Responses
- Response from Controlled Schools Support Council

**Appendix D: Sustainability Assessment - Ballytrea PS**

**Appendix E: Sustainability Assessment – Stewartstown PS**

**Appendix F: Copy of CCMS' Equality and Human Rights Screening Template – DPs 710-712**

**Appendix G: ETI Commentary Paper – DPs 710-712**

**Appendix H: Department of Education (Policy Team) Comments – DPs 710-711**



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