

COPY OF DEVELOPMENT PROPOSAL SUBMISSION

DP No.	DPs 483 and 484	
School	Mill Strand Integrated Primary School	
Proposal(s)	<p>DP 483 – To increase Mill Strand Integrated Primary School admissions number from 30 to 60. This would occur through an annual phased increase in the school’s enrolment number from 232 up to 420, commencing in September 2017, or as soon as possible thereafter.</p> <p>DP 484 - To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit with effect from 1 September 2017 or as soon as possible thereafter.</p>	
Department’s Decision	<p>DP 483 is approved, subject to modification as follows: “To increase Mill Strand Integrated Primary School’s admissions number from 30 to 58. This would occur through an annual phased increase in the school’s enrolment number from 232 up to 406, commencing in September 2018, or as soon as possible thereafter.”</p> <p>DP 484 is not approved.</p>	
Date of Decision	9 July 2017.	
Permanent Secretary’s Comments	<i>“I have carefully considered the information and analysis presented and am content to approve the recommendations set out at paragraph 164 of the submission.”</i>	
Additional Notes	-	
Information redacted	Some information and personal data may have been removed in line with the principles of the Freedom of Information and Data Protection Act.	
	Key	Details
	■	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: Ashley Waterworth
Area Planning Policy Team

DATE: 6 July 2017

TO: Derek Baker
Permanent Secretary

Copy distribution below:

DEVELOPMENT PROPOSALS (DPs) 483 & 484: MILL STRAND INTEGRATED PRIMARY SCHOOL

Issue: DP 483 – To increase Mill Strand Integrated Primary School admissions number from 30 to 60. This would occur through an annual phased increase in the school’s enrolment number from 232 up to 420, commencing in September 2017, or as soon as possible thereafter.

DP 484 - To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit with effect from 1 September 2017 or as soon as possible thereafter.

Both proposals are presented as linked but not dependent upon each other.

Timescale: Urgent – although the admissions position for September 2017 has been settled, certainty is needed to inform work on a new build.

Financial Implications: DP 483: Using 2016/17 Common Funding Formula (CFF) values, a high-level budget estimate to implement the proposal would be in the region of £73k (full-year cost) and £43k (in-year cost). While Mill Strand IPS could expect to receive a budget increase of this scale as part of the outworking of the CFF, it would not be an additional pressure on the Aggregated Schools Budget as funding follows the destination of pupils, whichever school they attend. Any additional recurrent costs would be a charge against the school’s budget.

The budget may be increased by other allocations, such as the Targeting Social Need (TSN) Factor and Premises Factor (Floor Area element), which cannot be estimated at present as relevant data is not available.

Additional funding would be required for staffing and overhead costs. This would have to be met from within the school’s budget.

Accommodation: Site options for a new build in the Portrush area (using funding linked to the Fresh Start Agreement) are being explored, and the planning process is at a stage where flexibility exists as to the capacity of that accommodation.

Transport: The average cost of transport per eligible pupil at Mill Strand IPS currently sits at £660.

Approval of enlargement on the scale proposed may have implications for the EA transport budget with increased numbers of eligible pupils as a result of pupils tending to travel longer distances to avail of integrated provision at Mill Strand IPS due to its position as sole integrated primary provider in the area.

DP 484: Should the proposed statutory pre-school provision be approved this would be funded through the DE Aggregated Schools Budget at an approximate cost of £51k for 26 part-time places.

FOI Implications:

This submission is fully disclosable.

Statutory Duties Implications

There is a statutory duty on the Department under Article 64 of the Education Reform (Northern Ireland) 1989 Order: *'to encourage and facilitate the development of integrated education, that is to say the education together at school of Protestant and Roman Catholic pupils.'*

Presentational Issues:

Mill Strand IPS has attracted local media and political attention recently. Press Office will monitor reaction to these decisions and respond accordingly.

Recommendations:

It is recommended that you :

- a. Approve:
 - (i) DP 483, subject to the following modification – To increase Mill Strand Integrated Primary School admissions number from 30 to 58. This would occur through an annual phased increase in the school's enrolment number from 232 up to 406, commencing in September 2018, or as soon as possible thereafter.
- b. Do not approve:
 - (ii) DP 484 - To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit with effect from 1 September 2017 or as soon as possible thereafter.

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

CONTENTS

Introduction: Paragraphs 1-6

Section 1: Paragraphs 7-51 provide evidence and analysis pertinent to both DPs;

Section 2: Paragraphs 52-108 provide evidence and analysis pertinent to DP 483;

Section 3: Paragraphs 109-158 provide evidence and analysis pertinent to DP 484;

Section 4: Paragraphs 159-165 provide an overall conclusion/recommendation.

Appendices

Appendix A: Sustainable Schools Policy, Area Planning and Development Proposal processes

Appendix B: Copy of Published DP 483 and DP 484

Appendix C: Cases for Change in support of DP 483 and DP 484

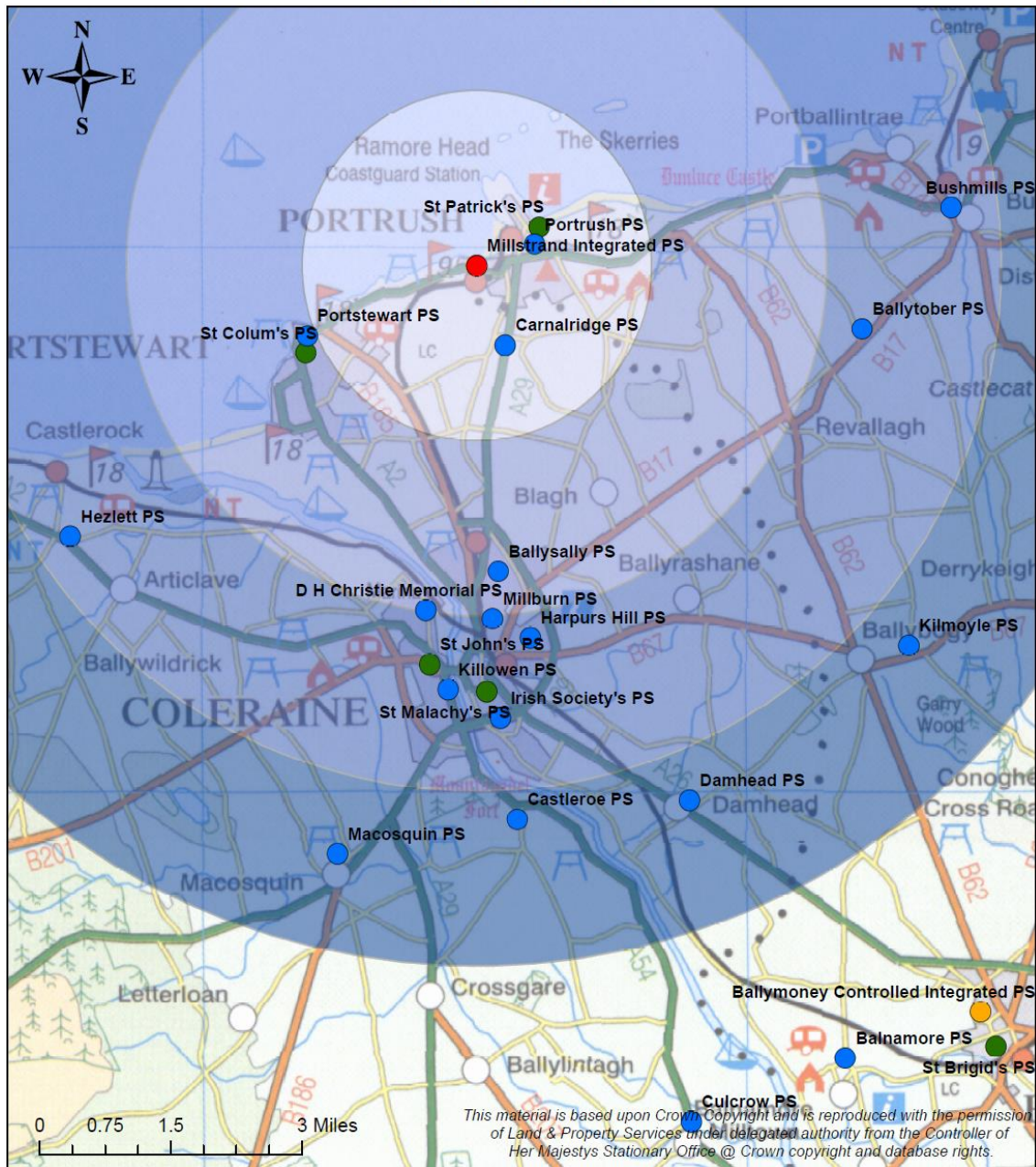
Appendix D: EA comments

Appendix E: Responses during the two month statutory objection period

Appendix F: ETI Comments

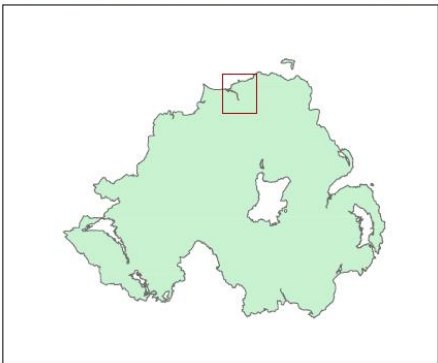
Appendix G: DE (Policy Team) Comments

Mill Strand IPS & NU - Alternative Primary Provision 8 Mile Radius

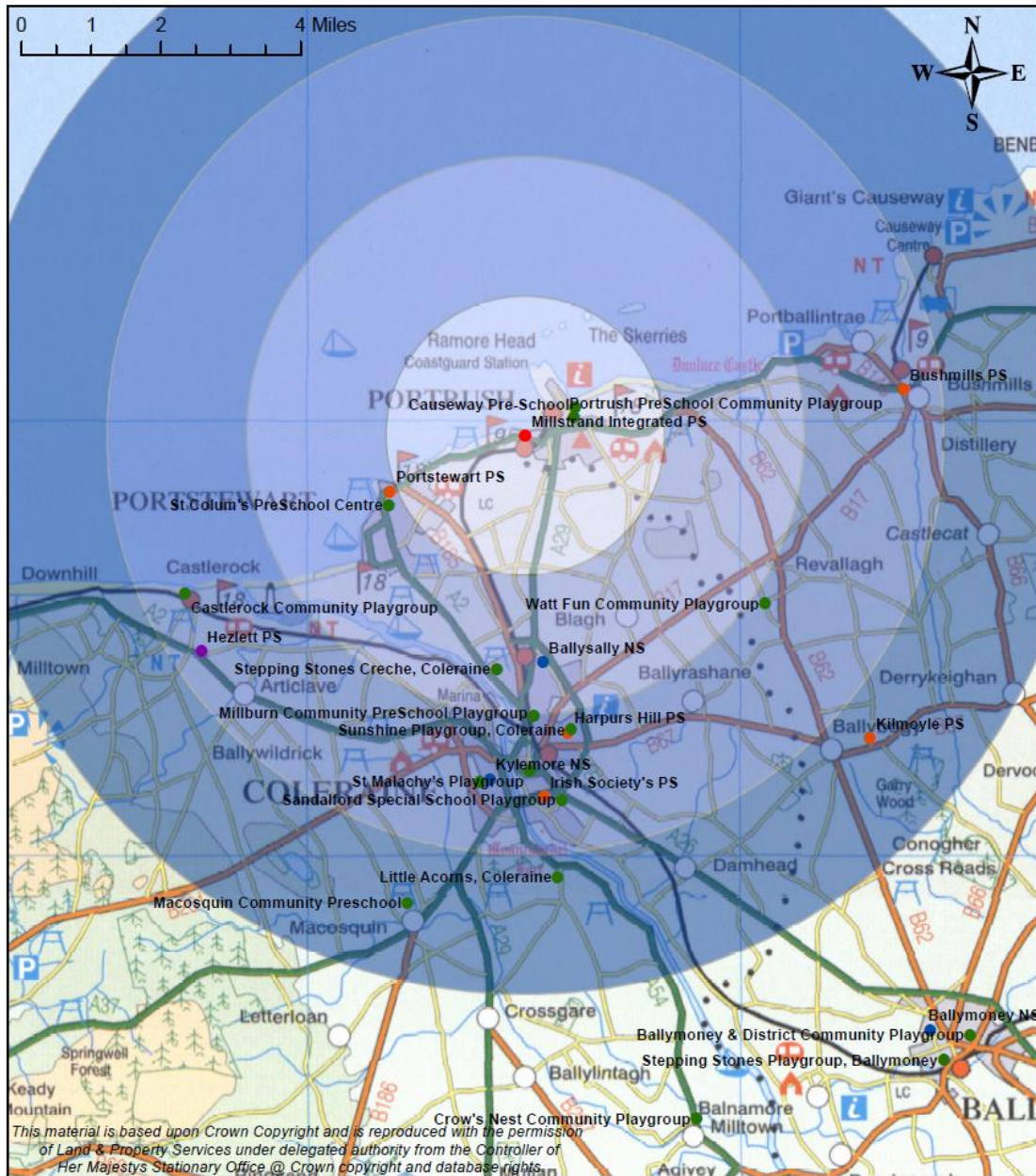


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- Legend**
- Mill Strand IPS & NU
 - Primary Controlled
 - Primary Voluntary
 - Primary Catholic Maintained
 - Primary Other Maintained
 - Primary Controlled Integrated
 - Primary GMI
- 8 Mile Buffer of Mill Strand IPS & NU**
- Buffer Distance**
- 0.00 - 2.00
 - 2.00 - 4.00
 - 4.00 - 6.00
 - 6.00 - 8.00



Mill Strand IPS & NU - 2, 4, 6 & 8 Mile Radii
Alternative Nursery / Pre-School Provision

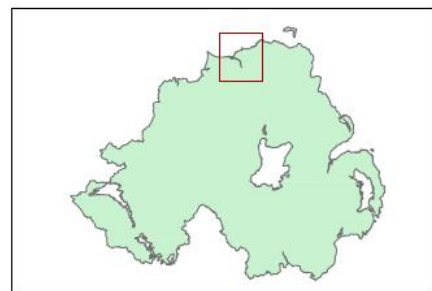


Key

- Mill Strand IPS & NU
 - Pre-schools
 - Primary Schools with Reception
 - Nursery Schools
 - Primary Schools with Nursery Units
- 8 Mile Buffer of Mill Strand IPS & NU

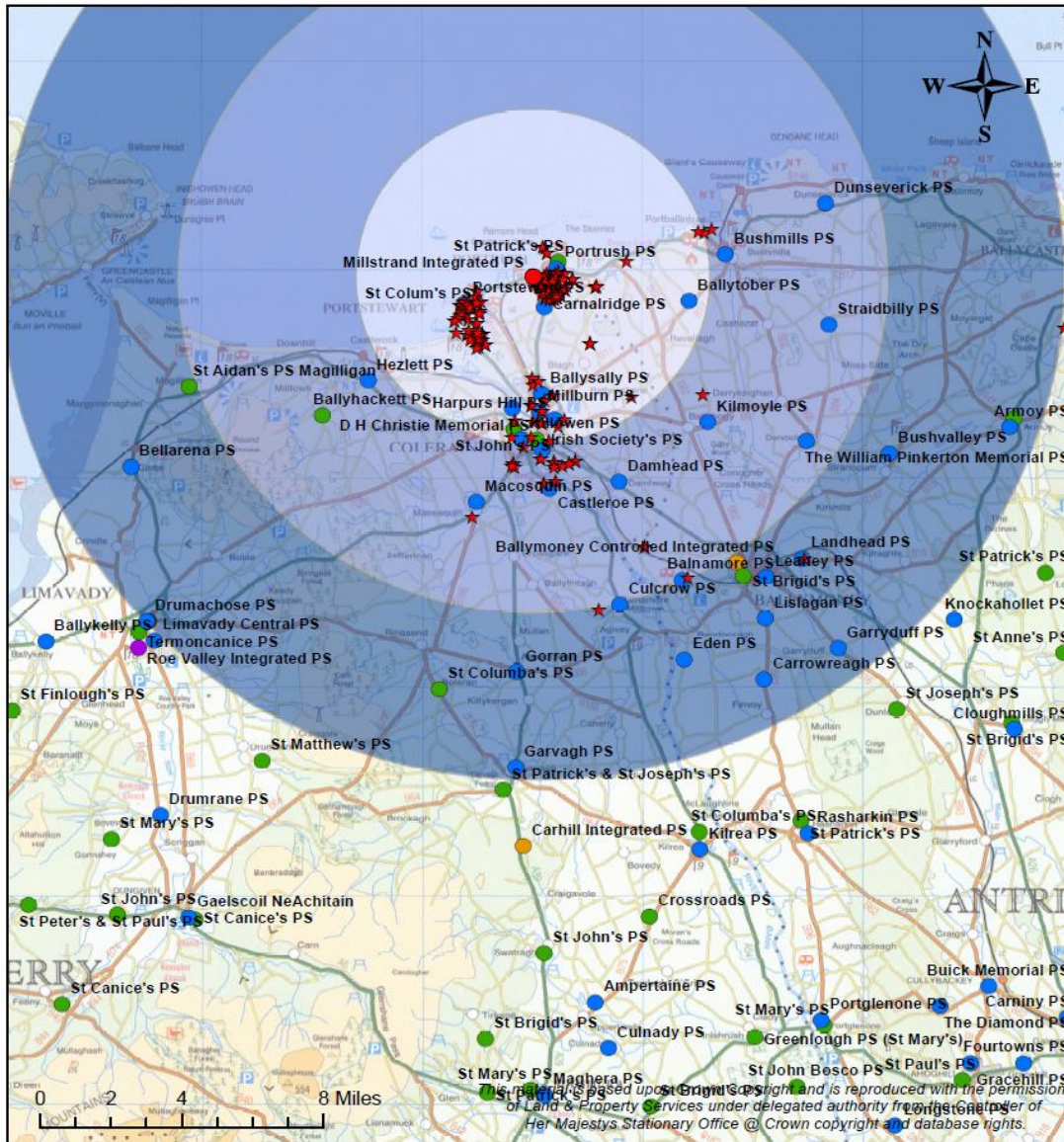
Buffer Distance

- 0.00 - 2.00
- 2.00 - 4.00
- 4.00 - 6.00
- 6.00 - 8.00

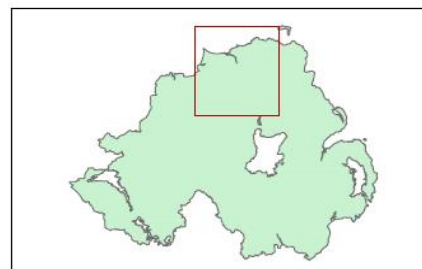


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Mill Strand Integrated PS & NU - Alternative Primary Provision & Pupil Locations Within 15 Mile Radius

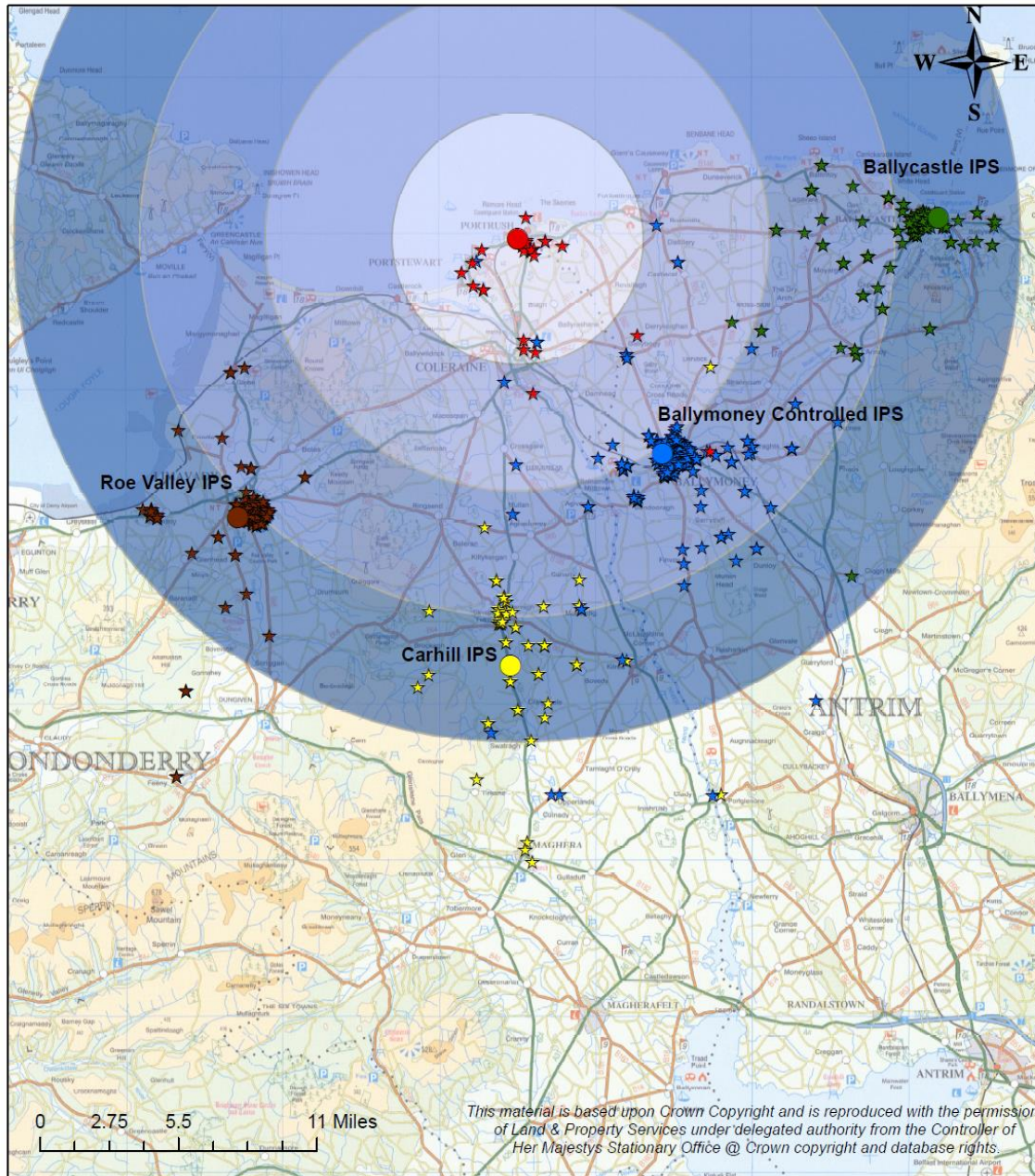


- Key**
- Mill Strand IPS
 - ★ Mill Strand IPS Pupil Location
 - Controlled Primary
 - Voluntary Primary
 - Catholic Maintained
 - Other Maintained Primary
 - Controlled Integrated Primary
 - GMI Primary
- 15 Mile Buffer of Mill Strand IPS**
- Buffer Distance**
- 0.00 - 5.00
 - 5.00 - 10.00
 - 10.00 - 15.00



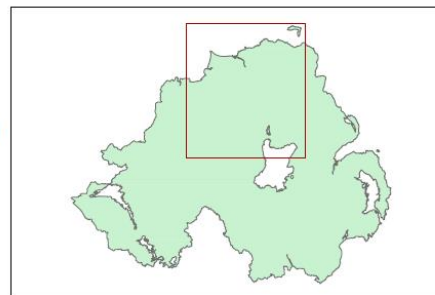
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Mill Strand IPS & NU - Alternative Integrated Primary Provision 20 Mile Buffer with Pupil Locations



Legend

- | | |
|--|---|
| ● Mill Strand IPS & NU | ★ Carhill IPS Pupil Location |
| ● Ballycastle IPS | ★ Roe Valley IPS Pupil Location |
| ● Ballymoney Controlled IPS | 20 Mile Buffer of Mill Strand IPS & NU |
| ● Carhill IPS | Buffer Distance |
| ● Roe Valley IPS | 0.00 - 5.00 |
| ★ Mill Strand IPS & NU Pupil Location | 5.00 - 10.00 |
| ★ Ballycastle IPS Pupil Location | 10.00 - 15.00 |
| ★ Ballymoney Controlled IPS Pupil Location | 15.00 - 20.00 |



INTRODUCTION

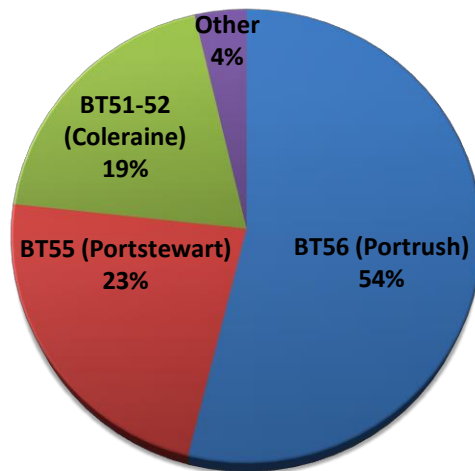
1. A Development Proposal (DP) is the statutory mechanism to bring about a significant change to a school, supporting implementation of the Area Plan. **Appendix A** provides detailed background information on the Sustainable Schools Policy, processes for Area Planning in line with the duty to encourage and facilitate the development of integrated education, and the Development Proposal process which will set the context for your consideration of this proposal.
2. On 11 January 2017 the Education Authority (EA) first published DPs 483 and 484 on behalf of the Board of Governors (BoG) of Mill Strand Integrated Primary School and Nursery Unit.
3. DP 483 proposes to “increase Mill Strand Integrated Primary School admissions number from 30 to 60. This would occur through an annual phased increase in the school’s enrolment number from 232 up to 420, commencing in September 2017, or as soon as possible thereafter.”
4. DP 484 proposes to “establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit with effect from 1 September 2017, or as soon as possible thereafter.” The proposals are presented as linked but not dependent upon each other.
5. Copies of the published DPs and associated Cases for Change are attached at **Appendices B** and **C** respectively.
6. This submission is structured as follows, reflecting the fact that DP 483 is referenced to the Department’s Sustainable Schools Policy and DP 484 is referenced to the Department’s Early Years Policy.
 - a. **Section 1:** Paragraphs 7 to 51 provide evidence and analysis pertinent to both DPs;
 - b. **Section 2:** Paragraphs 52 to 108 provide evidence and analysis pertinent to DP 483;
 - c. **Section 3:** Paragraphs 109 to 158 provide evidence and analysis pertinent to DP 484;
 - d. **Section 4:** Paragraphs 159 to 165 provide an overall conclusion and recommendation to inform your decision.

BACKGROUND

School and Pre-school

- 7. Mill Strand Integrated Primary School (IPS) is a co-educational grant-maintained integrated (GMI) primary school located on the west side of Portrush. The school opened in 1987 to serve the children of Portrush, Portstewart, Coleraine and surrounding area as the only integrated primary provider in the area. The school has an approved enrolment of 232 pupils with an actual enrolment of 218 in 2016/17. The approved admissions number is 30, however, through the granting of a temporary variation for 2017/18, the school is authorised to admit 45 pupils. Figures for 2016/17 show that 33.9% of the school’s pupils are entitled to Free School Meals (FSM).
- 8. The school serves a wide catchment area as illustrated by Maps 3 and 4. Chart 1 below further illustrates this point, showing that 46% of pupils attending Mill Strand IPS are located outside the Portrush area (BT56 postcode), drawn mainly from the Portstewart and Coleraine areas.

Chart 1: Mill Strand IPS pupil locations by postcode



Based on 2016/17 data

- 9. Mill Strand IPS Nursery Unit also opened in 1987, and has offered 26 full-time places since 2009.
- 10. In addition to the nursery unit Mill Strand IPS pre-school PlayGroup opened in September 2015 and for the current year it is reported in the Case for Change that 20 children are enrolled. The playgroup is funded by the Integrated Education Fund (IEF). Unlike non-statutory pre-school provision funded by the Department through the Pre-School Education Programme, this provision is not inspected by the Education and Training Inspectorate which precludes any comment on the quality of pre-school education delivered at this setting.

11. The school prioritises both forms of pre-school provision within its admissions criteria for entry to Year 1.

Area Context

12. The area that encompasses Portrush, Coleraine and Portrush is known locally as the 'Triangle Area' and a number of references to this appear throughout the submission.
13. The school is located within the Atlantic Super Output Area (SOA). On the Northern Ireland Multiple Deprivation Measure 2010 the Route Super Output Area is placed 334 out of 890 (1 being most deprived and 890 being least deprived). In 2016/17 33.9% of pupils enrolled were entitled to Free School Meals.

Strategic Area Plan

14. The EA Area Plan for 2017-2020, 'Providing Pathways', identifies strategic priorities for action and will be supplemented in each of the three years of the planning cycle by an Annual Action Plan containing details of specific actions to give effect to proposed changes at schools in order to address strategic area priorities identified. Proposals for expansion of provision at Mill Strand IPS featured as part of the EA's Action Plan for the period December 2015 to March 2017.

Demographics

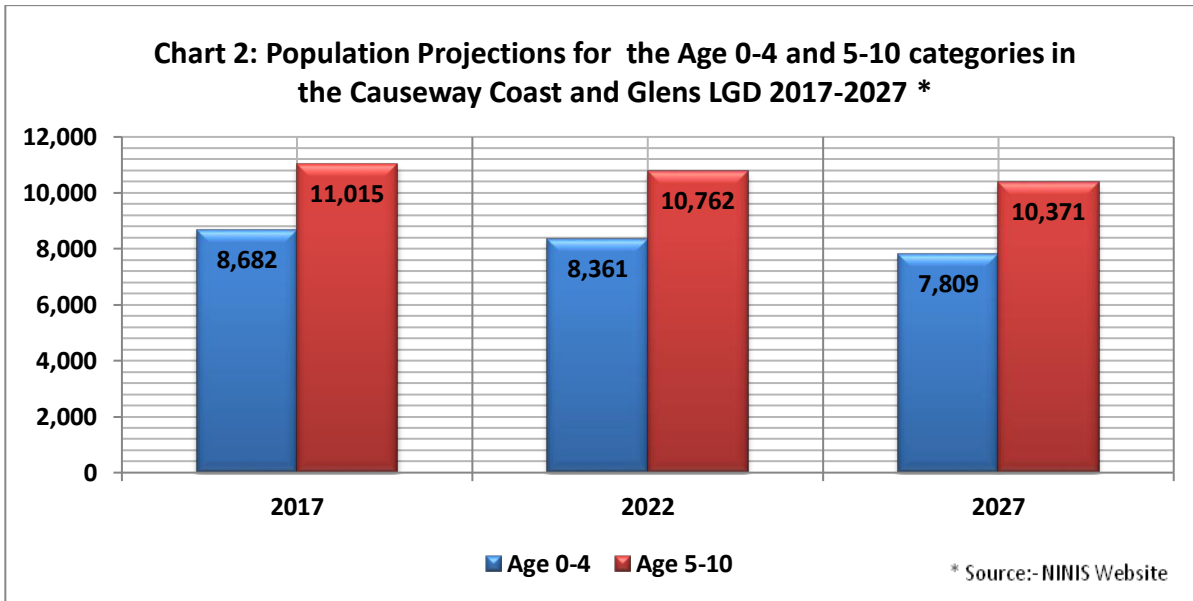
15. The Area Plan includes the following age projection information for the Causeway Coast and Glens LGD:-
 - The population in the age range 0-15 years is projected to decrease by 1.4% by 2024.
16. Key issues emerging from analysis of existing provision include the potential for integrated school development, and the strategic priorities for action identified within the plan include the development of proposals to encourage and facilitate sustainable integrated schools.
17. The NI Statistics and Research Agency (NISRA) local birth rates and population predictions provide information on potential future population trends in the area:
 - Birth statistics by academic year for all wards which fall at least partially within a 5 mile radius¹ of Mill Strand IPS are increasing by some 13% from 356 to 403 children in the pre-school cohort between September 2016 and September 2018 admissions².

¹ List of the wards considered: Atlantic, Ballysally, Castlerock, Cross Glebe, Dundooan, Dunluce, Hopefield, Macosquin, Mount Sandel, Portstewart, Royal Portrush, Strand (Coleraine LGD), University, Waterside

² Source: <https://www.nisra.gov.uk/statistics>

- Population projections for 3 year olds for the former Coleraine council area predict a significant drop in population in the area, with a fall of over 30% between 2017 and 2039 (726 to 504).

18. The Northern Ireland Neighbourhood Information Service (NINIS) population projections (2017-2037) show the following trends in Age 0-4 and Age 5-10 population categories in the Causeway Coast and Glens LGD. The Age 0-4 category is predicted to fall by over 10% and the Age 5-10 category by almost 6%.



Note: These figures can, however, only be indicators of the future pre-school population and do not fully take into account population migration and other factors. On that basis they are not an exact predictor of demand.

SPECIAL CONSIDERATIONS

Duty to Encourage and Facilitate Integrated Education

19. There is a statutory duty on the Department (DE) under Article 64 of the Education Reform (Northern Ireland) 1989 Order, 'to encourage and facilitate the development of integrated education, that is to say the education together at school of Protestant and Roman Catholic pupils'.
20. DE must also be mindful of its duty under Article 44 of the Education and Libraries (NI) 1986 Order and under Managing Public Money to ensure effective and efficient use of public funds.

Accommodation (future location of Mill Strand IPS)

21. Objectors to both these proposals reference uncertainty about the future location of Mill Strand IPS and how that may impact on any assessment of area impact.
22. On 23 March 2016 the Secretary of State for NI announced a list of shared and integrated education programmes which are set to benefit from the release of the

first tranche of the dedicated UK government funding allocated under the Stormont House and Fresh Start Agreements. The Fresh Start Agreement (FSA) includes provision of a contribution of up to £500 million over a ten-year period of new capital funding to support shared and integrated education subject to individual projects being agreed between the Executive and the UK Government.

23. Mill Strand IPS and Nursery Unit was included in the 23 March 2016 announcement on the first tranche of projects to benefit from the FSA capital funding package of £50m per annum for the next 10 years for shared and integrated education. Mill Strand IPS has been selected to take receipt of a new school build under the FSA.
24. The initial work on any new build involves identification of possible sites, technical feasibility work to assess the suitability of the sites and the preparation of a business case which will select the preferred site. The project is at planning stage with sites under consideration located in the Portrush area. Your decision on these DPs will inform that ongoing work.

SUSTAINABILITY ASSESSMENT

25. The Department's Sustainable Schools Policy (SSP) sets out six criteria supported by quantitative and qualitative indicators, which provide the framework for consideration of a school's longer-term sustainability. 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.
26. Schools are assessed against six sustainability criteria - (i) the quality of educational experience; (ii) stable enrolment trends; (iii) a sound financial position; (iv) strong leadership and management; (v) accessibility; and (vi) maintaining strong links with the community.

Criterion 1: Quality of Educational Experience

27. The Education and Training Inspectorate (ETI) inspected Mill Strand IPS & NU in 2012 and the quality of education provided by the school was assessed as 'good'. The nursery unit was also evaluated as good. The inspection report states that good standards were achieved by most of the children in English and mathematics.
28. Although the school was assessed as having important strengths in most of its educational provision an area for improvement was identified which the school had demonstrated the capacity to address:-

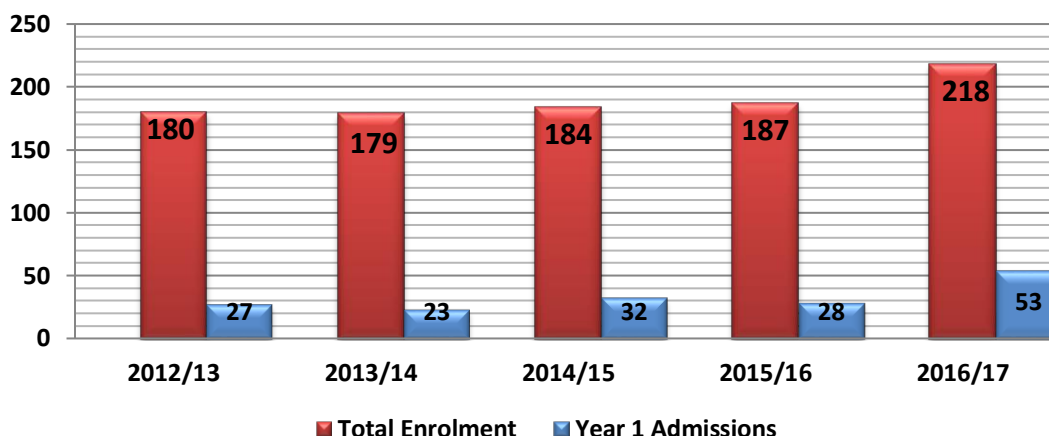
'review and develop further the quality of internal and external communication, including clarifying further the roles and responsibilities of all post-holders'.
29. The ETI Report noted the very good quality of pastoral care for children. It also affirms that children are well motivated and courteous and positively disposed to learning.

30. There are no composite classes at Mill Strand IPS.
31. The overall effectiveness conclusion for the nursery unit was also good. The report noted strengths in the World Around Us provision, the quality of planning and the quality of record keeping and recording children's progress. The report noted that improvements could be made in the quality of some teacher-child interactions and in transition arrangements between activities. The outdoor area was noted as a strength.
32. The Inspection Report comments "The school has placed appropriate emphasis on developing effective rewards and a positive behaviour system and the children benefit from a very good range of extra-curricular activities, which develop their social skills and confidence."
33. The report assessed the quality of provision for special educational needs (SEN) pupils at Mill Strand IPS as 'good'. The school identifies well and at an early stage pupils who would benefit from additional support with aspects of their learning.
34. A recent focus, under the guidance of the SENCO, has seen the further development of the Individual Education Plans; these plans outline clearly identified targets and appropriate strategies for achieving them. The school's performance data and outcomes from the IEPs demonstrate that children with SEN are making good progress in their learning and are achieving in line with their ability. Support for children with SEN is provided through a combination of withdrawal and in-class support.
35. A District inspection visit to the school was made on 6 April 2016 by the District Inspector. The school and nursery unit has progressed well since its last inspection. Both provisions have definitely moved forward in some areas and this shows continued levels of capacity to sustain improvement.

Criterion 2: Stable Enrolment Trends

36. The SSP minimum thresholds apply to grant-aided schools in all sectors. A rural primary school's minimum enrolment threshold is 105 pupils. Ideally a primary school should have 7 classrooms (1 per year group). Mill Strand IPS has approved admissions and enrolment numbers of 30 and 232 respectively. The school's enrolment has exhibited growth over a five year period. The school's enrolment significantly exceeds the SSP minimum enrolment threshold of 105 for a rural primary school.

Chart 3: Mill Strand IPS Pupil Enrolment and Y1 Admissions



37. Year 1 admissions have shown annual fluctuations with a recent spike evident following the establishment of additional non-statutory pre-school provision.

First Preference Applications

38. Mill Strand IPS received a total of 46 first preference applications for 2017/18. The table below illustrates this is the second consecutive year that the school has been significantly oversubscribed with first preference applications for Year 1 entry.

Table 1: First Preference Applications to Year 1 at Mill Strand IPS

September Intake	Approved Admissions	Applications for Y1		
		1st Pref	2nd Pref	Total
2017/18	30	46	2	48
2016/17	30	47	0	47
2015/16	30	24	0	24
2014/15	30	32	0	32
2013/14	30	25	1	26

39. The number of children enrolled in the statutory nursery unit remains steady at 26.

Criterion 3: Sound Financial Position

40. The Case for Change asserts the school is operating with an acceptable budget surplus. It goes on to state the school three-year financial plan has been carefully budgeted to allow for continued growth. The Department has no immediate financial concerns about this school.

Criterion 4: Strong Leadership and Management

41. The ETI inspection report of January 2012 assessed the overall quality of leadership and management of Mill Strand IPS as good. The report states that the Principal ‘provides very good leadership and management’ and ‘exhibits a commitment to the inclusive ethos of the integrated school’. The ‘very good quality of the leadership and management provided by the Principal, coupled with the

complementary governance procedures of the governors' is listed as a strength of the school.

42. The report comments that the Board of Governors expressed strong support for the work of the school, the leadership of the Principal and the commitment and dedication of its staff and that 'the governors are fully involved in the strategic planning and policy development for the school'. It was also stated that the Principal had the support of the Vice-Principals and co-ordinators.
43. ETI reported that governors are 'committed and professional' in their approach. The report notes that the Board of Governors actively exercise their challenge function with the principal and have demonstrated a willingness to provide support in improving areas identified in the inspection.

Criterion 5: Accessibility

44. The school has a central location within the Portrush area and situated on the main bus route of the three towns it serves - Portrush, Portstewart and Coleraine. As illustrated in Map 4 the current location appears accessible to children attending Mill Strand IPS who are mostly located within a 5 mile radius of the school.
45. The search for a suitable site for the proposed new school building is ongoing with the school's stated preference to remain located in Portrush as referenced in the Case for Change.

Criterion 6: Strong Links with the Community

46. ETI commented within the report on "the very good quality of links and partnerships established with the local and wider community, which benefit the children". The report adds that the school maintains links with neighbouring schools, most recently through the 'Creative Change' project and also good work in STEM (science, technology, engineering and mathematics) in conjunction with the University of Ulster.
47. ETI added that the Parents' Council gives very good support to school events and provides additional resources to broaden the children's learning opportunities. It is appropriate that the school has recognised the need to consult with parents more pro-actively for their views on the life and work of the school, in order to benefit further the children's educational and pastoral experiences. The Case for Change draws attention to the contribution of the Parents' Council towards social and financial support provided to the school.
48. The Case for Change states that Mill Strand IPS is the only school in the local area that hosts services in all three of the main churches. It also states that the school regularly utilises local businesses and venues to host school events, functions and plays.

49. The school presently offers out-of-school hours care for children attending the school. This facility is referred to as Mill Strand Children's Centre and it incorporates all after school activities including sports and clubs. Additionally the centre operates during holiday periods.

Sustainability Summary

50. Mill Strand IPS is an increasingly popular school as demonstrated through its growing enrolment, although the school remains within its approved enrolment of 232 for 2016/17 with a combined Year 1-7 enrolment of 218 pupils.
51. The school is meeting the stated criteria of Sustainable Schools Policy in full and is providing a good quality educational provision. The school is financially viable, exhibiting good quality leadership and management, strong links with the community and is accessible to pupils.

SECTION 2

DP 483: To increase Mill Strand Integrated Primary School admissions number from 30 to 60. This would occur through an annual phased increase in the school's enrolment number from 232 up to 420, commencing in September 2017, or as soon as possible thereafter.

AREA PRIMARY PROVISION

52. There are five neighbouring primary schools; three located in Portrush (two controlled, one Catholic maintained) and two in Portstewart (one controlled and one Catholic maintained). All five schools have available places – a total of 227 available places across the three Portrush schools and 176 available places across the two Portstewart schools.

Table 2: Pupil enrolments at Primary schools within a five mile radius

School	Distance from Mill Strand IPS	Approved Enrolment	2013/14 Enrol	2014/15 Enrol	2015/16 Enrol	2016/17 Enrol	2016/17 Available Places ³
Mill Strand IPS, Portrush	-	232	179	184	187	218	20
Portrush PS, Portrush	0.9	286	189	192	198	189	103
St Patrick's PS, Portrush	1.2	150	72	71	71	79	75
Carnalridge PS, Portrush	1.4	230	202	190	192	184	49
Portstewart PS, Portstewart	2.3	412	240	241	249	252	161
St Colum's PS, Portstewart	2.5	187	169	173	167	177	15
Ballysally PS, Coleraine	4.4	304	220	226	244	266	56
Total		1801	1271	1277	1308	1365	479

53. Table 2 above illustrates that the total enrolment at Mill Strand IPS has increased steadily over recent years, with a spike in 2016/17, and also that there are a significant number of alternative primary places available in surrounding non-integrated schools.

54. The snapshot of area primary school provision at Table 3 illustrates the extent to which available places exist (2016/17 figures) at all alternative providers in the area, amounting to over 1,400 places, which includes 21 available places at Mill Strand IPS.

³ 'Available Places' = the number of places available in a school that can be applied for through the competitive admissions process, recorded at the time of the annual school census.

Table 3 : Snapshot of area primary provision

Ref	School	Distance - (Miles - as per Google maps - by car)	Approved Enrolment Number 2017/18	2014/15 Actual Enrolment (incl. SEN)	2015/16 Actual Enrolment (incl. SEN)	2016/17 Actual Enrolment (incl. SEN)	2016/17 SEN	2016/17 Available Places	Approved Admissions Number 2017/18	2016/17 Actual Admissions No (incl. SEN)	2017/18 Total 1st Pref Applications	2017/18 Over/Under subscribed at 1st preference	ETI Reports – Assessment of Education Provision
306-6544	Millstrand IPS & NU	-	232	184	187	218	6	20	30	53	46	Over - 16	Feb '12 - Good
	Sub-total		232	184	187	218	6	20	30	53	46		
	Controlled												
301-0847	Portrush PS *	0.9	286	192	198	189	6	103	41	22	29	Under -12	Nov '13 - Very Good
301-0873	Bushmills PS	6.3	226	88	90	85	*	143	30	15	15	Under -15	Nov '14 - Good
301-0878	Kilmoyle PS	8.2	115	80	78	65	*	53	18	7	12	Under - 6	March '14 - Good (Latest report is a FUI on NU only - June 2015)
301-0892	Ballytober PS	6.6	87	71	81	87	5	5	12	8	9	Under - 3	March '16 - Significant areas for improvement
301-2049	Carnalridge PS *	1.4	230	190	192	184	*	49	30	23	10	Under - 20	June '12 - Very Good
301-2225	Damhead PS	8.3	203	197	196	206	*	1	29	30	30	Over - 1	June '11 - Good
301-2229	Hezlett PS **	12.6	295	231	243	248	5	52	42	38	13	Under - 29	May '15 - Good
301-2237	Killowen PS	7.1	195	193	200	201	6	1	28	32	30	Over - 2	May '13 - Very Good
301-2250	Portstewart PS	2.3	412	241	249	252	*	161	59	32	30	Under - 29	May '16 - High level of capacity for sustained improvement
301-2264	Millburn PS	5.2	422	366	355	351	15	86	60	53	53	Under - 7	Jan '15 - Good
301-2284	DH Christie Memorial PS	7.1	452	411	412	425	22	49	60	63	62	Over - 2	March '13 - Very Good
301-2288	Castleroe PS	8.1	98	92	102	110	7	0	14	16	15	Over - 1	Oct '10 - Outstanding
301-3700	Macosquin PS	9.3	194	198	200	204	5	0	28	30	28	-	March '10 - Outstanding
301-6052	Harpurs Hill PS	5.7	224	196	201	194	24	54	30	27	35	Over - 5	Nov '15 - High level of capacity for sustained improvement
301-6252	Ballysally PS	4.4	304	226	244	266	18	56	43	51	34	Under - 9	Dec '13 - Very Good
301-6264	Irish Society's PS	6.3	427	263	266	247	7	187	60	38	24	Under - 36	April '16 - Capacity to identify & bring about improvement
	Sub-total		4170	3235	3307	3314	133	1000	584	485	429		
	Maintained												
303-0547	St Patrick's PS, Portrush	1.2	150	71	71	79	*	75	21	12	10	Under -11	June '11 - Good
303-2231	St Colum's PS, Portstewart	2.5	187	173	167	177	5	15	27	32	17	Under -10	Dec '15 - Important area for improvement
303-2297	St Malachy's PS, Coleraine **	6.1	323	236	230	224	*	100	46	33	21	Under - 25	May '07 - Old report, no grade
303-3709	St John's PS, Coleraine	6.7	351	165	157	157	*	195	50	24	25	Under - 25	April '16 - High level of capacity for sustained improvement
	Sub-total		1011	645	625	637	11	385	144	101	73		
	Grand Total		5413	4064	4119	4169	150	1405	758	639	548		

* 2017 - ETI Inspections unable to confirm quality of education due to teacher strike action.

** Reception pupils included in actual enrolments of Hezlett PS for 2014/15, 2015/16 & 2016/17. Also for St Malachy's PS, Coleraine for 2014/15 & 2015/16 - it had no rec. pupils in 2016/17.

55. Analysis of first preference applications (Table 4) shows that Mill Strand IPS experienced a significant increase in first preference applications in 2016/17, replicated in 2017/18.

Table 4: Year 1 Applications

Sept	Approved Admissions	Applications				
		1st Pref	2nd Pref	3rd Pref	Other	Total
2017/18	30	46	2	0	0	48
2016/17	30	47	0	0	0	47
2015/16	30	24	0	0	0	24
2014/15	30	32	0	0	0	32
2013/14	30	25	1	0	0	26

Integrated Primary provision in the Area

56. Map 4 displays the location of Mill Strand IPS and other alternative integrated primary schools within a twenty mile radius of the school. The school makes reference within the Case for Change to the fact that it is the only integrated primary school in the Triangle Area. As illustrated by Table 5, the nearest alternative provision, Ballymoney Controlled Integrated Primary School, is located 12.8 miles from Mill Strand IPS with 75 places currently available. The only other integrated provider with available places in the wider area is Carhill Integrated Primary School (located 20.1 miles from Mill Strand IPS) with 24 places available for 2016/17.

Table 5: Pupil enrolments at other Integrated primary schools in the area

School	Distance from Mill Strand IPS	Approved Enrolment	2013/14 Enrol	2014/15 Enrol	2015/16 Enrol	2016/17 Enrol	2016/17 Available Places
Ballycastle IPS	18.6	158	158	160	176	176	0
Carhill IPS, Garvagh	20.1	94	64	66	67	71	24
Roe Valley IPS, Limavady	20.2	174	168	162	170	188	0
Ballymoney CIPS	12.8	414	298	328	354	355	75
Total		840	688	716	767	790	99

57. The pupil locations identified on Map 4 illustrate that integrated school alternatives to Mill Strand IPS serve distinct catchment areas.

CASE FOR CHANGE

58. The Case for Change in support of DP 483 is reproduced in full at **Appendix C**.
59. The Board of Governors proposing DP 483 asserts there is a high level of parental and community demand for integrated primary education and this should be met by introducing a two form entry throughout the school.

60. The Proposer includes the following points as part of its stated rationale for the change:
- The current enrolment figure of 232 and admissions number of 30 are considered inadequate to meet the demand for places at the school.
 - Staff and Governors recognise the desirability of educating children from all backgrounds together in a culture of respect and mutual understanding, promoting excellence and celebrating difference.
61. Mill Strand IPS will contribute to meeting the needs of every child in the area by providing a viable alternative for those parents who would prefer an integrated education for their children. This will assist the Department in meeting its duty to encourage and facilitate integrated education.
62. The Case for Change highlights that Mill Strand is the only integrated primary school serving the Portrush, Portstewart and Coleraine areas. The proposal is designed to address parental demand for integrated primary education and a perception that there are not sufficient integrated places to meet parental demand.
63. The Case for Change references admissions and enrolments at schools within a three mile radius of Mill Strand IPS and asserts that approving the proposal would have little impact on existing schools in the area.

STATUTORY DP PROCESSES

Pre-publication Consultation

64. The Case for Change confirms details of statutory consultation undertaken with the Board of Governors, staff, pupils and parents of Mill Strand IPS.
65. The EA undertook the required pre-publication consultation with schools which would, in the EA's opinion, be affected by the proposal. Twelve responses were received by the EA in relation to DP 483. One response received (from a school's Board of Governors) supported both proposals with all other responses expressing opposition. Those opposed to the Development Proposals referred to:
- The number of spare places already in the system locally in both pre-school and primary settings.
 - The significant detrimental impact the proposal would have on other schools and providers.
 - Development of the plan without the full context of other sectors being considered.
 - Potentially significant capital and recurrent costs associated with delivery of the Development Proposals.
 - Lack of information on the statistical integrity of the survey referenced in the Case for Change.
 - A lack of evidence demonstrating demand for integrated education in the area.

EA comments

66. EA comments are reproduced in full at Appendix D. It is highlighted that the average cost of transport per eligible pupil currently sits at £660, and approval of enlargement on the scale proposed may have implications for the EA transport budget as pupils tend to travel longer distances to avail of integrated provision at Mill Strand IPS due to its position as sole provider for the Triangle area.

Statutory two-month objection period

67. The EA first published DP 483 on 11 January 2017. The statutory two-month objection period ended on 13 March 2017, during which time anyone interested in or affected by the proposal could express views directly to the Department.

68. The Department received 102 responses, 64 of which supported the proposal and 38 opposed it. A detailed account of responses received during this period is provided at Appendix E.

	Letters of support	Letters of objection
Individual responses	63	28
Other Schools/Preschools		9
Sectoral Body	1 (NICIE)	1 (CSSC)
Total	64	38

69. Reasons provided for supporting the proposal are summarised below:

- Growing demand for integrated education in the Triangle area.
- Studies by UU and others demonstrate that up to 80% of the population support integrated education, yet Mill Strand can only currently offer this to 4% of the Triangle area primary age population.
- No alternative area provider of integrated provision to meet demand.
- The four alternative integrated schools serve catchment areas which are discrete and separate from Mill Strand. The distances involved mean that none of these schools are a realistic alternative option.
- Due to the nature of integrated education any impact on other schools in other sectors is minimised by the wider catchment areas traditionally associated with integrated schools.
- Integrated education can only be provided in integrated schools, shared education is not integrated education.
- The statutory duty to promote and encourage integrated education.
- The founding families of Mill Strand Integrated School had to re-mortgage their homes to set up the school that our pupils benefit from today and this illustrates their commitment.
- Fresh Start Funding for the expansion of Mill Strand will come from the Treasury and not local taxation, Stormont or local government.

- The Good Friday Agreement placed a responsibility on our politicians to support the growth of integrated education.
- Mill Strand IPS is the only integrated primary school in the area.
- The "Integrating Education in Northern Ireland" report - an independent review of integrated education commissioned by the Education Minister and published in November 2016 called for the DE and bodies such as the Education Authority, to actively promote integrated education in Northern Ireland.
- To oppose the Development Proposals is to deny parental choice and the choice for integrated education.
- The demand for places in Mill Strand IPS is because people want to send their children to an integrated school.
- Shared education is not Integrated Education - There is a responsibility to support the growth of Integrated Education.
- Justice Treacy judgment indicated that the Department of Education was not allowed to stifle the growth of the integrated sector to protect falling numbers in Catholic and Controlled schools and was critical of area based provision approaches then used by the Department of Education to the detriment of integrated education planning.
- The suggestion that parents should fill the spaces left in other schools is completely missing the point.
- The key here is freedom of choice.
- The reason Mill Strand is expanding is because parents have decided that it is the only school in the area which fulfils the brief of educating together.
- The provision of a new build at Mill Strand provides a unique opportunity for the best possible educational environment for the pupils.

70. Reasons provided for opposing the proposal are summarised below:

- Appears a done deal in light of the approval of a new school build, which has been approved without a defined site or enrolment size.
- Area planning impact cannot be properly assessed as there is uncertainty over the proposed future location of Mill Strand.
- Mill Strand has taken advantage of a preferential position (through access to external funding - IEF and Mill Strand Trustee grants) to drive demand for integrated education at the expense of other providers that equally welcome all faiths and none.
- If preference for an integrated education is the driver for expansion, why does the school only cite this as their 6th priority for admission when setting criteria?
- The school affords greater priority in its admissions criteria to those attending their pre-school facility, hence the real driver for expansion is teacher-led (as opposed to playgroup) pre-school education rather than any expressed preference for integrated education.
- Where is the evidence for an upsurge in demand for integrated education in the area? This is inconsistent with the fact that integrated post primary provision in the area is undersubscribed.

- Enrolment trends have been inflated by external funding. The increase in numbers is not evidence of parental demand for integrated education but an artificial inflation of numbers caused by the availability of altruistic funding.
- Repeated reference is made to Mill Strand being a ‘Triangle school’ servicing all three towns but the data provided assesses the impact at providers within a three mile radius. Statistics must reflect the entire area and the capacity available within the area.
- The Triangle area already has a surplus of primary places – why create more?
- There is no need for additional integrated pre-school provision as existing providers can meet demand, and are cross-community/integrated in nature.
- The demographics don’t support expansion, and new housing potential within Portrush is largely exhausted. Only 54% of Mill Strand’s intake live in Portrush and the reliance upon migration from other towns suggests that Coleraine, as regional transportation hub, might be a more appropriate location for their new build.
- In relation to Article 44 the creation of additional pupil places in the Triangle area which already has pupil places surplus to requirement would be a contravention of what is deemed “reasonable expenditure”.

71. During the two month statutory objection period the Department facilitated a request for a meeting to hear at first hand the concerns of a number of schools objecting to these proposals. The points made during that meeting overlap with those summarised above, and are reproduced in full at Appendix E.

NICIE comments

72. The Northern Ireland Council for Integrated Education (NICIE) supports the proposal. Its submission is reproduced in full at Appendix E. Some key points are summarised below:

- Due to the nature of integrated education any impact on other schools in other sectors is minimised by the wider catchment areas traditionally associated with integrated schools.
- There are 28 primary schools in the former Coleraine Council Area. 11 are undersubscribed, 11 are oversubscribed and the rest are holding their numbers. The 16 schools (other than Mill Strand IPS) which have been oversubscribed or held their numbers are unlikely to be much impacted as the effect will be spread over all these schools.
- While there is evidence of unfilled places, these places are not in formally integrated schools and NICIE reiterates its view that additional integrated provision is required in the area.
- The four alternative integrated schools serve catchment areas which are discrete and separate from Mill Strand IPS. The distance involved means none of these schools are a realistic alternative option.

CSSC comments

73. The Controlled Schools' Support Council (CSSC) objects to this proposal. Its submission is reproduced in full at Appendix E. Some key points are summarised below:
74. There is insufficient evidence within the Case for Change in respect of this capital proposal to enable the impact on other schools to be adequately assessed. The relocation of the school to a larger site in the town is referenced, however, it is not clear if a site has yet been identified.
75. Central to area based planning is the aim of establishing a network of sustainable schools. The CSSC wish to highlight the potential impact of DP 483 not just on primary schools in the towns of Portrush, Portstewart and the surrounding areas but the potential impact on primary schools across a wider geographical area including, but not exclusively, the Coleraine area. The case for change confirms that almost 20% of pupils currently attending the school reside in Coleraine.
76. The case for change states the provision at Mill Strand IPS is heavily oversubscribed on an annual basis. The admissions and enrolments data illustrates that this statement can only be attributed to the 2016/17 academic year.
77. It is also noted that additional pre-school places were established at Mill Strand in September 2015 and funded by the IEF. In the previous three years all pupils who applied were admitted with the exception of two children in 2014/15.
78. The CSSC does not believe DP 483 aligns with the current Area Plan and would urge that consideration is given to whether that which is proposed is the most appropriate area solution.
79. DP 483 has the ability to affect neighbouring controlled schools to remain sustainable and therefore may disadvantage children and young people in the local area.
80. The CSSC notes the inclusive ethos within local Controlled schools and the long history of cross community collaboration with schools from other sectors, including well established shared education links between schools in the area.
81. The 2014 based population projections for the Causeway Coast and Glens Council area project a decline in the 0-15 age range of 14%. This indicates fewer primary school places are likely to be required in the future.
82. The aspiration for a new school on a new site in the Portrush area creates a dilemma in that the impact of this proposal cannot be adequately assessed without clarity in respect of the future location of the school.

Education Training Inspectorate (ETI) comments

83. ETI comments are broadly supportive based on inspection evidence of existing provision, but recognise the potential for adverse impact on enrolments at

neighbouring non-integrated providers if approved. ETI comments are reproduced in full at **Appendix F**.

OTHER CONSIDERATIONS

Religious Balance

84. Table 6 below illustrates that Mill Strand IPS has a religiously balanced enrolment.

Table 6 - Religious Balance at Mill Strand IPS

Millstrand IPS – Religious Balance	2012/13	2013/14	2014/15	2015/16	2016/17
Protestant	76	69	69	71	74 (30%)
Roman Catholic	80	86	81	74	71 (29%)
Other / Religion not known	51	52	60	71	100 (41%)
Total	207	207	210	216	245

Finance – Resource Implications

85. A high-level estimate of funding (using 2016-17 Common Funding Formula values) is as follows:

AWPU Factor	$30 \times 1.08 \times \text{£}2,061.2134$	=	£66,783
Premises Factor - Pupil (FTE) Funding	$30 \times \text{£}85.67$	=	£2,570
GMI Admin Costs	$30 \times \text{£}120$	=	£3,600
TOTAL (Full Year)		=	£72,953
TOTAL (Part-Year)	$72,953 \times 7/12$	=	£42,556

86. Using 2016/17 Common Funding Formula (CFF) values, a high-level budget estimate to implement the proposal would be in the region of £73k (full-year cost) and £43k (in-year cost). While Mill Strand IPS could expect to receive a budget increase of this scale as part of the outworking of the CFF, it would not be an additional pressure on the Aggregated Schools Budget as funding follows the destination of pupils, whichever school they attend. Any additional recurrent costs would be a charge against the school's budget.

87. The funding requirement may be increased by other allocations, such as the TSN Factor and Premises Factor (Floor Area element), which cannot be estimated at present as relevant data are not available.

Transport considerations

88. The EA comments that transport assistance is currently provided for 46 pupils at the school at an average cost of approximately £660 per child. As there are no other integrated primary schools in the area the school has a relatively large catchment area, increasing the likelihood of pupils being over the 2 mile radius to qualify for transport assistance.

89. Further attention is focused on a possible requirement to evaluate the efficiency of the service currently provided for pupils attending Mill Strand IPS. If the proposal is approved, there could be a need for a new bus service to accommodate all pupils meeting the qualifying criteria.

Demand for Primary Places at Mill Strand IPS (Temporary Variations)

90. Should a school receive more applications for admission than it has places available it can request a temporary variation (TV) of its admissions/enrolment number from the Department.
91. When considering a TV request from a school the Department will look at the availability of places in that sector in the area within a reasonable distance of each pupil's home address. For primary schools reasonable travelling distance is defined as a distance of 2 miles. Where there are no other reasonable alternatives the Department will grant additional places.

Table 7: Temporary Variations

School Year	Approved Admissions Number	Approved Enrolment Number	Temporary Variations Approved (To total of)*
			Admissions Number
2017/18	30	232	47
2016/17	30	232	53
2015/16	30	232	-
2014/15	30	232	34
2013/14	30	232	-

*Numbers exclude stated children (all year groups) and those admitted following a successful admissions appeal or decision of the Exceptional Circumstances Body (year of admission only)

Demand for Integrated Education

92. There is evidence of unmet demand for integrated education in the area through the level of first preference applications to Mill Strand IPS in each of the last two years (Table 1) and temporary variations that have been approved by DE (Table 7) as a result.
93. The Case for Change references a belief that growing demand for places at Mill Strand IPS stems from a strong desire to have children educated in an integrated setting. However, the demand evident through recent applications to Mill Strand IPS does not at the moment correlate with strong demand for a post-primary integrated education by the time pupils at Mill Strand IPS reach transfer age. Table 8 illustrates that only 16% of pupils transferring decide to continue their education in a post-primary integrated setting through attending North Coast Integrated College.

Table 8: Transfer from primary to post-primary integrated education

	Year			
	2014	2015	2016	
Destination School	No. of pupils			% of pupils
Coleraine Academical Institution	*	0	0	0
Coleraine Grammar School	0	*	*	16
Coleraine High School	*	0	0	0
Dalriada School, Ballymoney	0	*	*	4
Dominican College, Portstewart	10	8	6	24
Dunluce School, Bushmills	*	*	*	8
Glengormley High School	0	*	0	0
Loreto College, Coleraine	6	*	*	16
North Coast Int College, Coleraine	*	*	*	16
St Joseph's College, Coleraine	7	*	*	16
Total	28	24	25	100

DP 483 - CONCLUSIONNeed

94. Given the current level of expressed demand (46 first preference applications for 2017/18) and the maximum temporary approved admission to Year 1 to date (53 in 2016/17), the evidence does not support enlargement on the proposed scale.
95. While there is evidence of unmet demand for Year 1 places through the granting of temporary variations, demand is not currently at a level consistent with the proposed admissions number of 60, intended to facilitate a double class Year 1 entry leading to a 14 class based school. The school has not reached its approved enrolment number yet but the evidence would suggest that the current approved enrolment number is insufficient should upward enrolment trends continue.

Impact

96. Concerns have been raised by objectors that approval of DP 483 would have a detrimental impact on enrolments at neighbouring schools, potentially on a scale that would threaten future sustainability. It is recognised that approval of DP 483 has the potential to impact on enrolments elsewhere, but whether that impact would be concentrated on a particular school or schools in the immediate area, or be spread across a number of schools in the wider area, mindful that Mill Strand IPS is sole integrated provider for the Triangle area, is less clear cut. There is insufficient evidence available to provide you with an accurate prediction of the distribution of impact.
97. If DP 483 is approved and it becomes apparent that one or more schools in the area are experiencing sustainability issues then it will be a matter for the planning

authorities to work together through the established area planning structures to assess the need for area solutions to address those issues.

OPTIONS

98. When the evidence is not clearly indicating an approval or rejection decision then the Department has discretion to consider a modification of DP 483. The aim of a modification is not to create a significantly different proposal but to make a minor amendment that takes account of the current context and comments received during the consultation. Taking account of the evidence outlined above, there are options to consider before making your decision on this proposal.

Reject DP 483

99. There is evidence of demand that would support a decision to approve a permanent increase to the school's approved numbers, however, the evidence does not currently support the scale of increase proposed. The first option is to turn down DP 483 and await a further proposal that is timed to align more closely with trend evidence, and a more established pattern of demand. A consideration here is your decision on DP 484. A decision not to approve DP 484 has the potential to alter the pattern of intakes to P1 if the IEF should decide not to continue funding non-statutory pre-school provision which is currently an influence on demand for P1 places at the school. The future position is unknown.

100. However, there is a statutory duty placed on the Department to encourage and facilitate the development of integrated education, and even if numbers are not currently at the levels proposed, applying the duty would not be consistent with a decision to reject DP 483, denying the school an opportunity to build upon an upward trend in enrolments, even if that has in part been fuelled by independently funded non-statutory pre-school provision.

101. This is therefore not the recommended option.

Approve DP 483

102. There is evidence of demand that would support a decision to approve a permanent increase to the school's approved numbers, however, the evidence does not currently support the scale of increase proposed. The second option is to approve DP 483 as published, mindful of the statutory duty to encourage and facilitate the development of integrated education, allowing the school to grow in an unfettered manner.

103. However, the duty is not an unfettered duty. Approval of the proposal as published would create a significant increase in available places that has no strong historical trend supporting such an increase. Should the school fail to meet the approved enrolment number then the number of surplus places in the system would increase. A lesser increase may be more manageable for the school and other schools in the area.

104. This is therefore not the recommended option.

Modify DP 483

105. There is evidence of demand that would support a decision to approve a permanent increase to the school's approved numbers, however, the evidence does not currently support the scale of increase proposed. The third option is to modify DP 483, consistent with application of the statutory duty to encourage and facilitate the development of integrated education but reflecting a closer alignment with the enrolment trends while remaining consistent with the Proposer's original intent to create a double entry to the school.
106. Modifying the admissions number to 58 would equate to an enrolment number of 406, at the upper end of the range (381-410) for a 14 class base school. This facilitates a double entry at year 1 and aligns with the building handbook for a 14 class base school.
107. Consideration must be given to the timing of this decision and its close proximity to the proposed implementation date of 1 September 2017 and the onset of the school summer holiday period. It is proposed that the implementation date is modified to 1 September 2018, or as soon as possible thereafter. This should not negatively impact on any child seeking admission to Year 1 in September 2017 as the admissions position for September 2017 has been settled through use of the Department's temporary variation powers. These powers remain available to address any further short term pressure on places that may arise until the modified numbers would take effect.
108. On balance this is the recommended option.

SECTION 3

DP 484: To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit with effect from 1 September 2017 or as soon as possible thereafter.

AREA PRE-SCHOOL PROVISION

109. Statutory pre-school provision in the form of Nursery Units (NUs) and non-statutory pre-school provision in the form of Playgroups (PGs) is detailed in Table 6 below, distinguishing between part-time (PT) and full-time (FT) places.
110. Table 9 illustrates the extent to which alternative pre-school providers are available in the area, with an upwards trend in funded pre-school provision until 2014/15, followed by a reduction in funded provision through to 2016/17.
111. Evidence provided by the Department's Early Years Team (reproduced within Appendix G) indicates that at the end (stage 2) of the pre-school admissions process for September 2017 admissions 22 funded pre-school places remain available in the area.

SPECIAL CONSIDERATIONS

Early Years Policy (and Practice)

112. DE aims to ensure that at least one year of pre-school education is available to every family that wants it. The policy position is set out in Learning to Learn – A Framework for Early Years Education and Learning, published on 7 October 2013. Among its key actions is placing a moratorium on any new or additional full-time provision or conversion from part-time to full-time (defined as over 4.5 hours) in advance of a review of the current levels of full-time provision, existing research and the needs of children being served by it. DP 484 is compatible with the current moratorium as it relates to part-time places.
113. It is the Department's practice not to displace good quality pre-school provision already in existence with pre-school provision in an alternative setting.

The non-sectoral nature of pre-school provision

114. Pre-school provision is not defined according to sectors so all pre-school settings, regardless of location, are considered accessible to pupils from all backgrounds. All pre-school settings (except where independently funded) follow the same curricular guidance which facilitates equality of opportunity.

Table 9: Snapshot of area pre-school provision

Ref No	School Name	Distance (M)	2012/13		2013/14		2014/15		2015/16		2016/17	
			T	F	T	F	T	F	T	F	T	F
	Primary with NUs											
306-6544	Mill Strand IPS & NU	/	27	27	28	28	26	26	29	29	27	27
301-2250	Portstewart PS & NU	2.3	26	26	26	26	26	26	26	26	26	26
301-6052	Harpur's Hill PS & NU	5.7	28	28	26	26	26	26	27	27	26	26
Sub-total			81	81	80	80	78	78	82	82	79	79
	Pre-School											
3AB-0096	St Malachy's PG	6.1	24	24	24	24	25	25	24	24	25	19
3AB-0130	Watt Fun Community PG	5	25	24	23	23	26	26	25	16	30	16
3AB-0248	Millburn Community PS PG	5.1	24	24	24	24	23	23	24	24	26	25
3AB-0260	Playhouse Activity Centre	6.7	30	20	33	25	24	24	24	24	32	24
3AB-0585	Sunshine PG	5.7					24	15	10	10	24	12
3BB-0367	Portrush PS Community PG	0.9					32	32	27	27	33	29
3BB-0369	St Colum's Pre-School Centre	2.5	24	23	24	24	23	20	31	31	23	20
3CA-0631	Causeway Pre-School	1.2			19	8	19	15	16	11	15	15
3CB-0486	Stepping Stones Creche	2.7	23	8	15	9	21	11	18	9	12	10
Sub-total			150	123	162	137	217	191	199	176	220	170
	Nursery School											
311-6215	Kylemore NS	6.6	104	104	104	104	105	105	105	105	104	104
311-6263	Ballysally NS	4.1	52	52	52	52	52	52	52	52	52	52
Sub-total			156	156	156	156	157	157	157	157	156	156
Total			387	360	398	373	452	426	438	415	455	405



No data available as the Pre-School was not in existence

T = Total pupils
F = Total funded pupils

CASE FOR CHANGE

115. The Case for Change in support of DP 484 is reproduced in full at **Appendix C**.
116. The Board of Governors proposing DP 484 explains that the main reason for seeking the change is to assist the school in reducing the bureaucratic burden associated with managing and governing pre-school provision under two separate funding and governance mechanisms. In addition to an existing statutory nursery unit the school has established an independent playgroup funded by the Integrated Education Fund, registered with the Northern Health and Social Care Trust to admit up to 20 children.
117. The proposed statutory provision would replace the existing non-statutory provision and, from the school's perspective, this would streamline the day-to-day operation/administration and funding of pre-school provision. It is asserted that this would help the school deliver improved outcomes for children, become a more sustainable school, and support DE by assisting in its duty to encourage and facilitate the growth of integrated education.
118. The Case for Change references admissions and enrolments at schools within a three mile radius of Mill Strand IPS and asserts that approving the proposal would have no impact on existing pre-school providers in the area as all are fully subscribed.
119. It is asserted that the educational impact of approval would be positive with increased accessibility to integrated education and greater availability of high quality pre-school provision meeting parental demand for places.

STATUTORY DP PROCESSES

Pre-publication Consultation

120. The Case for Change confirms details of statutory consultation undertaken with the Board of Governors, staff, pupils and parents of Mill Strand IPS.
121. The EA undertook the required pre-publication consultation with schools which would, in the EA's opinion, be affected by the proposal.
122. Seventeen responses were received by the EA in relation to DP 484.
123. One response received (from a school's Board of Governors) supported both proposals with all other responses expressing opposition. Those opposed to the Development Proposals referred to:
- The number of spare places already in the system locally in both pre-school and primary settings.
 - The significant detrimental impact the proposal would have on other schools and providers.

- Development of the plan without the full context of other sectors being considered.
- Potentially significant capital and recurrent costs associated with delivery of the Development Proposals.
- Lack of information on the statistical integrity of the survey referenced in the Case for Change.
- A lack of evidence demonstrating demand for integrated education in the area.

EA comments

124. EA Pre-School Education Group (PEG) comments on DP 484 are reproduced in full within Appendix G, explaining the PEG view that there is a sufficiency of pre-school provision in the area to meet demand.

Statutory two-month objection period

125. The EA first published DP 484 on 11 January 2017. The statutory two-month objection period ended on 13 March 2017, during which time anyone interested in or affected by the proposal could express views directly to the Department.

126. The Department received a total of 93 responses, 61 of which supported the proposal and 32 objected to it. A detailed account of responses received during this period is provided at Appendix E.

	Letters of support	Letters of objection
Individual responses	60	22
Other Schools/Preschools		9
Sectoral Body	1 (NICIE)	1 (CSSC)
Total	61	32

127. Reasons provided for supporting the proposal are summarised below:

- To meet the strong parental demand for an integrated beginning to children's learning journey. Children should not be segregated from their peers at such a young age, based on their perceived religion.
- Mill Strand Integrated School & Nursery is the only integrated education provider at primary & nursery level.
- The fulltime provision of 26 extra preschool places at Mill Strand will have zero impact on any other local preschool simply because you either choose integrated (not shared) education, or you choose something else.
- It is a parent's right to choose the type of education their child has. This cannot be fulfilled by the current number of integrated school places throughout Northern Ireland. This has to change! I feel that the proposals put forward by Mill Strand Integrated Primary School are a step in the right direction to achieving this in my immediate area, allowing parents to choose.

128. Reasons provided for opposing the proposal are summarised below:

- There is currently sufficient provision of nursery school places - within Portrush and Triangle Area.
- A negative effect on existing pre-School provision in the area and would likely mean that some would close resulting in job losses. This ultimately removes the choice of already established pre-schools.
- The uncertainty over the possible location of the proposed new build for Mill Strand IPS and Nursery Unit make it difficult to assess the potential sustainability impact on other providers.
- The approval of DP 484 would place significant pressure on the admission numbers of the established pre-schools affecting the future viability. This would have a negative and far-reaching impact on the other nursery and primary schools in the area.
- The North Eastern Education and Library Board's Area Plan 2014-2018 predicts a long-term decline to a level below the 2016 demand.
- "Providing Pathways" similarly projects a 1.4% decrease in the population of this area in the age range 0-15 years by 2024. This document also shows that there are over 4,000 empty primary school places across the Causeway Coast and Glens Borough Council area.
- The system is inequitable, it gives schools classed as 'Integrated' a much more favourable stance regarding funding and development opportunities. In the case of Mill Strand IPS they have been able to offer an annual £600 travel grant for those children who do not live in Portrush and a free 8.30am - 1pm, 5 days a week nursery unit for 3 year olds. Financial incentives like these are unavailable to those who attend other schools.
- If the DP were to be approved, there would be a larger number of children availing of the transport provision and this will increase the costs-The Development Proposal confirms that only 54% of pupils currently attending Mill Strand School come from Portrush. If there are no additional children available within Portrush then this proposal can only succeed if other schools in the town are forced into closure or if more children come from outside the town.
- A history of sharing exists with a number of cross community initiatives between local schools and preschools.

129. During the two month statutory objection period the Department facilitated a request for a meeting to hear at first hand the concerns of a number of schools objecting to these proposals. The points made during that meeting overlap with those summarised above, and are reproduced in full at Appendix E.

NICIE comments

130. The Northern Ireland Council for Integrated Education (NICIE) supports the proposal. Its submission is reproduced in full at Appendix E. Some key points are summarised below:

- The Independent Review of Integrated Education recommended “That where clear demand is demonstrated, integrated pre-school provision (an integrated nursery or any pre-school linked directly to an integrated primary school) should receive funding and additional places even where there are unfilled pre-school places in other providers in the area”⁴.
- This proposal would support the school in delivering improved outcomes for children and to help a sustainable school to be sustainable in the future.
- In 2016/17, 21.8% of children enrolled at Mill Strand IPS were registered at Stages 1-5 on the Special Educational Needs (SEN) register. Through the establishment of a statutory nursery unit this would create equality of opportunity in accessing services to support children e.g. SEN etc.
- The nursery unit is oversubscribed and in response to oversubscription in 2015/16 the Board of Governors took the decision to establish a Pre-School Playgroup to accommodate demand.
- In the case of Portrush, the opening of Mill Strand IPS Pre-School Playgroup has had no substantial impact on other settings.
- NICIE urge the Minister to approve this proposal as it would appear Mill Strand IPS has in recent years met a previously unmet demand.

CSSC comments

131. The Controlled Schools’ Support Council (CSSC) objects to this proposal. Its submission is reproduced in full at Appendix E. Some key points are summarised below:

- The Proposer’s Case for Change references compliance with the Department of Education’s Sustainable Schools Policy (SSP). The CSSC understands the Department of Education’s SSP does not apply to pre-school education.
- The Case for Change states there is no alternative for parents seeking an integrated education. The CSSC understands that pre-school provision is not defined according to sectors so all pre-school settings, regardless of location, are considered accessible to children from all backgrounds.
- Further consideration needs to be given to the potential impact of DP 484 on other pre-school providers in the local area and also the potential impact on providers across a wider geographical area including, but not exclusively, Coleraine.
- The CSSC believes DP 484 has the potential to affect the ability of neighbouring Controlled schools to remain sustainable and therefore may disadvantage children and young people in schools in the overall area.

⁴ This was an independent review of Integrated Education carried out by Prof Margaret Topping and Mr Colm M Cavanagh. The review was published on the 2 March 2017 and is available at <https://www.education-ni.gov.uk/publications/report-independent-review-integrated-education>

- The statistics provided within the Case for Change do not consider projected need in the area. There is no analysis of live births or population projections.
- There is insufficient evidence within the Case for Change in respect of the capital development to enable the impact of DP 484 on other pre-school providers to be adequately assessed.
- The CSSC recognises the role of the EA in planning pre-school provision based on an assessment of need. The Case for Change provides no reference to the EA's role or position of the Pre-School Education Group on the need for additional statutory provision at Mill Strand IPS.

Education Training Inspectorate (ETI) comments

132. ETI comments are broadly supportive based on inspection evidence of existing provision, but recognise the potential for adverse impact on neighbouring pre-school providers if approved. ETI comments are reproduced in full at **Appendix F**.

OTHER CONSIDERATIONS

Need for Pre-school Provision

133. In determining need, the Department generally assumes a level of provision at 95% of target age children, predicated on the application rate for pre-school places which is approximately 92%; however the level of provision within local areas may be higher or lower based on historic patterns of demand and assessment of ongoing need.

134. As the existing non-statutory provision at Mill Strand IPS is not PSEP funded provision, it is not included in the analysis below, either before or after the proposed change.

135. The numbers of pre-school places and associated percentages are measured against the Year One enrolments for 2014/15, 2015/16 and 2016/17 academic years.

Table 10: Level of Pre-school Provision – Two mile radius of Mill Strand IPS

Year	Statutory places	Non-statutory places	Reception places	Total pre-school provision (exc. reception)	P1 places	Level of pre-school provision (% of P1 places)	Underage children in statutory places
2014/15	26	47	0	73	93	78.5	0
2015/16	29	38	0	67	109	61.5	0
2016/17	27	44	0	71	110	64.5	0
2017/18 (as proposed)	52	44	0	96	110	87.3	-

136. The level of provision within the two mile radius is currently significantly lower than the planning figure, but would be close to 100% if the proposed statutory provision is approved.

Table 11: Level of Pre-school Provision – Five mile radius of Mill Strand IPS

Year	Statutory places	Non-statutory places	Reception places	Total pre-school provision (exc. reception)	P1 places	Level of pre-school provision (% of P1 places)	Underage children in statutory places
2014/15	235	184	4	419	402	104.2	30
2015/16	239	185	8	424	423	100.2	11
2016/17	235	170	0	405	465	87.1	23
2017/18 (as proposed)	261	170	-	431	465	92.7	-

137. The level of provision within a five mile radius has been close to or above the planning figure in each of the last three years, suggesting adequate provision is already in place and that the establishment of additional statutory provision may impact on other pre-school providers in the wider area. This is further indicated by the number of underage children accessing pre-school places in the five mile radius in both 2014/15 and 2015/16.

138. Table 12 below records ETI assessments of the quality of provision available at statutory and non-statutory pre-school settings in the area, excluding the independently (IEF) funded non-statutory provision at Mill Strand IPS which is not subject to ETI inspection.

Table 12: Quality of Pre-School Provision – Two and Five mile radius

Ref	Setting	Radius	ETI Assessment
	Nursery School		
311-6215	Kylemore NS	5	Feb '08 - Excellent
311-6263	Ballysally NS	5	May '10 - Good
	Nursery Unit		
306-6544	Mill Strand IPS	-	Feb '12 - Good
301-2250	Portstewart PS	5	May '16 - Good
301-6052	Harpurs Hill PS	5	Nov '15 - Outstanding
	Pre-school (Voluntary and Private)		
3BB0367	Portrush Pre-School Community Playgroup	2	Sept '15 - Capacity to identify & bring about improvement
3CA0631	Causeway Pre-School	2	June '16 - Capacity to identify & bring about improvement
3AB0096	St Malachy's Playgroup	5	Feb '10 - Good
3AB0130	Watt Fun Community Playgroup	5	May '16 - High level of capacity for sustained improvement
3AB0248	Millburn Community PreSchool Playgroup	5	Dec '15 - Capacity to identify & bring about improvement
3AB0260	Playhouse Activity Centre	5	June '16 - High level of capacity for sustained improvement
3AB0585	Sunshine Playgroup, Coleraine	5	Jan '16 - High level of capacity for sustained improvement
3BB0369	St Colum's PreSchool Centre	5	Nov '07 - Very Good
3CB0486	Stepping Stones Creche, Coleraine	5	April '17 - Good

Demand for Pre-School Places at Mill Strand Nursery Unit (Temporary Flexibility)

139. The full-time and/or part-time enrolment number of nursery schools and nursery units in primary schools is determined by the Department under Articles 25 and 29 of the Education (NI) Order 1998. The Department has determined that for pre-school education in nursery schools and nursery units the maximum class size is 26.
140. 'Learning to Learn – A Framework for Early Years Education and Learning' published in October 2013 introduced temporary flexibility in class size for nursery schools and nursery units up to a maximum class size of 30 in certain circumstances.
141. Temporary flexibility will only be approved to address a shortage of pre-school places for target age children within an area which cannot be met by any other pre-school provider as part of the Pre-School Education Programme. There were no temporary flexibility requests in the area approved for 2014/15, 2015/16 or 2016/17.
142. Mill Strand IPS Nursery Unit submitted a temporary flexibility request for four additional places for the 2017/18 school year. This was turned down by DE on 5 May 2017 as sufficient places were available in the area to meet the demand for pre-school education provision.

Demand for pre-school education of an integrated management type

143. The Case for Change states that additional provision of an integrated management type is required in the area. It claims that estimated need (for the Coleraine area) stated in the 2014 Area Plan "greatly underestimates the future need for integrated places" and further claims that "latest research indicates a need for 2,500 places of which a minimum of 420 will be required by Mill Strand Integrated School in addition to 52 Nursery places". The nature of the 'latest research' is not referenced in the Case for Change, nor does it elaborate on how, or by how much, need has been underestimated.

DP 484 - CONCLUSION

Need

144. The current level of pre-school education provision within both a two-mile and five-mile radius of the school is used as an indicator of current capacity to meet need for pre-school education provision and is considered alongside other factors such as population projections to determine the likely future need for additional pre-school education provision in the area.
145. The numbers of pre-school education places and associated percentages are measured against the Year One enrolments for the 2014/15, 2015/16 and 2016/17 academic years.

146. As the existing non-statutory provision at Mill Strand IPS is not publicly (PSEP) funded provision, it is excluded from this analysis.
147. The level of provision within the two mile radius is currently significantly lower than the planning figure, even if the proposed statutory provision were made available. This would suggest that pre-school education in the area is insufficient to meet demand, however, the EA has advised that in each of the last two years, every target aged child in the area whose parents stayed with the pre-school admissions process to the end received the offer of a funded place, suggesting that demand in the area is currently being met with the current level of provision.
148. The level of provision within the five mile radius has been above the planning figure in two of the last three years, dropping below it in 2016/17. If approved, the additional statutory provision would bring the level in the area close to the planning figure, suggesting that it may be needed to meet demand for pre-school education places. However, the number of underage children accessing pre-school education places in the five mile radius in each of the last three years suggests that adequate pre-school education provision is already in place in the wider area and that additional provision may impact on other good quality provision in the area and/or further increase the number of underage children accessing pre-school education places.
149. Demographic trends for the pre-school population are exhibiting a downwards pattern as described at Paragraphs 15-18 of this submission.

Impact/Displacement

150. In considering DPs for statutory pre-school provision, careful consideration is given to the impact of any new statutory provision on existing good quality voluntary/private providers funded through the PSEP.
151. The EA has advised that the setting received 50 first preference applications at stage one of the pre-school admissions process for the 2017/18 academic year.
152. However, the EA has also advised that during stage one of the pre-school admissions process for the 2017/18 academic year, only 120 first preference applications were received for some 130 funded pre-school education places in the area, suggesting that no additional provision is needed to meet the need for pre-school education places at this time.
153. While historic application trends for the school suggest that it may be able to fill the requested places with target age children, it is possible that the creation of additional provision at the setting could have a detrimental effect on other providers in the wider five mile radius, causing a decrease in the number of funded pre-school education places required in other non-statutory settings, potentially displacing good quality provision already in place and/or leading to an increase in the number of two year old children accessing provision in statutory settings.

154. NICIE has expressed support for the proposal and contends that if DE was to approve the conversion of the existing playgroup at Mill Strand IPS it would represent replacement rather than displacement of an existing playgroup. However, the playgroup is not DE funded provision. It provides 20 non-PSEP, non-DE funded places in 2016/17, which is below the 26 places requested in the Case for Change. The proposed additional provision would not therefore be replacing pre-school education provision assessed by the EA PEG as needed in the area.

Integrated pre-school provision

155. Objectors to DP 484 contest whether parents applying to this setting are expressing a preference for integrated education or a preference for accessible pre-school provision.

156. Pre-school provision is not defined according to sectors so all pre-school settings, regardless of location, are considered accessible to pupils from all backgrounds. All pre-school settings (except where independently funded) follow the same curricular guidance which facilitates equality of opportunity.

157. It is however acknowledged that parents make choices regarding pre-school education provision taking into account a wide range of factors, and in some cases parents may have a preference for pre-school education delivered at a setting of a particular management type, including an integrated management type.

158. Mill Strand IPS is the only integrated primary school with a statutory nursery unit within a five mile radius. Oversubscription in four of the last five years suggests that parents in the area may have a preference for pre-school education provision delivered at a setting of an integrated management type.

SECTION 4

OVERALL CONCLUSION (to be read in conjunction with conclusions that appear at the end of Sections 2 and 3)

Location of Mill Strand IPS

159. Objectors to both these proposals reference uncertainty about the future location of Mill Strand IPS and how that may impact on any assessment of area impact. It is not possible presently to provide absolute certainty as to the location of a site for a new build, but with the planning focus on sites located in close proximity to Portrush it is considered reasonable to draw conclusions based on the school continuing to be located close to its existing site.

DP 483

160. The evidence available in respect of DP 483 supports enlargement of the school's admissions and enrolment numbers, but to a level short of that proposed. A modification to the proposal setting the admissions number at 58 and enrolment number at 406 would be consistent with the statutory duty to encourage and facilitate growth in integrated provision, allowing for growth beyond existing levels of expressed demand. This would also be a practical outcome, facilitating a double class entry accommodated in a 14 class base school to be constructed using funding secured under the FSA.

161. As required by legislation, should the Department wish to modify a proposal it must first contact the Proposer to ensure that the changes are manageable and acceptable to the Proposer if approved. The outworkings of this are if the Proposer agrees then it is modified, approved and implemented. If the Proposer disagrees then they have the option to withdraw the proposal or the Department rejects the proposal as published. The suggested modification to DP 483 has been notified to, and accepted by, the Chair of the school's Board of Governors.

DP 484

162. The evidence available in respect of DP 484 does not support the proposed addition of 26 part-time statutory nursery places as there is a sufficiency of (PEG assessed, non-sectoral) pre-school provision in the area.

163. In making that statement, and in the interests of transparency, it should be pointed out that NICIE has provided evidence (reproduced within Appendix E) that calls into question the Department's stance on the non-sectoral nature of pre-school provision. The position remains as stated within this submission, but following a separate request from NICIE, not received as part of evidence pertinent to these DPs, a meeting between the Department and NICIE is anticipated to allow for a fuller airing of views on this matter.

RECOMMENDATION

164. Based on the evidence outlined in this submission, it is recommended that you:

- a. Approve: (i) DP 483, subject to the following modification – To increase Mill Strand Integrated Primary School admissions number from 30 to 58. This would occur through an annual phased increase in the school’s enrolment number from 232 up to 406, commencing in September 2018, or as soon as possible thereafter.
- b. Do not approve: (ii) DP 484 - To establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit with effect from 1 September 2017 or as soon as possible thereafter.
- c. Agree that this submission (with appropriate redactions) can be published on the Department’s website once the school and the EA have been notified.

165. Attached for your consideration are the following:

Appendix A: Sustainable Schools Policy, Area Planning and Development Proposal processes

Appendix B: Copy of Published DP 483 and DP 484

Appendix C: Cases for Change in support of DP 483 and DP 484

Appendix D: EA comments


Appendix E: Responses during the two month statutory objection period

Appendix F: ETI Comments

Appendix G: DE (Policy Team) Comments

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SUSTAINABLE SCHOOLS POLICY, AREA PLANNING AND DEVELOPMENT PROPOSAL PROCESSES

The purpose of this Appendix is to provide detailed background information on the policies and processes relating to Area Planning that have been in place up to the current time. These set the context within which Development Proposals for any significant change to a school are brought forward for consideration and decision.

Content

- 1) Departmental Vision**
- 2) Sustainable Schools Policy**
- 3) Area Planning Process**
- 4) Development Proposal Process**
- 5) Additional Background – Planning Pre-School Provision**
- 6) Glossary**

1. Departmental Vision

1.1 The Department of Education (DE) has a vision for the education sector which is to see: *“Every young person achieving to his or her full potential at each stage of his or her development.”* This aligns with the commitment in the draft Programme for Government which identifies a number of key indicators for education. Although the work of the Department extends across many of the 14 outcomes its key focus lies with Outcome 14 namely that - *“We give our children and young people the best start in life”*.

1.2 All Department policies and processes are focussed on achieving its aim. “Schools for the Future: A Policy for Sustainable Schools” (SSP) plays a key role in delivering this vision as it aims to establish a network of sustainable schools offering high quality educational experiences and outcomes for all pupils, while making the best use of available resources. The process for implementing this policy is Area Planning. The SSP can be found on the Department’s website at the following link: <https://www.education-ni.gov.uk/publications/policy-sustainable-schools>

1.3 The SSP does not apply to pre-school or Special Education provision these are taken forward under other relevant policies. However, Area Planning applies to primary, post-primary and special schools and ensures that provision is planned strategically to deliver sustainable, high quality education to all pupils.

1.4 Responsibility for Area Planning sits with DE’s Area Planning Policy Team (APPT) within the Area Planning, Admissions and Shared Campuses Directorate (APASCD).

2. Sustainable Schools Policy

2.1 The SSP focuses on the longer-term viability of schools provision and its primary objective is to ensure that all children get a first class education in fit for purpose facilities, regardless of background or where they live, making best use of the resources available for education. This policy drives the Area Planning process to ensure there is a network of strong viable schools to meet the educational needs of children and young people.

2.2 The SSP sets out six criteria to be considered in assessing a school’s viability:-

- Quality Educational Experience
- Stable Enrolment Trends
- Sound Financial Position
- Strong Leadership and Management
- Accessibility
- Strong Links with the Community.

2.3 The policy also sets out the enrolment thresholds as follows:-

School Type	Pupil Numbers
Rural Primary	105
Urban Primary**	140
Post-Primary*	500
Sixth Form	100

*excluding 6th form provision

** Urban is currently defined in the SSP as “Belfast and Derry City Council areas”.

2.4 It is the SSP's intention that all those involved with schools, including Boards of Governors (BoG), teachers and the local community use these criteria to assess the sustainability of education provision at a school and to help determine whether early intervention is required in an aspect of the school's operation. The SSP is not intended to be used mechanistically but simply as a benchmark against which a school can be considered taking account of local circumstances on a case by case basis. The overriding priority must be the quality of education provided for children and young people, with the focus on pupils and not institutions.

3. Area Planning Process

3.1 Area Planning is the process designed to implement the Sustainable Schools Policy (SSP) It has been primarily developed to support the strategic planning of primary and post-primary education provision and is central to achieving the Departmental vision for education. The SSP aims to ensure that all pupils have access to a broad and balanced curriculum that meets their educational needs in a school that is educationally and financially viable and takes account of the expressed preference of parents for a diverse education system. It also takes account of the strategic planning for Special Education provision in line with the Review of Special Education.

3.2 Area Planning is a complex process and there are a number of key contributors with differing statutory and non-statutory roles, summarised as follows:

DE: The effective implementation of the SSP and embedding of the Area Planning process have been key priorities for the Department. DE responsibilities include: setting and reviewing policy and area planning support frameworks and ensuring planning operates within them; providing advice and guidance to the planning authorities and sectoral support bodies; and scrutinizing and challenging Area Plans and Annual Action Plans. DE requires that the Education Authority (EA) produces a three-year strategic regional Area Plan covering the primary, post-primary and special schools sectors, supported by an Annual Action Plan (further details at paragraphs 3.4 to 3.7 below).

- DE has a duty under Article 64 of the Education Reform (NI) Order 1989 to encourage and facilitate Integrated education and a duty under Article 89 of the Education and Libraries (NI) Order 1998 to encourage and facilitate Irish medium education.
- The Shared Education Act (Northern Ireland) 2016 also places a duty on the Department of Education to encourage, facilitate and promote Shared Education. It also places a duty on DE, EA and CCMS to consider Shared Education when:
 - (a) developing, adopting, implementing or revising policies, strategies and plans: and
 - (b) designing and delivering public services.

Education Authority (EA): has overall operational responsibility for planning of provision within the policy and strategic framework set by DE as it has statutory duties to ensure that efficient primary and secondary education provision is available to meet the needs of all pupils and that schools, sufficient in number, character and equipment

are available. In addition it also has a statutory duty to plan for controlled schools. It therefore plays a central role in the Area Planning process. Its activities include the production and publishing of Annual Area Profiles, Area Plans and Annual Action Plans in line with the Area Planning cycle, having represented and reflected the interests of all other school sectors.

Council for Catholic Maintained Schools (CCMS): has a statutory duty to promote and co-ordinate, in consultation with the Trustees, the planning of effective provision of Catholic maintained schools. For the purposes of Area Planning, CCMS provides input for and represents the interests of the Catholic maintained sector. Its responsibilities also include engagement with the EA and other sectors in identifying innovative, creative and shared solutions for sustainable provision. The subsidiary planning role of CCMS was unaffected by the formation of the EA in 2015.

Sectoral Support Bodies: within the Area Planning structures, other sectoral support bodies namely, the Northern Ireland Council for Integrated Education (NICIE), Comhairle na Gaelscolaíocht (CnaG), the Controlled Sector Support Council (CSSC), the Governing Bodies Association (GBA) and the Catholic Schools Trustees Service (CSTS) reflect the views of their respective sectors. While not planning authorities these bodies are charged and funded by the Department with providing support to the sectors they represent in matters relating to Area Planning.

Other Participants: the Education and Training Inspectorate (ETI), and the Department for the Economy (DfE) also have roles, the former as Professional Education Advisors and the latter in advising on compatibility with its plans for Further Education (FE).

3.3 The following Area Planning structures have been put in place by DE and the EA to provide strategic direction, operational consistency and opportunity to actively engage with key stakeholder bodies.

- **Area Planning Steering Group (APSG):** was established to support the Department as it takes forward work to establish the implementation process for Area Planning. It also provides a forum for Chief Executives and senior officials to discuss and agree a common approach to issues which arise in relation to Area Planning. Previously, the Education Minister chaired two of four quarterly annual meetings.
- **Area Planning Working Group (APWG):** was established to bring together representatives of the planning authorities and sectoral bodies involved in operational aspects of Area Planning. Its purpose is to provide a regular forum for discussing cross-district/cross-sectoral issues and concerns, agreeing solutions to be applied by all relevant bodies or, where necessary, raising them to the APSG for consideration and resolution.
- **Area Planning Local Groups (APLGs):** are geographically determined groups set up by the EA to bring together local stakeholders including planning authorities, sectoral bodies, voluntary grammar school representatives and any other relevant interests, including Further Education (FE). They contribute to any review or revision of an existing Area Plan and assist with the implementation process for Area Plans before they are sent to the EA for approval.

3.4 The **Area Planning Cycle** is the timetable which underpins the Area Planning process. An Area Plan will cover three financial years (April to March), with the current planning period commencing in April 2017, aligning with the start of the Community Planning cycle. The Strategic Area Plan (“Providing Pathways”) covers the period April 2017 to March 2020 is to be published shortly and will be accompanied by an Annual Action Plan for 2017/18. In addition to this Annual Area Profiles for each primary and post-primary school are published by the Education Authority around May/June each year.

3.5 The **Area Plan** is a single strategic regional plan covering the whole of Northern Ireland which sets out a series of key strategic themes and priorities for action at system level, applied locally to the 11 Local Government Districts (LGD). It has a three year life span which covers all primary and post-primary schools of all management types and all special schools.

3.6 The **Annual Action Plan** which supports the implementation of the Area Plan is a work programme for the schools managing authorities. It outlining actions to address the strategic issues and will contain details of specific proposals for action to determine the shape of education provision in Local Government Districts. These actions will include details of Development Proposals (DPs) for named schools to give effect to the proposed changes. The Action Plan will be monitored to assess the progress on the delivery of the Area Plan.

3.7 The **Annual Area Profile** provides a statistical snapshot of every grant-aided primary and post-primary school. Its purpose is to provide the public with a clear picture of the shape of education provision in their area and to encourage informed local involvement in the area planning process. The Annual Area Profiles are published on the EA website and contain a range of information in a common and accessible format. For all primary and post-primary schools, the information will include details about admissions and enrolments, first preference applications and budgets. Details on performance outcomes and compliance with the Entitlement Framework are provided for post-primary schools only.

3.8 **Population Trends** inform plans for future overall provision. The EA liaises directly with the Northern Ireland Statistics and Research Agency (NISRA) to obtain information regarding population projection trends which it will use to inform Area Planning and to deliver a sufficient number of school places to meet projected demand in all sectors.

4. Development Proposal Process

4.1 A copy of DE Circular 2014/21 ‘*Publication of a Development Proposal*’ can be found at the following link on the Department’s website: <https://www.education-ni.gov.uk/sites/default/files/publications/de/2014-21-publication-of-a-development-proposal.pdf>

4.2 Any significant change to be made to a school can only be made through the publication of a DP as required by Article 14 (as amended) of the Education and Libraries (NI) Order 1986. DPs are therefore the means by which any significant changes required to a school, identified through the Area Planning process, are made to reshape provision in an area to deliver the strategic vision outlined in the area plan.

4.3 DE seeks to ensure that, regardless of the reason for the proposal, all DPs are considered in the wider context of the Department's statutory duties and policies and that all proposals support the implementation of the Area Plan.

4.4 DPs are brought forward by a 'Proposer'. The Proposer is the relevant school managing authority which includes the EA (for Controlled schools), the CCMS (for Catholic maintained schools) as well as individual BoGs of voluntary maintained schools, VGSs and GMI schools. Owners of independent schools may also bring forward a proposal to seek grant-aided status subject to meeting all the statutory requirements of a grant-aided school.

4.5 A key role of the Proposer is the development of a detailed Case for Change to support the proposal. This will include the rationale for the proposal together with supporting robust and verifiable evidence which clearly demonstrates that the proposal aligns to the Area Plan and is policy compliant.

4.6 The four main stages in the DP process are:-

(i) **Identification of need** in the Area Planning context: getting a proposal right at this stage will impact positively on the success of the proposal. The focus should be on educational benefits and provision of high quality education that meets the needs of children and young people and takes account of parental preference.

(ii) **Statutory pre-publication consultations**: the proposer must consult with the BoG, staff and parents of registered pupils of the affected school. On receipt of a DP, the EA (which publishes all DPs irrespective of sector) must consult with schools likely to be affected by it.

(iii) **Publication of a DP**: the EA publishes DPs on behalf of a proposer in newspapers.

(iv) **Statutory 2month objection period**: this is triggered at the date of publication and during this period anyone interested in or affected by a DP can submit their views (for or against a proposal) directly to DE. The public can request a meeting with Departmental Officials or the Minister at this stage of the process and these requests are normally facilitated, diaries permitting. At the end of the two month period, DE compiles and assesses all relevant information before making a recommendation on a DP to the decision maker. This decision is final and concludes the DP process.

4.7 All DPs are considered on a case by case basis within the general DP policy framework. In the case of Integrated and Irish-medium proposals full account must be taken of DE's duty to encourage and facilitate in accordance with the relevant legislation. A DP will be approved or not approved, although in some instances approval of a DP can be subject to modification in line with Article 14(7) of the 1986 Order.

4.8 DE's power to impose conditions on DPs is limited. The Education Orders provide that the only DPs to which specific conditions can be attached are those for the establishment of GMI and voluntary Irish medium schools). Other conditions (imposed when schools are opening or transforming) will relate to Department policies and not the approval itself.

4.9 A DP approved by the Department must be implemented in full. Further changes can only be made through the publication of another DP. Following approval, proposers may seek the Department's approval to defer implementation of the DP.

4.10 Although legislation does not provide for appeal, the Department's decision can be challenged through an application for judicial review (JR).

Additional Background – Planning Pre-School Provision

Pre-School Policy

The policy position to date was set out in Learning to Learn – A Framework for Early Years Education and Learning, published on 7 October 2013. Its key actions included placing a moratorium on any new or additional full-time provision or conversion from part-time to full-time (defined as over 4.5 hours) in advance of a review of the current levels of full-time provision, existing research and the needs of children being served by it.

PEG and the Pre-School Planning Process

The Education Authority's (EA's) Pre-school Education Group (PEG) is responsible for planning pre-school provision and overseeing the allocation of places to the non-statutory sector.

DE in conjunction with the EA undertakes an annual exercise to estimate the level of provision required for the following academic year. When planning pre-school provision, decisions are made on the basis of providing sufficient places for approximately 95% of the live birth statistics provided on the Northern Ireland Neighbourhood Information Service (NINIS) website. While the figure of 95% is higher than the average annual application rate (usually 92%), this provides for slightly more places to be allocated than assessed as needed to account for fluctuations in patterns of demand and ensure the process runs smoothly.

Displacement

It is the Department's practice not to displace good quality pre-school provision already in existence with pre-school provision in an alternative setting. This includes not ceasing funding for an existing Pre-School Education Programme (PSEP) funded playgroup and establishing statutory nursery provision as an alternative.

Provision Levels

In determining need, the Department generally assumes a level of provision at 95% of target age children, predicated on the application rate for pre-school places which is approximately 92%; however the level of provision within local areas may be higher or lower based on historic patterns of demand and assessment of ongoing need.

Glossary

ALB	Arms Length Body
APASCD	Area Planning, Admissions and Shared Campuses Directorate
APLG	Area Planning Local Group
APPT	Area Planning Policy Team
APSG	Area Planning Steering Group
APWG	Area Planning Working Group
BoG	Board of Governors
CCMS	Council for Catholic Maintained Schools
CnaG	Comhairle na Gaelscolaíochta
CSSC	Controlled Schools Support Council
CSTS	Catholic Schools Trustees Service
DE	Department of Education
DfE	Department for the Economy
DP	Development Proposal
EA	Education Authority
ETI	Education and Training Inspectorate
FE	Further Education
GBA	Governing Bodies Association
GMI	Grant Maintained Integrated
IM	Irish Medium
JR	Judicial Review
NICIE	Northern Ireland Council for Integrated Education
NISRA	Northern Ireland Statistics and Research Agency
SSP	Sustainable Schools Policy
VGS	Voluntary Grammar School

EDUCATION AUTHORITY

DEVELOPMENT PROPOSAL NO: 483

Notice is hereby given that, under Article 79 of the Education Reform (Northern Ireland) Order 1989, a Proposal has been submitted to the Education Authority by the Board of Governors of Mill Strand Integrated Primary School, to the effect that:

To increase Mill Strand Integrated Primary School admissions number from 30 to 60. This would occur through an annual phased increase in the school's enrolment number from 232 up to 420, commencing in September 2017, or as soon as possible thereafter.

The proposed increase to the approved admissions and enrolment number is linked to but not dependent upon Department of Education approval being given to:

- **Development Proposal No 484 – Proposal to establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit.**

A copy of the Proposal may be inspected at offices of the Education Authority located at 52-56 Ballymoney Street, BALLYMENA, Co Antrim, BT43 6AN between the hours of 9.00 am and 5.00 pm.

Any objections to this Proposal should be lodged with the Area Planning Policy Team, Department of Education, Rathgael House, Balloo Road, BANGOR, Co Down, BT19 7PR or emailed to dps@deni.gov.uk within two months of the date of publication of this Notice.

NOTE: The Department of Education and the Education Authority operate a regime of openness under the Freedom of Information Act. Letters of objection and information supplied to the Department of Education and to the Education Authority may be subject to disclosure under the terms of the Freedom of Information Act, if requested. (A fee may be charged for supplying this information).

**Gavin Boyd
Chief Executive**

CASE FOR CHANGE (DP483)

***MILL STRAND INTEGRATED PRIMARY SCHOOL &
NURSERY UNIT***

School Development Proposal

“Promoting Excellence, Celebrating Difference”

CASE FOR CHANGE – Supporting Information

SUMMARY / OVERVIEW

BOARD AREA	Education Authority – Ballymena Office
DP NUMBER	483
PROPOSER	Board of Governors of Mill Strand Integrated Primary School Contact: Philip Reid, Principal 028 7082 3090 E mail : preid377@C2kni.net reidpa@gmail.com
SCHOOL(S) NAME	Mill Strand Integrated Primary School
SCHOOL REFERENCE	306 6544
TYPE	Primary
MANAGEMENT	Grant Maintained Integrated
DP PUBLICATION DATE	
PROPOSAL	The Board of Governors propose that its admissions number should increase from 30 to 60 and increase its enrolment number yearly by 30 up to a maximum of 420 by the 1st September 2023, at which point the school would become a 2 form entry school with an admissions number of 60 and an enrolment of 420.

STATUTORY CONSULTATION

BY THE PROPOSER I confirm that the school(s) Board of Governors, Staff and Parents of Pupils were consulted on :

10th Feb. 2015 Introductory meeting of parents on the need for more integrated places in the area.

6th March 2015 Meeting of Parents to outline possible ways forward.

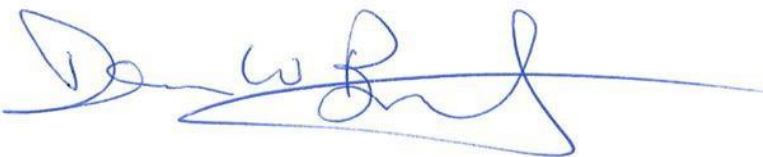

Meetings at which members of the Board of Governors including staff representatives were consulted on their views on the future development of the school:

- 30th January 2014
 - 20th March 2014
 - 30th April 2014
 - 28th May 2014
- 6th November 2014
 - 22nd January 2015
 - 28th March 2015
 - 4th June 2015
- 24th September 2015
- 19th November 2015
 - 21st January 2016
 - 3rd March 2016
 - 28th April 2016
 - 7th June 2016

27th August 2015 Meeting of all teaching and support staff to get their views on the Development Plans for both the school and nursery as part of Action Planning for the year ahead. Weekly updates given at Monday morning briefings and afternoon staff workshops.

Meetings of Parents' Council/Committee to outline the proposals for increasing the school size from Sept 2016 as well as address the critical issues and need to relocate the school:

- 28th May 2015

	<ul style="list-style-type: none"> • 17th June 2015 • 9th September 2015 • 18th September 2015 • 24th September 2015 • 16th October 2015 • 2nd November 2015 • 26th November 2015 • 20th January 2016 • 4th March 2016 • 4th May 2016 <p>A widespread consultation with the school and extended Portrush community was undertaken through paper and on-line questionnaires in September 2015 and again at a public meeting on 2nd June 2016 (see Appendix 1)</p> <p>Final approval of the joint Development Proposals by the Board of Governors on 24th August 2016.</p> <p>SIGNED:</p> 
By the EA	<p>I confirm that the schools which the EA consider might be impacted by this proposal were consulted on 4 October 2016.</p>  <p>SIGNED: DATE: 7 December 2016</p>

ASSOCIATED PROPOSALS

PROPOSAL	<p>To increase the nursery places from the present 26 to 52 by offering an additional session from 1st September 2017 or as soon as possible thereafter.</p>
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1. BACKGROUND

During the last few years the Board of Governors has regularly discussed the need to consider double enrolment to meet the needs of the community. Mill Strand IPS are therefore submitting two development proposals, one to seek two form entry throughout the primary school and the other to seek an additional 26 pre-school places for pre-school.

It is the purpose of these two interlinked Development Proposals to address this situation and provide a way forward in order to meet parental and community demand and enable the support and development of Integrated Education.

The Intentions of these Development Proposals are to:

1. To introduce a 2 form entry into Mill Strand Integrated Primary School in September 2017 or as soon as possible thereafter.
2. To increase Mill Strand Integrated Primary School's total enrolment number.
3. To increase nursery places from the present 26 to 52 by offering an additional 26 places from September 2017 or as soon as possible thereafter.
4. To obtain classroom accommodation proportionate to the increases in pupil enrolment. There is sufficient space for the proposed increased admissions in 2017 and 2018, but the school will need additional accommodation from then on.
5. The building of a new 2 form entry Integrated Primary School and Nursery on a new site in the Portrush area through SHA/FSA Funding.

The Board of Governors propose that its admissions number should increase from 30 to 60 and increase its enrolment number yearly by 30 up to a maximum of 420 by the 1st September 2023, at which point the school would become a 2 form entry school with an admissions number of 60 and an enrolment of 420.

1.1 Description of school

Mill Strand Integrated Primary School is located at 33 Dhu Varren, Portrush, Co. Antrim. The School has a current enrolment of 221. In September 2017 the school anticipates an enrolment of 242 because they currently have 44 children enrolled in the school's statutory nursery unit and independent playgroup whose parents have all indicated to the school that they are committed to Integrated Education and wish to enrol in P1 for September 2017. The school serves the children of Portrush, Portstewart, Coleraine and the outlying areas. Mill Strand Integrated School and Nursery is the only integrated primary provider serving the 'Triangle Area'.

There is no alternative for parents seeking an integrated education.

The school was established by a group of parents from Portrush and surrounding areas and opened in 1987. Since the school opened in 1987 with 52 pupils, it has grown and developed into a popular local school. The school's Enrolment Number is 232 and the Admissions Number is 30 for P1 (Source: EA website). Mill Strand IPS has a current enrolment of 221 (268 for September 2016 including the 27 Nursery & 20 additional pre-school). This is despite having to operate in inadequate, sub- standard accommodation.

The school accommodation consists of 12 classrooms, a small Learning Support room, assembly/PE/dining hall, secretary's office and principal's office. Six of the classrooms are in the permanent building, one of which, the Nursery, is accommodated in the original house in which the school was founded. The Secretary's office, Principal's Office, Learning support room and staffroom are also located in this two-storey building. Six of the classrooms are located in mobile units.

The current teaching staff consists of principal, 7 full-time teachers and 3 part-time teachers. The classroom assistants, secretary, building supervisor, cleaners, supervisory assistants, meals staff and staff in the additional pre-school centre complete the full staff team.

As well as delivering the full curriculum a wide range of extra-curricular activities are also undertaken within the school including: golf, surfing, cycling proficiency, football, glee, dance, netball, hockey, art club, cookery club and drama club. In addition, the school was one of the first outside Belfast to run an After School Club offering wraparound care until 6pm daily and during periods of school closure.

Mill Strand Integrated Primary School is delighted to have a hard working Parents' Council that contributes greatly to the social and financial support of the school.

The Board of Governors of Mill Strand Integrated PS believes that the proposed and existing provision at the school, in conjunction with the proposed future development highlighted in this development proposal will ensure compliance with the Department of Education's Sustainable Schools Policy.

1) Quality Educational Experience

The school has recently been recognised as having "a high capacity for sustained improvement in the interest of all learners." Its last focused, school Inspection in 2012, highlighted that "the quality of the teaching observed ranged from outstanding to satisfactory with almost all of the teaching being good or very good in almost equal measure."

It is the integrated nature of the school, however, that is unique in the three towns that it serves and the school is the perfect example of real integration, "promoting excellence and celebrating difference."

2) Stable Enrolment Trends

For the last 5 years the school has experienced a steady rise in enrolments, from **163 in 2011, 187 for 2015/16 and 221 in 2016/17 with an anticipated 242 in September 2017.** The Board of Governors believe that Ministerial approval for an additional nursery session to be established in the primary school at Mill Strand Integrated PS, in conjunction with this Development Proposal, would be a welcome addition to the provision available to parents and would meet evident parental demand confirmed with the provision of a Pre-School Playgroup in Sept 2015, funded by IEF. The Playgroup provided pre-school education for 18 children and has a

further 20 children enrolled for September 2016. (Current capacity 20)

3) Sound Financial Position

The school is currently operating with an acceptable budget surplus. Indeed, the school is one of the few in the area not having a deficit budget. Its three-year financial plan has been carefully budgeted by the Principal to allow for continued growth and to maintain the high standards currently in the school.

4) Strong Leadership and Management

Mill Strand Integrated PS has a strong leadership team led by the Principal, Philip Reid. In 2012, this was acknowledged in an ETI inspection of the school. In anticipation of the continued growth of the school the Principal, Senior Management Team and Governors have successfully managed the finances and physical resources of the school.

5) Access

Mill Strand Integrated PS's central location within the Portrush area itself is within convenient transport distance for all its present pupils. It is also readily accessible to future pupils travelling from areas outside the current immediate catchment area and is situated on the main bus route connecting the three towns it mainly serves.

The current site has health & safety issues relating to access from the main road. This has been exacerbated by the removal of parking, drop off and collection rights by the neighbouring landowner at the start of the 2015 academic year. Remedial Minor Works are being undertaken by DENI to address this issue pending the relocation of the school to a larger site in the town.

6) Community Links

As evidenced by ETI 2012 Mill Strand Integrated PS has exceptionally strong links with the local community and is widely recognised as '*a school in the heart of the community, catering for the whole community*'. Mill Strand IPS is the only school in the wider 'Triangle' area that hosts services in all three of the main churches: Harvest at Ballywillan Presbyterian, Sacraments including First Holy Communion at either Star of the Sea Portstewart or St Patrick's Portrush and a Christmas Carol Service at Holy Trinity Church of Ireland, Portrush. The school regularly utilises local businesses and venues to host school events, functions and plays. The school's strong and vibrant Parents Council further illustrates these strong links evidenced through the numerous well-supported and innovative community events held every year.

2. RATIONALE FOR CHANGE

The governors of Mill Strand IPS believe that the current enrolment number of 232 and admission number of 30 to P1 is inadequate to meet demand. This year there were 54 applications for 30 places in P1. The DE has therefore approved a temporary variation to 54 for 2016/17. Mill Strand Integrated PS has historically enjoyed a diverse enrolment. The school would be able to maintain the appropriate religious balance as at the present time some 31.81% of pupils are from 'Roman Catholic' backgrounds, 32.23% 'Protestant' and 35.9% 'Other' (DE School level data 2015/16).

In addition:

- The staff and governors are keen to meet the parental demand for integrated provision at Mill Strand IPS, provision that is heavily oversubscribed on an annual basis.
- The staff and the Governors recognise the desirability of educating children from all backgrounds together in a culture of respect and mutual understanding, promoting excellence and celebrating difference. Integrated education is more than a name. It is an ethos that permeates all aspects of school life in an environment underpinned by the ‘Statement of Principles of Integrated Education’.
- Mill Strand IPS will contribute to meeting the needs of every child in the area by providing a viable alternative for those parents who would prefer an Integrated Education for their children. This will assist the Department of Education in meeting its duty to encourage and facilitate integrated education, as outlined in Article 64 of the Education Reform Order Northern Ireland 1989.

3. Area Planning Impact

3.1 The NEELB Primary Area Plan 2014-2018 notes that Mill Strand IPS is the only integrated school in the Coleraine Area, with a small controlled integrated school located outside Garvagh 18 miles away being the only other integrated provider available to parents.

This proposal would address parental demand for Integrated Primary Education. Mill Strand Integrated School is the only integrated primary setting in the Portrush, Portstewart or Coleraine areas. Consultation with Mill Strand IPS Parents’ Council has highlighted the concerns of parents and the wider community that there are not adequate integrated places in this school to meet parental demand in the Portrush and surrounding areas. It is still perceived by parents that unless a child gains a nursery place at Mill Strand IPS they will not gain admission to Mill Strand for P1.

Impact on other Integrated Primary Schools

The nearest integrated schools in the area are Ballymoney Model CIPS at 13 miles from Mill Strand IPS, Carhill CIPS at 18 miles, Ballycastle Controlled Integrated Primary School in Ballycastle at 19 miles, and Roe Valley Integrated Primary School in Limavady at 20 miles distance from Mill Strand Integrated Primary School. Therefore there would be no impact on other integrated schools if this proposal was approved as the distance is too great.

Impact on other schools

Mill Strand IPS has had approval from DE for a temporary variation to 54 for P1 in September 2016. Table 1 (below) outlines the pattern of admissions and enrolments to schools within a three mile radius of Mill Strand IPS. Approval of this proposal for Mill Strand IPS would meet the demand for integrated provision and would have little impact on existing schools in the area as would appear to be growth in enrolment in all but one of the schools in the area over the past few years.

Table 1: Admissions and Enrolments within a 3 mile radius of Mill Strand IPS

Portrush PS	2015/16	38	38
	2014/15	34	32
Admissions No:41	2013/14	23	23
St Patrick's PS, Portrush	2015/16	15	15
	2014/15	11	11
Admissions No: 21	2013/14	4	4* <i>*Does not include Reception</i>
Carnalridge PS	2015/16	29	29
	2014/15	19	19
Admissions No: 30	2013/14	30	30
School Name	Year School	No of	No of
		Applications	Admissions
Portstewart PS	2015/16	40	40

	2014/15	30	28
Admissions No: 59	2013/14	41	41
St Colum's PS	2015/16	17	17
	2014/15	26	26
Admissions No: 27	2013/14	20	20

4. EDUCATIONAL IMPACT

The school currently provides a high capacity for sustained improvement in the interest of all learners as evidenced by recent ETI visits. By extending the capacity of the school to 60 places for the P1, it will be able to extend the availability of high quality provision in an integrated setting. This in turn will have a positive educational impact on pupil development and attainment throughout the school.

An essential part of integrated education is the celebration of difference, of allowing children to maintain and develop social and friendship bonds that cross divides of cultural, religious, national or social boundaries.

To maximise the educational outcomes for our young people, it is essential that these relationships and ethos be maintained from the earliest opportunity in an integrated setting rather than be broken by failing to meet parental choice of both Integrated Nursery and Integrated School provision.

5. STATISTICAL INFORMATION

5.1 Enrolments

The Admissions Number for Mill Strand Integrated Primary School Year 1 pupils is 30 + (26 full-time places in the statutory Nursery Unit) and the school's overall enrolment number is 232 + (26 Nursery). The current enrolment of the school excluding 27 nursery is 221 rising to an anticipated enrolment of 241 by September 2017 excluding Nursery & Pre School places (presently funded by Trustees).

Mill Strand IPS has had approval from DE through temporary variation to increase the number of P1 pupils to 54 for September 2016.

Table 2: Primary 1 Admissions and Enrolments – Mill Strand IPS

2016/17	54	54	Increased to 54	
2015/16	27	27	No TV	31
2014/15	34	34	Increased to 34	
2013/14	25	25	No TV	30

Source: DE

The intake from the year 2015/16 has now increased to 31 children in Year 2 for September 2016. Similarly the intake from 2013/14 has now increased to 30. This further demonstrates the parental demand for integrated education in the area.

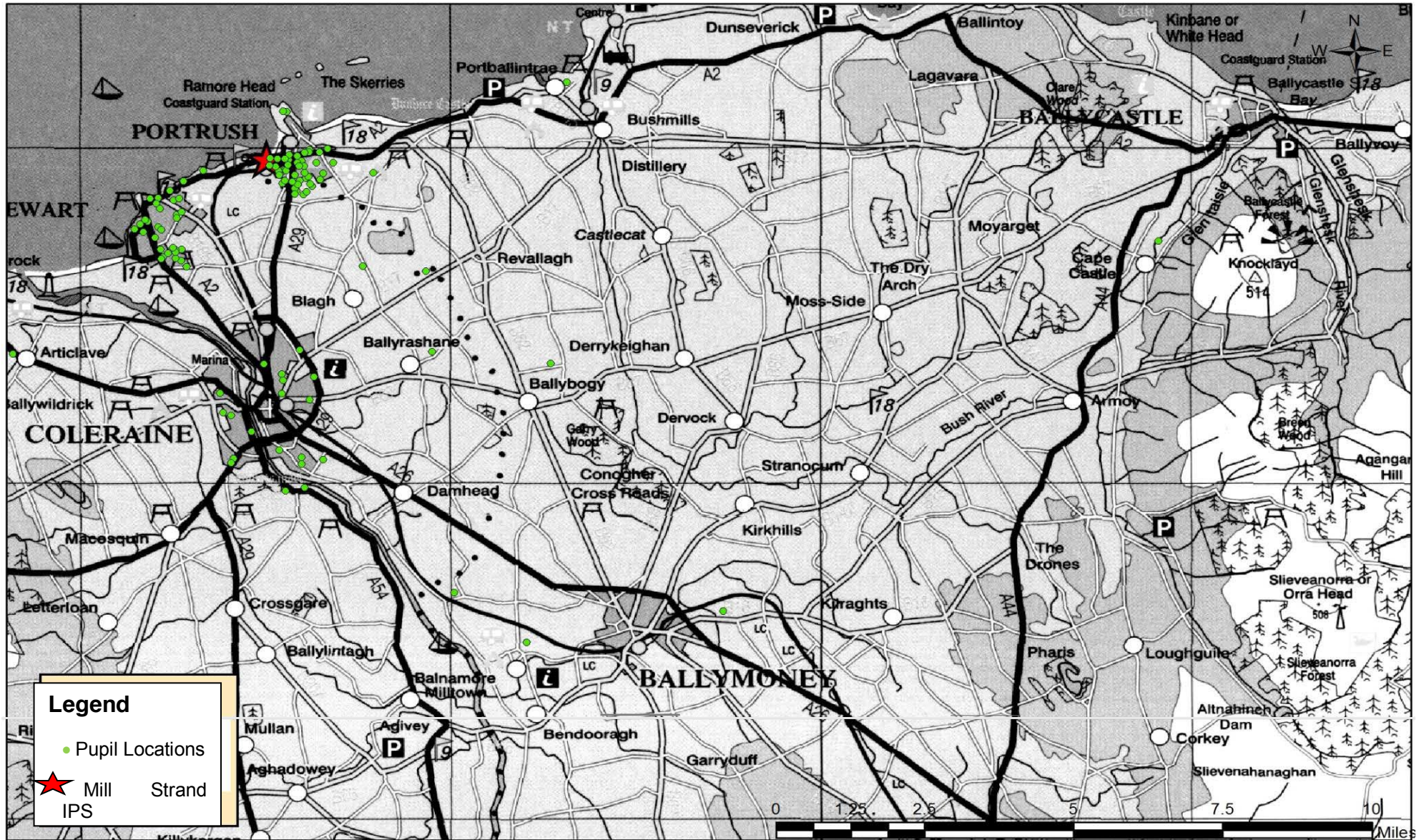
Table 3: Enrolment at Mill Strand Integrated Primary School 2011-2016

Year	Enrolment
2016/17	221
2015/16	187
2014/15	184
2013/14	179
2012/13	180
2011/12	163

Source: School Level SIMS Data

This demonstrates that this is a sustainable school in growth over a significant period of time.

Millstrand IPS, 2015/16



Legend

- Pupil Locations
- ★ Mill Strand

5.2 Pupils attending Mill Strand IPS by postcode

54.5% of pupils currently attending Mill Strand IPS reside in the BT56 postcode area (Portrush), 23% reside in BT55 (Portstewart) and 19.6% in BT51/52 (Coleraine). Mill Strand IPS represents a local school at the heart of the 'triangle' community. The approval for additional integrated primary provision will further support the school in meeting the high level of parental demand year on year. As described above there is no alternative integrated provision within this particular catchment.

6. IMPLEMENTATION PLAN (IF THE PROPOSAL IS APPROVED)

- Submission to the Education Authority for September 2016 for consultation and publication.
- Admissions Criteria to include notification of a Development Proposal This Circular 2015/26 outlines the timetables for primary school admission procedures. If the EA will normally annotate a school's admissions criteria with a note about any development proposals.
- Accommodation: see notes below (Resource Implications).
- Teacher Recruitment in Spring 2017 or as soon as possible thereafter.

The proposal has an effective date of August 2017.

RESOURCE IMPLICATIONS

There is adequate accommodation within the school to meet growth for the next two years but, after opening 28 years ago and 15 years after the school was first identified as being in urgent need, the fabric of the school is deteriorating to the extent that there is an urgent need for a new school build. The school has been notified by Ministerial announcement on 23rd March 2016 that it is to be included within the Fresh Start planning programme for capital buildings.

As funding is based on a pupil enrolment, there will be no net increased demand on Northern Ireland LMS budget for staffing costs. There will however be a shortfall in the school's LMS budget during the periods September to March for each year of growth. This would equate to £17,220 per year and over a 7-year period based on current Year 1 teacher's salary for 2015/16. This would equate to an approximate

£120,540 over the seven years of growth for the school.

STATUTORY CONSULTATION

Consultation with Parents

May 2015: Two Parent meetings were held to listen to the views of the parent body and wider community with regard to Area Based Planning and the lack of integrated education in the area. There was an overwhelming expression of support for Mill Strand IPS in taking forward development proposals to increase both integrated primary and pre-school provision in the area.

With regard to pre-school provision, a meeting was held in Mill Strand on 10 February 2015 to listen to views of parents. A further meeting was held on 6 March 2015 to outline proposals to meet and facilitate the parental demand for an integrated option. As a means of ensuring that parental desire for integrated pre-school was met at the school, the Board of Governors had voted to set up an independent playgroup at Mill Strand IPS. The purpose of this meeting was to inform parents that this development was planned and that it was the school's intention to open a pre-school playgroup at the school to compliment the statutory nursery provision in an attempt to ensure that every parent who sought an integrated pre-school experience for their child would be accommodated.

Meetings of Parents' Council/Committee including outlines and updates on the proposals for increasing the school size from Sept 2016 as well as address the critical issues and need to relocate the school were held on the following dates:

- 28th May 2015
- 17th June 2015
- 9th September 2015
- 18th September 2015
- 24th September 2015
- 16th October 2015
- 2nd November 2015
- 26th November 2015
- 20th January 2016
- 4th March 2016
- 4th May 2016

On 25 February 2015 the NICIE Development Officer met with the Principal before addressing the Board of Governors on 26 March 2015.

In addition to this, the school carried out a short survey. The results of the survey indicated that over 70% of respondents believed there were not enough integrated primary places to meet the demand from the local community. (see Appendix 1)

A final public consultation was undertaken on 2nd June 2016 in Portrush Town Hall when the Development Proposals were outlined in the Principal's opening remarks and an expanded school & nursery included in subsequent discussion on the future of the school in the community.

A significant level of consultation has taken place in respect of this development proposal:

Consultation with Governors

10th Feb. 2015 Introductory meeting of parents on the need for more integrated places in the area.

6th March 2015 Meeting of Parents to outline possible ways forward.
Meetings at which members of the Board of Governors including staff representatives were consulted on their views on the future development of the school:

- 30th January 2014
- 20th March 2014
- 30th April 2014
- 28th May 2014
- 6th November 2014
- 22nd January 2015
- 28th March 2015
- 4th June 2015
- 24th September 2015
- 19th November 2015
- 21st January 2016
- 3rd March 2016
- 28th April 2016
- 7th June 2016

27th August 2015 Meeting of all teaching and support staff to get their views on the Development Plans for both the school and nursery as part of Action Planning for the year ahead. Weekly updates given at Monday morning briefings and afternoon staff workshops.

A widespread consultation with the school and extended Portrush community was undertaken through paper and on-line questionnaires in September 2015 (see Appendix 1)

An open meeting for parents and the wider school community was held on Monday 9th November 2015 at 7.00pm to give a presentation and update of these development proposals.

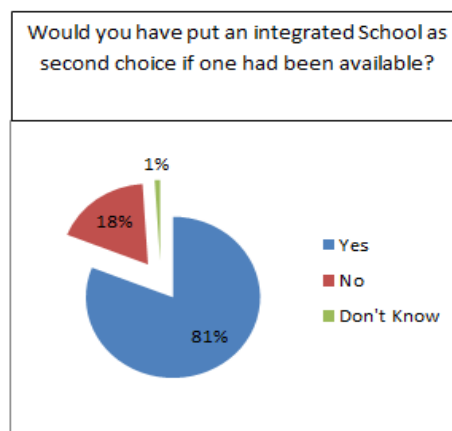
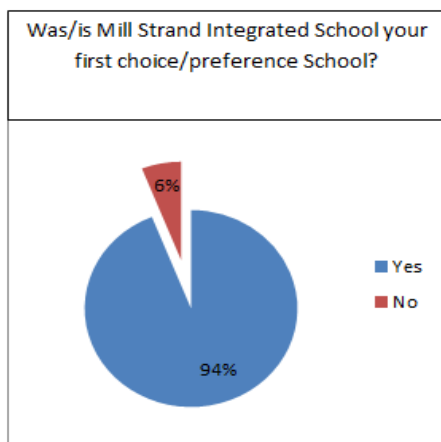
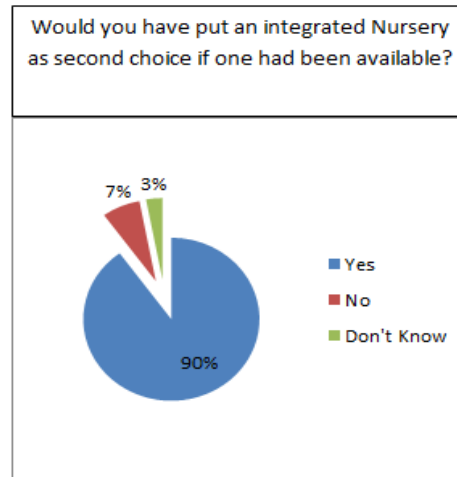
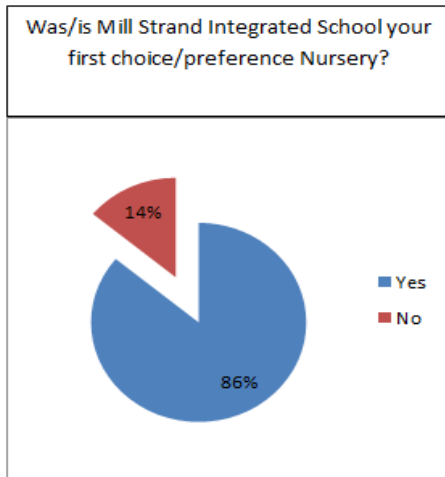
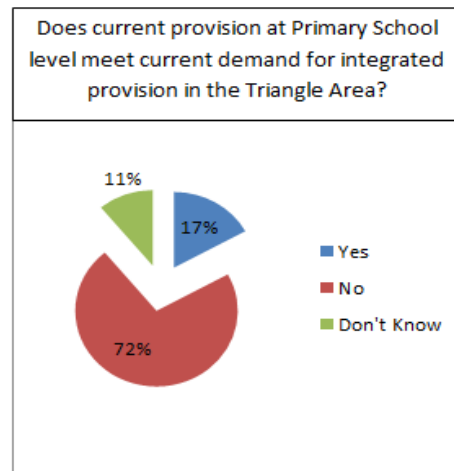
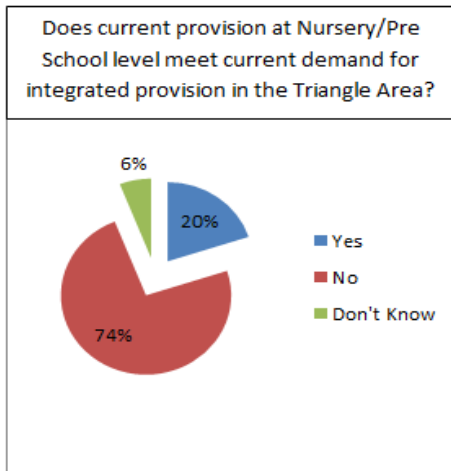
On Thursday 12th November 2015 a special meeting of the extended school community, to outline the development proposals was held in Mill Strand Integrated Primary School's Assembly Hall and all local councillors from the Causeway Coast & Glens Borough Council invited.

A further public consultation was undertaken on 2nd June 2016 in Portrush Town Hall when the Development Proposals were outlined in the Principal's opening remarks and an expanded school & nursery included in subsequent discussion on the future of the school in the community.

Appendix 1

The school has also conducted a survey in September 2015 of the views of present and future parents on the need for additional Integrated Nursery and School places in the area.

Survey Results



***MILL STRAND INTEGRATED PRIMARY SCHOOL &
NURSERY UNIT***

Nursery Development Proposal

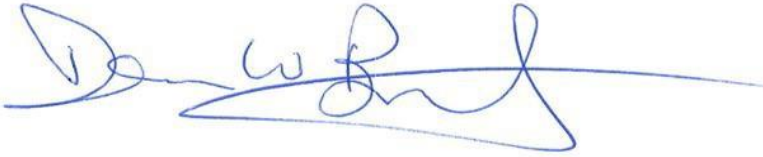

"Promoting Excellence, Celebrating Difference"

CASE FOR CHANGE – Supporting Information

SUMMARY / OVERVIEW

BOARD AREA	Education Authority – Ballymena Office
DP NUMBER	484
PROPOSER	Board of Governors of Mill Strand Integrated Primary School Contact: Philip Reid, Principal 028 7082 3090 E mail : preid377@C2kni.net reidpa@gmail.com
SCHOOL(S) NAME	Mill Strand Integrated Primary School
SCHOOL REFERENCE	306 6544
TYPE	Primary
MANAGEMENT	Grant Maintained Integrated
DP PUBLICATION DATE	
PROPOSAL	The Board of Governors of Mill Strand IPS proposes to establish an additional 26 part-time Nursery places at their grant maintained integrated primary school with effect from the 1 September 2017 or as soon as possible thereafter.

STATUTORY CONSULTATION

BY THE PROPOSER	<p>I confirm that the school(s) Board of Governors, Staff and Parents of Pupils were consulted on the dates indicated on Page 16 of this proposal.</p> <p>SIGNED:</p>  <p>DATE: 24th August 2016</p>
BY THE EA	<p>I confirm that the schools which the EA consider might be impacted by this proposal were consulted on 4</p> <p>October 2016. SIGNED:</p>  <p>DATE: 7 December 2016</p>

ASSOCIATED PROPOSALS

PROPOSAL	<p>The Board of Governors of Mill Strand Integrated Primary School propose that its admissions number should increase from 30 to 60 and increase its annual enrolment number yearly by 30 up to a maximum of 420 by the 1st September 2023 at which point the school would become a 2 form entry school with an admissions number of 60 and an enrolment of 420.</p>
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1. BACKGROUND

As submitted by Mill Strand IPS

1.1 Description of school

Mill Strand Integrated Primary School is located at 33 Dhu Varren, Portrush, Co. Antrim and has a current enrolment of **221**. In September 2017 the school anticipates an enrolment of 242 because they currently have 44 children enrolled in the school's statutory nursery unit and independent playgroup whose parents have all indicated to the school that they are committed to Integrated Education and wish to enrol in P1 for September 2017. The school serves the children of Portrush, Portstewart, Coleraine and the outlying areas. Mill Strand Integrated School and Nursery is the only integrated primary provider serving the 'Triangle Area'.

There is no alternative for parents seeking an integrated education.

The school was established by a group of parents from Portrush and surrounding areas and opened in 1987. Since the school opened in 1987 with 52 pupils, it has grown and developed into a popular, local school. The school's Enrolment Number is 232 and the Admissions Number is 30 for P1 (Source: EA website). Mill Strand IPS has a current enrolment of **221 (268** including the **27** Nursery & **20** additional pre-school). This is despite having to operate in inadequate, sub-standard accommodation.

The school accommodation consists of 12 classrooms, a small Learning Support room, assembly/dining/PE hall, secretary's office and principal's office. Six of the classrooms are in the permanent building, one of which, the Nursery, is accommodated in the original house in which the school was founded. The Secretary's office, Principal's Office, Learning support room and staffroom are also located in this two-storey building. Six of the classrooms are located in mobile units.

The current teaching staff consists of principal, 8 full-time teachers and 3 part-time teachers. The classroom assistants, secretary, building supervisor, cleaners, supervisory assistants, meals staff and staff in the additional pre-school centre complete the full staff team.

As well as delivering the full curriculum a wide range of extra-curricular activities are also undertaken within the school including: golf, surfing, cycling proficiency, football, glee, dance, netball, hockey, art club, cookery club and drama club. In addition, the school was one of the first outside Belfast to run an After School Club offering wraparound care until 6pm daily and during periods of school closure.

Mill Strand Integrated Primary School is delighted to have a hard working Parents' Council that contributes greatly to the social and financial support of the school.

The existing Nursery Unit was initially established as a Pre School, becoming a GMI Nursery in 2001, offering 26 part-time places. Due to social deprivation these were increased to full time places in November 2009. The Pre-School Playgroup at the school was established for September 2015 to meet parental demand for places at an integrated setting and is registered for 20 children.

The Board of Governors of Mill Strand Integrated PS believes that the proposed and existing provision at the school, in conjunction with the proposed future development highlighted in this development proposal will ensure compliance with the Department of Education's Sustainable Schools Policy.

1) Quality Educational Experience

The school has recently been recognised as having “a high capacity for sustained improvement in the interests of all learners” in the Nursery & school. Its last focused, school inspection in 2012, highlighted that “the quality of the teaching observed ranged from outstanding to satisfactory with almost all of the teaching being good or very good in almost equal measure.” It is the integrated nature of the school, however, that is unique in the three towns that it serves and the school is the perfect example of real integration, “promoting excellence and celebrating difference.”

2) Stable Enrolment Trends

For the last 5 years the school has experienced a steady rise in enrolments, from **163 in 2011 to 187 for 2015/16 and an anticipated 242 in September 2017**. The Board of Governors believe that Ministerial approval for an additional nursery session to be established in the primary school at Mill Strand Integrated PS, in conjunction with this Development Proposal, would be a welcome addition to the provision available to parents and would meet evident parental demand confirmed with the provision of a Pre-School Playgroup in Sept 2015, funded by IEF. The Playgroup provided pre-school education for 18 children and has a further 20 children enrolled for September 2016.

3) Sound Financial Position

The school is currently operating with an acceptable budget surplus. Its three-year financial plan has been carefully budgeted by the Principal to allow for continued growth and to maintain the high standards currently in the school.

4) Strong Leadership and Management

Mill Strand Integrated PS has a strong leadership team led by the Principal, Philip Reid. In 2012, this was acknowledged in an ETI inspection of the school. In anticipation of the continued growth of the school the Principal, Senior Management Team and Governors have successfully managed the finances and physical resources of the school.

5) Access

Mill Strand Integrated PS's central location within the Portrush area itself is within convenient transport distance for all its present pupils. It is also readily accessible to future pupils travelling from areas outside the current immediate catchment area and is situated on the main bus route connecting the three towns it mainly serves. The current site has health & safety issues relating access from the main road. This has been exacerbated by the removal of parking, drop off and collection rights by the neighbouring landowner at the start of the 2015 academic year.

6) Community Links

As evidenced by ETI 2012 Mill Strand Integrated PS has exceptionally strong links with the local community and is widely recognised as '*a school in the heart of the community, catering for the whole community*'. Mill Strand IPS is the only school in the wider 'Triangle' area that hosts services in all three of the main churches: Harvest at Ballywillan Presbyterian, Sacraments inc First Holy Communion at either Star of the Sea Portstewart or St Patrick's Portrush and a Christmas Carol Service at Holy Trinity Church of Ireland, Portrush. The school regularly utilises local businesses and venues to host school events, functions and plays. Mill Strand's pupils are a recognised part of the fabric of the town, engaging in outdoor learning and environmental education on its shoreline and beaches, weekly, throughout the year. The school's strong and vibrant Parents Council further illustrates these strong links evidenced through the numerous well-supported and innovative community events held every year.

2. RATIONALE FOR CHANGE

The main reason for seeking the change is to assist the school in reducing the bureaucratic burden related with managing and governing under two separate funding and governance mechanisms, thereby supporting the school to deliver improved outcomes for children and to become a more sustainable school. In addition, this would support the DE by assisting in its duty 'to encourage and facilitate the growth of integrated education. Also to realise the objectives of Area Based Planning which include 'The aim of the plan is to facilitate the development of a network of viable and sustainable primary schools which can effectively deliver the Northern Ireland Curriculum.

Specific reasons include:

- More efficient and effective way of funding and administering early years provision

- To create equality of opportunity in accessing services to support vulnerable children in relation to attendance, welfare, safeguarding and Special Educational Needs and inclusion
- To rationalise governance and inspections under a single model
- The Northern Health and Social Care Trust, the registering authority for the playgroup, require us to adhere to a number of procedures as part of their requirements. In a letter to the school dated 19th August 2016, the Early Years Panel have asked “that reasonable steps would be taken to avoid congested areas within the school such as 9.00am, 10.45am and 12.40 and outdoor play would be timetabled to ensure children do not mix with others within the setting and the Early Years Panel viewpoint on this remains unchanged.” In practice this means that we cannot allow the children in the playgroup to mix with the children in the statutory nursery unit at Mill Strand IPS except for the school nativity as long as appropriate risk assessment is in place according to the Health Trust requirements of registration. This is only allowed as it would be time limited. Therefore approval for an additional 26 statutory nursery places at Mill Strand IPS would allow us to operate under one management system, LMS.
- Parents of children attending Mill Strand IPS want their children to be able to avail of pre-school education in our integrated school. The governors took the decision to open a Playgroup in Sept 2015, funded by IEF in an effort to support parental demand for integrated pre-school. The Playgroup has 20 children enrolled for September 2016.
- The staff and governors are keen to see parental demand for integrated pre-school provision at Mill Strand IPS met, provision that is heavily oversubscribed on an annual basis.
- The staff and the Governors recognise the desirability of educating children from all backgrounds together in a culture of respect and mutual understanding, promoting excellence and celebrating difference. Integrated education is an ethos that permeates all aspects of school life in an environment underpinned by the ‘Statement of Principles of Integrated Education’.

- Approval for additional pre-school provision in our school would support parents in being able to access our highly sought pre-school provision in our integrated school environment from the age of 3 to 11 years in the Triangle area.
- Those involved in Mill Strand Integrated PS would like to play a role in moving towards a shared future for all. The school has been at the forefront of building a shared future and continues to strive to break down barriers in a community still divided on grounds of religious difference.

3. IMPACT

Area Planning Impact

The NEELB Primary Area Plan 2014-2018 notes that Mill Strand IPS is the only integrated school in the Coleraine Area, with a small controlled integrated school located outside Garvagh being the only other integrated provider available to parents.

This proposal would address parental demand for Integrated Pre-School Education. Mill Strand Integrated PS is the only integrated primary setting in the Portrush, Portstewart and Coleraine areas. Consultation with Mill Strand IPS Parents' Council has highlighted the concerns. Admissions are restricted to 26 in the Nursery, this has been particularly oversubscribed for the past few years.

Mill Strand Integrated School manages its finances to operate with a minimum of a 3% surplus.

The estimated need in Table 56 of the Area Plan for the Coleraine Area greatly underestimates the future need for integrated places. Latest research indicates a need for 2,500 places of which a minimum of 420 will be required by Mill Strand Integrated School in addition to 52 Nursery places.

Impact on other Pre-school Providers

Mill Strand IPS has had approval from DE for a temporary variation to 54 for P1 in September 2016. Table 1 (below) outlines the pattern of admissions and enrolments to pre-school providers within a three mile radius of Mill Strand IPS. Approval of this proposal for Mill Strand IPS would meet the demand for integrated provision and would have no impact on existing schools in the area as all are fully subscribed.

The nearest integrated schools in the area are Ballycastle Integrated Primary School in Ballycastle at 19 miles, Ballymoney Model Integrated at 13 miles and Roe Valley

Integrated Primary School in Limavady at 20 miles distance from Mill Strand Integrated Primary School.

Table 1: Admissions and Enrolments of Statutory and Voluntary Providers within a 3 mile radius of Mill Strand IPS for 2016/17

School Name	Year School	No of 1st pref App	Total No of Applications	Total No Admitted
STATUTORY				
Portstewart NS	2016/17	33	33	26
Mill Strand IPS Statutory Nursery Unit	2016/17	34	35 (48 to Sept 2016 – 20 in pre school)	26
VOLUNTARY PROVIDERS				
Mill Strand IPS Playgroup	2016/17	15	21	20 (17 in pre school yr)
Portrush Community Playgroup (situated at Portrush PS)	2016/17	32	34	32
Causeway Pre-School (Situated at St Patrick's PS)	2016/17	15	15	15
St Colum's Pre School (Situated at St Colum's PS)	2016/17	18	21	21

Source: EA

4. EDUCATIONAL IMPACT

As submitted by Mill Strand IPS

The school currently provides a high capacity for sustained improvement in the interest of all learners as evidenced by recent ETI inspections. Approval for the establishment of additional nursery provision at Mill Strand Integrated PS would be significant in providing parents with much sought after integrated pre-school provision at the school to meet parental demand. This would increase accessibility to integrated education and strengthen the position of the school within the Portrush area.

By extending the capacity of the Nursery to 52 places, the school will be able to extend the availability of high quality pre-school provision and build on the outstanding progress of pupils in the foundation stage.

An essential part of integrated education is the celebration of difference, of allowing children to maintain and develop social and friendship bonds that cross divides of cultural, religious, national or social boundaries.

To maximise the educational outcomes for our young people, it is essential that these relationships and ethos be maintained from the earliest opportunity in an integrated setting rather than be broken by failing to meet parental choice of both integrated Nursery and Integrated School provision. This would allow for acceptance and celebration of difference to be firmly built into our children's DNA so that they may make a lasting positive impact on our society.

5. STATISTICAL INFORMATION

As submitted by Mill Strand IPS

5.1 Enrolments

The Admissions Number for Mill Strand Integrated Primary School is 30 + (26 Nursery) and the school's overall enrolment number is 232 + (26 Nursery) The current enrolment of the school including 27 nursery is 248 rising to an anticipated enrolment of 268 by September 2016 including Nursery & Pre School. The

continuing upward trend in enrolment and applications for admission at Mill Strand IPS demonstrates the parental demand for integrated education in the area. Mill Strand IPS is a sustainable school in growth.

Table 1: Enrolment at Mill Strand Integrated Primary School & Nursery 2011-2015

Year	Admissions
2016/17	268*
2015/16	232*
2014/15	210
2013/14	207
2012/13	207
2011/12	189

Source: NEELB Open Enrolment 2015/16

**inc additional pre school to meet parental demand.*

Above figures include Nursery & [Pre School (2015-16) and (2016-17)]

Please note that 2015-16 figures comprise of 186 School, 28 Nursery and 18 Pre School and increased to 242 by the end of June 2016.

The 2016-17 figures comprise of 221 School, 27 Nursery and 20 Pre School

Table 2 Pattern of enrolments at Mill Strand Integrated PS Nursery Unit

Levels of First Preference Applications and Over-subscription at Mill Strand IPS Nursery in Causeway Coast & Glens Council area

School	Year	1 st preference	Total applied	Total admitted	Total Level of Over-subscription for 1 st choice applications
Mill Strand IPS Nursery Unit	2016/17	38	38	26	12
	2015/16	43	43	29	17
	2014/15	23	23	26	0
	2013/14	44	44	28	16
	2012/13	31	31	26	5

Source: NEELB & DE

**As the table above illustrates, the perception of the wider community is that if a child does not get a place in the nursery they cannot get a place in the school. Furthermore, when the school is refused permission to meet parental preference and forced to turn families away, applications for the following year drop as the school is seen as a 'closed shop'. The short term funding of a pre-school has clearly illustrated the need for additional pre-school places in integrated settings.*

NB All 12 families not admitted through Open Enrolment chose to attend the school's Pre School setting.

5.2 Pupils attending Mill Strand IPS by postcode

54.5% of pupils currently attending Mill Strand IPS reside in the BT56 postcode area (Portrush), 23% reside in BT55 (Portstewart) and 19.6% in BT51/52 (Coleraine). Mill Strand IPS represents a local school at the heart of its community. The approval for additional integrated pre-school provision through the establishment of additional nursery places will further support the school in meeting the high level of parental demand year on year. It will also enable children to build relationships in an integrated environment from the onset, rather than have to break them at the end of a nursery year.

6. IMPLEMENTATION PLAN (IF THE PROPOSAL IS APPROVED)

- Submission to the Education Authority for September 2016 for consultation and publication.
- Admissions criteria to include notification of a Development Proposal. This circular 2015/26 outlines the timetables for primary school admission procedures. If the EA will normally annotate a school's admissions criteria with a note about any development proposals.
- Accommodation: see notes below (Resource Implications).
- Teacher recruitment in Spring of 2017 or as soon as possible thereafter.

The proposal has an effective date of August 2017.

RESOURCE IMPLICATIONS

As submitted by Mill Strand IPS

There is adequate accommodation within the school to meet growth for the next two years but, after opening 28 years ago and 15 years after the school was first identified as being in urgent need, the fabric of the school building is deteriorating to the extent that there is an urgent need for a new school build. The school has been notified by Ministerial announcement on 23rd March 2016 that it is to be included within the Fresh Start planning programme for capital buildings.

The school site is 1.62 acres and accommodates the existing nursery unit in a ground floor room of the old house that forms part of the school's accommodation. The school has a further 6 mobile classrooms and four classrooms in the permanent extension to the original house. A limited number of additional rooms are available in the main house for class use.

The school has established a pre-school Playgroup to meet parental demand. The room used for this provision can be used to accommodate a second Nursery session. Alternative accommodation is also available in mobile classrooms.

There are no resource implications in the short-term. There is a long-term need to relocate and expand the school. This has been supported through approval to 'Proceed to Planning' for a new build through FSA Funding. There are therefore no Capital Resource Implications as funding will come directly from the Treasury and not DENI/EA.

We anticipate a need for £26,000 in year 1 to employ a Nursery teacher and a Nursery Assistant. As the overall educational budget is largely determined by the

number of pupils being educated in Northern Ireland this should not cause an overall increase in educational expenditure.

STATUTORY CONSULTATION

Consultation with Parents

May 2013: Two Parent meetings were held to listen to the views of the parent body and wider community with regard to Area Based Planning and the lack of integrated education in the area.

Further meetings were held in Mill Strand on 10 February 2015 and 6 March 2015 to outline proposals which Mill Strand IPS were putting together to meet parental demand and facilitate an integrated option.

On 25 February 2015 the NICIE Development Officer met with the Principal before addressing the Board of Governors on 26 March 2015 to advise them on the process involved in taking development proposals as outlined by DE, the information which the school would need to prove that they had a case for change and to direct them towards the DE guidance on Development Proposals.

In addition to this, the school carried out a short survey open to the school and wider community. Both on-line and paper responses were received by the school over the two-week period of the survey. The results of the survey indicated strong support of this proposal.

Despite increasing provision to accept sixteen additional applicants, through an IEF funded pre-school, 74% of those surveyed still felt that there is not sufficient pre-school provision in integrated settings. Although the school strives to accept all applicants 72% believe that there is not adequate integrated provision to meet demand within the 'Triangle' Area.

Interestingly 90% of parents would have put an integrated Nursery as an additional second choice had one been available while 81% of those surveyed would have chosen an integrated school as a second choice to Mill Strand Integrated if available. Mill Strand Integrated School & Nursery remains their only choice.

Alongside the school's excellent reputation and many strengths relating to learning and teaching, curriculum and child centred approach, the majority of those surveyed listed integrated education as being the main reason for choosing Mill Strand IPS.

[see Appendix 1 Survey Results]

The Development Proposals for the school were further discussed over the fourteen meetings of the Board of Governors and eleven meetings of the Parents' Council throughout the last eighteen months. (Detailed under Statutory Consultation)

A further meeting to widen consultation to include members of the public was held in Portrush Town Hall on Thursday 2nd June 2016 when the proposals for school growth to meet parental demand were included in the Principal's opening remarks.

A significant level of consultation has taken place in respect of this development proposal:

10th Feb. 2015 Introductory meeting of parents on the need for more integrated places in the area.

6th March 2015 Meeting of Parents to outline possible ways forward.

Meetings at which members of the Board of Governors including staff representatives were consulted on their views on the future development of the school:

- 30th January 2014
- 20th March 2014
- 30th April 2014
- 28th May 2014
- 6th November 2014
- 22nd January 2015
- 28th March 2015
- 4th June 2015
- 24th September 2015
- 19th November 2015
- 21st January 2016
- 3rd March 2016
- 28th April 2016
- 7th June 2016

27 August 2015 Meeting of all teaching and support staff to get their views on the Development Plans for both the school and nursery as part of Action Planning for the

year ahead. Weekly updates given at Monday morning briefings and afternoon staff workshops.

Meeting of Parents' Council/Committee to outline the proposals for increasing the school size from Sept 2016 as well as address the critical issues and need to relocate the school:

- 28th May 2015
- 17th June 2015
- 9th September 2015
- 18th September 2015
- 24th September 2015
- 16th October 2015
- 2nd November 2015
- 26th November 2015
- 20th January 2016
- 4th March 2016
- 4th May 2016

A widespread consultation with the school and extended Portrush community was undertaken through paper and on-line questionnaires in September 2015 (see Appendix 1).

An open meeting for parents and the wider school community was held on Tuesday 10 November 2015 at 7.00pm to give a presentation and update of these development proposals.

On Thursday 12 November 2015 a special meeting of the extended school community, to outline the development proposals was held in Mill Strand Integrated Primary School's Assembly Hall and all local councillors from the Causeway Coast & Glens Borough Council invited.

A further meeting to widen consultation to include members of the public was held in Portrush Town Hall on Thursday 2 June 2016 when the proposals for school growth/Development Proposals to meet parental demand were included in the Principal's opening remarks.

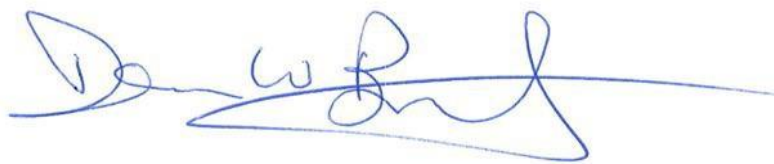
Final approval of the joint Development Proposals by the full Board of Governors & Board of Directors on 19th November 2015. The subsequently revised proposals were approved on 24th August 2016.

Minutes of these meetings are available if required.

Following the decision to go forward by the Board of Directors, a steering group will be established, comprising representatives of the governing body, parents and staff.

This group has been charged with taking forward the development proposal for the establishment of increased part-time nursery places and establishing a two-form intake for the school. This group will also maintain links with all stakeholders involved in this process.

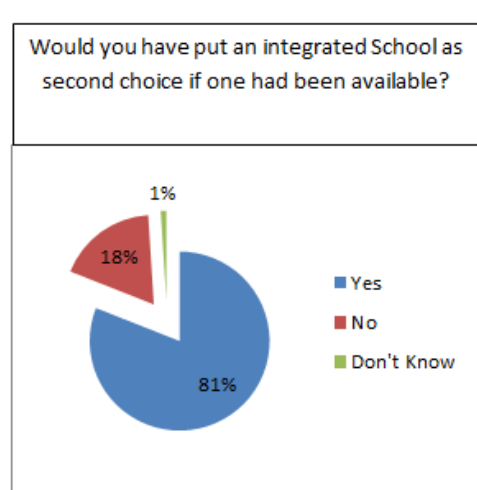
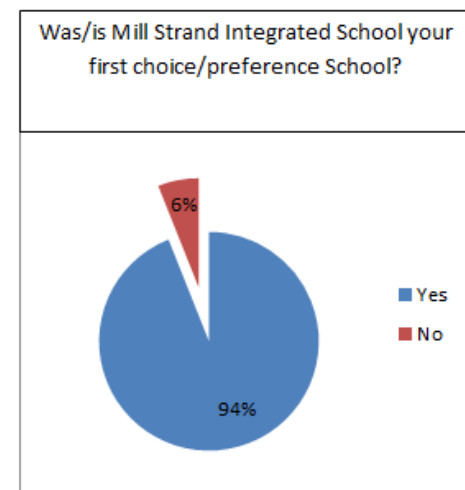
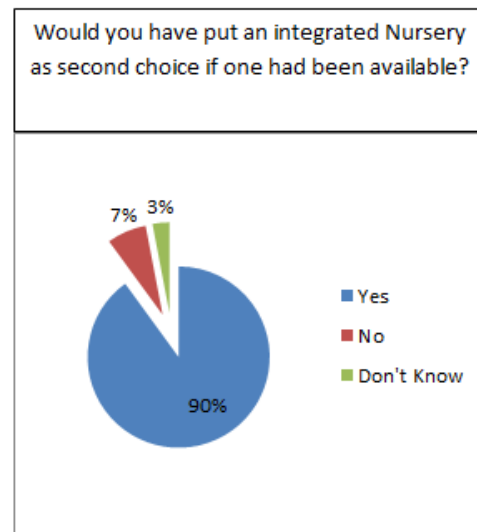
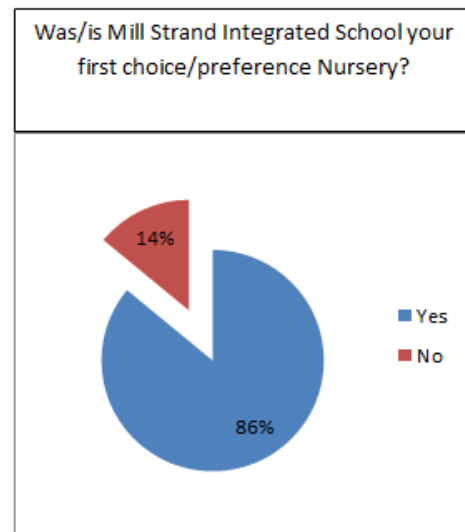
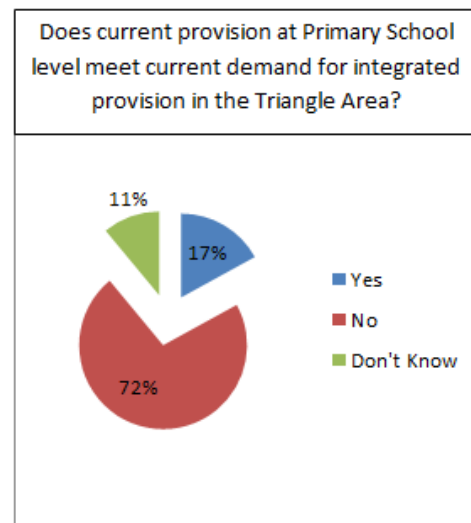
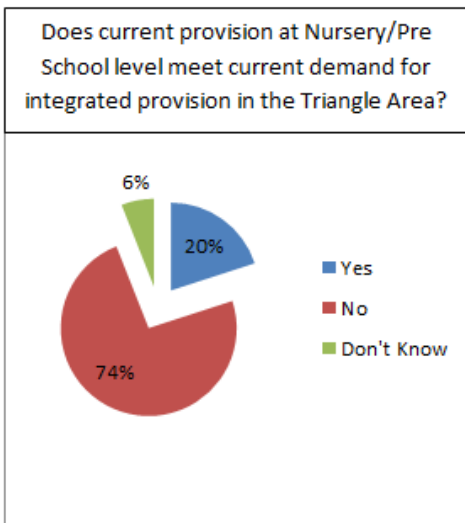
SIGNED:



Dennis Brereton

Chair of Governors Mill Strand Integrated School & Nursery
24th August 2016

Appendix 1 Survey Results



Chief Executive Gavin Boyd



The Secretary
Department of Education
Rathgael House
Balloo Road
BANGOR
BT19 7PR

16 December 2016

For the attention of the Area Planning Policy Team

Dear Sir/Madam

Development Proposal No. 483 – To increase Mill Strand Integrated Primary School admissions number from 30 to 60. This would occur through an annual phased increase in the school’s enrolment number from 232 up to 420, commencing in September 2017, or as soon as possible thereafter

Development Proposal No. 484 - Proposal to establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit

In considering the above Development Proposals, the Education Authority Board Members considered the background to the proposals as outlined in the Summary Papers and Cases for Change presented at the Education Committee meeting held on 15 December 2016.

Members noted that the proposals were not referred to in the NEELB Primary Area Plan 2014-2018 which stated that the Board of Governors propose no action at this time. The proposals were included in a subsequent Annual Action Plan. Members also noted that the enrolment trends for the school were above the minimum threshold as set out in the Sustainable School Policy. Consideration was given to the financial, transport, legal and accommodation implications as outlined below.

Consultation with other affected schools

The consultation response summary paper details the issues raised by schools during the consultation process. In summary twelve responses were received by the EA in relation to DP 483 and seventeen were received in relation to DP 484. One response received supported both proposals and all other responses opposed the Development Proposals.

The response supporting the proposals stated that the Governors fully supported the Development Proposals.

Among other points, those opposed to the Development Proposals referred to the number of spare places already in the system locally in both the preschool and primary settings, the significant detrimental impact the proposal will have on other schools and providers, the development of the plan without the full context of other sectors being considered, the potentially significant capital and recurrent costs associated with the delivery of the Development Proposals, the lack of information on the statistical integrity of the survey referenced and the lack of evidence demonstrating a demand for integrated education in the area.

Financial

As a Grant Maintained Integrated School, Mill Strand is funded directly from DE. Members noted that the impact of such a large increase on a diminishing resource budget would be significant.

Accommodation

Mill Strand Integrated Primary School and Nursery Unit have been announced by the Department of Education in March 2016 as a major capital scheme and permission given for the scheme to proceed in planning. While there is no capital implications for the Education Authority, members noted the likely significant impact of doubling the size of both the nursery unit and primary school.

Transport

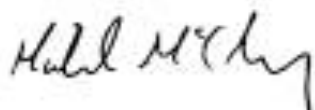
Transport assistance is currently provided for 46 pupils at the school at an average cost of approx £660 per child.

As there are no other integrated primary schools in the area the school has a fairly large catchment area, increasing the likelihood of pupils being over the 2 mile radius to qualify for transport assistance.

Depending on the addresses of the new intake, transport may have to evaluate the efficiency of the service currently provided for pupils attending Mill Strand Integrated Primary School, possibly resulting in a new bus service having to be provided for those who meet the qualifying criteria.

Members noted that there are no associated legal issues associated with this proposal.

Yours sincerely



Michael McConkey
Assistant Senior Education Officer
Area Planning

RESPONSES DURING THE TWO MONTH STATUTORY OBJECTION PERIOD

A] Summary of Responses from Individuals

<p>DP 483 – SUPPORT <i>The Department received 63 responses from individuals in support of DP 483, many of which made similar points which have been grouped together under the following headings.</i></p>
<p>DP 484 – SUPPORT <i>The Department received 62 responses from individuals in support of DP 484. Points raised by respondents largely mirrored those made in support of DP 483, but where comments focussed on pre-school considerations these have been factored in to the summary.</i></p>
<p>Spirit of Mill Strand IPS: The school evolved from a parent led movement and this has led to a unique sense of community and a harmonious feel.</p>
<p>The Good Friday Agreement: The agreement placed a responsibility on our politicians to support the growth of integrated education and a statutory duty to encourage and facilitate integrated education. The Justice Treacy judgment indicated that DE was not allowed to stifle the growth of the integrated sector to protect falling numbers in Catholic and Controlled schools. Integrated education is key to shaping the future in an inclusive way.</p>
<p>Fresh Start Funding: The funding for expansion of Mill Strand IPS will come from the Treasury and not local taxation, Stormont or local government.</p>
<p>Demand/Parental preference: No alternative Integrated primary school exists within a 10 mile radius. There is high demand for places at Mill Strand IPS fuelled by a strong desire from parents to send their children to an Integrated school. The school is at capacity and needs to increase the existing provision to allow more children to attend as at present they can only offer a place 4% of children in the Triangle area a place.</p> <p>No alternative Integrated primary school with a nursery unit exists within a 10 mile radius. Mill Strand Nursery Unit has demonstrated there is a high demand for places and is heavily oversubscribed. Opened the playgroup to help parents who wished to avail of the setting.</p> <p>To oppose the Development Proposals is to deny freedom of choice for integrated education.</p>
<p>Integration from the outset: Integration should occur from the earliest stage of a child's educational journey and parent's wishes should be met as children should not be separated from their peers at age 4 on the basis of religion.</p>
<p>Shared education does not equate to Integrated Education: Both forms of education should be promoted and facilitated but Shared Education should not be used to suppress growth in the integrated sector.</p>
<p>Research – respondents pointed to a University of Ulster study demonstrating that up to 80% of the population support integrated education, and also an independent review of Integrated Education in Northern Ireland, the report of which contained recommendations aimed at actively promoting and planning for an increase in the number of pupils educated in integrated schools.</p>
<p>Impact on other schools: Other schools are deliberately undermining Mill Strand's proposals by actively encouraging their parents to object for self-preservation reasons.</p> <p>The proposed increased in provision of additional 26 pre-school places at Mill Strand would have no impact on any other local pre-school.</p>

DP 483: OPPOSITION

The Department received 29 responses objecting to DP 483, many of which made similar points which have been grouped together under the following headings.

The Department received 22 responses objecting to DP 484. Points raised by respondents largely mirrored those made in opposition to DP 483, but where comments focussed on pre-school considerations these have been factored in to the summary.

Inflated Demand: Demand has not been proven to be based on Integrated Education over any other form. It is the result of having additional pre-school places funded by the IEF through the creation of a playgroup with 20 places.

If integrated education is the ideal parents are seeking above other factors, then why does this not translate into Year 8 transfers to the local post-primary Integrated school?

There are enough pre-school places within Portrush and the wider 'Triangle Area'. There is no commitment anywhere in the proposal that the existing playgroup will be closed if nursery places are expanded.

Inequity: Schools classed as 'Integrated' have a more favourable position regarding funding and development opportunities. In the case of Mill Strand they have been able to offer an annual £600 travel grant for those children who do not live in Portrush and a free 8.30am - 1pm, 5 days a week nursery unit for 3 year olds. Financial incentives like these are unavailable to those who attend other schools.

Demographics: The North Eastern Education and Library Board's Area Plan 2014-2018 predicted a long term decline in the numbers of children at primary school to a level below 2016 demand. "Providing Pathways" similarly projects a 1.4% decrease in the population of this area in the age range 0-15 years by 2024. This document also shows that there are over 4,000 empty primary school places across the Council area.

Impact on other schools: Allowing Mill Strand to go ahead with their proposal will surely see the closure in the near future of one of the other three primary schools in Portrush and thus many jobs with it. There are no additional children from demographic projections so the additional children will be drawn from other schools.

Only 54% of pupils currently attending Mill Strand come from Portrush. If there are no additional children available within Portrush, then this proposal can only succeed if other schools in the town are forced into closure or if more children come from outside the town.

Approval of DP 484 would place significant pressure on the admission numbers of the established pre-schools affecting future viability. This would have a negative and far-reaching impact on other nursery schools in the area and will likely lead to the closure of St Patrick's and its nursery.

Location of Mill Strand IPS: Difficult to assess area impact with uncertainty surrounding the school's future location. If seeking to serve the Triangle area the school may be more appropriately located in Coleraine, with a population four times the size of Portrush, better transportation links and closer to the North Coast Integrated College.

Shared Education and Integrated Education: Local schools and preschools are also actively providing the same quality of integrated style education offered by Mill Strand.

B1 RESPONSES RECEIVED FROM SCHOOLS AND PRE-SCHOOLS

St. Colum's Primary School
Lever Road
Portstewart
BT55 7EF
Tel: 028 7083 3010
Fax: 028 7083 6032



Mrs K S McCullagh M Ed PGCE BA Principal
05.01.17

Dear Sir / Madam

Development Proposals No 483 – Proposal to establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School Nursery Unit. Development Proposal 484 - School Development Proposal.

In response to the public consultation process we, the Principal and Board of Governors wish to make comment on the above.

Proposal 484.

- In the academic year 2015/2016 St Colum's Primary School submitted a Proposal (298) to establish a part-time Nursery Unit at St. Colum's Primary school. In DENI response dated 07.07.16 the Department refused the proposal as the Minister concluded "...there are already sufficient pre-school places in the area and if approved the new unit had the potential to displace good quality pre-school provision already in existence". We would suggest that this rationale would surely be equally applied to the Mill Strand Proposal.
- In analysing provision levels in considering our application DENI also noted in 2013/14 and 2014/15 the level of pre-school/ nursery provision across the 5 mile radius indicated that there is actually over provision in the area and furthermore that the population projections for the Coleraine council area show a steady decline in the live birth rate. It is unlikely that these demographics have changed in one year.
- At St. Colum's Primary School we strongly support the cross community pre-school provision at St. Colum's Pre-School which provides for children from all denominations. We believe DP 484 could strongly jeopardise the existing Provision which has been in existence for 21 years. We have never refused any child admission to the Pre-School based on religious denomination.
- In rejecting DP 298 from St Colum's Primary School DENI stated "There is no criteria in place whereby it would be appropriate to cease funding an existing PSEP funded playgroup to establish nursery provision in its place". In our view it would be unfair to change the designation of an externally funded playgroup to statutory nursery provision ahead of our proposal submitted from the same area last year.

Proposal 483.

- The Principal and Governors of St. Colum's Primary School do not believe that the enrolment claims are fair and equitable. The enrolment trends demonstrated in the proposal show that the external funding of additional places for a given period of time have created a one year projection of need rather than being a sustainable year on year projected increase.
- Had DENI accepted Proposal 298 from St. Colum's Primary School we too would have had greater demand for Primary One places as this is the preferred option for parents of Pre-School children. No Maintained Primary School within a five mile radius can offer parents their preferred option of Nursery Education for their children. Were Mill Strand to be given additional nursery places this would further bias the alleged claim of support for Integrated Education in this area of which there is no definitive evidence.
- In relation to Article 44 of the Education and Libraries (NI) 1986 Order (to educate in accordance with the wishes of parents as far as is compatible with the provision of effective teaching and learning and the avoidance of unreasonable expenditure) the creation of additional pupil places in the Triangle area which already has pupil places surplus to requirement would surely be a contravention of what would be deemed to be "reasonable expenditure".
- It is our understanding that Shared education has an equal footing with Integrated Education. Strong links have been established as a solid foundation for Shared Education in the locality of Portstewart between St. Colum's Primary School, Portstewart Primary School and Dominican College Portstewart. Were the above proposals to be supported by DENI we would see that as favouring Integrated Education over Shared Education and would have grave concerns that this would limit our vision for Shared Education as St. Colum's Primary School and

Portstewart Primary School could both be adversely affected by sustainability issues were pupils to be drawn from our catchment area.

Yours faithfully,

Sinead Mc Cullagh, Principal of St. Colum's PS, Portstewart & Board of Governors of St. Colum's PS, Portstewart.



Re: Development Proposal 483 and 484

Killowen Primary School governors are extremely concerned about a situation which has arisen because the integrated sector school, Mill Strand, have a nursery. Nursery places have been denied to numerous primary schools in the controlled sector, clearly demonstrating discrimination. The nursery places being provided by Mill Strand have undoubtedly skewed data now being presented to make a case for these development proposals. The integrated school in question has not been subject to the channels of approval for additional nursery places being provided that controlled schools would be subject to, if in a similar situation. Can the paperwork sanctioning such approval be provided? As enrolment figures have been stated as being stable then this evidences the fact that the need is for nursery places in the area, not integrated places. This is further evidenced by the number of children who transfer from Mill Strand to grammar school rather than show a commitment to integrated education.

EA's 'Providing Pathways 2017-2020' which was published for consultation extremely recently stated in its press release, 'The core purpose of area planning is to ensure a network of sustainable schools that are the right type, the right size and are located in the right place. Providing Pathways is the start of that process under the Education Authority'. Killowen governors would question how Mill Strand's development proposals fit with wider area planning and this new strategy just published. It is necessary to point out that, as the development proposal itself states there were 39 empty places between the 5 nearest schools in 2015/16, the bigger picture has not been considered. The term 'integrated' appears to be what the proposals is based upon and as stated in the previous paragraph evidence suggests parents are choosing nursery places not integrated places.

Statutory duty does not equate to a duty to grant every proposal brought forward on behalf of an Integrated school. However, the Department must be mindful of its statutory 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.

Public funds should only be spent where need is clearly and independently identified. The Department has a responsibility to produce valid, impartial information which has been researched efficiently. This needs to be examined within the context of wider area planning to ensure provision of education that is needed by communities for future skills and stability. During an extreme period of financial difficulty when controlled sector schools are not being so much as provided with a light bulb, we can only see funding being spent in this manner as discrimination towards all other sectors of education.

In conclusion, there is enough capacity in the local area to meet the demand of both primary and pre-school children and the impact of increasing nursery provision to this school will have a detrimental effect on other local providers.

Yours sincerely

D Collins

Chariperson Killowen Board of Governors.

HARPUR'S HILL
RE: DEVELOPMENT PROPOSAL 483 AND 484

The Board of Governors at Harpur's Hill would like to make the following response in relation to the above Development Proposal:

- There is enough capacity in the local area to meet the demand of both primary and pre-school children;
- The impact of increasing Nursery provision to this school will have a detrimental effect on many local nurseries and playgroups; with some probably facing closure.
- The level of funding required to benefit Mill Strand Integrated PS school's proposals would be detrimental to others in the local area especially in a climate of severe funding restrictions and resources;

In specific response to the matters highlighted in the two Development Proposals:

STABLE ENROLMENT TRENDS:

- Naturally Mill Strand's enrolment is growing, due to the fact it has been allocated a nursery. Prior to this their enrolment figures were steady.
- This is the only school in Portrush to be in receipt of Nursery provision. Surely this highlights the demand is for Nursery provision locally rather than specifically *integrated* provision.

SOUND FINANCIAL POSITION:

- If the school is in a sound financial position, why has it not addressed the Health and Safety issues regarding its building?
- In recent years Mill Strand Integrated Primary School has utilised external funding to establish additional pre-school provision. Is this money guaranteed for future years?
- Just because you have a full-time nursery full does not mean that you can assume all the parents want Integrated Education – they just want a nursery place for their child as there are no other full-time places available in the Portrush area.

RATIONALE FOR CHANGE:

- Why create a larger school, to the detriment of other local schools; when there are still empty desks!! We could understand this if the schools were substandard, but they aren't. They are deemed highly effective by the inspectorate.

AREA PLANNING IMPACT:

“.....parental demand for Integrated Pre-School Education.....”

- This is not evidenced in the proposals. The survey presented is statistically irrelevant;
- Schools should be working together, sharing good practice, resources etc. and not wasting energy and money trying to monopolise the system. Healthy competition is good but schools can still achieve this and work together.
- EA's 'Providing Pathways 2017-2020' which was published for consultation last week stated in its press release, 'The core purpose of area planning is to ensure a network of sustainable schools that are the right type, the right size and are located in the right place. Providing Pathways is the start of that process under the Education Authority'. How does Mill Strand's Development Proposal fit with wider area planning and this new strategy just published?

IMPACT ON OTHER PRE SCHOOL PROVIDERS:

A temporary variation was granted for 54 from 30 spaces. This is discriminatory towards non-integrated schools in other triangle schools that are being turned down for minimal temporary variations.

Document states, “no impact on existing schools”that is simply untrue and would have a significant impact on other schools, nurseries and playgroups in the locality, undoubtedly resulting in redundancies among front line staff;

It is DE’s practice not to displace good quality pre-school provision already in existence with pre-school provision in an alternative setting. These additional spaces would have a detrimental effect on other pre-school providers in the area, not filling their capacity. Children should be educated along with their peers in their own community and not bussed in from the surrounding area to a school that only cares about the number of bums on seats!!

ENROLMENT

The school’s own figures show an increase in enrolment due to additional places. This is surely a self-created demand which we could all generate with the financial backing of an externally funded body, with the creation of teacher led Nursery provision.

How does this sit with area planning for the whole school estate? - especially as the development proposal itself states that there were 39 empty places between the 5 nearest schools in 2015/16! The document also states that 20% of their current pupils come from Coleraine, but there is no information on Coleraine schools' intakes etc. - only on those 5 within a 3 mile radius. Whatever happened to a proper audit of what is actually needed?

RESOURCE IMPLICATIONS

- What stage is this process at in regards to guaranteed provision?
- No consideration of timescales are being taken at all, with no site for a new building, no site even likely, the procurement procedures and building timescales would not allow for a school to grow at the rate forecast and be able to deliver the accommodation it would require;
- As a school that serves the ‘whole triangle’ area, they state publically that they are a Portrush school and will not be leaving the town regardless of availability of sites, so with a wider population travelling to Portrush, there will be implications around transport costs for children being transported for free to the school.

THE ‘SURVEY’

- Where is the statistical evidence to show the demographics of the survey sample?
- What is the size of the sample to be numerically significant?

Statutory duty does not equate to a duty to grant every proposal brought forward on behalf of an Integrated school and that the Department must be mindful of its statutory 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.

We believe this Development Proposal is being rushed through, with little time for Board of Governors to meet and discuss their response at length. We also believe an independent survey should be carried out to see if there is a need for a larger integrated school in Portrush. The survey that was carried out by Mill Strand is extremely biased and totally invalid.

In conclusion, there is nothing in these Development Proposals which we could support.

P.Mark (Chair of Governors)

D. Radcliffe (Principal)



D.H. Christie Memorial Primary School

Ballycairn Road, COLERAINE, Co. Londonderry, BT51 3HX

Tel:028 703 43740 Fax:028 703 56556

Principal: Mr P. Henry B.Ed. PQH (NI)

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Twitter: [@dhchristiems](https://twitter.com/dhchristiems)



Regarding the development proposals for Mill Strand Integrated Primary School, the Governors of DHChristie Memorial Primary School would like to express the following objections:

- Integrated Education, as described by NICIE (“Integrated Schools are not secular, but are essentially Christian in character and welcome all faiths and none.”) including provision of sacramental preparation through close effective community links, is already provided by most controlled primary schools and this should be recognised by the department. We, the governors of DH Christie Memorial Primary School, are proud to represent a school which is very naturally integrated, providing for pupils from multiple faiths, cultures and backgrounds without the need for faith related quotas or questions. We turn nobody away on the basis of religion and treat everyone equally. We do not require a label to achieve this. To show favour to a school because they carry a certain title or label is unacceptable. All schools should be treated equally.
- The Triangle area already has a significant excess of primary school seats and does not require further new provision. To provide an additional 200 places would require a significant build investment and would potentially have a serious and detrimental impact on other schools.
- The issue of sustained growth over a significant period of time simply demonstrates that when teacher-led pre-school places are offered, parents will take them. Once a child is in a school setting, it is very unusual for parents to remove them, due to their friendship groups and satisfaction with the provision. Once Mill Strand introduced additional places in pre-school, the number of applicants for a P1 place was influenced by the number of places offered. Their growth is linked to teacher-led pre-school provision rather than Integrated Status. Indeed, according to data listed on a recent ETI report, not all of the pre-school pupils transferred directly into Mill Strand, indicating a desire for the teacher-led provision rather than the integrated label.
- There is no clear evidence that there is a significant swing towards the principle of integrated education. E.g. The only integrated post primary provision is not managing to fill their enrolment in the same area. Another school in the triangle area has explored the idea of "going integrated" only to discover that parents are not sufficiently in favour to make the necessary changes. No detailed study of the population has been carried out to identify a change in preference from either controlled or maintained school provision towards integrated provision.

- There is no clearly evidenced need for additional pre-school places, with many of the local places remaining unfilled. The growth in Mill Strand is predominantly caused by the creation of additional teacher-led places. The Proposals reference to the school being “heavily over-subscribed” is only seen in the one year when additional pre-school places were provided. Parents have historically leaned in favour of teacher-led provision over playgroups etc. In addition to this, other schools have explored the possibility of establishing nursery provision only to be advised that none would be granted as the area already has too many places available. If this principle is applied to one school, it should be applied to all schools.
- Contrary to the claims of Mill Strand, there is no need for additional integrated pre-school places as many of the community playgroups are cross-community provisions, integrated by their very nature.
- The perceived demand given in the proposal as evidence of a need for further integrated education places is in fact only an indicator of parents' desire to have their children attend a teacher led nursery place, rather than a community playgroup. The extension of this facility within Mill Strand would be a clear act of bias at a time when other schools would love to have such a facility and would have no problem filling such places. DHChristie has been asked by a significant number of parents in the past four years about nursery provision. Parents clearly favour nurseries/teacher led provision over alternatives. It is our understanding that other schools which have considered such provision have been advised that these places would not be granted.
- If such a need is confirmed, and we would contest that this is so, surely the exploration of transforming one of the existing schools to controlled integrated status would be a much more cost effective process. At a time of area planning, and in light of the serious financial problems faced by the department, surely the proposals set forth by Mill Strand are excessive and wasteful.

Thank you for considering our response.



**PORTSTEWART PRIMARY SCHOOL
and NURSERY UNIT**



**22-24 Central
Avenue
Portstewart
Co. Londonderry
BT55 7BT**

Principal: A K Millar, B.Ed., M.A., Dip.A.S.E.

Telephone: (028) 7083 2194

**Re: Development Proposals 483 and 484 in relation to
Mill Strand Integrated Primary School and Nursery Unit**

Please find enclosed the responses of the governors of Portstewart Primary School in relation to the Development Proposals noted above.

It is the view of the governors of Portstewart Primary School that the two proposals submitted by Mill Strand, should they be successful, would have serious, negative consequences for this school. Please find below the issues/concerns which the governors have identified.

The points which follow are in response to BOTH proposals which the governors believe are deeply flawed, naïve and contain misleading information. The issues are listed under the same section headings used in both proposals.

STABLE ENROLMENT TRENDS

- Both proposals are predicated on the exaggerated and unproven assumption that there is overwhelming demand for “integrated education” in the ‘Triangle Area’. The main evidence for this appears to be a “short survey” and the school’s enrolment numbers based on just two years. The most cursory of glances at the statistics reproduced for pre-school and primary one intakes clearly demonstrates that Mill Strand has not experienced significant, “year on year” increases.
- The increases in the last two years are clearly linked to the additional, externally funded, pre-school places which Mill Strand has provided. To claim widespread support for integrated education based on these figures is absurd.
- Recent increased enrolment indicates parents’ desire for pre-school places, NOT for integrated education.
- Where are the historical statistics relating to enrolment trends which display this demand for Integrated Education?
- The statistics provided by Mill Strand show the enrolment trends for the “coastal schools” only, yet Mill Strand claims to serve the whole “Triangle Area”. Why then have the facts and figures for the Coleraine schools not been included.
- If, as Mill Strand suggests, integrated education is in such high demand within the “Triangle Area”, the school should be vastly over-subscribed with large numbers of children from Coleraine seeking admission.

This has not been, and is not, the case.

- It must be noted that enrolment figures for years 2007 – 2012 show that enrolment in the nursery and primary departments is at normal, even static levels and that the school was operating at or below capacity.
- The provision of additional pre-school provision, funded from external sources, has led directly to the increase in numbers. Once again to equate the rise with a demand for integrated education is tenuous in the extreme.
- The funding which Mill Strand was able to access is NOT available to other schools. If it were then Portstewart Primary would, undoubtedly, show an increase in enrolment. (This can be verified from the number of unsuccessful applications for our nursery places!!)
- Both proposals refer to Mill Strand being an integral part of the triangle but only the statistics for the local coastal schools are provided. The statistics for ALL other **pre-school settings** must be considered to determine the capacity presently available in “the triangle”. This may prevent unnecessary expenditure in providing pre-school places at Mill Strand.

SURVEY

Details of the survey are not provided therefore rendering its claims ineffective. The following questions arise from the survey.

- What size was the sample used in the survey?
- How widespread was the survey undertaken in the Portrush community?
- How many responses were returned to facilitate the analysis of the survey?
- What measures were taken to ensure the sample was truly representative of the local population?
- How was the survey carried out and by whom? (Methods employed)
- Being a triangle school, how was the survey carried out in Coleraine and how many responses were received from the biggest town in the area?

The following points address directly some of the survey’s questions.

- **“Does the current provision at Nursery/Pre-School level meet current demand for integrated provision in the Triangle Area?”**

A respondent could not accurately answer that question! How would a respondent know the current level of demand or provision? The question effectively asks the respondent to guess and to present the answer as fact.

- **“Would you have put an integrated nursery as second choice if one had been available?”**

The survey focuses on just one factor – integrated education but fails to address within the context all the other factors a parent will consider when selecting a school/pre-school place, such as location, quality of education, facilities etc. Parents will, of course, say that integrated education is important when the question is asked in isolation but for many it is not the driving factor when choosing a school. This is surely true of the Triangle Area where the vast majority of parents choose **NOT** to send their children to Mill Strand.

- It should be noted, also, that excellent work in the local area is being carried out under the banner of “**shared education.**” Currently Portstewart Primary School, St Colum’s Primary School and Dominican College are working together (children and staff) on a number of projects. This contact is extremely valuable in bringing people together in a meaningful context to work towards shared goals. This work, which is replicated across the local area, is often unseen, unheralded and yet contributes immensely to the peace and stability of our community and to the respect and mutual understanding between the children and adults of our area.
- It should be remembered that in Portstewart Primary School we cater for children of different faiths, Christian and Non-Christian. This may also be viewed as “integrated education” as may our efforts to include, respect and care for children with disabilities. These circumstances suggest real integration is occurring significantly and purposely without the “integrated” label being attached. Why then, with spare capacity in local primary schools, which offer similar programmes of shared/integration education, would additional places at Mill Strand be required.
- With little background information available about the survey the details which are published in the proposals are practically worthless. It appears that the results of the survey (number of responses received?) have been misinterpreted hence giving the impression of a large scale demand for integrated education which patently does not exist).
- It would be a huge and potentially disastrous leap of faith to accept that, based on two years enrolment, Mill Strand will experience sustained demand for places.
- No consideration has been given to the possibility that enrolment can fluctuate or how, on its present site, Mill Strand would cope with the predicted rise in two years time.
- These proposals, if successful, will have the effect of reducing numbers in other, excellent schools in the area (ETI reports) leading to staff reductions which in turn will lead to larger and composite classes. The disadvantages which other schools would experience would lead to parental unrest and dissatisfaction and would lead to controlled and maintained schools believing they are not experiencing equality of opportunity for the children, staff or parents associated with their schools.

FINANCE

External funding has been utilised to create additional pre-school places but the proposal will need Department finance if the places are to be sustainable. Why would additional money be provided to Mill Strand and not to other schools to help with the provision of additional pre-school places? The statistics for applications to the Nursery Unit at Portstewart Primary School over the last ten years will clearly show that demand has outstripped places available.

ACCESS

- The proposals states that, “the current site has health and safety issues relating to access from the main road.” Surely increased numbers on this site would only increase the dangers for the children and other users of this facility.
- Mention is made of Mill Strand being “.. accessible to future pupils travelling from areas outside the current immediate catchment area and is situated on the main bus route ...”

No reference is made to the additional finance which would be required to fund transport.

COMMUNITY LINKS

- The claims made in this section are misleading. Children from other primary schools also attend services in a range of churches including the sacraments of First Communion and Confirmation.

- All of the local primary schools are recognised as being “part of the fabric of the town” and the shops, businesses and community groups are all involved with local primary schools at different times and for various reasons.

RATIONALE FOR CHANGE

- One of the main reasons for the proposal in relation to Nursery places appears to be with Mill Strand’s desire to uncouple itself from the control of NHSET. Should the proposal be granted would this be viewed as justifiable public expenditure?
- The proposals note also that the Department of Education has a statutory duty, “to encourage and facilitate the growth of integrated education.” To fund these proposals would signify to all schools the relevant unimportance of shared education when compared to integrated education. At a stroke, the Department would damage and begin to undo the excellent work which schools have undertaken while operating under the **“shared education umbrella.”**
- To fund these proposals under the guise of promoting integrated education would also be to disregard the negative and detrimental effects on other excellent primary schools in the area.
- The provision of extra primary school places would also lead to public finance being used in an unreasonable manner as spare capacity exists right across the triangle area.
- How exactly will Mill Strand, should the proposals be approved, set about, “accessing services to support vulnerable children in relation to attendance, welfare ..” Why are the services not already in place?
- The proposal argues for the desirability of educating children from all backgrounds together. Local schools, nursery units and community playgroups have been doing this for many years!!

AREA PLANNING IMPACT

- The proposals, again, state there is parental demand for integrated education and integrated pre-school education. There are no statistics and no evidence to support this position. The survey does nothing to support the school’s claims.
- The school’s own statistics demonstrate that the demand for integrated pre-school and primary one places was not excessive before the extra pre-school places were externally funded.

Impact on Other Pre-School Providers/Integrated Primary Schools

- Proposal 484 states that if successful the proposal .. “would meet the demand for integrated provision and would have no impact on existing schools in the area ..”

Proposal 483 also states that there would be “little impact on existing schools in the area..”

On the contrary, the provision of additional nursery places would have a huge impact on local providers and would probably mean reductions in staff and decreased opportunities and experiences for the children in the local settings.

- To claim there would be little effect on existing school, as opposed to Nursery places, is also inaccurate. The Department cannot approve a substantial increase in enrolment numbers for Mill Strand which is being justified by questionable parental demand, and not be aware of the damage to other schools. Once again, account by the Department, would have to be made of the success of shared education initiatives in the area.

- Why was Portstewart Primary School refused a temporary variation of 3 places a number of years ago and yet Mill Strand was granted a temporary variation from 30 to 54 places for the primary school. If the reason lies in providing integrated education then there is an immediate conflict with the delivering and advantages of shared education programmes which schools in the area are providing for hundreds of children.
- May we ask which authority endorsed the additional pre-school places?

AREA PLANNING IMPACT

- Once again “parental demand for integrated Pre-School and Primary education” has not been evidenced.
- Mill Strand insists that the need for integrated places is greatly underestimated in the Area Plan. However it does not explain how its demands for increased places at pre-school and primary level will be sustained in a geographical location which the Sustainable Schools Policy predicts will have a negative growth of -1.4%.

RESOURCE IMPLICATIONS

- It would seem obvious that if Mill Strand’s plans for expansion are to be realised and become sustainable then it should seek to serve the whole Triangle Area. This could only be achieved by locating the school in Coleraine. To do otherwise and spend public money on building a school in Portrush, a small coastal town, would seem at odds with the Sustainable Schools Policy.
- The proposals do not explain what FSA funding is, where its source lies, what use it can be put to and what other projects it has funded in local or national areas? Is it funding which is available to all schools? Has Mill Strand secured this funding?
- As Mill Strand is a Portrush school what are the consequences in terms of additional transport costs for the increased number of children who will be transported to the school from across the Triangle Area.

In summary, the main elements of our concerns and objectives are as follows:

- A lack of information in relation to the “survey” renders it ineffective.
- The demand for integrated places has not been proven.
- The provision of externally funded pre-school places is incorrectly equated to an increased demand for integrated education.
- The sudden demand for integrated places has coincided with extra pre-school places. Clearly recent increases in enrolment have been manipulated by the fact that Mill Strand accessed funding for additional pre-school places.
- Funding and resource implications have not been properly investigated and presented for inspection.
- The other school settings in the Triangle Area are capable of absorbing current demand.
- The present location of Mill Strand does not permit an examination of the total impact that the proposals may have for primary education within the Area Plan parameters. If the school location were to change then a more detailed study of the consequences for the Coleraine Triangle Area may be possible.

The above points accurately reflect the views of the governors of Portstewart Primary School. It is clear, I hope, from the objections raised and issues discussed that it is this school's firmly held belief that proposals 483 and 484 are flawed.

Yours faithfully

A K Millar

Principal



*Together Everyone
Achieves More*

ST PATRICK'S PRIMARY SCHOOL



St Patrick's PS Board of Governors
C/o
St Patrick's Primary School
109b Causeway Street
Portrush, BT56 8JE
Tel/Fax: 028 7082 3578

26th January 2017

To the School Admissions Team,

Regarding: Department Circular 2017/01: Admissions and enrolment numbers – temporary variation requests.

Development Proposal No. 483 – Mill Strand Integrated Primary School. Proposal to increase admissions and enrolment number.

Development Proposal No 484 – Mill Strand Integrated Primary School, Nursery Unit. Proposal to establish additional nursery places.

The Board of Governors request that, if submitted, a temporary variation of admission and enrolment numbers at Portrush Mill Strand Integrated Primary School is not granted.

It is the opinion of the Board that any temporary variation to the enrolment numbers of Mill Stand IPS would *prejudice the outcome of the public consultation process and Ministerial decision* of development proposals No. 483 & 484. This takes account of the previous temporary variation allowed for Mill Stand IPS for Sept 2016.

The Boards serious concerns of development proposals No. 483 & 484, and any temporary variation, have been previously forwarded to the Department namely:

The proposals would, if allowed, adversely impact on the continued viability of other quality schools and nursery/pre-school units within the Portrush, Portstewart and Coleraine triangle area. This would particularly be the case for St Patrick's PS and could adversely affect parental choice for Catholic education within Portrush.

Thank you for your consideration of our concerns.

Yours sincerely

Mr Andrew McGreevy

Chair, Board of Governors

**"The quality of the arrangements for pastoral care is outstanding;
the children's behaviour both in and out of class is exemplary" ETI 2011**

Causeway Preschool, Portrush

To whom it may concern,

I am writing to oppose Development Proposals 483 and 484 submitted by Mill Strand Integrated Nursery and Primary School, Portrush. I would argue that an increase in enrolments to Mill Strand is currently unnecessary.

Their reasoning for their proposed increase is to ensure that more families are given the opportunity to choose integrated education for their children and believe that children of different backgrounds in Northern Ireland can only be educated together successfully in a school with Integrated Status. This assumption is outdated and misleading. Local primary schools such as Carnalridge and Portrush Primary are active in welcoming children from all backgrounds and faiths and St Patrick's Primary school, while still a Catholic maintained school, would also follow the same entry mandate. Furthermore, all Education Board funded preschools in the area are cross community with no religious element in the curriculum at all so the significance of the Integrated banner is irrelevant. Very simply, all children who live locally are welcome at all local schools and preschools and while integrated schools play a big part in the diverse fabric of Northern Irish communities, they are not solely responsible for providing successfully integrated education.

Under the current education funding system schools with Integrated Status, such as Mill Strand, receive substantially greater funding than the neighbouring schools. This financial inequity has meant they are able to provide additional free services and resources to their pupils and families. In the case of Mill Strand they have been able to offer an annual £600 travel grant for those children who do not live in Portrush and a free 8.30am - 1pm, 5 days a week nursery unit for 3 year olds. Financial incentives like these are unavailable to those who attend other schools. It is therefore debatable whether the motivation for attending Mill Strand is to partake in integrated education or a financial one.

In recent years, Mill Strand has claimed their current premises are too small for the number of students that attend and have applied to move to a bigger location in the area. It is therefore unclear why an already overcrowded school would apply for significantly more places as this would further compromise the learning facilities of the attending pupils and their families.

If the Proposals were to go ahead it would have detrimental effect on the intake of local preschools and primary schools and consequently on their survival. All local schools and preschools currently have available spaces and can be filled by any child from the local community. Our local schools and preschools are also actively providing the same quality of integrated style education offered by Mill Strand so the demand for extra spaces at Mill Strand based on their Integrated Status is unnecessary and fabricated.

I would also question the necessity to provide so much additional funding to schools with Integrated Status and the financial inequity it creates. I would argue that children at neighbouring local schools who benefit from the same kind of education are automatically at a disadvantage because their schools do not have the funding to provide them with the same resources and financial incentives that Mill Strand do.

I believe when faced with more first choice preferences than spaces, Mill Strand implements their enrollment selection process as all schools and preschools are required to do.

Thank you for considering my reasons against these proposals going ahead.

Samantha Russell-Morelli
Chairperson
Causeway Preschool, Portrush



Portrush Primary School
Crocknamack Road, Portrush, Co. Antrim BT56 BJW
Tel: 028 70 822 333 Fax: 028 70 825 497

Principal: Mr C. G. Guy B. Ed (Hons) P.Q.H.

27th January 2017

In response to Development Proposal 483 (SCHOOL)

The Board of Governors are writing to you in response to the proposal listed above.

This proposal and the associated proposal 484 could have far-reaching impacts on the provision of pre- school and primary education in Portrush and the wider area.

The Board of Governors has had an opportunity to discuss both proposals and specifically proposal 483 at its meeting on 21st January 2017. We would wish to bring your attention to the points outlined below and overleaf.

We note a number of flawed and tenuous arguments put forward in the case for change.

The simple principles of our objections are:

- There is sufficient existing capacity in the area in both Pre-school and Primary provision;
- The impact of increasing statutory nursery provision within the only school in Portrush which currently has such provision would be a further bias in a playing field that is already uneven and would be prejudicial to existing voluntary playgroups in Portrush and Portstewart;
- There is no sound evidence for increased demand for Integrated spaces;
- Enrolment trends have been inflated by external funding which has created additional places, in teacher led, preschool settings, for extended periods of time;
- The survey conducted by the school is of insufficient rigour and fidelity to be considered;
- Significant funding and resource implications have been discounted;
- Area planning impact cannot be properly assessed. The proposer states that the school serves a wide geographical area and it is noted that there is no certainty regarding the location for proposed future development.

A more detailed response is included overleaf.

STABLE ENROLMENT TRENDS:

Under the heading "Stable Enrolment Trends" the proposer seeks to demonstrate evidence of parental demand for integrated education.

- This is the only primary school in Portrush which has statutory Nursery provision. Furthermore the provision is full time. It is equally feasible that what is demonstrated is a demand for Nursery provision or full time pre-school provision rather than Integrated provision;
- Within chapter 1.1 "Description of School" the proposal states that the school has a current enrolment of 268 including nursery and pre-school places. The presentation of these figures is misleading from the outset. EA publications do not recognise children attending such pre-school units.

Therefore these figures are misleading.

- There is currently more than adequate space within the existing pre-school provision in the area further increases in capacity are not necessary;
- The ETI report of February 2012 details enrolment figures for the years 2007 to 2012 to both the Primary and Nursery level are static throughout the period. The figures show that the nursery unit was largely operating at or below capacity. The primary school was operating significantly below its approved enrolment number. Admissions into primary 1 during this period are below the Admission Number of 30.
- Further consideration of the numbers indicates that in three of the five years listed from 2007 to 2012 the full quota of children from the nursery unit did not transfer to primary education within the school. This would appear to indicate that there is not an overwhelming move towards integrated education. It would however suggest that there is a need for nursery education in the area.
- The provision of pre-school and nursery facilities are a proven way to maintain enrolment numbers within primary schools. The demand for teacher-led nursery education is recognised by Portrush Primary School and many other local primary schools. It is therefore unfortunate that restrictions on funding have meant that informal and formal requests to The Department to establish similar facilities at other schools in the area have consistently been refused.
- In recent years Mill Strand Integrated Primary School has utilised external funding to establish additional pre-school provision. Given the recognised parental preference for full time pre-school places it is therefore not surprising that this new provision has been taken up by parents. It is also not especially remarkable that parents express the wish that their children should move into primary education with a group of friends established within a pre-school environment. The funding utilised by Mill Strand Integrated Primary School is not available to other schools. Therefore it can be argued that the stated increase in numbers is not evidence of parental demand for integrated education but an artificial inflation of numbers caused by the availability of altruistic funding, rather than emphatic move to integrated education.
- Both proposals 483 and 484 make repeated reference to a 'triangle school' and servicing all three towns, Portrush, Portstewart and Coleraine. However the data provided to assess potential impact on other providers lists only those located within a three mile radius. Given that the proposals exceed the capacity of the existing school site and do not confirm the location of a new site, the proposals

must be seen within the context of Mill Strand being a 'triangle school' and likely to be located anywhere within that area.

- Therefore statistics must reflect that entire area and the capacity available within the area for the evidence to be reliable.
- The NEELB Primary Area Plan 2013 - 2018 for the primary sector detailed the primary school age projections for the Coleraine Council Area which indicated an estimated annual increase until 2013 follow by an estimated yearly decrease up 2025. It stated that taking into account cross border flows, the Coleraine Council area was facing a predicted decrease of 961 pupils between 2013 and 2025. The draft area plan anticipated that the level of unfilled places may increase to 2524 places. *(Paragraph 8.5 and Table 5, NEELB Primary Area Plan 2013-2018}*
- The following table highlights the amount of excess capacity (calculated using the actual PI admissions against the approved admissions number) evident in the Triangle area in the past three years.

Only those figures highlighted show a school operating in excess of their capacity within any single year.

Table 1. Excess capacity in the Triangle' Area

School name	Year	No of Applications	No of Admissions	Capacity	Excess
Mill Strand	2015/16	27	27	30	3
	2014/15	33	31	30	-1
	2013/14	25	25	30	5
Ballyhackett PS	2015/16	7	7	10	3
	2014/15	4	4	10	6
	2013/14	3	3	10	7
Ballysally PS	2015/16	43	43	43	0
	2014/15	30	30	43	13
	2013/14	45	45	43	-2
Ballytober PS	2015/16	13	13	12	-1
	2014/15	3	3	12	9
	2013/14	13	13	12	-1
Carnalridge PS	2015/16	29	29	30	1

	2014/15	19	19	30	11
	2013/14	30	30	30	0
Castleroe PS	2015/16	16	14	14	0
	2014/15	16	15	14	-1
	2013/14	14	14	14	0
DH Christie	2015/16	47	47	60	13
	2014/15	53	53	60	7
	2013/14	51	51	60	9
Harpur's Hill PS	2015/16	31	30	30	0
	2014/15	31	30	30	0
	2013/14	32	30	30	0
Hezlett PS	2015/16	39	39	42	3
	2014/15	32	32	42	10
	2013/14	29	29	42	13
Killowen PS	2015/16	31	30	28	-2
	2014/15	38	30	28	-2
	2013/14	31	30	28	-2
Macosquin PS	2015/16	40	28	28	0
	2014/15	48	27	28	1
	2013/14	38	30	28	-2
Millburn PS	2015/16	37	37	60	23
	2014/15	51	51	60	9
	2013/14	46	46	60	14
Portrush PS	2015/16	38	38	41	3
	2014/15	34	32	41	9
	2013/14	23	23	41	18
Portstewart PS	2015/16	40	41	59	18
	2014/15	30	28	59	31

	2013/14	41	40	59	19
St Colum's PS	2015/16	17	17	27	10
	2014/15	26	26	27	1
	2013/14	20	20	27	7
St John's PS	2015/16	23	23	50	27
	2014/15	18	18	50	32
	2013/14	23	23	50	27
St Malachy's PS	2015/16	35	35	46	11
	2014/15	37	37	46	9
	2013/14	40	40	46	6
St Patrick's PS	2015/16	15	15	21	6
	2014/15	11	11	21	10
	2013/14	4	4	21	17
Irish Society PS	2015/16	30	30	60	30
	2014/15	40	36	60	24
	2013/14	36	36	60	24

SOUND FINANCIAL POSITION

- The Board of Governors has no access to the Millstrand School budget and are not in a position to comment on the financial position, the extent of external funding received by the school or how it has been used. The proposer describes a "Sound Financial Position" and an acceptable budget surplus where the senior management team and governors have successfully managed the financial position and physical resources. The statement under 1.1 describes the school as having "inadequate, sub- standard accommodation." This is inconsistent with the assertion relating to successful management of physical resources.
- The positive impact of external funding cannot be underestimated at a time of significant cuts to the education budget. Similarly the negative impact when this funding is ultimately removed must be considered. The proposal makes it clear that external funding has been used to create a teacher-led

nursery facility that is not sustainable without continued financial intervention. The Department of Education has consistently been unable to provide the necessary resources to establish nursery provision with other primary schools in the area.

- The proposer also makes a claim that, "the school is one of the few in the area not having a deficit budget.; The Providing Pathways 2017-2020 document confirms that only 2 out of 80 Primary Schools in the Causeway Coast and Glen's area have a deficit in excess of the acceptable range of 5% or > £75,000.

ACCESS:

- The proposal describes the school's central location within the Portrush Area. The Board of Governors of Portrush Primary School contend that the school occupies a marginal position at the edge of the settlement, remote from the town's bus interchange.
- There is a bus route that passes the school but this **is a** single service starting in Coleraine and passing through Portstewart before reaching Portrush or vice versa. There is no ready access on public transport for parents and children from the outlying areas that the school serves. It is also difficult to envisage that large numbers of nursery pupils arrive or leave the school premises by public bus. We therefore contend that this is irrelevant to the proposal;
- Coleraine is the main hub of the Coleraine/Portstewart/Portrush triangle and provides the area's major concentrations of population, employment, schools, housing and transportation links. Portrush is a relatively small coastal resort that currently accommodates four primary schools. The proposal to expand Mill Strand Integrated Primary School does not therefore present a sustainable model that makes the best use of the area's resources and can only lead to increased car journeys and increased transport costs to the Department.
- The proposer states that the school is located within convenient transport distance for all its present pupils; however it is also highlighted that the school serves the children of Portrush, Portstewart and Coleraine and the outlying areas. This also highlights Health & Safety Issues at the site which will be exacerbated by the increased pupil numbers;
- The impact of cars on the safe operation of the site is extremely relevant. This issue has been highlighted on numerous occasions by the school's management through various press releases and social media campaigns. It is also identified by the ETI report of 2012;
- The proposal also mentions health and safety issues relating to access from the main road. Any expansion of numbers at this site clearly has to be considered against a detailed assessment of the junction capacity onto the main Portrush/Portstewart Road and the availability of third party lands to create right turn lanes, visibility splays and the like.
- The proposal details issues relating to access, drop off/pick up arrangements, and Northern Health and Social Care Trust concerns. It would therefore appear that the management of the school has allowed this situation to arise in an un-planned way and has allowed an un-safe environment to develop.

COMMUNITY LINKS:

- The proposer claims that Mill Strand is the only school in the wider Triangle area hosting services in all three main churches (Catholic sacraments, Presbyterian & Church of Ireland.) The Catholic Church hosts the sacraments, and children from Portrush Primary School attend these as do many children from other schools. Schools in the Triangle area have a long history of embracing diversity.
- The proposal seeks to set Mill Strand Integrated Primary School apart from other schools in the Triangle Area but the stated range of religious and business links are not unique in the area. The ETI report of 2012 describes the *"very good quality"* of these links.
- The ETI report for Portrush Primary School of 2013 similarly describes *"very good links with a range of other schools, with people in the community and with various external agencies"*. Therefore it cannot be argued that Mill Strand is a unique provider in this context.

RATIONALE FOR CHANGE:

The proposer makes reference to the Department's statutory duty in respect of Integrated Education. *'.... to encourage and facilitate the development of integrated education, that is to say the education together at school of Protestant and Roman Catholic pupils.'* Article 64 of the Education Reform (NI) Order 1989;

- The data presented clearly highlights that the largest body of children present in the school are listed as 'Other,' neither Protestant nor Catholic;
- The legislation does not suggest that the duty conferred on the Department is fulfilled with no regard to the potential impact on other schools.

This duty must also be considered alongside the duty under Article 44 of the Education and Libraries (NI) 1986 Order, that is, that the Department, *"shall have regard to the general principle that, so far as it is compatible with the provision of efficient instruction and training and the avoidance of unreasonable expenditure, pupils shall be educated in accordance with the wishes of parents."*

- The Governors of- Portrush Primary School strongly believe that the creation of additional statutory preschool provision in the Portrush/Portstewart/Coleraine area, which already has sufficient capacity, is unreasonable public expenditure.
- The additional transport costs which are inevitable with a school in Portrush servicing the whole Triangle area, where children have the right to access free transport, must be considered.
- The stated case for parental demand is undermined by Table 12 and Table 13 of the recent "Providing Pathways" document produced by the Education Authority. These tables indicate that there are a total of 1172 primary places within the Controlled Integrated and Grant Maintained Integrated sectors in the Causeway Coast and Glens Local Government District (LGD). The actual enrolment number is noted as 954. Table 13 shows that there are a total of 500 post primary places available within the LGD and 105 available places. Therefore integrated schools across the LGD are under subscribed and there is no follow through from integrated primary education to integrated post-primary education.

The proposer claims the provision at Mill Strand Integrated Primary School is "heavily oversubscribed"

- However, their own enrolment statistics provided do not support this with the exception of the 2016/.17 academic year where the numbers reflect the inflated pre-school intake the previous year.

Table 2: Applications and admissions to Primary 1 Mill Strand Integrated Primary School					
Table 1 from Case for Change Dev Proposal 484	Year	No of Applications	No of Admissions	Actual no in excess of Admissions number	
Mill Strand IPS	2016/17	54	54	+24	Due to inflated pre-school intake in previous year.
	2015/16	27	27	-3	
	2014/15	33	31	+1	
	2013/14	25	25	-5	

The proposer cites the desirability of educating children from all backgrounds together-

- Community Playgroups already achieve this as all preschool funded education is on a cross community basis. No regard is given to the Controlled sector that has never turned away any child based on religion etc.
- The proposer claimsto have highly soughtafter pre-school provision: This is a reflection of the historic development of pre-school provision in the area which has created ,inequality across the sectors which will be further exacerbated if this proposal is approved.
- The Sustainable Schools Policy promotes better links to Early Years Provision. Doubling Nursery intake at Mill Strand integrated Primary School would have a significantly detrimental effect on other pre-school providers in the area, in particular the Department of Education funded voluntary providers within the town and outlying areas of Portrush. This will threaten and potentially erode the strong links that Portrush Primary School has already established.

AREA PLANNING IMPACT:

Area planning cannot adequately be considered when a new site is to be identified for Mill Strand Primary School and Nursery Unit and the location of such has not yet been identified. Impact from an area learning perspective cannot be reasonably considered in this situation.

- The proposer references "parental demand for Integrated Pre-School Education" yet no evidence is presented to substantiate this statement and the survey which is referenced is neither independent nor statistically relevant.
- The proposer claims parental demand on the basis of Integrated Education. This parental demand is not evident at transfer stage when parents choose the post-primary school their child will attend. Table three shows that fewer than five children leaving Mill Strand Integrated Primary School in June 2016 transferred into an Integrated school at post primary level:

Table 3 : Mill Strand IPS P7 Transfers	
Sector of post primary placement	Number
Controlled Grammar	#
Voluntary Grammar	11
Controlled Secondary	#
Maintained Secondary	#
Integrated College	#
Total	25
# denotes redacted due to being less than 5	

This demand for Integrated Education is further contradicted in the figures in Table 5 showing the sources of North Coast Integrated College's Year 8 Intake:

Table 5 : North Coast Integrated College	
Sector of primary school	Number
Controlled Primary	80
Voluntary Primary	#
Integrated Primary	#

Total	88
# denotes redacted due to being less than 5	

- Measured against the NEELB figures the proposer's stated need for 420 places would use up almost 17% of the total provision within a combined Controlled and Grant Maintained Integrated subset that comprises 13 other schools. This assume growth within Millstrand will outstrip that of other integrated schools by a ratio of almost 3:1. This cannot be judged to be a realistic figure.

IMPACT ON OTHER SCHOOL PROVIDERS:

The Board of Governors of Portrush Primary School strongly believe that the impact of this proposal on other schools which would significantly increase enrolment, cannot be properly assessed as Mill Strand Primary School, which draws pupils from 3 towns and the surrounding area. Schools which may be impacted by this proposal do not know the future location for Mill Strand Integrated Primary School and Nursery Unit.

- A temporary variation for Primary 1 admissions was granted in 2016/17 for 54 places from 30 places.
- Other triangle schools have been turned down for minimal temporary variations. The Governors do not consider this to be an equitable position.
- In the interests of efficient use of resources and avoiding unreasonable public expenditure the Governors would question a system which avoids making use of available existing spare capacity.
- The Case for Change document states that the approval of the proposal "would have little impact on existing schools." The Board of Governors strongly disagree with this assertion.

5.1 ENROLMENT

The headline figures presented in Section 5.1, Table 1 present a misleading picture of trends within the Mill Strand Integrated Primary School. Consideration of Tables 1&2 and figures from the ETI report show that during the period from, 2007/08 until 2015/16. School numbers rose from 164 to 184 ,in a school that has a prescribed enrolment number of 232. The figures in the Nursery were steady at or around capacity during this period (26-29).

The Case for Change shows an increase in the combined pre-school and primary enrolments in 2015/16 and 2016/17. This is due to the additional pre-school places, a self-created demand which is a

consequence of the financial sponsorship of an externally funded body to create additional teacher led Nursery provision outside the statutory planning framework.

In the years previous to the additional pre-school class, Mill Strand Integrated Primary was only oversubscribed, minimally, in one of three years-in this year they admitted one child more than the Admissions number.

The proposer claims that their provision is "heavily oversubscribed" on an annual basis.

- However, their own figures provided in the Case for Change do not support this as was demonstrated in Table 2 below.

Table 2: Applications and admissions to Primary 1 Mill Strand					
Table 1 from Case for Change Dev Proposal 484		No of Applications	No of Admissions	Actual no in excess of Admissions number	
Mill Strand IPS	2016/17	54	54	+24	Due to inflated pre-school intake in previous
	2015/16	27	27	-3	
	2014/15	33	31	+1	
	2013/14	25	25	-5	

- All of these applications could have been accommodated through existing capacity within the triangle area.
- The Sustainable Schools Policy published on 14/01/2009 has an aim of sustaining, "strong, successful and viable schools..." The Governors believe that Portrush Primary School currently fits this description; however the impact of this proposal would be significantly compromise the sustainability of our school;
- The Draft Strategic Area Plan, "Providing Pathways," published on 17/10/2016 highlights, that the number of children in Northern Ireland (0-15 year olds) is projected to grow by 3.9% throughout the decade 2014-2024, whilst there is a projected decrease of -1.4% in the number of children in the Causeway Coast and Glens Local District Council Area, of which the 'Triangle' is a significant part .

5.2 PUPILS ATTENDING Mill STRAND IPS BY POST CODE

- The assessment of postcodes provided within the proposal underlines the issues raised above about the sustainability of any proposal to expand a school facility at a marginal location that draws almost half its pupils from outside its immediate area. This demands additional car and bus journeys and involves additional expense to the public purse.
- The proposal makes a case for expansion based on the aspiration that young children will continue the relationships they build at an early age with the celebration of difference built into their DNA. This is however not borne out by continued low level of uptake in post-primary places.
- If this is truly the objective it may be more sustainable to allow an integrated primary school to develop and expand in a more central location such as

Coleraine where links can be more easily developed with the existing post-primary integrated sector.

RESOURCE IMPLICATIONS

- Mill Strand Integrated Primary School was included in an announcement made on 23 March 2016 as one of a number of Integrated school proposals which would "advance to planning" as a result of the first allocation of funding following the Fresh Start Agreement.
- This press release would appear to contradict this. It is not named here as one of the seventeen schools.

<https://www.education-ni.gov.uk/news/ministers-announce-funding-shared-and-integrated-education-phoenix-integrated-ps>

- No further information is available to the Governors of Portrush Primary School at this stage regarding the availability of this funding or the planning status of the proposals for Mill Strand Integrated Primary School, including the timescales and the procurement of a site for a new school building.
- The procurement procedures and building timescales would not allow for a school to grow at the rate forecast and be able to deliver the accommodation it would require to increase nursery provision;
- The Sustainable Schools Policy envisages a, "network of sustainable schools, within reasonable travelling distance for pupils." The current location of Mill Strand Integrated Primary School serves an extensive catchment area. The associated transport costs for pupils have been highlighted above under the section 'Rationale for Change'. The Governors believe that consideration should be given to the further development of integrated education provision at the centre of the 'Triangle' hub in Coleraine.

STATUTORY CONSULTATION

Details of consultation undertaken include reference to a survey carried out by Mill Strand Integrated Primary School.

Any survey of this type must meet a basic minimum standard. The survey raises a number of questions in respect of its validity and fidelity:

- Where is the statistical evidence to show the demographics of the survey sample?
- Which individuals were responsible for generating the survey?
- What was the stated purpose of the survey?
- Were any conflicts of interest declared?

- How was participant understanding confirmed?
- How was the population of study identified?
- What strategies were used to recruit participants?
- What is the size of the sample required to be numerically significant?
- What educational background, do those surveyed, access?
- What steps were taken to ensure that the sample was representative of the larger population?
- How was data analysed and evaluated?

Most Importantly:

- Where are the results of the questions that were asked but not included in the results?

The survey cannot be accepted as a true representation of the views of the local community and -should not be considered as evidence in respect of this proposal.

In conclusion, the Governors of Portrush Primary School believe that the statutory duty to encourage and facilitate the development of Integrated Education does not equate to a duty to grant every proposal for expansion brought forward on behalf of an Integrated school and that the Department of Education must be mindful of its statutory duty under Article 44 of the Education and Libraries (NI) Order 1986 to ensure effective and efficient use of public funds.

The Governors affirm their opinion that the creation of additional spaces in the Portrush/Portstewart/Coleraine area, which has significant excess capacity and is projected to experience a decrease in the primary aged population, is unreasonable public expenditure.

The Ministerial Statement of 17th October 2016, in regard to the Draft Strategic Area Plan, states, "*Regardless of which sector a pupil is enrolled in-all pupils deserve equality of access to high quality education. The educational experience of our children and young people is greatly enhanced when they attend schools that are educationally and financially viable.*" If this Development Proposal is allowed to progress, this equality will be further eroded against children choosing to attend the local Controlled or Maintained schools as they cannot access teacher led, Nursery education. Two schools in Portrush that currently do not have composite classes, are likely to end up with composites throughout their school, leaving three schools in a town of four schools with composite classes, creating a situation in stark opposition to the Minister's stated position that "*ideally they should be in single year group classes.*"

The minister goes on to ask us to engage with our constituents to help them understand what is needed and why it is needed. There is nothing in this Development Proposal (483) or in the related Development Proposal (484) which would be explainable to our community or that we could support. On reflection of the Justice Treacy ruling of 2014, it is perhaps prudent to flip the words of a former Minister to now emphasise that Integrated Education is not the only show in town. Indeed, the Shared Education Act (Northern Ireland) 2016 makes this clear.

Signed: A Irwin (Chair of Governors)

Signed: C. Guy (Principal)

27th January 2017

In response to Development Proposal 484 (Nursery)

The Board of Governors are writing to you in response to the proposal listed above.

This proposal and the associated proposal 483 could have far-reaching impacts on the provision of pre- school and primary education in Portrush and the wider area.

The Board of Governors has had an opportunity to discuss both proposals and specifically proposal 484 at its meeting on 27th January 2017. We would wish to bring your attention to the points outlined below and overleaf.

We note a number of flawed and tenuous arguments put forward in the case for change.

The simple principles of our objections are:

- There is sufficient existing capacity in the area in both Pre-school and Primary provision;
- The impact of increasing statutory nursery provision within the only school in Portrush which currently has such provision would be a further bias in a playing field that is already uneven and would be prejudicial to existing voluntary playgroups in Portrush and Portstewart;
- There is no sound evidence for increased demand for Integrated spaces;
- Enrolment trends have been inflated by external funding which has created additional places, in teacher led, preschool settings, for extended periods of time;
- The survey conducted by the school is of insufficient rigour and fidelity to be considered;
- Significant funding and resource implications have been discounted;
- Parents have been led down a path with no guarantees and with no regard for practicalities, timescales or resourcing;
- Area planning impact cannot be properly assessed when the school is claiming to operate within a wide area yet not secure in any location for its future development. A more detailed response is included overleaf.

DESCRIPTION OF SCHOOL

The proposal specifies a current enrolment of 268, including nursery and pre-school places. The presentation of these figures is misleading from the outset. EA publications do not recognise children attending such pre-school units. Therefore, these are misleading.

QUALITY EDUCATIONAL EXPERIENCE:

The proposer makes the assertion that, "the integrated nature of the school is unique in the three towns that it serves" yet there are a number of cross community Pre-School providers in these three towns, all providing good quality education, as reported by ETI. The grade allocated by ETI to these playgroups ("good") is the same as that attained by Mill Strand Integrated Nursery Unit when last inspected in 2012.

- The additional pre-school class/Nursery externally funded by Mill Strand School has never been Inspected by ETI;
- The additional class operating out of Mill Strand is offering four hours of teacher led provision. This extended time will inevitably create a demand, however there is no evidence to support the assertion that it is a demand for integrated ethos;

STABLE ENROLMENT TRENDS:

Under this heading the proposal does not actually list any evidence of their own demand for places in Nursery and/or pre-school.

The proposer seeks to demonstrate evidence of parental demand for integrated education.

- This is the only primary school in Portrush which has statutory Nursery provision. Furthermore the provision is full time. It is equally feasible that what is demonstrated is a demand for Nursery provision or full time pre-school provision rather than Integrated provision;
- There is currently more than adequate space within the existing pre-school provision in the area, further increases in capacity are not necessary;
- The ETI report of February 2012 details enrolment figures for the years 2007 to 2012. Enrolment to both the Primary and Nursery level are static throughout the period. The figures show that the nursery unit was largely operating at or below capacity. The primary school was operating significantly below its approved enrolment number. Admissions into primary 1 during this period are below the Admission Number of 30.
- Further consideration of these numbers indicates that in three of the five years listed from 2007 to 2012 the full cohort of children from the nursery unit did not transfer to primary education within the school. This does not support the proposer's assertion that there is parental demand for integrated education. The historic drop off in pupil numbers between the nursery unit and primary 1 suggests that parents in the area favour teacher-led nursery education but this has not followed through with a consistent take up of integrated primary places. The assumption that this is based on a demand for Integrated education is at best speculative;
- The provision of pre-school and nursery facilities are a proven way to maintain enrolment numbers within primary schools. The demand for

teacher-led nursery education is recognised by Portrush Primary School and many other local primary schools. It is therefore unfortunate that restrictions on funding have meant that informal and formal requests to The Department to establish similar facilities at other schools in the area have consistently been refused.

- In recent years Millstrand Integrated Primary School has utilised external funding to establish additional pre-school provision. Given the recognised parental preference for full time pre-school places

it is therefore not surprising that this new provision has been taken up by parents. It is also not especially remarkable that parents express the wish that their children should move into primary education with a group of friends established within a pre-school environment. The funding utilised by Mill Strand IPS is not available to other schools. Therefore it can be argued that the stated increase in numbers is not evidence of parental demand for integrated education but an artificial inflation of numbers caused by the availability of altruistic funding, rather than an emphatic move to integrated education.

- There is currently sufficient capacity within the existing preschool provision in the area, a further increase in capacity is not necessary. NISRA population projections for the Causeway Coast and Glens Council area over the period 2014-2039 show an 18.5% reduction in the 0-4 age group from a total of 8769 to 7144. Live births for Coleraine District Council also demonstrate a reduction in the last two years from 717 in 2013 to 693 in 2014 and 648 in 2015.
- Both proposals 483 and 484 make repeated reference as 'triangle school' and servicing all three towns, Portrush, Portstewart and Coleraine. However the data provided to assess potential impact on other providers lists only those located within a three mile radius. Given that the proposals exceed the capacity of the existing school site and do not confirm the location of a new site, the proposals must be seen within the context of Mill Strand being a 'triangle school' and likely to be located anywhere within that area.
- Therefore statistics must reflect that entire area and the capacity available within the area for the evidence to be reliable. **(See Table 1 Below)**

TABLE 1:					
	Year	No of 1st Preference	Total No of Applications	Total No	CAPACITY
STATUTORY					
Portstewart NS	2016/17	33	33	26	26
Mill Strand NU	2016/17	34	35	26	26
VOLUNTARY					
Mill Strand Playgroup	2016/17	15	21	20	UNKNOWN
Portrush Community Playgroup	2016/17	32	34	32	To be determined
Causeway Community Pre School	2016/17	15	15	15	To be determined

St Colum's Pre-School Centre	2016/17	18	21	21	To be determined
Ballysally Nursery	2016/17				52
Castlerock Community Playgroup	2016/17				To be determined
Cullrath Corner Nursery Unit	2016/17				26
Kylemore Nursery School	2016/17				104
Little Acorns Playgroup	2016/17				To be determined
Macosquin Community Playgroup	2016/17				To be determined
Millburn Community Pre-School	2016/17				To be determined
Playhouse Activity Centre	2016/17				To be determined
St Malachy's Pre-School Playgroup	2016/17				To be determined
Stepping Stones Creche	2016/17				To be determined
Sunshine Playgroup	2016/17				To be determined
Irish Society's PS Nursery Unit	2016/17				52
Watt Fun Community Playgroup	2016/17				To be determined

- The EA Draft Area Plan for the primary sector detailed the primary school age projections for the Coleraine Council Area which indicated an estimated annual increase until 2013 followed by an estimated yearly decrease up to 2025. It stated that taking into account cross border flows, the Coleraine Council area was facing a predicted decrease of 961 pupils between 2013 and 2025. The draft area plan anticipated that the level of unfulfilled places may increase to 2524 places, if the approved enrolment numbers within the Coleraine Council area schools remained steady.

SOUND FINANCIAL POSITION

- The Board of Governors has no access to the Millstrand School budget and are not in a position to comment on the financial position, the extent of external funding received by the school or how it has been used. The proposer describes a "*Sound Financial Position*" and an acceptable budget surplus where the senior management team and governors have successfully managed the financial position and physical resources. The statement under 1.1 is describes the school as having "*inadequate, sub-standard accommodation*", is inconsistent with the assertion relating to successful management of physical resources.
- The positive impact of external funding cannot be underestimated at a time of significant cuts to the education budget. Similarly the negative impact when this funding is ultimately removed must be considered. The proposal makes it clear that external funding has been used to create a teacher-led nursery facility that is not sustainable without continued financial intervention. The Department of Education has consistently been unable to provide the necessary resources to establish nursery provision with other primary schools in the area.

- The proposer also makes a claim that, "the school is one of the few in the area not having a deficit budget." The Providing Pathways 2017-2020 document confirms that only 2 out of 80 Primary Schools in the Causeway Coast and Glen's area have a deficit in excess of the acceptable range of 5% or > £75,000.

ACCESS:

- The proposal describes the school's central location within the Portrush Area. The Board of Governors of Portrush Primary School contend that the school occupies a marginal position at the edge of the settlement, remote from the town's bus interchange.
- There is a bus route that passes the school but this is a single service starting in Coleraine and passing through Portstewart before reaching Portrush or vice versa. There is no ready access on public transport for parents and children from the outlying areas that the school serves. It is also difficult to envisage that large numbers of nursery pupils arrive or leave the school premises by public bus. We therefore contend that this is irrelevant to the proposal.
- The proposer states that the school is located within convenient transport distance for all its present pupils; however it is also highlighted that the school serves the children of Portrush, Portstewart and Coleraine and the outlying areas. This also highlights Health and Safety Issues at the site which will be exacerbated by the increased pupil numbers;
- The two existing Community Playgroups in the Royal Portrush Ward are situated in the top 26% of sites listed by deprivation and the Governors believe they provide a valuable service to children in these areas;
- The impact of cars on the safe operation of the site is extremely relevant. This issue has been highlighted on numerous occasions by the school's management through various press releases and social media campaigns. It is also identified by the ETI report of 2012;
- The proposal also mentions health and safety issues relating to access from the main road. Any expansion of numbers at this site clearly has to be considered against a detailed assessment of the junction capacity onto the main Portrush Portstewart Road and the availability of third party lands to create right turn lanes, visibility splays and the like.
- The proposal details issues relating to access, drop off/pick up arrangements, and Northern Health and Social Care Trust concerns. It would therefore appear that the management of the school has allowed this situation to arise in an un-planned way and has allowed an un-safe environment to develop.
- It is therefore evident that a problem exists that can only be exacerbated by increased numbers. It is also evident that any solution to this problem may be beyond the school's control and the proposal makes no suggestion as to how these problems can be resolved.

COMMUNITY LINKS:

- The proposer claims that Mill Strand is the only school in the wider Triangle area hosting services in all three main churches (Catholic sacraments, Presbyterian & Church of Ireland.) The Catholic Church hosts the sacraments, and children from Portrush Primary School attend these as do many children from other schools. Schools in the Triangle area have a long history of embracing diversity.

RATIONALE FOR CHANGE:

- The proposer makes reference to the Department's statutory duty in respect of Integrated Education. '*... to encourage and facilitate the development of Integrated education, that is to say the education together at school of Protestant and Roman Catholic pupils.*' Article 64 of the Education Reform (NI) Order 1989;
- The data presented clearly highlights that the largest body of children present in the school are listed as 'Other,' neither Protestant nor Catholic;
- The legislation does not suggest that the duty conferred on the Department is fulfilled with no regard to the potential impact on other schools.
- This duty must also be considered alongside the duty under Article 44 of the Education and Libraries (NI) 1986 Order, that is, that the Department, "*shall have regard to the general principle that, so far as it is compatible with the provision of efficient instruction and training and the avoidance of unreasonable expenditure, pupils shall be educated in accordance with the wishes of parents*".
- The Governors of Portrush Primary School strongly believe that the creation of additional statutory preschool provision in the Portrush/Portstewart/Coleraine area, which already has sufficient capacity, is unreasonable public expenditure and has the potential to threaten the sustainability of long established voluntary community playgroups in the area;
- The proposer highlights concerns that the Northern Health and Social Care Trust has however these are not detailed in the case for change. It is noted that the concerns led to the exclusion of playgroup children from the rest of school suggesting that significant concerns were raised;
- The proposer claims their provision is "heavily oversubscribed"
- However, the enrolment statistics provided do not support this. (Table 2)

Table 2:

Table 1 from Dev Proposal 484		No of	No of	Actual no in excess of Admissions	
Mill Strand IPS	2016/17	54	54	+24	Due to inflated pre-school
	2015/16	27	27	-3	
	2014/15	33	31	+1	
	2013/14	25	25	-5	

The proposers cites the desirability of educating children from all backgrounds together-

- Community Playgroups already achieve this. All pre-school funded education is on a cross community basis. No regard is given to the Controlled sector that has never turned away any child based on religion etc.

- The proposer claims to have highly sought after pre-school provision: This is a reflection of the historic development of pre-school provision in the area which has created inequality across the sectors which will be further exacerbated if this proposal is approved.
- The Sustainable Schools Policy promotes better links to Early Years Provision. Doubling Nursery intake at Mill Strand Integrated Primary School would have a significantly detrimental effect on other pre-school providers in the area, in particular the Department of Education funded voluntary providers within the town and outlying areas of Portrush. This will threaten and potentially erode the strong links that Portrush Primary School has already established.

AREA PLANNING IMPACT:

Area planning cannot adequately be considered when a new site is to be identified for Mill Strand Primary School and Nursery Unit and the location of such has not yet been identified. Impact from an area learning perspective cannot be reasonably considered in this situation.

- The proposer references "parental demand for Integrated Pre-School Education" yet no evidence is presented to substantiate this statement and the survey which is referenced is neither independent nor statistically relevant.

IMPACT ON OTHER PRE SCHOOL PROVIDERS:

The Board of Governors of Portrush Primary School strongly believe that the impact of this proposal on other schools cannot be properly assessed as Mill Strand Primary School, which draws pupils from three towns and the surrounding area, does not have a site secured for the proposal to be facilitated. Schools which may be impacted by this proposal do not know the future location for Mill Strand Integrated Primary School and Nursery Unit.

However, we cannot find anywhere to say that the additional spaces created were ever endorsed or approved by anyone within the Education Authority. We have in fact been told that the additional spaces in pre-school requested were refused and the School proceeding with no regard for this decision.

The Case for Change states that the approval of the proposal "would have no impact on existing schools in the area as all are fully subscribed". The Board of Governors strongly disagree with this assertion.

It is the Department of Education's practice not to displace good quality pre-school provision already in existence with pre-school provision in an alternative setting. These additional spaces would have a detrimental effect on other pre-school providers in the area, and result in them not filling their capacity.

4 EDUCATIONAL IMPACT

The ETI report of 2012 states that the quality of provision within the Nursery is "good". The proposal seeks to aggrandize this provision by describing it as "high quality". There is no evidence to suggest that the quality of provision is superior to that of other providers.

5.1 ENROLMENT

The Case for Change shows an increase in the combined pre-school and primary enrolments in 2015/16 and 2016/17. This is due to the additional pre-school places, a self-created demand which is a consequence of the financial sponsorship of an externally funded body to create additional teacher led Nursery provision outside the statutory planning framework.

- The headline figures presented in Section 5.1, Table 1 present a misleading picture of trends within the Mill Strand Integrated Primary School. Consideration of Tables 1&2 and figures from the ETI report show that during the period from 2007/08 until 2015/16 school numbers rose from 164 to 184 in a school that has a prescribed enrolment number of 232. The figures in the Nursery were steady at or around capacity during this period (26-29).
- In 2015/16 the introduction of the pre-school unit caused a spike in numbers. This has followed through into 2016/17 with the continuation of the pre-school numbers and a temporary variation in the Primary 1 intake.
- This is a self-fulfilling demand caused by the intervention of external funding that has exacerbated existing health and safety issues on site and raised new concerns for child safety as identified by the Northern Health and Social Care Trust.
- The demand for teacher led, nursery provision has always been evident throughout Northern Ireland.
- In the years previous to the additional pre-school classes, Mill Strand Integrated Primary School was only oversubscribed, minimally, in one of three years - in this year they admitted one child more than the Admissions Number (**See Table 2**);
- All of these applications could have been accommodated through existing capacity within the triangle area.
- The Sustainable Schools Policy published on 14/01/2009 has an aim of sustaining, "strong, successful and viable schools. The Governors believe that Portrush Primary School currently fits this description however the impact of this proposal would be significantly compromise the sustainability of our school;

5.2 The Case for Change states that the approval for additional Nursery places will, "enable children to build relationships in an integrated environment from the onset, rather than have to break them at the end of a nursery year". This somewhat crude statement does not take cognisance of the ethos of existing cross community playgroups and neighbouring schools which strive to promote an inclusive ethos where all children are welcomed and valued.

RESOURCE IMPLICATIONS

- Mill Strand Integrated Primary School was included in an announcement made on 23 March 2016 as one of a number of Integrated school proposals which would "advance to planning" as a result of the first allocation of funding following the Fresh Start Agreement.
- No further information is available to the Governors of Portrush Primary School at this stage regarding the availability of this funding or the planning status of the proposals for Mill Strand Integrated Primary School, including the timescales and the procurement of a site for a new school building.

- The procurement procedures and building timescales would not allow for a school to grow at the rate forecast and be able to deliver the accommodation it would require to increase nursery provision;

STATUTORY CONSULTATION

Details of consultation undertaken include reference to a survey carried out by Mill Strand Integrated Primary School.

Any survey of this type must meet a basic minimum standard. The survey raises a number of questions in respect of its validity and fidelity:

- Where is the statistical evidence to show the demographics of the survey sample?
 - Which individuals were responsible for generating the survey?
 - What was the stated purpose of the survey?
 - Were any conflicts of interest declared?
 - How was participant understanding confirmed?
 - How was the population of study identified?
 - What strategies were used to recruit participants?
 - What is the size of the sample required to be numerically significant?
 - What educational background, do those surveyed, access?
 - What steps were taken to ensure that the sample was representative of the larger population?
 - How was data analysed and evaluated?
- Most importantly:**
- Where are the results of the questions that were asked but not included in the results?

In conclusion, the Governors of Portrush Primary School believe that the statutory duty to encourage and facilitate the development of Integrated Education does not equate to a duty to grant every proposal for expansion brought forward on behalf of an Integrated school and that the Department of Education must be mindful of its statutory duty under Article 44 of the Education and Libraries (NI) Order 1986 to ensure effective and efficient use of public funds.

The Governors affirm their opinion that the creation of additional spaces in the Portrush / Portstewart/ Coleraine area, which has sufficient existing capacity, is unreasonable public expenditure.

The Ministerial Statement of 17th October 2016, in regard to the Draft Strategic Area Plan, states, "*Regardless of which sector a pupil is enrolled in-all pupils deserve equality of access to high quality education. The educational experience of our children and young people is greatly enhanced when they attend schools that are educationally and financially viable*". If this Development Proposal is allowed to progress, this equality will be further eroded against children choosing to attend the local Controlled or Maintained schools as they cannot access teacher led, Nursery education. Two schools in Portrush that currently do not have composite classes, are likely to end up with composites throughout their school, leaving three schools in a town of four schools with composite classes, creating a situation in stark opposition to the Minister's stated position that, "*ideally they should be in single year group classes*".

The Minister goes on to ask us to engage with our constituents to help them understand what is needed and why it is needed. There is nothing in this Development Proposal (484) or in the related Development Proposal 483 which would be explainable to our community or that we could support. On reflection of the Justice Treacy ruling of 2014, it is perhaps prudent to flip the words of a former Minister to now emphasise that Integrated Education is not the only show in town. Indeed, the Shared Education Act (Northern Ireland) 2016 makes this clear.

Signed - Mr A Irwin (Chair of Governors)

Signed - Mr C Guy (Principal)

Carnalridge Primary School

Response to Development Proposals No. 483 & 484

Governors recognise the potential for these proposals to impact on the sustainability of Carnalridge Primary School and welcome the opportunity to make comment in this context.

Development Proposal No. 483
Proposer: The Board of Governors, Mill Strand Integrated Primary School and Nursery Unit
Sector: Primary
Summary of Proposal: The Board of Governors propose: that its admissions number should increase from 30 to 60 and increase its enrolment number yearly by 30 up to a maximum of 420 by 1st September 2023, at which point the school would become a 2 form entry school with an admissions number of 60 and an enrolment of 420 (483)
Associated Proposal: DP 484

- There is significant surplus capacity in the primary sector in the Causeway Coast & Glens Council area; There are already more available spaces than children, in the schools in the Portrush and Portstewart areas, based on available 2015/16 PI admissions - refer Table 1.0 below:

Table 1.0	DE Approved PI	2015/16 PI	Surplus Capacity	Surplus
Portrush PS	41	38	3	7.3%
St Patrick's	21	15	6	28.6%
Carnalridge	30	29	1	3.3%
Portstewart	59	40	19	32.2%
St Colum's	27	17	10	37.0016
Mill Strand	30	27	3	10.0016
Total	208	166	42	20.2%

- The DE Approved Temporary Variations for Mill Strand IPS PI enrolments in 2014/15 (34) and again in 2016/17 (54) resulted in a significant decrease in PI enrolments to both Portstewart PS and Carnalridge PS as clearly illustrated in Appendix 1.0
- Available PI enrolment information indicates that Mill Strand IPS did not meet its approved PI intake (30) in two of the last four years i.e. 2013/14 (25) and 2015/16 (27)
- Demand for extra spaces at Mill Strand has been inflated due to the additional pre- school places created by external funding not available to all schools
- The demand has not been proven to be based on Integrated Education over any other form
- As a Controlled School we have always welcomed all children, regardless of religious or non-religious backgrounds. In Carnalridge

PS, SIMS Religion Analysis records pupils in 7 Church groups as well as having pupils listed as 'Unclassified' and 'No religion'

- There is an inclusive ethos within Carnalridge PS and engagement in shared education initiatives, for example, with Dominican College, St Patrick's PS, Portrush etc. through participation in Literacy and Numeracy KS2 & KS3 CPD Project 'Joint' Primary and Post Primary Professional Learning
- Drop off and collection facilities at Mill Strand site are not satisfactory
- Mill Strand's assertion that they draw children from Coleraine and further afield and it is on this basis that they require a two form primary school is in direct opposition to the DE strategic direction of reducing pupil travel time to school.

Development Proposal No. 484
Proposer: The Board of Governors, Mill Strand Integrated Primary School and Nursery Unit
Sector: Nursery
Summary of Proposal: The Board of Governors propose to establish an additional 26 part- time Nursery places at their grant-maintained integrated primary school with effect from 1st September 2017 or as soon as possible thereafter (484)
Associated Proposal: DP 483

- Currently the impact of this additional service proposed by Mill Strand will be the displacement of current high quality pre-school provision in the Royal Portrush electoral ward (which is ranked in the top twenty five per cent of areas of deprivation) if this is allowed to proceed
- The current Playgroup operating at Mill Strand is providing free child sessions for four hours thus making it a very cheap option to parents, not necessarily the best provision for children of this age (most other provision is only 2.5 hours)
- The two existing playgroups in Royal Portrush Ward are situated in the top 25% of deprived wards, as are many of the families that attend those settings. They therefore, need preschool and primary settings in their local environment e.g. across the road, in order to manage school attendance, walking distance, social inclusion etc.
- Mill Strand is the only school in Portrush to offer Nursery provision, which highlights that the demand may be for Nursery provision rather than Integrated provision
- Potential creation of additional nursery places in the Triangle area should not be confined to an Integrated Primary School
- The current system is inequitable and gives 'Integrated' schools a much more favourable stance regarding funding and development opportunities

- Mill Strand is the only school in the Portrush area with a teacher led nursery, this proposal would further extend this inequity. This is not something we have been able to access
- There are existing empty seats in the preschool providers in the area, what need is there for more space to be created?
- All pre-school provision is non-statutory, integrated and community based
- Mill Strand have, through external funding, provided additional places free of charge to parents, again something we cannot access.

Conclusion

In summary, Carnalridge PS Board of Governors wishes to raise an objection to Development Proposals 483 & 484 as these proposals have the potential to have a detrimental impact on the future sustainability of Carnalridge Primary School and are contrary to a number of the specific aims/objectives of area planning.

Signed: _____



Chairman of the Board of Governors

**NOTE OF MEETING WITH PRIMARY SCHOOL PRINCIPALS
ANTRIM BOARD CENTRE – 1 MARCH 2017**

OBJECTIONS TO DPs 483/484

(MILL STRAND INTEGRATED PRIMARY SCHOOL)

Attendees:

Alan Millar	Portstewart Primary School
David Radcliffe	Harpur's Hill PS, Coleraine
Hazel Harris	Carnalridge PS, Portrush
Carwyn Guy	Portrush PS
Sam Linton	Ballysally PS, Coleraine
Sinead McCullough	St Colum's PS, Portstewart
Peter Henry	DH Christie Memorial PS, Coleraine
Dorina Edgar	Department of Education, Area Planning Policy Team
Ashley Waterworth	Department of Education, Area Planning Policy Team

Apologies:

Sharon Lamont, Millburn PS, Coleraine
Niall McKinney, St Patrick's PS, Portrush
Siobhan Burns, St Malachy's PS, Coleraine
Arleen Moon, Killowen PS, Coleraine

Purpose of the meeting: Dorina Edgar explained that the Minister had initially agreed to host a meeting to listen to concerns as is customary during the two month statutory objection period, but was later unable to facilitate this. With the Minister's consent officials offered the same opportunity, with a view to preparing a summary of objections that would form part of the evidence provided to inform a Ministerial decision.

Throughout the meeting clarification was provided by DE officials in response to queries about the Development Proposal process.

Summary of Main Objections to DPs 483/484

- Concern expressed that a decision could be taken on the size of a new school build (for which Fresh Start funding has been agreed) in advance of any decision on a future site for Mill Strand IPS. Any consideration of area impact needs to take into account the future location of a school.
- Mill Strand has taken advantage of a preferential position (through access to external funding that facilitated an expansion in pre-school provision) to drive demand for integrated education generally at the expense of other providers that equally welcome all faiths and none.
- The real driver for any upsurge in demand for places at Mill Strand is teacher-led pre-school education rather than an expressed preference for integrated education.

- The claimed demand for integrated education in the area is contested, witness the fact that integrated post primary provision in the area (at North Coast Integrated College) is undersubscribed.
- Concern was expressed at some of the content in the Case for Change that is claimed to evidence support for integrated education, and also some media content that may influence parental opinion towards the proposed changes and later the expressing of parental preference during the admissions processes.
- Any examination of demand for integrated education should take account of year on year trends and not place undue reliance upon short term demand fuelled by externally funded pre-school provision and the impact that has had on demand for P1 places, leading to decisions on requests for a temporary variation to the school's approved admissions number.
- The Triangle area is considered to have a sufficiency of provision and the demographics are not considered to support the proposed expansion of provision at Mill Strand.
- A decision to approve expansion on the proposed scale would have a significant impact on the future sustainability of alternative providers in the Triangle area.

C] SECTORAL BODY RESPONSES

NICIE response to Development Proposal 483

Proposal

The Board of Governors of the grant maintained Mill Strand Integrated Primary School propose that its admission number should increase from 30 to 60 in September 2017, or as soon as possible thereafter, and further increase its enrolment number yearly by 30 up to a maximum of 420.

1. Introduction

This proposal to increase the size of Mill Strand Integrated Primary School is set against a changing educational and demographic landscape in which Northern Ireland still remains a divided society. Under area based planning the then Minister called for a network of sustainable schools delivering a high quality education to all pupils but he also made it clear that the area plans *'should allow for popular, oversubscribed schools to grow further'*. He spoke of his own personal vision as being one of *'education without barriers: good schools where children learn grow and develop together'*. Mill Strand Integrated Primary School represents one such school and its proven track record at challenging religious and educational division has established it as the integrated school of choice for the North Coast, 'Triangle' area of Portrush, Coleraine and Portstewart.

2. Departmental Duty to 'encourage and facilitate integrated education' under Article 64 of the 1989 Education Reform Order (NI)

NICIE welcomes the finding of Judge Treacy at the recent Judicial Review which confirms integrated education as a standalone concept which is *'integrated throughout and not education that is delivered by a partisan board'*. In addition NICIE is particularly pleased to note Judge Treacy's comment that the Department of Education *'needs to be alive to the Article 64 duty at all levels, including the strategic level'*. These points are relevant not only to Development Proposal 483 but to all future proposals relating to new or existing integrated provision. NICIE would contend that agreement on a method by which local communities can have the opportunity to make informed decisions about their future education provision, one which is based on a range of possible options rather than single sector options only is vitally important.

3. Background

Mill Strand IPS had its genesis in a parent-led initiative to bring about integrated education to children in the North Coast area. Mill Strand Integrated Primary School was set up in 1987, with 52 pupils, by a group of families who had to re-mortgage their homes to raise the funding. The school ran on charitable donations for two years before the then Education Minister Brian Mawhinney gave Integrated Schools recognised status in the 1989 Education Reform Order (NI). The nursery was established at the same time, but not given status as GMI nursery unit until June 2001, after the removal of the prohibition of the funding of integrated nurseries in the 1998 Education Order (NI).

4. Pupil Population

Since its opening Mill Strand IPS has thrived, with enrolments steady each year at around 200 pupils (see Table 1a). At the present time the school has an approved enrolment number of 232 and an admissions number of 30. It has been oversubscribed at P1 for two of the last 3 years (see Table 1b).

Table 1a Pattern of enrolments at Mill Strand IPS

Enrolments								
2000/01	2005/6	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17
219	210	193	189	207	207	211	187	216

Table 1b Pattern of applications and admissions at Mill Strand IPS (Source EA)

	No. of applications received	No. of pupils admitted
2013/14	25	25
2014/15	33	31
2015/16	27	27
2016/17	52	52 * Temp Variation

Indications from the current admissions process (2017/18) are that the school is oversubscribed again and has been granted another Temporary Variation. The nursery unit is also oversubscribed and a Temporary Flexibility request is being progressed. In September 2015, the school opened a pre-school playgroup with funding from the Integrated Education Fund and this has attracted a steady enrolment.

Table 1c shows the religious balance achieved within Mill Strand since 2014/15. The school has met the requirement for integrated status as determined by the Department of Education. In Atlantic Ward, where the school is located, according to the 2011 Census; **30.88%** belong to or were brought up in the Catholic religion and **61.12%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion. The figures for the Causeway, Coast and Glens Council based on the 2011 Census are **40.21%** belong to or were brought up in the Catholic religion and **54.79%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion. The former Coleraine Council area had slightly less balanced figures **28.02%** belong to or were brought up in the Catholic religion and **65.28%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion. This latter set of figures more closely resemble Mill Strand's balance and indeed the school draws from most of the former

Table 1c Religious Balance at Mill Strand IPS 2014-2017 Source DE Census

	2014/15	2015/16	2016/17
Catholic	38.6%	34.3%	29.0%
Protestant	32.9%	32.9%	30.2%
Other	28.6%	32.9%	40.8%

Free School Meals (FSM) entitlement at Mill Strand IPS is currently 33.9% which is higher than the overall percentage of children entitled to Free School Meals of 30.7% (Statistical Bulletin 2/2017).

5. Catchment

The data in Table 2 shows that a sizable proportion (over 58%) of pupils attending Mill Strand is drawn from the local Portrush area, up to one mile from the school.

However over 18.5% of the pupils travel from more than 4 miles away to reach the school; e.g. from Coleraine and Portstewart wards.

Table 2- Percentage of pupils travelling from a particular distance.

Distance to school	Percentage of pupils travelling to school
0 to 1 miles	58.3
2 to 3 miles	23.1
4 to 5 miles	12.5
6 to 7 miles	2.8
8 to 10 miles	1.9
11 to 14 miles	1.4

The Ward analysis of the postcodes in Table 3 shows that the pupils come from 22 wards. Whilst the former Coleraine LGD is **28.02%** Catholic and **65.28%** Protestant as noted above from the 2011 Census, the wards the pupils come from vary greatly in that they are very different in nature, one ward is only 6.01% Catholic and another is 49.78% Catholic.

With regards to deprivation it is important to note that 11.6% of the children attending the school come from the top 25% of the most deprived wards in Northern Ireland.

Table 3 Ward Analysis of pupils attending Mill Strand IPS not including Nursery and Pre-School in 2016/17

Ward	No of pupils by postcode	% Catholic	% Protestant	Deprivation
Agivey	*	23.53	71.71	371
Atlantic	36	30.88	61.12	212
Ballysally	*	13.04	76.44	72
Benvardin	*	6.01	87.78	208
Central (Coleraine LGD)	*	28.28	63.49	53
Churchland	*	40.49	52.63	65
Cross Glebe	*	21.95	71.03	54
Dervock	*	10.4	83.7	356

Dundooan	21	24.21	68.16	468
Dunluce	6	6.08	89.2	442
Hopefield	74	22.23	70.34	478
Knocklynn	7	18.2	74.15	528
Moss Side and Moyarget	*	17.83	76.37	120
Mount Sandel	5	31.4	61.42	443
Portstewart	8	32.35	58.14	187
Ringsend	*	49.78	46.19	314
Royal Portrush	16	27.81	63.14	145
Seacon	*	14.68	78.24	354
Strand (Coleraine lgd)	11	40.24	53.98	568
The Cuts	5	21.6	72.48	490
University	8	24.23	66.17	224
Waterside	*	24.66	66.79	535

6. Accommodation

The poor state of the accommodation at Mill Strand has been recognised and is being addressed by the fact that the school was on the announced list for assessment and progression under Fresh Start Agreement on 23 March 2016.

7. Impact on other schools

Due to the nature of integrated education any impact on schools in other sectors is minimised by the wider catchment areas traditionally associated with integrated schools.

Table 1 in the Case for Change document shows that the five schools in the immediate area are in growth again and therefore unlikely to be affected.

The Education Authority, Ballymena Office supplied a list of 28 schools (attached as an Appendix 1 - EA Admissions and Enrolment Information for Primary Schools in the former Coleraine LGD area) in the former Coleraine Council area with their enrolment trends since 2012. Given the wide catchment of Mill Strand it seems appropriate to look at this list.

The former NEELB Primary Area Plan 2014-2018 in Table 64 on page 94 shows that of the 28 primary schools in the Coleraine Council area, 9 fall below the enrolment threshold of 105, and 7 of these 9 have less than 86 pupils.

Examination of the enrolment trends since 2012 shows that 11 of the 28 schools are under-subscribed and the same number (including Mill Strand) are over-subscribed. The rest are holding their numbers.

Of those which are under-subscribed, that would appear to have been the situation some time, so the increase in numbers at Mill Strand would be unlikely to influence the outcome for them in the long term. The 16 schools (other than Mill Strand) which have been over-subscribed in recent years or which are holding their numbers are unlikely to be much impacted as the effect will be spread over all of these schools.

In the Minister's statement of 17th October 2016, he referred to the number small schools who are struggling to deliver high quality educational experiences for a wide range of reasons. The Minister stated that "the challenge that faces almost all Local Government Districts is that we have schools that are too small to adequately provide for their pupils and ensure they have the opportunity to fulfil their potential."

8. Impact on other integrated schools

The nearest integrated schools are Ballymoney IPS (12.8 miles), Ballycastle IPS (19.8 miles), Roe Valley IPS, (20.2 miles) and Carhill IPS (19.7 miles). This first three of these schools are successful and periodically oversubscribed integrated primary schools. Carhill IPS is a smaller rural school which has started to attract more children in recent years. All four schools serve catchment areas which are discrete and separate from Mill Strand IPS. The distance involved means that none of these schools, even if they were in a position to take more children, are realistic options for parents seeking integrated provision.

9. Area Based Planning

Mill Strand's plan to seek an expansion was notified in the Dec 2015 – Mar 2017 Area Planning Action Plan. This development proposal for Mill Strand IPS presents an opportunity for the Minister to make a significant contribution to increase existing integrated provision in the Causeway Coast and Glens Council area by approving the further development of a successful and popular integrated school. The Minister in his statement to the Assembly on 17th October 2016, said that "Pupils' needs must come first."

14.2 Other schools

NICIE is aware that a number of schools have lodged concerns with the EA North Eastern region regarding the proposal and respects their right to do so. However NICIE wishes to highlight the Department's statement in the recent Judicial Review that '*when considering proposals in the future it is recognised that consent of other sectors is not a prerequisite*'. In considering the comments raised by, and on behalf of other schools NICIE would like to reflect the following;

- Due to limited local provision many primary pupils travel further than the recommended distance to attend integrated primary schools. As Mill Strand IPS is the only integrated option in the former Coleraine "Triangle Area", parents who wish to avail of an integrated place for their children do then have to travel significant distances.
- There is evidence of diversity within other school populations. NICIE acknowledges the inclusive nature of these schools and also the efforts made to encourage and support this diversity. Looking at the five closest schools to Mill Strand IPS, while some controlled schools have a level of mixing below 10%, at this point in time however only Mill Strand offers integrated education, as defined by the 1989 Education Reform Order and recognised by Judge Treacy. Table 4 below shows the religious balance within those controlled schools closest to Mill Strand IPS for which concerns have been raised.

Table 4 Religious breakdown in local schools

	Protestant	Catholic	Other
Carnalridge P S	52.2%	9.8%	38%
Mill Strand Integrated P S	30.2%	29.0%	40.8%
Portrush P S	66.1%	7.4%	26.5%
Portstewart P S	52.5%	5.8%	41.7%
St Colum's P S, Portstewart	*	97.2%	*
St Patrick's Portrush	*	78.5%	#

15. Concluding remarks

Mill Strand IPS is a thriving, successful school delivering integrated education within the Coleraine Triangle area and its surrounds

The principal, staff, parents and governing body have displayed support for this development proposal and NICIE believes that the school demonstrates the capacity to increase in size from its present enrolment number of 232.

While there is evidence of unfilled places in primary schools within the former Coleraine Council area, these places are not in formally integrated schools and NICIE reiterates its view that additional integrated provision is required in the area.

NICIE fully supports Mill Strand's Development Proposal believing that the provision of additional places would enhance this school's ability to deal with the demands placed upon it and more readily meet the needs of those parents and children who have made the choice for a quality integrated education.

NICIE sees the approval of this proposal as an opportunity for the incoming Minister to publicly demonstrate the Department's duty, not only to 'encourage and facilitate integrated education' (Article 64 of ERO 1989), but also 'to plan and invest to meet the needs of our children, not the demand of the institutions we have inherited' (Sep 2011). It is also an opportunity for public endorsement of the Assembly's commitments to integrated education made in the Stormont House Agreement (December 2014) the Fresh Start Agreement (November 2015) and recommendations made in the recently published Independent Review of Integrated Education (November 2016).

NICIE would contend that supporting this proposal will also assist in delivering the Outcomes of the draft Programme for Government (PfG): Outcome 7; We have a safe community where we respect the law and each other and Outcome 9; We are a shared society that respects diversity (shared space section).

The delivery plans for both Outcome 7 and 9, state that we (the government) will '...facilitate integrated education, including through consideration of the recommendations from the Review of Integrated Education'.

Ministerial support for this proposal will therefore not only help to meet many stated policy aims, but will also deliver for more parents and children who want an integrated primary place in the Coleraine Triangle area.

NICIE (DP 483) – APPENDIX 1

Primary sector - statistical information as at the end of admissions procedure

School Name	DE Ref	Type	Constituency	District Council	Adm No	Enr No	School year 2012/13				School year 2013/14				School year 2014/15				School year 2015/16				School year 2016/17			
							1st pref apps	1st pref admitted	Total apps	Total admitted	1st pref apps	1st pref admitted	Total apps	Total admitted	1st pref apps	1st pref admitted	Total apps	Total admitted	1st pref apps	1st pref admitted	Total apps	Total admitted	1st pref apps	1st pref admitted	Total apps	Total admitted
Ballynacket P S	3032104	Catholic Maint.	East Londonderry	Causeway Coast and Glens	10	67	4	4	4	4	3	3	3	3	2	2	2	2	1	1	1	1	3	3	3	3
Ballysally P S	3016252	Controlled	East Londonderry	Causeway Coast and Glens	53	304	30	30	30	30	41	41	42	42	30	30	30	30	42	42	42	42	50	47	51	47
Ballytober P S	3010892	Controlled	East Londonderry	Causeway Coast and Glens	12	87	8	8	8	8	12	12	12	12	3	3	3	3	13	13	13	13	8	8	8	8
Carhill Integrated P S	3052071	Controlled Integ.	East Londonderry	Causeway Coast and Glens	13	94	12	12	12	12	13	13	13	13	8	8	9	9	5	5	5	5	12	12	12	12
Carnalridge P S	3012049	Controlled	East Londonderry	Causeway Coast and Glens	30	230	36	36	36	36	30	30	30	30	21	21	21	21	30	30	30	30	24	24	24	24
Casteroe P S	3012288	Controlled	East Londonderry	Causeway Coast and Glens	14	98	14	14	14	14	14	14	15	15	14	14	15	15	15	15	15	15	13	12	16	14
Culcrow P S	3012065	Controlled	East Londonderry	Causeway Coast and Glens	11	77	14	13	14	13	18	16	18	16	12	11	12	11	19	14	19	14	16	13	16	13
D H Christie Memorial P S	3012284	Controlled	East Londonderry	Causeway Coast and Glens	60	452	53	53	53	53	47	47	49	49	49	49	52	52	48	48	48	48	64	58	68	60
Damhead P S	3012225	Controlled	East Londonderry	Causeway Coast and Glens	29	203	23	23	24	24	32	31	32	31	37	30	38	30	28	28	28	28	27	27	30	30
Garvagh P S	3016119	Controlled	East Londonderry	Causeway Coast and Glens	30	236	14	14	14	14	15	15	15	15	4	4	4	4	12	12	12	12	10	10	10	10
Gorran P S	3016055	Controlled	East Londonderry	Causeway Coast and Glens	21	120	13	13	13	13	11	11	11	11	7	7	8	7	12	12	12	12	9	9	10	10
Harpurs Hill P S	3016052	Controlled	East Londonderry	Causeway Coast and Glens	30	224	25	25	25	25	36	30	36	30	29	29	30	30	30	30	30	30	19	19	21	21
Hezlett P S	3012229	Controlled	East Londonderry	Causeway Coast and Glens	42	295	46	46	46	46	29	29	30	30	27	27	28	28	34	34	37	37	28	28	29	29
Irish Society's P S	3016264	Controlled	East Londonderry	Causeway Coast and Glens	60	427	50	50	51	51	37	37	38	38	32	32	35	35	26	26	27	27	38	38	42	42
Kilowen P S	3012237	Controlled	East Londonderry	Causeway Coast and Glens	28	195	30	30	30	30	34	30	34	30	36	30	36	30	31	30	31	30	39	30	45	30
Kilrea P S	3012269	Controlled	East Londonderry	Causeway Coast and Glens	18	127	11	11	11	11	12	12	12	12	15	15	15	15	18	18	18	18	18	18	18	18
Macosquin P S	3013700	Controlled	East Londonderry	Causeway Coast and Glens	28	194	24	24	24	24	37	29	38	30	47	27	48	28	40	28	40	28	34	28	34	28
Milburn P S	3012264	Controlled	East Londonderry	Causeway Coast and Glens	60	422	54	54	54	54	43	43	46	46	47	47	48	48	34	34	34	34	49	49	51	51
Millstrand Integrated P S	3066544	Grant Maint. Integ.	East Londonderry	Causeway Coast and Glens	30	232	27	27	27	27	25	25	26	26	32	30	32	30	24	24	24	24	47	47	47	47
Portrush P S	3010847	Controlled	East Londonderry	Causeway Coast and Glens	41	286	26	26	26	26	24	24	24	24	32	32	34	34	36	36	36	36	20	20	20	20
Portstewart P S	3012250	Controlled	East Londonderry	Causeway Coast and Glens	59	412	34	34	34	34	39	39	39	39	25	25	25	25	38	38	38	38	33	33	33	33
St Columba's P S, Garvagh	3032202	Catholic Maint.	East Londonderry	Causeway Coast and Glens	21	144	18	18	18	18	12	12	12	12	10	10	10	10	13	13	13	13	20	20	20	20
St Columba's P S, Kilrea	3036147	Catholic Maint.	East Londonderry	Causeway Coast and Glens	29	202	37	37	37	37	32	31	32	31	39	37	39	37	32	31	32	31	28	28	28	28
St Colum's P S, Portstewart	3032231	Catholic Maint.	East Londonderry	Causeway Coast and Glens	27	187	25	25	25	25	20	20	20	20	25	25	25	25	17	17	17	17	32	31	32	31
St John's P S, Coleraine	3033709	Catholic Maint.	East Londonderry	Causeway Coast and Glens	50	351	25	25	25	25	22	22	23	23	17	17	17	17	23	23	23	23	24	24	24	24
St Malachy's P S, Coleraine	3032297	Catholic Maint.	East Londonderry	Causeway Coast and Glens	46	323	42	42	42	42	41	41	42	42	37	37	37	37	34	34	34	34	22	22	22	22
St Patrick's & St Joseph's P S	3032285	Catholic Maint.	East Londonderry	Causeway Coast and Glens	27	189	23	23	24	24	29	26	29	26	26	26	26	26	30	30	30	30	19	19	19	19
St Patrick's P S, Portrush	3030547	Catholic Maint.	East Londonderry	Causeway Coast and Glens	21	150	15	15	15	15	12	12	12	12	10	10	10	10	15	15	15	15	10	10	10	10

NICIE response to Development Proposal 484

Proposal

The Board of Governors of the grant maintained Mill Strand Integrated Primary School propose to establish an additional 26 part-time nursery places at their grant maintained integrated primary school with effect from 1st September 2017 or as soon as possible thereafter. The school also has a current proposal running alongside this (Development Proposal No 483) which seeks to develop two-form entry throughout the school.

1. Introduction and background to nursery units within the integrated sector

Generally when an integrated primary school was established, parents then began to work towards the setting up of a pre-school facility. These were often staffed by the nursery teacher and assistant(s), however owing to the prohibition under the 1989 Education Reform Order; no integrated nursery could receive government funding. The facilities were then funded from charitable grants and parental subscription. This represented a substantial sacrifice with regard to continuous fund raising and extra work and commitment on behalf of the whole school community including the Board of Governors (BoG).

When European Peace and Reconciliation funding became available, some groups were able to access this but had to register with the DHSS as playgroups even though they had nursery teachers and staff. The first tranches of Pre-school Education Advisory Group (PEAG) funding were also only available if the facility were registered as a playgroup.

The 1998 Education Order removed the prohibition on integrated schools having integrated nursery units. At the same time the Pre-school Education Expansion Plan was making significant capital available to the statutory sector to provide nursery units. The integrated sector already had several pre-school settings, so the capital required to bring them up to DE Handbook standards was much less than that required to develop entirely new buildings. The policy within the Department of Education and conveyed to NICIE by senior officials was that if a playgroup had a

substantial number of PEAG funded places it could then be transferred across to nursery status units using the normal development proposal and economic appraisal process.

From September 1999 onwards a dozen pre-schools were transferred to nursery status as the funded places grew in each setting. The capital from the Pre-school Education Expansion Plan was used to provide, in the main, small alterations to most settings. This represented an inexpensive way for the Department of Education to reach its target of 50% of places in the statutory sector and 50% in the voluntary sector. In total 15 Grant Maintained Integrated primary schools now have nursery units. Of the Controlled Integrated Primary Schools, three have nursery units. Currently there are 7 integrated playgroups in GMI schools. Of the Controlled Integrated Primary Schools, there are 5 playgroups co-located within the grounds of the schools.

The integrated sector has never been able to have a pre-school nursery unit established alongside a new school. In the past, PEAGs have not been able to consider newly established schools until they have a track record of Primary 1 children, as these children were used as a proxy for pre-school children. This route of building up funded pre-school places within a setting has been the only route to nursery unit establishment within the integrated sector until ministerial approval for the establishment of a GMI nursery unit at Phoenix IPS in 2014.

It should be noted that only four of the GMI settings have achieved full-time places. The first of these is Saints and Scholars, where the reception class was converted to full-time places. In 2009, the first of the nursery units transformed from playgroups, were granted a change in pattern of attendance from part-time to full-time provision (Windmill IPS, Hazelwood IPS and Mill Strand IPS). The remainder of settings only have part-time places. This disadvantages those settings located in areas where the nursery schools and units surrounding them have, through application to DE's open enrolment section, rationalised their two part-time sessions to one full-time session. This creates an uneven playing field for the integrated schools which can only offer part-time places compared to the other sectors' full-time provision. We are aware that there is a moratorium on full-time provision currently.

Integrated primary schools attract a higher percentage of children with special needs and historically access to assessment and support has been much more difficult to obtain in a playgroup setting than in an established nursery.

The outcomes for children within nursery units have been shown to be a higher quality than those within playgroups (EPPNI). The importance of early intervention has been underlined in the Chief Inspector's Report 2012-2014.

The importance of a sustainable pre-school service has been highlighted by the Chief Inspector's Report in 2012-2014. Within a nursery unit, staffing and finance (through LMS) is more easily managed by the BoG and Principal of the primary school than when operating as a separate BoG committee with its own distinct funding stream for a playgroup.

Despite the problems that managing playgroups have presented to Boards of Governors and Principals, they remain committed to the provision of integrated pre-school because they are aware of the importance of children having positive experiences of others from different backgrounds from as early an age as possible and Professor Paul Connolly's research supports this.

More recently, the Independent Review of Integrated Education carried out by Professor Margaret Topping and Mr Colm Cavanagh on behalf of the Minister for Education, highlighted the importance of further development of integrated pre-school provision in Recommendation 6 which stated: *"That where clear demand is demonstrated, integrated pre-school provision (an integrated nursery or any pre-school linked directly to an integrated primary school) should receive funding and additional places even where there are unfilled pre-school places in other providers in the area."*

2. Education Authority Consultation Process- views of PEAG

Since the inception of the Pre-school Education Expansion Plan, in 1998, Pre-school Education Advisory Groups (PEAG) as operated by the Education and Library Boards (ELBs) have been consulted and asked for their opinion on Development Proposals for the pre-school sector.

In April 2015 the merger of the five ELBs took place to form the Education Authority. On 30 November 2015, a meeting of potential members for the Pre-school Education Group (PEG) took place but there has been no meeting of the PEG, although one is now planned for Thursday 23rd March 2017. In the absence of a PEG meeting the approach taken to pre-school Development Proposals has varied across the five offices and this has led to some inconsistencies in the consultation process. For example, some of the EA offices sent the Cases for Change out to PEAG members by e-mail and some discussed at a meeting the putative proposal before the actual Case for Change was presented to the EA for publication. This former situation meant that no discussion could take place among the members to come to a single recommendation. Whilst the latter situation meant that the members were not in receipt of the full facts when making their initial comments prior to the Case for Change document being available. In addition whilst the partner organisations were asked in June 2016 for their nominees for the PEG, however since then the Case for Change information has continued to be sent to PEAG representatives and not PEG members.

3. Non-sectoral nature of pre-school provision

A founding premise under the Pre-school Education Expansion Plan was that pre-school provision should be non-sectoral in nature, i.e. any setting should be capable of being attended by a child from any background comfortably. In reality, practices such as having the pre-school children wear the uniform of the school have been off-putting to parents. Thus whilst the Department has often asserted that pre-school provision should be non-sectoral in nature, in reality the Department's own statistics show that few Catholics attend Controlled nursery units and schools and fewer Protestants attend Catholic nursery units and schools. In 2016/17, only 86 Protestants attended Catholic Maintained Nursery Schools which offered 1723 places and 66 Protestants attended Nursery Classes in Catholic Maintained schools which offered 4060 places. The figures for Catholics attending Controlled Nursery Units were 522 out of 4593 places. It is only in the controlled nursery schools many of which pre-date the Pre-School Education Expansion Plan where there is a substantial level of mixing at 28.5% Catholic. Overall the percentage of Catholics attending controlled provision was 19.5% but it is only 2.6% for Protestants attending Catholic maintained provision. On the other hand, Integrated Nursery provision (GMI

and Controlled), demonstrates figures of 31.4% Protestant and 39% Catholic in 2016/17.

Thus within the statutory sector only the older controlled nursery schools and the integrated nursery units provision can be viewed as truly providing a non-sectoral pre-school setting, capable of being attended comfortably by the two main traditions. Thus using the assertion that pre-school provision should be non-sectoral against the integrated proposals seems all the more ironic and inequitable.

In the case of Mill Strand IPS as is demonstrated below, this particular situation is crystallised by the shortfall of perceived non-sectoral provision in the Portrush area.

4. Introduction to Mill Strand IPS pre-school provision

Mill Strand IPS had its genesis in a parent-led initiative to bring about integrated education to children in the North Coast area. Mill Strand Integrated Primary School was set up in 1987, with 52 pupils, by a group of families who had to re-mortgage their homes to raise the funding. The school ran on charitable donations for two years before the then Education Minister Brian Mawhinney gave Integrated Schools recognised status in the 1989 Education Reform Order (NI). The nursery was established at the same time, but not given status as GMI nursery unit until June 2001, after the removal of the prohibition of the funding of integrated nurseries in the 1998 Education Order (NI).

The school has currently got 27 children enrolled in the Nursery Unit (Source: EA website) and a further 20 children in the school's Pre-School Playgroup.

The school accommodation consists of 12 classrooms, a small Learning Support room, assembly/dining/PE hall, secretary's office and principal's office. Six of the classrooms are in the permanent building, one of which, the Nursery, is accommodated in the original house in which the school was founded. The Secretary's office, Principal's Office, Learning support room and staffroom are also located in this two-storey building. Six of the classrooms are located in mobile units.

The current teaching staff consists of principal, 7 full-time teachers and 3 part-time teachers. The classroom assistants, secretary, building supervisor, cleaners, supervisory assistants, meals staff and staff in the additional pre-school centre

complete the full staff team.

The existing Nursery Unit was initially established as a Pre School, becoming a GMI Nursery in 2001, offering 26 part-time places. Due to social deprivation these were increased to full time places in November 2009. The Pre-School Playgroup at the school was established for September 2015 to meet parental demand for places at an integrated setting and is registered for 20 children.

5. Current Proposal

The main reason for seeking the change is to assist the school in reducing the bureaucratic burden related to managing and governing under two separate funding and governance mechanisms, thereby supporting the school to deliver improved outcomes for children and to become a more sustainable school. In addition, this would support the DE by assisting in its duty 'to encourage and facilitate the growth of integrated education. Also to realise the objectives of Area Based Planning which include 'The aim of the plan is to facilitate the development of a network of viable and sustainable primary schools which can effectively deliver the Northern Ireland Curriculum.

The Board of Governors of Mill Strand Integrated PS believes that the proposed and existing provision at the school, in conjunction with the proposed future development highlighted in this development proposal will ensure compliance with the Department of Education's Sustainable Schools Policy.

This change would support the school to deliver improved outcomes for children and to help a sustainable school to be sustainable into the future. The Chief Inspector's Report of 2012-2014 highlighted at paragraph 133, "The lack of coherent area-based planning for pre-school provision across Northern Ireland can lead to settings being established with small numbers of funded children, thus limiting the children's opportunities to develop socially and emotionally. In addition, fluctuations in enrolments result in a small number of private and voluntary settings becoming unviable. To ensure the needs of all children are met effectively, the employing authorities and the Pre-school Education Advisory Group should consider how best to provide a high quality service that is sustainable and effective within an area-

based model. To effect this improvement, there needs to be more coherent strategic planning and co-operation between government departments and across sectors to ensure that all children receive a good quality pre-school education.”

One of the objectives of the recent draft of the Strategic Area Plan is to “sustain strong, successful and viable schools.” The Mill Strand IPS development proposals are in the current Area Action Plan (December 2015 - March 2017). In addition supporting this proposal would assist the DE in fulfilling its duty ‘to encourage and facilitate the growth of integrated education.’

Characteristics of the Area and School Enrolment at Mill Strand IPS

The council area in which the school is located, Causeway Coast and Glens experienced a population increase, between 2005 and 2015 of 5%. (NISRA website).

Mill Strand IPS has a number of children on the SEN Register; in 2016/17 there were 21.8% children enrolled at the school with Stages 1-5 SEN. (Source: DE 2016/17 School Level Data). Access to assessment and support has been much more difficult to obtain in a playgroup setting than in an established nursery, therefore establishment of a statutory nursery unit would be supportive of children with SEN.

Free School Meals (FSM) entitlement at Mill Strand IPS is currently 33.9% which is higher than the overall percentage of children entitled to Free School Meals of 30.7% (Statistical Bulletin 2/2017).

The outcomes for children within nursery units have been shown to be a higher quality than those within playgroups (EPPNI). The importance of early intervention has been underlined in the Chief Inspector’s Report 2012-2014.

Table 1: Ward Information for Pupil Enrolment at Mill Strand IPS in Nursery and Pre-School Playgroup

Ward	No of Pupils	% Catholic	% Protestant	Deprivation
Atlantic	7	30.88	61.12	212

Ballylough	*	4.79	91.37	137
Cross Glebe	*	21.95	71.03	54
Dundooan	*	24.21	68.16	468
Dunluce	*	6.08	89.2	442
Hopefield	17	22.23	70.34	478
Knocklynn	*	18.2	74.15	528
Mount Sandel	*	31.4	61.42	443
Royal Portrush	*	27.81	63.14	145
Seacon	*	14.68	78.24	354
Strand (Coleraine lgd)	*	40.24	53.98	568
The Cuts	*	40.21	54.79	490

The nursery unit is also oversubscribed and a Temporary Flexibility request is being progressed. In September 2015, the school opened a pre-school playgroup with funding from the Integrated Education Fund and this has attracted a steady enrolment.

Table 1 shows the ward religious backgrounds from the 2011 Census. In Atlantic Ward, where the school is located, according to the 2011 Census; **30.88%** belong to or were brought up in the Catholic religion and **61.12%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion. The figures for the Causeway, Coast and Glens Council based on the 2011 Census are **40.21%** belong to or were brought up in the Catholic religion and **54.79%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion. The former Coleraine Council area had slightly less balanced figures **28.02%** belong to or were brought up in the Catholic religion and **65.28%** belong to or were brought up in a 'Protestant and Other Christian (including Christian related)' religion. This latter set of figures more closely resemble Mill Strand's balance and indeed the school draws from most of the former

The Ward analysis of the postcodes in Table 1 shows that the pupils come from 12 wards. Whilst the former Coleraine LGD is **28.02%** Catholic and **65.28%** Protestant as noted above from the 2011 Census, the wards the pupils come from vary greatly in that they are very different in nature, one ward is only 6.08% Catholic and another is 40.24% Catholic.

With regards to deprivation it is important to note that approximately 10% of the children attending the school come from the top 25% of the most deprived wards in Northern Ireland.

Additional reasons to approve this proposal include:

- Approval for this proposal would allow the school to run more effectively under one funding, management, registering and inspection stream. NICIE and Mill Strand IPS are very mindful of the equal value equated to pre-school provision in both nursery units and playgroups and the excellent provision available in both types of settings throughout Northern Ireland.
- From a management perspective NICIE supports Mill Strand IPS in making this request and asks that careful consideration is given to allow Mill Strand IPS to move to nursery status to reduce the bureaucratic burdens placed on the school. Operating a nursery unit and a playgroup requires different management structures and different inspection bodies for what is effectively identical provision. The school does not seek this change lightly. The principal has been fully involved in the playgroup and appreciates that the Department's position is that there is no difference between a well-run nursery and a well-run playgroup.
- It would create equality of opportunity in accessing services to support vulnerable children in relation to attendance, welfare, safeguarding and Special Educational Needs and inclusion.
- The school has highlighted that the Northern Health and Social Care Trust, the registering authority for the playgroup, require the school to adhere to a number of procedures as part of their requirements. In a letter to the school

dated 19th August 2016, the Early Years Panel have asked “that reasonable steps would be taken to avoid congested areas within the school such as 9.00am, 10.45am and 12.40 and outdoor play would be timetabled to ensure children do not mix with others within the setting and the Early Years Panel viewpoint on this remains unchanged.” In practice this means that the school cannot allow the children in the playgroup to mix with the children in the statutory nursery unit at Mill Strand IPS except for the school nativity as long as appropriate risk assessment is in place according to the Health Trust requirements of registration. This is only allowed as it would be time limited. Therefore approval for an additional 26 statutory nursery places at Mill Strand IPS would allow the school to operate under one management system, LMS.

- NICIE contends that if DE was to approve the conversion of the existing (non-PEAG funded) playgroup at Mill Strand IPS, it would represent replacement rather than displacement of an existing playgroup.
- The Nursery Unit is regularly over-subscribed:

34 (1st preference) for 26 in 2016/17;

41 (1st preference) for 26 in 2015/16;

25 (1st preference) for 26 in 2014/15;

45 (1st preference) for 26 in 2013/14 and

29 (1st preference) for 26 in 2012/13.

In response to the oversubscription in 2015/16 (41 first preferences), the Board of Governors took the decision to establish a Pre-School Playgroup in order to be able to accommodate demand for an integrated pre-school place quickly. In 2016/17, 20 children were accommodated in the school’s playgroup and in 2015/16, 17 children were enrolled. Even with the opening of the Pre-School Playgroup at Mill Strand IPS Table 2 shows that children are still coming to school having had no pre-school experience. It is particularly concerning that nine children arrived in P1 in 2016 with no pre-school experience. This amounts to over 17% of the P1 intake which is not in keeping with the Minister’s Pre-School Education Target.

Table 2: Pre-school experience of P1 intake at Mill Strand IPS from 2012 -2016

Year	Total intake	No Experience	Nursery	Private /Voluntary
2012	27	0	26	1
2013	23	0	22	1
2014	32	2	27	3
2015	28	1	26	1
2016	53 (includes Transfers from Mill Strand IPS Playgroup	9	27	17

The nine children with no pre-school experience for September 2016 were largely designated as other religions or no faith.

From a parent and child point of view, approval would mean that:

Parents and children will enjoy a more seamless approach to education with an easier transition to primary education. The Chief Inspector’s Report 2012-2014 highlighted the importance of transition by stating “the need for a reliable form of assessment that is rigorously and externally moderated and linked closely with the statements of what the child knows, understands and can do.”

- Children with special needs and their families would benefit from simpler and timelier access to the systems for assessment and support. Children in playgroups still do not have access to assessment for SEN, except through medical referrals.

6. Impact on other settings

This Development Proposal has been notified in the current Area Action plan. Table 1 shows the P1 children in Mill Strand IPS have attended a number of other pre-school settings.

A substantial majority of the pre-school cohort of children attending Mill Strand IPS Nursery Unit and Pre-School Playgroup enrol in P1 at Mill Strand IPS. The remainder of the P1 children come from a variety of other settings.

In the case of the Portrush area, there has no substantial impact on other settings since the opening of Mill Strand IPS Pre-School Playgroup as evidenced by the table in Appendix 1 (Source: EA) which outlines the admissions and enrolments for pre-school providers in the area, some of which are also oversubscribed.

Impact on other integrated provision

Other integrated settings (Carhill CIPS, Ballycastle CIPS, Ballymoney CIPS) of these three schools only one has a nursery unit, Ballycastle CIPS (19.8 miles away) which is oversubscribed and too far away to be impacted. All the schools serve catchment areas which are discrete and separate from Mill Strand IPS. The distance involved means that none of these schools, even if they were in a position to take more children, are realistic options for parents seeking integrated provision.

As has been discussed earlier in the section on Non-Sectoral Nature of Pre-School Education, Table 3 demonstrates that the statutory provision in Mill Strand IPS is providing a religiously integrated provision with a good representation from all communities attending.

Table 3: Religious Balance in these settings 2016/17

Funded Providers	No. of Protestants	% Protestants	No. of Catholics	% Catholics	No. of Others	% Others	Total
Mill Strand IPS Nursery Unit	74	30.2	71	29.0	100	40.8	245
Causeway Pre-School	*	*	#	#	0	0.0	15
Portrush Pre-School	17	58.6	6	20.7	6	20.7	29
Portstewart Nursery Unit	146	52.5	16	5.8	116	41.7	278
Stepping Stones Creche	#	#	*	*	0	0.0	10

Key	
-	means zero cases.
*	refers to less than five cases where data is considered sensitive.
#	means figure has been suppressed under rules of disclosure.

Concluding Remarks

NICIE would urge the Minister to approve this proposal. NICIE believes that supporting this expansion of pre-school provision would be a low cost and positive step to support a currently sustainable integrated school and would remove an obstacle to supporting its possible further growth in years to come. Justice Treacy [2014] NIQB 69 referred to the Article 64 duty “to encourage and facilitate integrated education in Northern Ireland and its practical consequences and legislative significance which includes taking positive steps or removing obstacles which inhibit the statutory objective.”

It would appear that Mill Strand IPS has in recent years met a previously unmet demand. This is evidenced by the high level of oversubscription at Mill Strand IPS (Nursery Unit) as well as other settings in the area and the demand for places in an integrated pre-school playgroup setting by parents.

NICIE would also be concerned that the current hiatus in how PEAG /PEG has been operating since the establishment of the Education Authority (EA) is impeding full and frank discussions at an appropriate level to be able to fully deal with these issues. We are also concerned that the information being brought to the EA Education Committee and forwarded to DE is based on flawed and incomplete consultations.

NICIE would urge the Minister to support this proposal as it represents a low cost opportunity to support a sustainable school into the future. The school has already been announced as being progressed under the Fresh Start Agreement (23rd March 2016). It would also help those who wish to choose an integrated option and address any shortfall for pre-school places in the area as well as providing additional places for those who are arriving at school without pre-school experience.

The school draws from wards which have been severely affected by the conflict and research is beginning to expose the trans-generational aspects of the troubles. ‘Towards a Better Future: the Trans-generational Impact of the Troubles on Mental Health.’ (Prepared for the Commission for Victims and Survivors by Ulster University, March 2015). Indeed the Victims and Survivors Forum members’ “consideration of

the conflict's trans-generational legacy recognised the imperative of examining the role of early years education in supporting parents and addressing sectarianism.”

This proposal therefore represents a positive move forward for the whole school community.

References:

The Report of the Independent Review of Integrated Education to Mr Peter Weir MLA, Minister for Education, Northern Ireland by Prof Margaret Topping and Mr Colm M Cavanagh

<https://www.education-ni.gov.uk/sites/default/files/publications/education/Integrating%20Education%20Report.pdf>

				School year 2013/14										
				Stage 1				Stage 2						
				1st pref apps	1st pref admitted	Total apps	Total admitted	Total Apps			Total Admitted			
								T/A	U/A	Total	T/A	U/A	Total	
Causeway Pre-school	V		P/T											
Millstrand Integ. Nurs Unit	Sch	26	F/T	45	26	46	26	46	6	52	26	0	26	
Portrush Pre-School PG	V		P/T	20	20	24	24	24	0	24	24	0	24	
Portstewart Nursery Unit	Sch	26	F/T	26	24	30	26	30	13	43	26	0	26	
St Colum's Pre-School Centre	V		P/T	22	22	23	23	25	0	25	24	0	24	
Stepping Stones Creche, Portstewart	V		P/T	9	9	9	9	9	0	9	9	0	9	
				School year 2014/15										
				Stage1				Stage 2						
				1st pref apps	1st pref admitted	Total apps	Total admitted	Total Apps			Total Admitted			
								T/A	U/A	Total	T/A	U/A	Total	
Causeway Pre-school	V		P/T	15	15	16	16	18	0	18	16	0	16	
Millstrand Integ. Nurs Unit	Sch	26	F/T	25	24	30	26	29	0	29	26	0	26	
Portrush Pre-School PG	V		P/T	30	30	31	31	32	0	32	32	0	32	
Portstewart Nursery Unit	Sch	26	F/T	40	26	41	26	41	5	46	26	0	26	
St Colum's Pre-School Centre	V		P/T	14	14	18	18	21	0	21	21	0	21	
Stepping Stones Creche, Portstewart	V		P/T	7	7	8	8	9	0	9	9	0	9	

				School year 2015/16										
				Stage 1				Stage 2						
				1st pref apps	1st pref admitted	Total apps	Total admitted	Total Apps			Total Admitted			
								T/A	U/A	Total	T/A	U/A	Total	
Causeway Pre-school	V		P/T	10	10	10	10	13	0	13	13	0	13	
Millstrand Integ. Nurs Unit	Sch	26	F/T	41	26	45	26	41	6	47	26	0	26	
Portrush Pre-School PG	V		P/T	28	28	32	32	32	0	32	32	0	32	
Portstewart Nursery Unit	Sch	26	F/T	29	26	32	26	31	9	40	26	0	26	
St Colum's Pre-School Centre	V		P/T	32	32	33	32	35	0	35	32	0	32	
Stepping Stones Creche, Portstewart	V		P/T	8	8	9	9	10	0	10	10	0	10	
				School year 2016/17										
				Stage 1				Stage 2						
				1st pref apps	1st pref admitted	Total apps	Total admitted	Total Apps			Total Admitted			
								T/A	U/A	Total	T/A	U/A	Total	
Causeway Pre-school	V		P/T	15	15	16	16	16	0	16	16	0	16	
Millstrand Integ. Nurs Unit	Sch	26	F/T	34	26	36	26	36	3	39	26	0	26	
Portrush Pre-School PG	V		P/T	32	32	34	32	32	0	32	32	0	32	
Portstewart Nursery Unit	Sch	26	F/T	33	26	33	26	33	1	34	26	0	26	
St Colum's Pre-School Centre	V		P/T	18	18	22	22	22	0	22	22	0	22	
Stepping Stones Creche, Portstewart	V		P/T	11	10	14	10	14	0	14	10	0	10	

Controlled Schools' Support Council (CSSC) response

Development Proposal No. 483	
Proposer: Board of Governors, Mill Strand Integrated Primary School and Nursery Unit	
Sector: Primary, Grant Maintained Integrated	
Summary of Proposal: The Board of Governors proposes that its admissions number should increase from 30 to 60 and increase its enrolment number yearly by 30 up to a maximum of 420 by 1st September 2023, at which point the school would become a 2 form entry school with an admissions number of 60 and an enrolment of 420.	
Associated Proposal: DP 484	

The Controlled Schools' Support Council (CSSC) has consulted with schools in the Controlled sector in respect of Development Proposal 483 {and Associated Proposal 484). The CSSC recognises the potential for these proposals to impact on the sustainability of Controlled schools in the area and welcomes the opportunity to make comment in this context.

Background

The CSSC notes the Ministerial announcement on 23 March 2016 that Mill Strand Integrated Primary School is to be included within the Fresh Start planning programme for capital buildings. There is insufficient evidence within the Case for Change in respect of this capital proposal to enable the impact on other schools to be adequately assessed. The relocation of the school to a larger site in the town is referenced, however, it is not clear if a site has yet been identified.

Rationale for Proposal

The CSSC endorses the Department of Education's position that positive outcomes for pupils must be central to the area planning process. The CSSC notes the assertion that Mill Strand PS will contribute to meeting the needs of every child in the area. Central to area based planning is the aim of establishing a network of sustainable schools. Insufficient consideration has been given to the potential impact of this proposal on the sustainability of other schools in the area. The CSSC would wish to highlight the potential impact of Development Proposal 483 not just on primary schools in the towns of Portrush and Portstewart and the surrounding areas but the potential impact on primary schools across a wider geographical area including, but not exclusively, the Coleraine area. The case for change confirms that almost 20% of pupils currently attending the school reside in Coleraine.

The CSSC acknowledges the duty placed on the Department of Education to encourage and facilitate sustainable integrated schools and promote shared education solutions. No evidence has been provided to demonstrate that parental

preference has been considered in respect of all sectors or that other options to that which is proposed have been explored. The CSSC acknowledges that controlled schools in the area promote inclusive education in their ethos and daily practice.

The case for change states that provision at Mill Strand Integrated Primary School is heavily oversubscribed on an annual basis. The admissions and enrolments data illustrates that this statement can only be attributed to the 2016/17 academic year. It is also noted that additional pre-school places were established at Mill Strand in September 2015 and funded by the Integrated Education Fund. In the previous 3 years all pupils who applied were admitted with the exception of 2 children in 2014/15. It is interesting to note that this position is identical to the pattern of enrolments and admissions for Portrush Primary School and Portstewart Primary School over the same 3 year period.

Area Planning Impact

The CSSC notes that the 2013-2018 draft Primary Area Plan (NEELB) confirmed that Mill Strand Integrated Primary School, together with 3 neighbouring controlled primary schools, namely, Portrush Primary School, Carnalridge Primary School and Portstewart Primary School, were all considered to be sustainable within the local area context and no change was proposed within the timeframe of the area plan.

The Area Plan also highlighted the importance of giving consideration to the needs of local communities in addition to the specific educational requirements of schools themselves.

The CSSC notes the number of unfilled places in the Coleraine Council area which at the time of publication of the area plan was 1,682. Furthermore, it was anticipated that this could increase to 2,524 places by 2025 if the approved enrolment numbers within the Coleraine Council area schools remained steady. The area plan highlighted the need to reduce the number of unfilled places and emphasised the considerable challenge this presents, a challenge further exacerbated by the projected downturn in the population.

The Area Plan also emphasised the need to make the most effective use of the school estate.

No evidence has been presented to demonstrate how Development Proposal 483 is aligned to the 2013-2018 Area Plan. The CSSC believes that the potential impact on other schools has not been adequately examined in the context of demographic projections for the area which are referred to in greater detail later in this submission. Further consideration needs to be given to the potential impact of Development Proposal 484 on other schools in the local area and also the potential impact on schools across a wider geographical area including, but not exclusively, Coleraine.

The CSSC is of the view that the proposal is contrary to a number of the specific aims/objectives of area planning, namely to:

- i. ensure a network of sustainable schools, within reasonable travelling distance for pupils and capable of delivering effectively the revised curriculum;
- ii. identify and meet the needs of all children and young people in the area;
- iv. reduce the number of unfilled places;
- v. reduce duplication of provision;
- vi. identify realistic, innovative and creative solutions to address need, including opportunities for shared schooling on a cross sectoral basis;
- vii. maximise the use and sharing of the existing schools estate;

The CSSC does not believe that Development Proposal 483 aligns with the current Area Plan and would urge that consideration is given to whether that which is proposed is the most appropriate area solution.

Educational Impact

DE Circular 2014/21, Publication of a Development Proposal, states that any significant change to an existing school must be considered in the wider context of the network of schools and must be in line with the overall proposed pattern of provision outlined in the Area Plan. The circular stresses the importance of understanding the local context and that this understanding should extend to all the school sectors within an area and not just focus on any single sector. The CSSC believes that Development Proposal 483 has the potential to affect the ability of neighbouring controlled schools to remain sustainable and therefore may disadvantage children and young people in the schools in the local area. The needs and aspirations of all children and young people in the area are not adequately considered in the Case for Change.

The CSSC notes the inclusive ethos within local Controlled schools and the long history of cross community collaboration with schools from other sectors, including well established shared education links between schools in the area. This needs to be given due regard in the consideration of this proposal.

Statistical Information

The statistics provided within the Case for Change do not consider projected need in the area. There is no analysis of live births or population projections. The 2014 based population projections for the Causeway Coast and Glens Council area project a decline in the 0-15 age range from 26,476 in 2014 to 22,659 in 2039(1). This 14% decrease may be affected by the cross boundary flow of pupils, however, these projections would indicate that fewer primary school places are likely to be required in the future. Live births by academic year for the Causeway Coast and Glens Council area demonstrate a fluctuating pattern over the 7 year period 2008-2014 (2)•

1 Source: Neighbourhood Statistics (NISRA) Website: www.nisra.gov.uk/ninis

2 Source: Neighbourhood Statistics (NISRA) Website: www.nisra.gov.uk/ninis

Closer analysis at ward level confirms a relatively stable trend in resident live births with some annual fluctuation.

Information provided in relation to pupils attending Mill Strand Integrated Primary School illustrates that pupils attend from a wide geographical area. The Bain Report recommended that maximum travel distances and times for all pupils should be established to inform the siting of new schools. In the context of this proposal, consideration must be given to accessibility and reasonable travelling distance for primary aged pupils.

Implementation Plan

The case for change does not include a sufficiently detailed implementation plan with actions required and milestones to deliver the proposal, if approved. As a result, it is not possible to assess with any confidence whether or not the proposal is deliverable.

Resource Implications

The CSSC is of the view that the case for change does not provide sufficiently detailed information to enable resource implications (both capital and recurrent) to be adequately considered. Within a 2 year period there will be insufficient accommodation on the present site to sustain the proposed increase in enrolment. The aspiration for a new school on a new site in the Portrush area creates a dilemma in that the impact of this proposal cannot be adequately assessed without clarity in respect of the future location of the school.

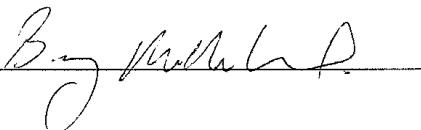
Statutory Consultation

The CSSC notes that concerns were raised by a number of Controlled schools during the pre-consultation stage and requests that full consideration is given to the concerns raised.

Conclusion

In summary, the CSSC firmly believes that positive outcomes for pupils must be central to the area planning process. The CSSC wishes to raise an objection to Development Proposal 483 as the proposal to increase the enrolment number of Mill Strand Integrated Primary School has the potential to have a detrimental impact on the future sustainability of Controlled schools in the local area and is contrary to a number of the specific aims/objectives of area planning.

Chief Executive

Signed: 

Development Proposal No. 484
Proposer: Board of Governors, Mill Strand Integrated Primary School and Nursery Unit
Sector: Nursery, Grant Maintained Integrated
Summary of Proposal: The Governors propose to establish an additional 26 part- time Nursery places at their grant-maintained integrated primary school with effect from 1 September 2017, or as soon as possible thereafter.
Associated Proposal: DP 483

The Controlled Schools' Support Council (CSSC) has consulted with schools in the Controlled sector in respect of Development Proposal 484 (and Associated Proposal 483). The CSSC recognises the potential for these proposals to impact on the sustainability of Controlled schools in the area and welcomes the opportunity to make comment in this context.

Background

It is noted that additional pre-school places were established at Mill Strand in September 2015, funded by the Integrated Education Fund. The Case for Change states that the proposed and existing provision at the school, in conjunction with the proposed future development highlighted in this development proposal will ensure compliance with the Department of Education's Sustainable Schools Policy. The CSSC understands that the Department of Education's Sustainable Schools Policy does not apply to pre-school education. This policy reference within the Case for Change is misleading.

Rationale for Proposal

The Case for Change states that the main reason for seeking the change is to assist the school in reducing the bureaucratic burden related with managing and governing under two separate funding and governing mechanisms, thereby supporting the school to deliver improved outcomes for children and to become a more sustainable school. The educational merits of the proposed change are not clear.

The Case for Change states that there is no alternative for parents seeking an integrated education. The CSSC understands that pre-school provision is not defined according to sectors (e.g. Integrated, Controlled), so all pre-school settings, regardless of location, are considered accessible to children from all backgrounds. There are a number of statutory and voluntary providers in the area which will be impacted by this proposal.

No evidence has been provided to demonstrate that other options to that which is proposed have been explored or that parental preference has been considered in respect of all pre-school providers in the area.

Area Planning Impact

The Case for Change states that approval of this proposal for Mill Strand Integrated Primary School would meet the demand for integrated provision and would have no impact on existing schools in the area as all are fully subscribed. It is assumed that this statement relates to other pre-school providers in the area and not schools exclusively (the draft Primary Area Plan illustrated that there is surplus capacity within primary schools in the area). The CSSC considers that the impact on other providers has not been adequately examined in the context of demographic projections for the area which are referred to in greater detail later in this submission. Further consideration needs to be given to the potential impact of Development Proposal 484 on other pre-school providers in the local area and also the potential impact on providers across a wider geographical area including, but not exclusively, Coleraine.

The CSSC would also wish to re-emphasise the non-sectoral nature of pre-school education and notes that there has been a long history of cross community pre-school provision in the area and an inclusive ethos within local schools, including well established Shared Education links between schools. This needs to be given due regard in the consideration of this proposal.

The CSSC notes that pre-school education is non-statutory and that area planning, which is the process of strategic planning of primary and post-primary education provision, does not relate directly to this phase of education. However, Development Proposal 484, if approved, has the potential to have an indirect impact and subsequently threaten the sustainability of neighbouring primary schools. The CSSC notes that Mill Strand Integrated Primary School was described as sustainable in the 2013-2018 draft Primary Area Plan (NEELB). The draft Primary Area Plan also confirmed that Controlled primary schools in the Portrush and Portstewart areas, namely, Portrush Primary School, Carnalridge Primary School and Portstewart Primary School, were all considered to be sustainable within the local area context. Insufficient consideration has been given to the potential impact of this proposal on the sustainability of other primary schools in the area.

Educational Impact

DE Circular 2014/21, Publication of a Development Proposal, states that any significant change to an existing school must be considered in the wider context of the network of schools. The circular stresses the importance of understanding the local context and that this understanding should extend to all the school sectors within an area and not just focus on any single sector. The CSSC believes that Development Proposal 484 has the potential to affect the ability of neighbouring Controlled schools to remain sustainable and therefore may disadvantage children and young people in the schools in the overall area. The needs and aspirations of all children and young people in the area are not adequately considered in the Case for Change.

Statistical Information

The statistics provided within the Case for Change do not consider projected need in the area. There is no analysis of live births or population projections. The 2014 based population projections for the Causeway Coast and Glens Council area project a decline in the 0-4 age range from 8,769 in 2014 to 7,144 in 2039 (1). This 14%

decrease indicates that fewer pre-school places are likely to be required in the future. live births by academic year for the Causeway Coast and Glens Council area demonstrate a fluctuating pattern over the 7 year period 2008-2014(“ Closer analysis at ward level confirms a relatively stable trend in resident live births with some annual fluctuation. Information provided in relation to pupils attending Mill Strand Integrated Primary School illustrates that pupils attend from a wide geographical area. The Case for Change confirms that almost 20% of pupils currently attending the school reside in Coleraine. It is not clear if this statistic relates to total enrolment of pre-school and primary aged pupils or if it is relevant to pre-school children.

Implementation Plan

The Case for Change does not include a sufficiently detailed implementation plan with actions required and milestones to deliver the proposal, if approved. As a result, it is not possible to assess with any confidence whether or not the proposal is deliverable. Reference is made to the timetable for primary admission procedures. It is assumed that this should refer to pre-school admissions.

Resource Implications

The Ministerial announcement on 23 March 2016, which stated that Mill Strand Integrated Primary School is to be included within the Fresh Start planning programme for capital buildings, is noted. There is insufficient evidence within the Case for Change in respect of this capital development to enable the impact of Development Proposal 484 on other pre-school providers to be adequately assessed.

The case for change does not provide sufficiently detailed information to enable resource implications (both capital and recurrent) to be adequately considered.

Statutory Consultation

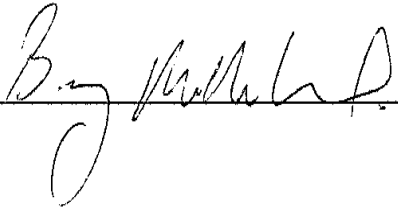
The arrangements for consultation are noted, however, the scope, of the survey conducted with the school and wider community, is not clear. The CSSC notes the concerns raised by Controlled schools in the area and requests that full consideration is given to the concerns raised.

Conclusion

In summary, the CSSC endorses the value of pre-school education and notes that high quality pre-school education is available at all types of pre-school settings, both statutory (nursery schools or nursery units attached to primary schools) and non-statutory (voluntary or private providers). The CSSC recognizes the role of the Education Authority in planning pre-school provision based on an assessment of need. The Case for Change provides no reference to the Education Authority's role or position of the Pre-School Education Group on the need for additional statutory provision at Mill Strand Integrated Primary School.

The CSSC considers it critical in considering this proposal to acknowledge that pre-school education is not defined according to sectors and that all pre-school settings are considered accessible to children from all backgrounds. Excellent transition programmes exist within all pre-school settings and primary schools in the area to ensure all children experience a smooth transition from pre-school to primary school

regardless of the setting from which they are transferring or the primary school within which they will be enrolled.

Signed:  _____

Chief Executive

EDUCATION AND TRAINING INSPECTORATE (ETI) COMMENTS ON DP 483

ETI KNOWLEDGE

A District inspection visit to the school was made on 6 April 2016 by the District Inspector. The school has progressed well since its last inspection. There has been a change in personnel and the principal was positive and felt that the school had moved forward since the inspection. It has some newly appointed teachers who have brought added energy to the school and most of the lessons observed were good or very good, suggesting that the school has maintained its consistency and quality. The classes are all quite large and all the teachers cope well with securing engagement and most secure effective or very effective learning. The data provided by the school indicated a diminishing trend of under-performance noted at the time of the inspection. The principal still works alongside a very engaged Board of Governors. Since the last inspection, the school has definitely moved forward in some areas and this shows continued levels of capacity to sustain improvement.

RATIONALE FROM THE PERSPECTIVE OF ETI EVIDENCE

The ETI may support the proposal where the children will benefit from:

- having access to an integrated education, should that be the wishes of their parents;
- gaining admission to a school that historically has met broadly the needs of its children in terms of a largely effective provision and outcomes; and
- having access to wide learning experiences based on a historical curriculum and extra-curricular provision.

In addition, the ETI is supportive of DE's wider policies, which include arrangements for integrated education.

However, the ETI would have a reservation in the following area:

- the school's current building would not be able to accommodate such a large increase in intake, should they be able to maximise its potential intake.

The DE therefore needs to be mindful of the potential out-working.

In addition, the DE would need to satisfy itself that the outworking would not create a disproportionately adverse impact on the neighbouring primary schools, particularly those in the three-mile radius and is satisfied with the school's comments on financial planning on page 17.

The ETI would not have sufficient evidence to ascertain how the school would be able to sustain a notable increase in intake in going forward. The DE might need to satisfy itself that forward enrolment projections are accurate.

MATTERS ARISING OR FURTHER QUERIES BY ETI

The DE might need to satisfy itself on the impact the proposal will have on the neighbouring primary schools. The principles of increasing parental choice and satisfying demand, alongside DE's position on integrated education are laudable; however, there may be other ramifications that need consideration.

The ETI would not have sufficient evidence to ascertain how the school would be able to sustain a notable increase in intake in going forward, nor do we have secure first-hand evidence to be able to comment on the likely impact on neighbouring educational providers. The DE might need to satisfy itself that forward enrolment projections are accurate and that the research evidence provided by the school is secure.

ANY OTHER RELEVANT INFORMATION

N/A

RECOMMENDATION

Inspection evidence and the ETI knowledge may support this development proposal, where there is a genuine need to meet the demands and wishes of parents for a good quality integrated primary school provision, including the integrated nursery unit. However, the ETI would be concerned that DE satisfies itself around any out-working that could have a disproportionately detrimental effect on Millstrand's neighbouring primary schools and be content with the significant issues that there would be around providing adequate accommodation for such a potentially large increase in intake.

EDUCATION AND TRAINING INSPECTORATE (ETI) COMMENTS ON DP 484

EDUCATIONAL PROVISION

The ETI acknowledges the work the school has done so far and the level of consultation that has taken place to get the development proposal to this stage.

Millstrand Primary School (including its nursery unit) was last inspected in February 2012 and the outcome was that overall effectiveness was good. The nursery unit was also evaluated as good. The inspection was a four-day focused primary inspection. The ETI noted that the school had maintained its enrolment well at around 190 children and since the time of this report, there has been a steady rise to around 221 children. The number of children in the nursery unit has remained steady with a consistent 26 children enrolled over recent years.

In the areas that the school was evaluated (leadership, quality of provision and achievement and standards) outcomes were good.

The overall effectiveness conclusion for the nursery unit was also good. The report noted strengths in the World Around Us provision, the quality of planning and the quality of record keeping and recording children's progress. The report noted that improvements could be made in the quality of some teacher-child interactions and in transition arrangements between activities. The outdoor area was noted as a strength.

The school building and its wider grounds gave some cause for concern at the time of the inspection. Consequently, a sentence was included in the report regarding the arrangements for setting down and picking up of children. The school is adjacent to a privately owned business and parts of the area around both were shared spaces. Inspectors were led to believe that working relationships between the school and the owner were strained to the extent that restrictions were placed on where the parents could and could not set down and pick up their children. This may be less an issue for the nursery unit, given the smaller numbers, earlier closing times and the other access arrangements.

ETI KNOWLEDGE

A district inspection visit to the school was made on 6 April 2016 by the District Inspector and this included a visit to the nursery unit. The nursery unit has progressed well since its last inspection. There has been a change in personnel and the principal was positive and pleased with the new appointment. The teacher, along with the assistants worked very well as a team and were engaged in plenty of one-to-one support for the children along with using ICT very effectively to photograph and record the children's competence in completing important tasks and activities that are required in the pre-school curriculum. Interactions were purposeful and learning and soft-skills focused.

The staff coped well in working with a fairly large number of highly inquisitive and engaged children at the time of the visit and signs were clear, on the day of the visit, that they have moved on well since the time of their last inspection.

RATIONALE FROM THE PERSPECTIVE OF ETI EVIDENCE

The ETI may support the proposal where the children will benefit from:

- having access to a pre-school education within the integrated education sector, should that be the wishes of their parents;
- the benefits for children from the likelihood of smooth transition between pre-school and primary 1 of a school whose past performance was good;
- gaining admission to a school that historically has met broadly the needs of its children in terms of largely effective provision and outcomes; and
- having access to good outdoor learning facilities based on past inspection findings.

In addition, the ETI is supportive of DE's wider policies, which include arrangements for integrated education.

However, the ETI would have reservations in the following area:

- additional pressure will be placed on the school's current building and given a proposal (DP483) to grow the size of the school, there will be issues around accommodation.

In addition, the transition of a pre-school playgroup to becoming part of a larger nursery unit is likely to have associated increases in staffing costs, which the DE needs to satisfy it is content with. For example, a fully qualified nursery unit teacher may cost more than a pre-school playgroup leader.

Furthermore, the DE would need to satisfy itself that the outworking would not create a disproportionately adverse impact on the neighbouring voluntary pre-school providers.

The ETI would not have sufficient evidence to ascertain how the school would be able to sustain a notable increase in intake in going forward, nor do we have secure first-hand evidence to be able to comment on the likely impact on neighbouring educational providers.

The DE might need to satisfy itself that forward enrolment projections are accurate and that the research evidence provided by the school is secure. For example, page 9 of the proposal states, 'The estimated need in Table 56 of the Area Plan for the Coleraine Area greatly underestimates the future need for integrated places. Latest research indicates a need for 2500 places of which a minimum of 420 will be required by Mill Strand Integrated School, in addition to 52 Nursery places.'

The exact detail of the 'latest research' is not clear, nor is there a reference to explain how such 'need' was under-estimated.

FURTHER QUERIES BY ETI

The ETI would not have sufficient evidence to ascertain how the school would be able to sustain a notable increase in intake in going forward, nor do we own secure first-hand evidence to be able to comment on the likely impact on neighbouring educational providers.

The DE might need to satisfy itself that forward enrolment projections are accurate and that the research evidence provided by the school is secure. For example, page 9 of the proposal states, 'The estimated need in Table 56 of the Area Plan for the Coleraine Area greatly underestimates the future need for integrated places. Latest research indicates a need for 2500 places of which a minimum of 420 will be required by Mill Strand Integrated School, in addition to 52 Nursery places.'

The exact detail of the 'latest research' is not clear, nor is there a reference to explain how such 'need' was under-estimated.

ANY OTHER RELVANT INFORMATION

N/A

RECOMMENDATION

Inspection evidence and the ETI knowledge may support this development proposal, where there is a genuine need to meet the demands and wishes of parents for a good quality integrated pre-school provision.

However, the ETI would be concerned that DE satisfies itself around any out-working that could have a disproportionately detrimental effect on Millstrand's neighbouring pre-school educational providers and be content with the issues that there would be around providing adequate accommodation, given the wider requests made within DP483.

DE (POLICY TEAM) COMMENTS

A|INVESTMENT AND INFRASTRUCTURE DIRECTORATE

Current Position – Accommodation

Millstrand Integrated Primary School (IPS) was announced as one of the schools to benefit from Fresh Start Funding in March 2016. This funding will provide for a new school and nursery unit. At the time of the funding announcement the school had not submitted a DP proposing that Millstrand IPS should increase from a 7 class primary school to a 14 class base primary school.

The school currently comprises a permanent building with a high percentage of mobile and modular accommodation that has been added over the years to accommodate the enrolment numbers. Repair works to some of the existing mobiles, to make them viable for 5 years (in the period while a new build is underway) has recently been approved.

While an integrated consultant team has yet to be appointed to undertake a feasibility study, initial indications from desktop studies are that the existing site is unable to meet the recommended site area for even a 7 class primary school. Therefore a new site will be needed for either a 7 or 14 class base school. A site size of between 1 -1.66 hectares will be required depending on the size of school being built.

A site search within a 1 mile radius of the existing school (extending to 2 miles if necessary) has already been commissioned from LPS. This has indicated a range of potential sites are available, however Millstrand has indicated a preference to remain in Portrush.

Additional Accommodation Requirements

If DP 483 was approved, then there will be an increased accommodation requirement. This could easily be incorporated into the planning stages of a new build. It is hoped that an Integrated Consultant Team will be appointed shortly to undertake a technical feasibility study. Until a DP decision is made the feasibility study will continue to look at options to accommodate both sizes of school.

Summary

A new site is required for either a 7 or 14 class base school. It is possible to incorporate either size of school into the feasibility study at this stage. The business case could not proceed until a decision on the size of the school is made.

BJ SCHOOL ADMISSIONS TEAM - DP 483

1.0 Development Proposal

- 1.1 The DP proposes “To increase...admissions number from 30 to 60. This would occur through an annual phased increase in the school’s enrolment number from 232 up to 420, commencing in September 2017, or as soon as possible thereafter”.
- 1.2 “The proposed increase to the approved admissions and enrolment number is linked to but not dependent upon DE approval being given to: Development Proposal No 484 – Proposal to establish an additional 26 part-time nursery places at Mill Strand Integrated Primary School”.

2.0 Rationale for the DP

- 2.1 The rationale for seeking an increase is the governors of the school believe that the current enrolment number of 232 and admission number of 30 to P1 is inadequate to meet demand.

3.0 Current Approved Enrolment and Admissions Numbers

- 3.1 The approved admissions and enrolment numbers for Mill Strand PS for 16/17 are 30 and 232 respectively. Following SAT’s annual review in June 2016 these figures remain the same for the 17/18 year albeit a temporary variation to 45 for admissions for 17/18 has recently been approved.
- 3.2 In the event that DP 483 is approved the revised admissions number would normally apply from September 2017, or as soon as possible thereafter and SAT will then phase in increases to the enrolment number annually. The Department consults on proposed numbers with schools and with the Education Authority and, where appropriate, the Council for Catholic Maintained Schools, so any phased increase would be agreed with the school concerned.
- 3.3 The table below outlines Applications to Primary 1 over the last three years (*figures as published alongside the school’s published admissions criteria for 2017*).

Applications to Primary 1	
School Year	Total Applications
2016/17	52
2015/16	27
2014/15	33

4.0 School Admissions

- 4.1 Should a school receive more applications for admission than it has places available it can request a temporary variation (TV) of its admissions and / enrolment number from the Department. The Department may approve TVs to a school's numbers to respond to particular demographic pressures in an area in a particular year.
- 4.2 When considering a TV request from a school the Department will look at the availability of places in that sector in the area within a reasonable distance of each pupil's home address. For primary schools reasonable travelling distance is defined as a distance of 2 miles. Where there are no other reasonable alternatives the Department will grant additional places.
- 4.3 It should be noted that a TV is granted on the condition that no additional accommodation will be involved. TVs are not granted to address anticipation of demand, nor a long term desire to increase the size of a school within an area. As stated at para 3.1 above a TV has been granted for the 17/18 year in respect of admissions and is also noted on the table below.

5.0 Previous TV Requests

- 5.1 Mill Strand PS has had temporary increases of its admissions numbers approved in recent years as follows:

School Year	Approved Admissions Number	Approved Enrolment Number	Temporary Variations Approved (To total of)*	
			Admissions	Enrolment
2017/18	30	232	47	-
2016/17	30	232	53	-
2015/16	30	232	-	-
2014/15	30	232	34	-
2013/14	30	232	-	-

*Numbers exclude statemented children (all year groups) and those admitted on appeal or by the ECB (year of admission only)

6.0 Other Issues

- 6.1 Accommodation – The school states that there is sufficient space for the proposed increased admissions in 2017 and 2018, but that the school will need additional accommodation from then on.

- 6.2 Demand for places – In September 2017 the school anticipates an enrolment of 242 because it currently has 44 children enrolled in its statutory nursery unit and independent playgroup whose parents have all indicated to the school that they are committed to integrated education and wish to enrol in P1 in September 2017. There is a separate development proposal (DP: 484) which seeks to increase the nursery places from 26 to 52 (*ref para 1.2 above*). It should be noted however, that, because a child attends a certain pre-school they cannot be guaranteed admission to an ‘attached’ primary school. Nursery schools are a non-compulsory phase of education, are there to provide for the wider community, and are not to be used as ‘feeders’ to any individual school. Where this is the case it disadvantages parents who choose not to opt for nursery education for their children. As such, DE strongly recommends that primary schools do not use admissions criteria related to attendance at a specified nursery/pre-school setting. SAT, therefore do not view it as prudent to speculate on the impact the creation of nursery school places may have on numbers at Mill Strand Integrated Primary School.
- 6.3 Impact on other schools – The school states that it serves the Portrush, Portstewart, Coleraine and the outlying areas and that it is the only integrated primary provider in the area. There is no alternative for parents seeking an integrated education.

7.0 Conclusion

Ultimately, the long term need for places in particular areas is for the area planning process to consider. SAT does not hold data on future demand for places and is unable to make a recommendation on whether the DP should be approved.

C] CURRICULUM, QUALIFICATIONS AND STANDARDS DIRECTORATE (CQSD)

Development Proposal Number 483

Context

- The governors of Mill Strand IPS have advised that they want to introduce a two form entry at Year 1 wef September 2017 hence the level of the proposed increase and, in the longer term, the building of a new replacement primary school to provide for a Year 1 -7 enrolment of 420 and a nursery unit for 52 places.
- The school’s 2016/17 Year 1 to 7 enrolment is 218 with an additional 27 pupils enrolled in its nursery unit. If approved, the two development proposals would realise a significant increase in the school’s admissions and enrolment effectively doubling the size of the existing school.
- The governors advise that the school was significantly oversubscribed in 2016/17 and received DE approval for a temporary variation in its Year 1 admissions number for 54 pupils in September 2016. However, there is no explanation why there was this sudden spike in demand for places at the school

given that in previous years applications had been only slightly below or slightly above the approved admissions number of 30. No evidence has been provided to demonstrate this increased level of demand for places will be sustained in future years.

- Mill Strand currently has an approved enrolment of 232. Whilst the enrolment has shown a steady increase in recent years the school has not exceeded its approved enrolment – the 2016/17 enrolment across Years 1-7 is 218.
- There are five neighbouring primary schools; three located in Portrush (2 controlled, 1 Catholic maintained) and two in Portstewart (1 controlled and 1 Catholic maintained). Per the 2015/16 enrolment statistics all five schools have surplus places – a total of 205 places across the three Portrush schools and 183 surplus places across the two Portstewart schools. There is clearly over-provision in the area which would only increase if the proposal (DP 483) put forward by Mill Strand IPS were approved in isolation.
- The school was last inspected by the ETI in February 2012 who reported that in the areas inspected, the quality of education provided in the school was ‘good’. The quality of the provision for literacy and numeracy were each reported to be ‘good’ as was the quality of the school’s leadership and management.

Conclusion and Recommendation

DP No 483 – There was a significant increase in demand for places at Mill Strand IPS in September 2016 however the school has not provided evidence to demonstrate this level of demand will be sustained in future years. In addition, there is a significant level of over-provision across the five neighbouring primary schools with some 388 surplus places in total (based on 2015/16 enrolments). Whilst acknowledging the school’s wish to provide additional places for parents seeking an integrated education for their children, this proposal, considered in isolation, would create more surplus provision in the Portrush/Portstewart area. This proposal would best be considered on an area-basis. **CQSD does not support DP No. 483.**

Development Proposal Number 484

Context

- The governors of Mill Strand IPS have advised that they want to introduce a two form entry at Year 1 wef September 2017 and, in the longer term, the building of a new replacement primary school to provide for a Year 1 -7 enrolment of 420 and a nursery unit for 52 places.
- The school's 2016/17 Year 1 to 7 enrolment is 218 with an additional 27 pupils enrolled in its nursery unit. If approved, the two development proposals would realise a significant increase in the school's admissions and enrolment effectively doubling the size of the existing school.
- The governors advise that in addition to the existing nursery unit there is an independent playgroup funded by the IEF on-site with a capacity for 20 pupils. The proposed additional statutory nursery unit would replace this independent provision and, from the governors' perspective, streamline the day-to-day operation/administration and funding of pre-school provision on the school site.
- The school was last inspected by the ETI in February 2012 who reported that in the areas inspected, the quality of education provided by the nursery unit was 'good' and had important strengths in most of its educational and pastoral provision.

Conclusion and Recommendation

DP No. 484 – This proposal would in effect replace independent pre-school provision funded by the IEF with a statutory grant-aided provision albeit creating an additional six pre-school places. **CQSD is content to support DP No 484.**

DJ IRISH-MEDIUM AND INTEGRATED EDUCATION TEAM

DP 483

Unmet Demand for integrated education

There is evidence of unmet demand for integrated education in the area, as demonstrated in the level of first preference applications to Mill Strand IPS in each of the last two years. The approved admissions number at the school is 30. As set out in Table below, the school's **first** preference Year 1 applications have been in excess of its admissions number in each of the last two years. A temporary variation to permit admissions of 53 was granted in 2016/17.

It is noted that the recent increase in demand for Year 1 places coincides with and is probably stimulated by the establishment of an independent pre-school at the school providing an additional 20 places pre-school places(in addition to the 26 place statutory nursery unit at the school). The additional pre-school places are funded by the IEF.

Sept	Approved Admissions	Applications				
		1st Pref	2nd Pref	3rd Pref	Other	Total
2017/18	30	46	2	0	0	46
2016/17	30	47	0	0	0	47
2015/16	30	24	0	0	0	24
2014/15	30	32	0	0	0	32
2013/14	30	25	1	0	0	26

There is no closely located integrated provision with surplus places. Mill Strand IPS is the only provider of integrated school provision within the area. The nearest alternative integrated primary provision is located some 13 miles away at Ballymoney CIPS.

It is notable that the level of unmet demand for Year 1 places does not amount to an annual admissions number of 60. However, a double class Year 1 entry is administratively and educationally preferable to a compromise option of an 11 class base school, which while being exactly in line with current demand, would necessitate composite classes throughout the school.

It is noted that the admissions and enrolment number proposed would be in the 15 classbase range. Given the current level of demand, IMIE can see no rationale for this and would suggest that an admissions figure of 55, which would place the school at the lower end of the 14 classbase range, would be more appropriate.

It is noted that the proposal may have an impact on admissions to other non-integrated schools in the area. However, DE's statutory duty to encourage and facilitate the development of integrated education should be given due consideration, particularly in light of the conclusions of the Drumragh judgment that DE must have regard to the Article 64 obligations when taking decisions on an area planning basis.

Having established there is unmet demand in the area for integrated education, is the expansion of Mill Strand IPS appropriate means to meet this demand?

The current approved enrolment at Mill Strand IPS is above the minimum level set out for a sustainable primary school.

The school was last inspected by the Education and Training Inspectorate (ETI) in May 2012. The ETI reported that in the areas inspected, the quality of education provided in the school was good with important strengths in most of its educational and pastoral provision.

Financial Position

As a grant-maintained integrated school, Mill Strand IPS cannot operate with a deficit of public funds.

There are no concerns regarding the religious balance at the school. In 2016/17, the number of pupils from Catholic and Protestant community backgrounds was very similar, with 30% of pupils from a Protestant community background; 29% from a Catholic community background and 41% designating as 'Other'.

Overall, whilst Area Planning Policy Team will carry out a full sustainability assessment, there do not appear to be any particular concerns regarding the appropriateness of further extending the school and its capacity to appropriately manage growth.

Other Options

The creation of additional places at Mill Strand IPS will involve additional capital investment. Mill Strand IPS has been confirmed as one of the integrated school settings which will proceed to planning as part of the proposed capital funding agreed within the Fresh Start Agreement. However, no school in the area has previously indicated interest in transformation.

Conclusion and Recommendation

The approval of the proposal to increase admissions at Mill Strand IPS will meet current unmet demand for integrated provision through expanding a viable, sustainable school, which has been found to offer good quality provision. There is no potential impact upon existing integrated provision and no other integrated option in the immediate area.

Whilst the proposal may have an impact on admissions to other non integrated schools in the area, DE's statutory duty to encourage and facilitate the development of integrated education should be given due consideration.

In light of the above factors and in line with the statutory duty to encourage and facilitate integrated education, IMIE would recommend that the proposal should be approved, with appropriate modification to admissions and enrolment in the 14 rather than 15 classbase range.

E] EARLY YEARS TEAM – INPUT ON DP 484

Background

Mill Strand Integrated Primary School currently provides 26 pre-school education places in its nursery unit, and a further 20 places in a non statutory (non-PSEP) pre-school which was established with funding from the Integrated Education Fund in September 2015. Mill Strand IPS has confirmed that all the children attending the non-PSEP pre-school in 2016/17 are target age and 22 applications from target age children for 2017/18 have been accepted.

The case for change proposes that the new additional 26 place part-time statutory pre-school education provision, if established, will be in the accommodation that the non-statutory/non-PSEP provision currently operates in. It is not explicitly stated that this non-statutory/non DE funded provision would close.

The case for change states that the main reason for seeking change is to assist the school in reducing the bureaucratic burden related with managing and governing pre-school provision under two separate funding and governance mechanisms. Other reasons given include providing equality of access to support and other services, increasing access to education of an integrated management type and enabling the setting to operate under one (LMS) management system, thus removing restrictions currently placed by the HSCT in regard to the use of the playground provision in particular.

The Case for Change states that additional provision of an integrated management type is required in the area. It claims that the estimated need in the Area Plan for the Coleraine Area “greatly underestimates the future need for integrated places” and further claims that “latest research indicates a need for 2,500 places of which a minimum of 420 will be required by Mill Strand Integrated School in addition to 52 Nursery places” (page 9 of Case for Change). The nature of the ‘latest research’ is not referenced in the case for change, nor does it elaborate on how, or by how much, need has been underestimated.

Relevant Policies

The main policies relevant to this proposal are:

To provide a funded pre-school education place for every target age child whose family want it. The case for change focuses on preferences for pre-school at Mill Strand IPS NU rather than unmet need for pre-school provision generally and claims it has been oversubscribed with first preference applications in four of the last five years (page 13 of Case for Change). Although a setting may receive a high level of first preference applications, this does not in itself indicate a shortage of pre-school education provision in an area. Pre-school education provision is made on the basis of preference, not choice, and parents are encouraged to apply for a range of settings for their child in order to maximise their chance of securing a suitable place for their child. This is considered in more detail below.

Learning to Learn – A Framework for Early Years Education and Learning - was published on 7 October 2013. Among its key actions is placing a moratorium on any new or additional full-time provision or conversion from part-time to full-time (defined as over 4.5 hours) in advance of a review of the current levels of full-time provision, existing research and the needs of children being served by it. This proposal is in line with the current moratorium.

Under the 1989 Education Reform (NI) Order, the Department of Education (DE) has a statutory duty to ‘encourage and facilitate the development of integrated education, that is to say the education together at school of Protestant and Roman Catholic pupils’. This duty is considered in more detail below.

It is the Department’s practice not to displace good quality pre-school education provision already in existence with pre-school education provision in an alternative setting. The potential impact of this proposal on existing provision is considered in more detail below.

The EYT has also considered consultation responses submitted as part of the Development Proposal process, advice from the Education Authority and population data from NISRA (See attached annexes).

A key action under the Learning to Learning framework is the removal of reception provision. Mill Strand IPS does not have reception provision. There is one setting within the five mile radius, St Malachy's PS, which has no pre-school education provision, but provided reception places in 2014/15 and 2015/16 (providing 4 and 8 places respectively).

Level of need for pre-school provision

In determining the need for pre-school education provision, the Department generally assumes a level of provision at 95% of target age children, predicated on the application rate for pre-school education places, which is c.92%, however the level of provision within local areas may be higher or lower, based on historic patterns of demand and assessment of ongoing need.

Current level of pre-school provision

The current level of pre-school education provision within both a two-mile and five-mile radius of the school is used as an indicator of current capacity to meet need for pre-school education provision and is considered alongside other factors such as population projections to determine the likely future need for additional pre-school education provision in the area.

The numbers of pre-school education places and associated percentages are measured against the Year One enrolments for the 2014/15, 2015/16 and 2016/17 academic years.

As the existing non-statutory provision at Mill Strand IPS is not PSEP provision, it is not included in the analysis below, either before or after the proposed change.

The statistical information available in relation to the level of funded pre-school education provision is as follows:-

All Pre-school provision

Level of Pre-school Education Provision – two mile radius of Mill Strand Integrated Primary School

Year	Statutory places	Non-statutory places	Reception places	Total pre-school provision	P1 places	Level of pre-school provision (%age of P1 places)	Underage children in statutory places
2014/15	26	47	0	73	93	78.5%	0
2015/16	29	38	0	67	109	61.5%	0
2016/17	27	44	0	71	110	64.5%	0
Proposed	52	44	0	96	110	87.3%	--

The level of provision within the two mile radius is currently significantly lower than the planning figure, even if the proposed statutory provision were made available. This would suggest that pre-school education in the area is insufficient to meet demand, however, the EA has advised that in each of the last two years, every target aged child in the area whose parents stayed with the pre-school admissions process to the end received the offer of a funded place, suggesting that demand in the area is currently being met with the current level of provision.

Level of Provision – five mile radius of Mill Strand Integrated Primary School

Year	Statutory places	Non-statutory places	Reception places	Total pre-school provision	P1 places	Level of pre-school provision (%age of P1 places)	Underage children in statutory places
2014/15	235	184	4	419	402	104.2	30
2015/16	239	185	8	424	423	100.2	11
2016/17	235	170	0	405	465	87.1	23
Proposed	261	170	-	431	465	92.7	-

The level of provision within the five mile radius has been above the planning figure in two of the last three years, dropping below it in 2016/17. If approved, the additional statutory provision would bring the level in the area close to the planning figure, suggesting that it may be needed to meet demand for pre-school education places. The numbers of underage children accessing pre-school education places in the five mile radius in each of the last three years, however, suggest that adequate pre-school education provision is already in place in the wider area and that additional provision may impact on other good quality provision in the area and/or further increase the number of underage children accessing pre-school education places.

Recent Changes in provision

There have been no significant changes to the pre-school education provision in this area in recent years.

In November 2014 a Development Proposal (DP298) was published which proposed the establishment of a 26 place part-time nursery unit at St Colum's Primary School, Portstewart, with effect from 1 September 2015, or as soon as possible thereafter. This proposal was considered by the then Minister in June 2015 but was not approved.

Temporary Flexibility

There were no temporary flexibility requests in the area approved for 2014/15, 2015/16 or 2016/17.

In 2015/16 Mill Strand IPS Nursery Unit made a temporary flexibility request for 2 additional places. Portstewart PS Nursery Unit was the only other setting in the five miles radius which made a request during this time, requesting 4 additional places in 2014/15. On both occasions, the EA recommended that these were not approved as sufficient places were available in the area to meet the demand for pre-school education provision.

In April 2017 Millstrand IPS Nursery Unit made another temporary flexibility request for 4 additional places for the 2017/18 school year. This was not supported by the PEG on the grounds that additional pre-school places are not required to meet a

shortfall in the area and the request was not approved. This was confirmed by DE on 5 May 2017.

Integrated Education

Under the 1989 Education Reform (NI) Order, the Department has a statutory duty to 'encourage and facilitate the development of integrated education'. The duty under the 1989 Order must be considered alongside the duty under Article 44 of the 1986 Order (the Department and boards shall have regard to the general principle that, so far as is compatible with the provision of efficient instruction and training and the avoidance of unreasonable public expenditure, pupils shall be educated in accordance with the wishes of their parents).

Pre-school education provision is not defined according to sectors (e.g. Integrated, Roman Catholic Maintained), so all pre-school education settings, regardless of location, are considered accessible to children from all backgrounds. All pre-school education settings follow the same curricular guidance the broad framework of which ensures equality of opportunity, pointing to staff acknowledging and respecting the culture, beliefs and lifestyles of the families of all children. However, it is acknowledged that parents make choices regarding pre-school education provision taking into account a wide range of factors, and in some cases parents may have a preference for pre-school education in schools with a particular management type, including an integrated management type, and this is taken into account in the EYT advice.

Mill Strand IPS is the only integrated primary school with a statutory nursery unit in the five mile radius. The case for change sets out that the setting has been oversubscribed in four of the last five years, by up to 17 applications (see table below). This suggests that parents in the area may have a preference for pre-school education provision with an integrated management type, as suggested by the case for change. This has been taken into consideration by EYT in preparing this advice, and balanced with the duty under Article 44 of the 1986 Order.

Year	First preference application	Total admitted
2012/13	31	26
2013/14	44	28
2014/15	23	26
2015/16	43	29
2016/17	38	26

Source: Case for Change

Impact on voluntary and private sector providers

The Pre-school Education Programme (PSEP) is a partnership between statutory and voluntary/private pre-school providers and both sectors are equally valued for their contribution to the education of pre-school children. Both sectors adhere to the same curricular guidelines and are inspected to the same educational standards.

In considering DPs for statutory provision, careful consideration is given to the impact of any new statutory provision on existing good quality voluntary/private providers in PSEP.

The EA has advised that the setting received 50 first preference applications at stage one of the pre-school admissions process for the 2017/18 academic year.

However, the EA has also advised that during stage one of the pre-school admissions process for the 2017/18 academic year, only 120 first preference applications have been received for some 130 funded pre-school education places in the area, suggesting that no additional provision is needed to meet the need for pre-school education places at this time.

While the historic application trends for the school suggest that it may be able to fill the requested places with target age children, it is possible that the creation of additional provision at the setting could have a detrimental effect on other providers

in the wider five mile radius, causing a decrease in the number of funded pre-school education places required in other non-statutory settings, potentially displacing good quality provision already in place and/or leading to an increase in the number of two year old children accessing provision in statutory settings.

Consultation Responses

The Case for Change states that the parents of children attending Mill Strand IPS want their children to be able to avail of pre-school education in their integrated school. Staff and governors are keen to see parental demand for integrated pre-school education provision at Mill Strand IPS met and would like the school to play a role in moving towards a shared future for all.

NICIE has expressed support for the proposal and contends that if DE was to approve the conversion of the existing (non-DE funded) playgroup at Mill Strand IPS it would represent replacement rather than displacement of an existing playgroup. However, the playgroup is not DE funded provision. It provides 20 non PSEP, non-DE funded places in 2016/17, which is below the 26 places requested in the Case for Change. The proposed additional provision is not, therefore, replacing pre-school education provision assessed by the EA PEG as needed in the area.

NICIE also set out historical and background information regarding the proposal and a brief summary of some additional points made are as follows:

- Pre-school education provision is non-sectoral in nature, whereas the Department's statistics show that few Catholics attend Controlled nursery units or schools and few Protestants attend Catholic nursery units and schools;
- The Pre-school Playgroup at the school was established to meet parental demand for places at an integrated setting;
- The main reason for seeking the change is to assist the school in reducing the bureaucratic burden related to managing and governing under two separate funding and governance mechanisms;

- Approving the proposal would create equality of opportunity in accessing services to support vulnerable children in relation to attendance, welfare, safeguarding and Special Educational Needs and Inclusion;
- The existing nursery class is oversubscribed; and
- A substantial majority of the pre-school cohort of children attending Mill Strand IPS Nursery Unit and Pre-School Playgroup enrol in P1 at Mill Strand IPS.

EA Comments

The EA has advised that it does not support this proposal. It states that currently within the relevant wards, a total of 130 funded pre-school places are available and only 120 first preference applications were received at stage one of the pre-school admissions process for 2017/18. These figures suggest that sufficient provision exists to meet current demand and any increased provision at Mill Strand IPS could displace existing good quality provision. The EA has further advised that at the end of stage two of the pre-school admissions process for 2017/18 a total of 22 funded pre-school places remain available in the area.

Summary of Key Points

- The current level of provision within the two mile radius is lower than the planning figure;
- The level of provision within the five mile radius has been close to or above the planning figure in each of the last three years;
- Underage children accessed pre-school places within the five mile radius of Mill Strand IPS Nursery Unit in each of the last three years (30 in 2014/15; 11 in 2015/16; and 23 in 2016/17);
- NISRA population projections suggest a decline in the pre-school cohort over time, with a fall of 30% in the Coleraine council area from 2017-39;
- No Temporary Flexibility requests were approved within five miles during the three academic years 2014-17 as sufficient provision was in place to meet the need for funded pre-school education places;
- Under the 1989 Education Reform (NI) Order, the Department of Education (DE) has a statutory duty to 'encourage and facilitate the development of

integrated education' which must be considered with the duty under Article 44 of the 1986 Order;

- Pre-school is non-sectoral and accessible to all, but first preference applications at Mill Strand IPS suggests a parental preference for pre-school education in schools with an integrated management type in the area;
- EA does not support the proposal and has advised that there is currently sufficient pre-school education provision in the area to meet demand and the introduction of additional places at this setting could therefore displace existing good quality provision in the area;
- Within the relevant wards, 120 first preference applications were received at stage one of the pre-school admissions process for 130 available pre-school education places for the 2017/18 academic year. At the end of stage two of the pre-school admissions process for 2017/18 a total of 22 funded pre-school places remain available in the area.

Early Years Comments

Based on the evidence and information available, the Early Years Team does not support the approval of the development proposal to establish an additional 26 part-time nursery places from 1 September 2017 or as soon as possible thereafter at Mill Strand IPS.

The Case for Change and available data on enrolments and demand, do not sufficiently evidence the need for additional pre-school education provision in the area. Although there is some evidence of parental preference in the area for pre-school education provision of an integrated management type, this must be considered alongside with the Department's duty under Article 44 of the 1986 Order.

The creation of a nursery unit as proposed could result in over provision of pre-school education places in the area, potentially displacing current good quality provision and/or increasing the number of underage children accessing statutory pre-school education places.

**Early Years (Pre-School) Team
June 2017**

List of Providers**2 Mile****Nursery Units**

3066544 Millstrand Integrated PS

Vol/Priv

3BB0367 Portrush PreSchool Community Playgroup

3CA0631 Causeway Pre-School

PS No NU

3010847 Portrush PS

3012049 Carnalridge PS

3030547 St Patrick's PS, Portrush

5 Mile**Nursery Schools**

3116215 Kylemore NS

3116263 Ballysally NS

Vol/Priv

3AB0096 St Malachy's Playgroup

3AB0130 Watt Fun Community Playgroup

3AB0248 Millburn Community PreSchool
Playgroup

3AB0260 Playhouse Activity Centre

3AB0585 Sunshine Playgroup, Coleraine

3BB0369 St Colum's PreSchool Centre

3CB0486 Stepping Stones Creche, Coleraine

Primary with NU

3012250 Portstewart PS

3016052 Harpurs Hill PS

Primary with no NU

3010892 Ballytober PS

3012237 Killowen PS, Coleraine

3012264 Millburn PS

3012284 D H Christie Memorial PS

3016252 Ballysally PS

3032231 St Colum's PS, Portstewart

3032297 St Malachy's PS, Coleraine

3033709 St John's PS, Coleraine

List of the wards considered

Atlantic

Ballysally

Castlerock

Cross Glebe

Dundooan

Dunluce

Hopefield

Macosquin

Mount Sandel

Portstewart

Royal Portrush

Strand (Coleraine LGD)

University

Waterside

NISRA local birth rates and population predictions

EYT have considered NISRA local birth rates and population predictions to identify potential future population trends in the area.

- Birth statistics by academic year for all wards which fall at least partially within a 5 mile radius of Mill Strand IPS are increasing by some 13% from 356 to 403 children in the pre-school cohort between September 2015 and September 2017 admissions.
- Population projections for 3 year olds for the Coleraine council area predict a significant drop in population in the area, with a fall of over 30% between 2017 and 2039 (726 to 504)

These figures can, however, only be indicators of the future pre-school population and do not fully take into account population migration and other factors. On that basis they are not an exact predictor of demand.

Temporary Flexibility

There were no Temporary Flexibility requests approved in the area in 2014/15, 2015/16 or 2016/17.

The following requests were not approved as the EA advised there was sufficient pre-school education places in the area to meet need:

2014/15 Portstewart PS NS 4

2015/16 Mill Strand IPS NU 2

A further request was received from Mill Strand IPS NU in April 2017 requesting 4 additional places for the 2017/18 school year. This request was not approved on the grounds that additional pre-school education places are not required to meet a shortfall in the area.

PRE-SCHOOL EDUCATION GROUP (PEG) COMMENTS ON DP 484

Does PEG support the proposal?	No
What is the potential impact if the proposal is/ is not approved? (alternatives for meeting demand/ potential for over provision)	See attached statistics. Currently within the wards a total of 120 funded pre-school places are available and in January 2017 113 1 st preference applications have been received. The figures suggest sufficient provision exists to meet current demand. Increased provision could displace existing provision.
What is the PEG assessment of need for pre-school provision for the area? Is this need currently met?	The attached statistics would suggest sufficient provision exists to meet demand.
How many 1 st preference applications were received by the setting? (usually 2 years figures but this depends on the timing of the development proposal)	2017 – 26 places 50 1 st Preferences applications 2016 – 26 places 34 1 st Preferences applications
Are there current or anticipated pressures in placing pre-school children in the area?	No
Have children been unplaced at the end of the process in previous years?	In both 2016/17 and 2015/16 there was one child unplaced in Portrush at the end of Stage 1. No further preferences given in Stage 2 so they remained unplaced.
Has demand been increasing over time but the number of places has not? Is the level of need or provision changing significantly? Eg new housing development, provider leaving PSEP	See attached statistics
Can existing voluntary/private providers expand to help meet demand? Is there potential for new providers to come on to the programme?	Existing providers can take additional funded places, if required, within their current registration.
What is the potential impact on existing good quality provision (displacement)?	The attached statistics would suggest sufficient provision exists.
If there are other development proposals in the area, how might they impact? (eg if proposal A were to be approved, would B still be required?)	No other Development Proposals.
Other comments	

NE SCHOOL CENSUS OCT 2016

28/04/2017

year-1	total enrolment	De ref	Provider Name	town	constituency	WARDNAME	rural	Pre-School Funded Places	nursery pupils	TOTAL FUNDED PRE-SCHOOL PROVISION	1st Preference applications Jan 2017	reception pupils
53	245	3066544	Millstrand Integrated Primary School	PORTRUSH	EAST LONDONDERRY	Atlantic	URBAN		26	26	50	0
23	184	3012049	Carnalridge Primary School	PORTRUSH	EAST LONDONDERRY	Dundooan	RURAL		0			0
32	278	3012250	Portstewart Primary School	PORTSTEWART	EAST LONDONDERRY	Portstewart	URBAN		26	26	29	0
32	177	3032231	St Colum's Primary School, Portstewart	PORTSTEWART	EAST LONDONDERRY	Portstewart	URBAN		0			0
		3BB0369	St Colum's PreSchool Centre	PORTSTEWART	EAST LONDONDERRY	Portstewart	URBAN	21		21	8	
		3CB0486	Stepping Stones Creche, Portstewart	PORTSTEWART	EAST LONDONDERRY	Portstewart	URBAN	10		10	7	
22	189	3010847	Portrush Primary School	PORTRUSH	EAST LONDONDERRY	Royal Portrush	URBAN		0			0
12	79	3030547	St Patrick's Primary School, Portrush	PORTRUSH	EAST LONDONDERRY	Royal Portrush	URBAN		0			0
		3BB0367	Portrush PreSchool Community Playgroup	PORTRUSH	EAST LONDONDERRY	Royal Portrush	URBAN	32		32	16	
		3CA0631	Causeway Pre-School	PORTRUSH	EAST LONDONDERRY	Royal Portrush	URBAN	15		15	10	
174	1152					Grand Total		78	52	130	120	0