

CONSULTATION REPORT

REPORT ON THE CONSULTATION RELATING TO THE PROPOSAL TO PERMANENTLY CLOSE BLACKNESS PRIMARY SCHOOL

16 December 2024

This document has been issued by Falkirk Council in accordance with the
Schools (Consultation) (Scotland) Act 2010

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1. The Proposal

Falkirk Council is proposing, subject to the outcome of the statutory consultation process, that:

- **Provision of a school at Blackness Primary School be permanently discontinued with effect from 27 June 2025, or as soon as possible thereafter;**
- **That the pupils of Blackness Primary School catchment area permanently receive their education at Grange Primary School, from 30 June 2025 or as soon as possible thereafter;**
- **That the delineated catchment area of Grange Primary School be permanently extended to include the whole delineated catchment area of Blackness Primary School from 30 June 2025; and**
- **All non-catchment Placing Request pupils currently enrolled at Blackness Primary School will be automatically enrolled at their catchment primary school if they live in the Falkirk Council area. Pupils living out with the Falkirk Council area will require a placing request to transfer to another Falkirk Council school.**

2. Reasons for this proposal

This has been proposed as it is considered by the Authority to be the best option to address the reasons below:

- For school session 2024/2025 there are 16 pupils at the school (including 10 catchment). Pupil numbers have been below the agreed threshold of 10 or less catchment pupils for 7 years (since School Session 2018/19), with no prospect, based on available data, that this would change significantly soon. The school is currently at an occupancy level of 32% of available capacity (50).
- 38% of current pupils are out-of-catchment placing requests, but this has been as high as 72% in recent years (2019/20). A number of these pupils have been from adjacent local authority areas (Edinburgh & West Lothian).
- During a previous informal consultation exercise on a mothballing proposal in 2022, several concerns were raised by the Parent Council and others in the local community, about the prospect that pupil numbers would start to rise in coming years making the school increasingly viable again. It was therefore agreed by the Education, Children and Young People Executive on 31 January 2023, that the school would not be mothballed in August 2023 and instructed the Director of Children's Services to monitor the position and update the Education, Children and Young People Executive in 2024.
- Following a review of pupil numbers in 2024, it was agreed by the Council's Executive Committee on 12 September 2024 that it would be

appropriate to move to a statutory consultation process on a proposal to close Blackness Primary School.

- This document has been issued by Falkirk Council in accordance with the Schools (Consultation) (Scotland) Act 2010.

3. Introduction

This consultation report has been prepared in accordance with the Schools (Consultation) (Scotland) Act 2010.

The purpose of this report is to:

- Provide a record of the total number of written representations made during the statutory consultation period;
- Provide a summary of the written representations;
- Provide a summary of oral representations made at the Public Meetings held on 1 and 10 October 2024;
- Provide a statement of Education Services response to those written and oral representations;
- Provide the full text of Education Scotland's report and a statement of Education Services response to this report;
- State how Education Services reviewed the above proposal with regard to the representations received during the statutory consultation period and the report from Education Scotland;
- Provide details of any omission from, or inaccuracy in, the Proposal Paper and state how Education Services acted upon it;
- Explain the opportunity that may arise to make representation to the Scottish Ministers in connection with Section 15(4) of the Schools (Consultation) (Scotland) Act 2010.

4. Background

The 2010 Act's principal purpose is to provide strong, accountable statutory consultation practices and procedures that local authorities must apply to their handling of all proposals for school closures and other major changes to schools. These consultation processes are expected to be robust, open, transparent and fair, and seen to be so. They are also expected to be consistent across Scotland.

The 2010 Act makes special arrangements in relation to rural schools and establishes a presumption against the closure of rural schools. The result of this is that education authorities must have special regard before formalising a proposal to close a rural school and in consulting on and reaching a decision as to whether to implement a rural school closure proposal.

These duties are outlined in the Schools (Consultation) (Scotland) Act 2010 and the accompanying Statutory Guidance.

The term “rural” is applied to schools as follows:

- Very Remote rural - areas with a population of less than 3,000 people, and with a drive time of over 60 minutes to a settlement of 10,000 or more
- Remote Rural - areas with a population of less than 3,000 people, and with a drive time of over 30 minutes but less than or equal to 60 minutes to a settlement of 10,000 or more
- Accessible rural - areas with a population of less than 3,000 people, and within a drive time of 30 minutes to a settlement of 10,000 or more

Blackness Primary School is defined as “accessible rural” which means it is within 30 mins drive to a settlement of 10,000 people which is easily the case with both the settlements of Bo’ness and Linlithgow, which are both under 15 minutes’ drive from Blackness.

On 12 September 2024, Executive Committee agreed to commence statutory consultation on a proposal to close Blackness Primary School in accordance with the Schools (Consultation) (Scotland) Act 2010.

Education Services published a Proposal Paper on 12 September 2024 (Appendix 1), including an Educational Benefits Statement, financial information and an explanation of the reasons for the proposal; alternatives to the proposal and the authority’s assessment of these and the reasons why the authority considers the implementation of the proposal the most appropriate response to the reasons for the proposal.

Educational benefits of this proposal are set out in section 9 of the Proposal Paper.

By highlighting the benefits of Grange Primary School in the Educational Benefits Statement, Education Services is not implying that many of these benefits do not already exist in Blackness Primary School. The benefits are being considered when looking at the proposal in terms of what would be provided in the rezoned catchment of Grange Primary School.

5. Consultation Process

The Proposal Paper was published on 12 September 2024 on the Falkirk Council website.

A copy of this document was provided to:

- Parents and carers of all primary and nursery age pupils living in the catchment areas of Blackness and Grange Primary Schools

- Blackness and Grange Primary School Parent Councils
- School staff and trade unions at both schools
- Blackness and Bo'ness Community Councils
- Blackness Community Hall Management Committee
- All other households in the Blackness Primary School catchment area
- Elected Members of Falkirk Council
- MSPs for the area
- The constituency MP
- West Lothian Council
- The Community Planning Partnership

A copy of this document was also available on request, free of charge, from:

- Children's Services, Suite 1A, Falkirk Community Stadium, 4 Stadium Way, Falkirk, FK2 9EE
- Blackness Primary School, Blackness Road, Blackness, Linlithgow, EH49 7NP
- Grange Primary School, Grange Loan, Bo'ness EH51 9DX

The document was also available on request in alternative formats or in translated form for readers whose first language is not English.

A Notice of Consultation was emailed to the consultees listed above (and posted to the "other households in Blackness") on 16th September 2024 (Appendix 2). This provided details of how to access the Proposal Paper and Educational Benefits Statement; how to submit responses via Falkirk Council website and in writing; and the date of the in person public meeting and the online public meetings.

The Notice of Consultation, the Proposal Document and the Public Meetings were advertised on the Council's Participate+ platform, in the local newspaper (the Falkirk Herald) and supported by local targeted digital advertisement through Facebook.

The Consultation was undertaken over a 6-week period from 16th September to 8 December 2024.

The online survey allowed members of the public to review the consultation documents and submit their responses online.

Education Services officers attended an online meeting with representatives of Blackness Community Council, Blackness Parent Council and The Blackness Community Hall Management Committee on 01 October 2024.

An in person public meeting took place in Blackness Community Hall on 1 October 2024, 18:30pm.

A second public meeting took place online using Microsoft Teams on 10 October 2024, 18:30 pm.

The Director of Education and Head of Education engaged with the children of Blackness Primary School on 30 November 2024.

The Headteacher of Blackness Primary School and Grange Primary School engaged with pupils through their class teacher to collate their responses to the proposal.

This Consultation Report contains Falkirk Council's response to the issues raised regarding the proposal during the consultation exercise. It will be published on Falkirk Council's website for a period of no less than 3 weeks prior to the final consideration of the proposal at Executive Committee on 13 February 2025.

6. Pupil Engagement

Pupils' views are a significant part of the consultation process. A summary of comments made by:

Blackness Primary School pupils

Blackness Primary School pupils were asked about how they feel about the proposed closure of Blackness Primary School. None of the pupils at Blackness Primary School were in favour of the school closure proposal. Their responses are summarised as:

- Will miss friends
- Won't be able to cycle/walk to school
- Will miss the teacher
- Feeling sad
- Larger class/school will be too loud
- Will miss the school trips
- Likes the one-to-one attention the teacher gives them

Grange Primary School pupils

39% of Grange Primary School pupils were in favour of the proposal. Grange Primary School pupils were asked about how they feel about the suggested closure of Blackness Primary School proposal. Their responses are summarised below:

- Blackness pupils will have more opportunities to make friends
- Grange pupils looking forward to making new friends
- It will save a lot of money
- More opportunities to learn such as sports
- A good education at Grange Primary School
- Pupils will be around children their age
- Pupils can experience a bigger school
- Not many pupils at Blackness Primary School
- Concerns that Blackness pupils will struggle to fit in a new school
- Concern the pupils at Blackness Primary will be sad to lose their school

21% of the Grange Primary School pupils were not in favour of the school closure. When asked about how they feel about the proposed closure of Blackness Primary School their responses are summarised as:

- Concern Blackness pupils might be anxious about attending a new school
- Additional travel time pupils will take to go to school
- Feeling bad for the Blackness pupils
- Blackness is a nice area
- Pupils will be split up from their friends
- Children should go to a school near them

- They get more one to one time
- Blackness pupils will be attached to their school and not want to leave

See Appendix 3 for the full detail of pupil responses.

7. Responses to the Consultation Exercise

7.1 Summary of Consultation with Parent Councils and Response

A formal response was received by Blackness Primary School Parent Council. The Parent Council was not in support of the proposal. The main points raised in their response were as follows:

- Concerns over children's mental health and education
- The parent council is actively involved in activities within the school and within the community of Blackness.
- Concern on how the closure of the school will impact the local community
- Environmental impact with increased traffic on the roads if the proposal was to go ahead
- Children might be anxious travelling to a new school
- The Council should instead review schools with less catchment children

The full response from Blackness Parent Council is available in Appendix 4.

7.2 Summary of Consultation with Community Councils

A formal response was received by Blackness Community Council and Bo'ness Community Councils. Blackness Community Council was not in favour of the proposal and Bo'ness Community Council was in favour of the proposal.

Blackness Community Council

The main points raised in the response from Blackness Community Council included:

- The detrimental impact the closure of the school will have on the community, families and children
- It will have a negative impact on children's education and mental health
- No financial benefit
- The impact the closure will have on the community hall
- Additional cost to parents to transport children to school
- Environmental impact with additional traffic on the roads

Bo'ness Community Council

The main points raised in the response from Bo'ness Community Council included:

- Disproportionate use of council funds when more populated schools suffer with a lack of funding to support Bo'ness primary pupils educational needs
- Funds should be re-directed to other schools within Bo'ness to meet teacher allocation and additional support needs

The full response from each Community Council is available in Appendix 4

7.3 Summary of Consultation with Blackness Community Hall Management Committee

The management committee was represented at the pre-meeting and public meetings on 1 October 2024.

- Oral representation made by the management committee was to report concern about the viability of the hall should the proposal go ahead.

7.4 Summary of consultation with Staff and Response

Staff at Grange Primary School who responded were in favour of the proposal (100%). However, Staff at Blackness Primary school who responded were not in favour (100%).

Key themes from Blackness Primary School staff included:

- Several staff members expressed anxiety over losing their jobs
- Staff believe pupil numbers might grow
- Staff expressed a strong emotional attachment to Blackness as a workplace and emphasised it's unique and positive environment.
- Concern was raised about moving pupils into a larger classroom as they are used to the smaller and more personal teaching approach.
- Acknowledgement of potential social benefits which included greater exposure to a wider range of peers and opportunities to participate in larger group activities
- The effect of travel arrangements including the longer travel distance for children and an increase in transportation costs for families and for the council.
- Staff proposed creating a nursery to drive enrolment for the future.
- There is acknowledgement of the Council's financial challenges.
- Staff value the personalised teaching style in smaller class sizes and feel larger class sizes may negatively affect students' educational experiences.

Key themes from Grange Primary School staff included:

- Staff appear confident that the increase in student numbers won't overwhelm resources.
- Staff seem aware of the social and cultural adjustments required for a seamless transition, which could require additional effort from educators and support staff.
- It was recognised by staff the financial challenges the Local Authority has. There were broader concerns about funding for education, resources, or potential budget cuts that could indirectly affect staff.
- Many responses emphasise the benefit of learning alongside more children, allowing children to form new friendships and interact with a greater number of peers of the same age.
- Attending a larger school offers age-appropriate interactions that could improve children's emotional well-being and social development.
- Responses highlight that children will benefit from learning alongside peers of similar ages, with narrower ranges in ability levels.
- Larger class sizes are seen as beneficial for group learning activities, which could deepen understanding through collaboration
- Larger schools provide access to more extracurricular options, including after-school clubs and sports.
- Responses suggest that children will benefit from a more diverse curriculum, particularly in subjects like STEM, literacy, and numeracy.
- Being part of a larger primary school is seen as better preparation for the transition to secondary education, which involves larger, more diverse student populations.
- Exposure to a "busier" environment is viewed as equipping students for the demands of high school and beyond.

7.5 Summary of Oral Representations made at the Public Meetings and Response

The total number of consultees who attended the Public Meetings was 68.

- 1 October 2024 – In Person meeting at Blackness Community Hall attended by 58 people
- 10 October 2024 – Online meeting attended by 10 people

The issues raised at the public meetings by consultees are grouped by key themes which are summarised below, and a Minute of each meeting is included in Appendix 6.

- Education benefits of moving from Blackness Primary School to Grange Primary School
- Class sizes and individualised learning available at Blackness Primary School
- Shared leadership and equity of resources available to both primary schools
- Impact of local housing developments on Grange Primary School capacity
- Financial justifications and cost savings

- Support for neurodiverse pupils and those with other additional support needs
- Effectiveness of smaller classes for pupil achievement
- Opportunities to promote Blackness Primary School
- Impact of the proposal on the local housing market in Blackness
- Lack of consideration of alternative options to the proposal
- The proposal should highlight benefits of Blackness Primary School
- Impact on the sustainability of the Blackness Village community
- Loss of active travel options for Blackness pupils

7.6 Summary of representation made through the online survey

There were 134 responses to the online survey.

Table 1: Total number of responses by type of respondent

Type of Respondent	Number of Responses
Individuals	131
Groups and Organisations	3
TOTAL	134

Table 2: Analysis of All Individual Respondents

Type of Respondent	Number of Responses	%
Parents	34	26%
Staff	16	12%
Pupils	2	2%
Resident within Blackness and Grange Primary School Catchment	33	25%
Others	46	35%
TOTAL	131	100%

Table 3: Analysis of All Organisation Responses

Type of Organisation	Number of Responses	%
Community Councils	2	67%
Parent Council	1	33%
TOTAL	3	100%

7.7 Number of respondents in favour of the proposal, or not

The percentage of the 134 online responses agreeing to the proposal, or not are shown in table 4.

Table 4: Do you agree to the proposal?

Respondents' relationship to the school	Do you agree with the Proposal?			
	No	Yes	No	Yes
Parents	79%	21%		
Parent/Carer of pupil(s) at Blackness Primary School	100%	0%	19	0
Parent/Carer of pupil(s) at Grange Primary School	36%	64%	4	7
A parent/carer of an early years aged child affected by the proposal	100%	0%	4	0
Staff				
Staff at Blackness and Grange Primary Schools	19%	81%	3	13
Young person	100%	0%	2	0
Residents	85%	15%		
Resident within the Blackness Primary School Catchment area	100%	0%	19	0
Resident within the Grange Primary School Catchment area	64%	36%	9	5
Other	96%	4%		
Family member attends Blackness Primary School	100%	0%	22	
Other	92%	8%	22	2
Group/Organisations	67%	33%		
Blackness Community Council	100%	0%	1	
Blackness Primary School Parent Council	100%	0%	1	
Bo'ness Community Council	0%	100%		1
Overall Total	79%	21%	106	28

The full response from individuals and groups/organisations can be read in Appendix 4, Appendix 5 and Appendix 8.

7.8 Summary of online comments received in favour of the proposal, or not

There were 131 individual responses to the online survey, 27 respondents (21%) were **in favour of the proposal**.

The individual responses in favour of the proposal were focused on:

- The financial savings the Council will make
- The cost per pupil compared to other schools in Falkirk

- Educational Benefits of attending a larger school:
 - wider experience Blackness pupils will receive at Grange Primary School
 - the transition to Bo'ness Academy will be less challenging for some pupils
 - the benefits of peer group learning
 - would enhance social skills and relationships across peer group
 - more opportunities to access clubs and activities within peer group settings
 - pupils will have access to specialist teaching staff at Grange Primary School
- Concern over the number of non-catchment children attending a Falkirk Council School
- Difficulties for one class teacher to plan and teach pupils across 5 different year stages
- Improve community relationships between Blackness and Grange

From the 131 individual responses to the online survey, 104 respondents (79%) were **not in favour of the proposal**.

The individual responses that were not in favour of the proposal were focused on:

(a) Education and learning experience

Many of the respondents who have previously attended or currently have children or family members attending Blackness Primary School speak highly of the positive learning and experiences from attending the school.

- Parents prefer the smaller class setting for their children
- Individual learning experiences a pupil receives
- Outdoor learning experiences
- Parents want their children to be educated in a rural school setting
- Benefits of children learning with pupils across different year stages
- Blackness Primary School Pupils have a close relationship with each other.
- The positive impact the children have within the local community
- Children participating in community activities
- That the Council should be promoting Blackness Primary School as an asset rather than closing it.
- Children have an emotional attachment to Blackness Primary School

(b) The impact on the Community

One of the key themes arising in the survey concerned the impact that the school closure would have on the community.

- The school is regarded as the “heart of the community”
- Events/activities run by Blackness Primary School are supported by residents within the catchment area
- Pupils are actively involved in the community such as distributing food parcels and beach cleans
- Not having a school in the area will impact on peoples’ decisions to move to Blackness
- It is the only Council building left in the area
- Concern the building will become derelict if the school closes
- Children will lose their ties with the community

(c) Community Hall

Respondents were concerned over the future of the Community Hall.

- The car park at the school is used for the community hall
- Loss of income from the primary school if it closes
- Viability of the community hall if the school closes

(d) Impact on families

Parents who are currently at the school raised concern on the impact this will have on their family. This includes the following:

- Impact on transporting children to Grange Primary School
- Impact on childcare arrangements
- Longer travel time to get to and from Grange Primary School
- If the school closes, parents can’t walk their child to school anymore
- May impact on employment arrangements
- The impact the school closure process has on the mental health and wellbeing of pupils
- The school provides a place for parents to meet and support each other
- Closing a rural school reduces parental choice
- Children's mental health and well-being are being affected by the proposal to close Blackness Primary School

(e) Grange Primary School

One of the themes within the consultation responses was concerning Grange Primary School. Concerns were raised over:

- Overcrowding at Grange Primary School
- Concern about the community growth within the Grange Primary School Catchment
- Traffic around Grange Primary School
- Pupils from Blackness going into a larger class and school
- Parents raised concern over children’s anxiety about going from a smaller to larger class setting and a different school.

- Some parents raised concern regarding the attainment and attendance levels of Grange Primary School

(f) Travel and Accessibility

The main themes arriving around travel and accessibility included:

- Children will have further to travel to school
- Closing the school doesn't allow for active travel
- A longer day for children
- Reliability of the bus
- Unsafe roads for children to wait for transport
- There is poor public transport
- Children's anxiety at travelling on a bus without parents
- Cost of travel
- May impact on children's after-school activities
- Children will be left unattended in the playground when the bus drops them off at Grange

7.9 Summary of responses about the reasonable alternatives considered

The Proposal Paper identified alternative options to the proposal. Each of these have been further reviewed and assessed considering consultation responses. Respondents were asked to consider the alternative options and suggest any alternative which the local authority should consider.

Where respondents expressed a preference, the following table shows the options considered most viable. It should be noted that these percentages do not reflect overall opinion on the proposal from those that responded (i.e. more than 39% of those responding were in favour of keeping the school open). What it does reflect is that rezoning was the most favoured alternative to closure, other than just keeping the school open.

Options	% of responses in favour
Option 1 - Open nursery provision in Blackness Primary School	16.2%
Option 2 - Increase occupancy through rezoning and extending the catchment area of Blackness Primary School	33.1%
Option 3 - Reallocate available capacity in Blackness Primary School for other purposes	7.0%
Option 4 - Mothball Blackness Primary School	4.2%
Option 5 - Blackness Primary School remains open	39.4%

Alternative options suggested by respondents included:

- (a) Blackness Primary School to become an outdoor learning school
- (b) Relocate a year stage from another school to Blackness Primary School to enhance pupils learning and increase the occupancy rate.
- (c) Become an Additional Support Needs school
- (d) Promote Blackness Primary School as a positive asset to other parents
- (e) Provide bus service from Bo'ness to Blackness to allow parents the option to go to Blackness Primary School.

Respondents who were in favour of the proposal suggested the following:

- Sell the building and re-invest the funds back into education
- Close Blackness due to the financial costs
- Increase the capacity at Grange Primary School to support the growth of the school
- Provide wrap around care at Grange Primary School

The full response to this question can be read in Appendix 8.

8. Education Services Response to the Main Issues Raised

Questions and statements received through the representations made through the consultation period fell into the following main themes:

- (a) Education and learning experience
- (b) Inaccuracies
- (c) The impact on the community
- (d) Grange Primary School
- (e) Travel and accessibility
- (f) Additional Support Needs
- (g) Promotion of Blackness Primary School

(a) Education and learning experience

Statement: The educational benefits of going from a smaller rural school to a larger school outlined in the proposal were disputed.

Response: Grange Primary School offers a vibrant and dynamic learning environment that provides pupils with opportunities that extend beyond what can be offered in a small, rural setting like Blackness Primary School. While Blackness is highly valued by its community and provides a caring and supportive atmosphere, the significantly larger pupil roll at Grange allows for a more diverse peer group, which is crucial for developing social and collaborative skills. Grange pupils benefit from access to increased specialist teaching staff, broader extracurricular opportunities, and a wider range of resources, including enhanced facilities for sports, arts, and STEM activities. These experiences better prepare pupils for the transition to secondary education by fostering resilience, adaptability, and teamwork in a setting that

reflects the more varied environments they will encounter in the future. While the individualised attention at Blackness has been appreciated, the educational benefits at Grange offer pupils the chance to thrive academically, socially, and emotionally in a larger, well-resourced community of learners.

(b) Inaccuracies

Statement: Inaccuracies in the financial report within the consultation proposal document

Response: The closure proposal in May 2024 stated a cost per pupil of £32,388 based on a roll of 10 pupils in 2022/23. Following comments received from parents reading the proposal on the agenda it was recognised that the appended financials overstated the teacher staffing cost in Blackness Primary School when checking against the staff timetable. This came from an entry in the Council's financial ledger which coded 100% teaching costs to Blackness Primary School that should have been apportioned in part to the shared school, Grange Primary.

The paper was subsequently withdrawn because of the timing of the UK General Election announcement before any corrections could be tabled.

The closure proposal was resubmitted in September 2024 stating a cost per pupil of £25,004 based on a roll of 11 pupils in 2023/24. Staffing costs used were sourced from the ledger, cross checked with staffing allocations and school timetabling and confirmed by the Headteacher. It is worth commenting that discretionary teacher staffing allocated to the sector was reduced in 2023/24 which resulted in a reduced teacher resource allocation to Blackness Primary School.

Statement: It was claimed that the School Roll Projections are inaccurate, and that school rolls will increase beyond that indicated in the proposal document.

Response: School rolls have been projected based on the number of pupils currently at the school and the pre-school age children known to be living in the catchment area (this data is supplied annually by the Forth Valley Health Board for all Falkirk Council primary school catchments). In recent years the projections have been accurate and there is no reason to expect that this will change. Out of catchment placing requests have declined in recent years and there has been a low demand for places at the school relative to the actual primary population living in the Blackness PS catchment area. It is known that a significant proportion of primary aged children attend schools in Linlithgow. It is worth noting that there were 8 primary 1 age pupils living in the catchment and only 1 enrolled at Blackness Primary School. In August 2023 there were 4 primary one age pupils and only 2 enrolled at the school. Currently there are 26 primary aged pupils living in the Blackness Primary School catchment and only 10 of them are enrolled at the school. All things considered, the projected modest increase in the catchment school roll over the coming 3-4

years is what should be expected based on known children and established trends in parental choice.

(c) The impact on the community

Statement: There was concern over the detrimental impact that the school closure will have on the Community Hall and the local community in general

Response: The closure of the school will not have implications for the use of the hall by the community. However, Education Services paid £5,280 for the use of the hall in 2023/24 for the use of the hall during the school day. This is set out in the Appendix 1 of the Proposal Paper. Should the proposal be agreed, Education Services would continue to make payment on same terms for a period of 3 years to assist the management committee while alternative funding opportunities are developed.

(d) Grange Primary School

Statement: High occupancy rates at Grange Primary School and the community growth in the area and how that impacts the occupancy rates at Grange Primary School.

Response: Grange Primary School can comfortably accommodate the small increase from catchment pupils (current and projected) attending Blackness Primary School if it is closed. Any future housing growth in the East Bo'ness area will be subject to financial planning obligations that will be used to increase primary school capacity as required.

Statement: Some parents raised concern regarding the attainment and attendance levels of Grange Primary School.

Response: All primary schools across Falkirk are provided with their attainment and attendance data and this is monitored regularly across the school year. The Headteacher of Grange Primary School is responsible for focusing on improvement across both these areas and this is reflected in the school's improvement plan. Data shows that Grange Primary School are in line with or above their comparator schools and national expectations across all areas of literacy and within numeracy and continue to demonstrate improvement every year. Their attendance is currently higher than the Authority primary average.

(e) Travel and accessibility

Statement: Blackness pupils would require a longer journey to school and some pupils will lose the option for active travel to a local primary school.

Response: Blackness Primary School is classed as "accessible rural" as noted in section 4 of this report. This means it is within 30 minutes of the nearest settlement of 10,000 people or more.

Most pupils are already using a school bus, and whilst journey times will increase, it would be 15-25 minutes each way, so only an additional 10 minutes at most compared to the current provision.

A similar bus journey is already required for secondary pupils in Blackness. Education Services is content this distance, and the travel times involved, are well within the range which currently exists for other pupils across Falkirk who are offered school transport.

It is, however, acknowledged that primary age pupils in Blackness would no longer be able to walk (or cycle) to school if Blackness Primary School closes.

(f) Additional Support Needs

Statement: Potential loss of support for Neurodiverse and Pupils with Additional Support Needs currently provided at Blackness Primary School.

Response: All primary schools in Falkirk are provided with their staffing allocation on an annual basis which includes Support for Learning Teaching staff and Support for Learning Assistants. All schools also have an identified Educational Psychologist who works directly with them to support identified children with additional support needs and have access to Falkirk's ASN service as required. As allocations are primarily based on school roll, the level of staffing allocation is higher in a larger school. As a service, a range of professional learning opportunities are offered regularly with a particular focus on ensuring all staff are confident when supporting children and young people with additional support needs. This includes working with key professional partners, both for individual pupils and across the service. Within Grange Primary School, staff have a wide range of experience and currently support children with additional support needs well. All schools across Falkirk are experienced in dealing with neurodiverse children across all stages and their practice reflects this. Grange Primary School have an Enhanced Provision within the school which supports children with a higher level of need that require individualised planning to enable them to access the curriculum and engage in learning. There is therefore a highly skilled workforce within the school who have significant experience of planning for children who require additional support, ensuring an inclusive, nurturing approach is embedded across the school.

(g) Promotion of Blackness Primary School

Statement: Falkirk Council should be promoting Blackness Primary School as a smaller rural school to encourage numbers to increase.

Response: The Council does not promote schools with a view to increasing out-of-catchment placing requests. These are accommodated at all schools where capacity allows, and in accordance with legislation, but additional classes and teaching resources are not assigned to schools to increase available spaces for out-of-catchment pupils. Council resources are optimised to meet catchment pupil demand for schools.

9. Education Scotland Report

In line with the requirements of the Schools (Consultation) (Scotland) Act 2010, a report was provided by Education Scotland on the educational aspects of the Proposal to close Blackness Primary School. This report is attached as Appendix 9.

In preparing this report, HM Inspectors undertook the following activities:

- attendance at the online public meeting held on 10 October 2024 in connection with the council's proposals;
- consideration of all relevant documentation provided by the council in relation to the proposal, specifically the educational benefits statement and related consultation documents, written and oral submissions from parents and others; and
- visits to the site of Blackness Primary School and Grange Primary School, including discussion with relevant consultees.

The Education Scotland report is attached in full at Appendix 9.

The report findings can be summarised as follows:

- (a) HM Inspectors agree that there are potential education benefits that children can experience if the proposal goes ahead. HM Inspectors also recognise that the context for learning in Blackness Primary School provides experiences that the children who attend and their parents value. In coming to a final decision, the council should consider fully its justification of the educational benefits of one context for learning over another.
- (b) The stakeholders who will be affected most by a decision to close Blackness Primary School all oppose the proposal. However, a minority of stakeholders who responded to the consultation agree that the proposal represents the best value for educational purposes. Parents and children at Blackness Primary School are concerned about the potential negative impacts on their child if the school closes. If the proposal is approved, the council will need to ensure that children and families are well-supported in their transition to Grange Primary School.

9.1 Falkirk Council's Response to Education Scotland's Report

Falkirk Council welcomes the report from Education Scotland and accepts its findings. The authority response to the findings obtained within the Education Scotland Report is as follows:

(a) HM Inspectors agree that there are potential education benefits that children can experience if the proposal goes ahead. HM Inspectors also recognise that the context for learning in Blackness Primary School provides experiences that the children who attend and their parents value. In coming to a final decision, the council should consider fully its justification of the educational benefits of one context for learning over another.

Response: Whilst Falkirk Council Education Services acknowledges that the level of provision offered at Blackness Primary School is appropriate for the children who attend, it is also acknowledged that the experience offered at Grange Primary School will bring a wider range of opportunities for children, both educationally and socially. Whilst there is a concern that class sizes will be larger, the children from Blackness will have the opportunity to work alongside a greater number of peers of the same age and stage, providing valuable opportunities for collaborative learning, peer interactions and the development of friendship groups. The single class at Blackness is currently multi composite due to the small number of pupils, currently only in the primary 1 to primary 5 year stages, which reflects a trend in recent years for Blackness pupils to move elsewhere in Primary 6 and 7. This can limit the opportunities that can be provided, and children can often be working as an individual within many aspects of their learning. Providing appropriate support and challenge for all requires a heavily differentiated approach by staff working with the pupils. Given the greater number of staff, with a range of areas of expertise, opportunities will be increased for participation in both classroom learning and wider achievement activity within an environment which has identified learning spaces to support the delivery of sports, expressive arts and school performances. The experiences provided in a larger primary school setting, with a more diverse school community will better prepare pupils for the transition to secondary education by fostering resilience, adaptability, and teamwork in a setting that reflects the more varied environments they will encounter in the future. While the individualised attention at Blackness has been appreciated, the educational benefits at Grange offer pupils the chance to thrive academically, socially, and emotionally in a larger, well-resourced community of learners.

(b) The stakeholders who will be affected most by a decision to close Blackness Primary School all oppose the proposal. However, a minority of stakeholders who responded to the consultation agree that the proposal represents the best value for educational purposes. Parents and children at Blackness Primary School are concerned about the potential negative impacts on their child if the school closes. If the proposal is approved, the council will need to ensure that children and families are well-supported in their transition to Grange Primary School.

Response: If the proposal was approved, effective transition would be a strong feature within the process which would include activities involving key staff across both settings. The Headteacher is well placed to organise and coordinate a transition programme given her leadership across both Grange Primary and Blackness Primary. Familiar staff, who already have strong relationships with the pupils, will ensure there is an equal focus on both academic and pastoral needs during the transition period and when children

are settling into a new setting. For pupils who choose to transition to a different school setting, a planned transition programme will also be implemented, ensuring close partnership working with any receiving school.

10. Rural Schools – Compliance with Section 9(1) of the Schools (Consultation) (Scotland) Act 2010

Following receipt of Education Scotland's report, education officers carried out a further review of the proposal having regard to representations received during the consultation period.

Education Services has reviewed the proposal and each of the reasonable alternatives to it as set out in the Proposal Paper which identified 5 options:

- Option 1 - Open nursery provision in Blackness Primary School.
- Option 2 - Increase occupancy through rezoning and extending the catchment area of Blackness Primary School.
- Option 3 - Reallocate available capacity in Blackness Primary School for other purposes.
- Option 4 - Mothball Blackness Primary School.
- Option 5 - Blackness Primary School remains open

These options have been further reviewed and assessed below considering consultation responses.

Other options suggested by respondents to the consultation are:

- (a) Create overlapping catchment areas in Muirhouses/Carriden Brae and the new housing development in East Bo'ness to give parents options and increase the school roll.
- (b) Relocate a whole year group to Blackness Primary School to allow them to experience the rural school and boost pupil numbers
- (c) Accommodate outdoor learning provision
- (d) Use the building as an Additional Support for Learning setting.

An assessment of the new alternative options (a) and (b) are addressed in section 10.2 below, and options (c) and (d) in section 10.3.

10.1 Open nursery provision in Blackness Primary School

Effect on education benefits

It was stated during the consultation that opening a nursery provision in Blackness Primary School will drive enrolment for the future.

While creating a nursery class is an option, the expected low catchment demand for primary places suggests that there would be insufficient numbers to initiate and sustain a nursery class.

Blackness Primary School is not immediately suitable for pre-5 provision regarding indoor and outdoor facilities. The school would require appropriate toilet and nappy changing facilities to meet Care Inspectorate regulations.

The school building does not have the appropriate facilities or space to develop these as well as function as a small school.

Effect on the local community

Adding a nursery provision is unlikely to add to the sustainability of the community and although some respondents felt that a nursery would increase pupil demand, there is not sufficient numbers to offer this.

The introduction of a nursery provision would have a neutral impact on the availability of the premises for use by the community who favour the use of the community hall next door anyway.

Effect on travel arrangements

Primary school pupils are mainly provided with free school transport to Blackness Primary School, and this would remain the case if they were transferred to Grange Primary School. Nursery pupils are not offered free transport and are mainly transported by car. This would not change if a nursery were to open at Blackness Primary School, although some may walk to the new provision.

Summary of Review

In summary, Education Services remains of the view that the low projected uptake, requirement for suitable adjustments to Blackness Primary School and availability of nearby alternative provision in Bo'ness means that it does not assess this to be a reasonable alternative option.

10.2 Increase occupancy through rezoning and extending the catchment area of Blackness Primary School

Effect on Education Benefits

It was stated during the consultation that Education Services should relocate a year stage from another school to Blackness Primary School to enhance pupils learning and increase the occupancy rate. Blackness has capacity for 50 children. Education Services does not believe that introducing a full year group from another school can practically be accommodated.

Similarly, the suggested increase in catchment area to accommodate eastern areas of Bo'ness including the new housing development is unlikely to be sustainable at such a small rural school.

The suggestion for overlapping school catchments with Blackness Primary School would have the same effect, but school place planning would be less easy to predict if parents had dual choices that could not be managed in the same way as placing requests

Effect on travel arrangements

A catchment review can in principle be a reasonable option in some cases, to increase the sustainability of a school. However, the geographical location of Blackness means the only option for increasing the catchment is to extend the existing catchment area of Blackness Primary School to towards Bo'ness in the west.

This would mean rezoning the nearest area of Bo'ness (Muirhouses/Carriden Brae) which is over 2 miles away from Blackness but within walking distance to Grange Primary School. There are currently only 11 primary aged pupils living in these semi-rural localities, so any proposed rezoning would also need to consider the more densely populated areas even closer to Grange Primary School to have the necessary impact on the pupil roll at Blackness Primary School.

It was also suggested during the consultation that new housing developments could be rezoned to Blackness Primary School catchment. This would have the same effect as rezoning established communities that can currently walk their children to school to a school where bus transport would have to be provided.

Effect on the local community

For the reasons outlined above, a rezoning would disrupt an existing community in Bo'ness and have a neutral impact on the availability of the school premises for the local community (as detailed above in section 10.1).

Summary of Review

In summary, Education Services stated in the proposal paper that there are no viable options for increasing the pupil roll of Blackness Primary School. Any proposal to do so would be disruptive to families living in Bo'ness and likely to face opposition. Education Services remains of this view and has assessed that this is not a reasonable alternative option.

10.3 Reallocate available capacity in Blackness Primary School for other purposes

Effect on education benefits

It was stated during the consultation that capacity in Blackness Primary School could be used to accommodate outdoor learning provision or an additional support needs (ASN) setting.

Blackness Primary School is a small school with a maximum capacity of 50 pupils. The school currently uses all the available indoor and outdoor space, even with the limited numbers of pupils. Removal of this space would detract from the education benefit of the small school experience so valued by the community.

Education Services have considered alternative use as stated by respondents to the consultation and assess that:

- (a) outdoor learning is already mainstreamed in schools and is supported with excursions where needed; and
- (b) there is no requirement for a new additional support needs school in this location.

Effect on travel arrangements

This option presents no change to travel arrangements for pupils currently attending Blackness Primary School.

Effect on the local community

This was well covered in the Proposal paper with respect community resources available elsewhere. Responses from the local community during the consultation did not suggest alternative uses, other than the educational ones which are addressed above.

Summary of Review

In summary, Education Services stated in the proposal paper that the location of Blackness Primary School at the eastern extremity of the Falkirk Council area, the space availability within the school and the nearby community hub for access to other Council services means the Education Service does not consider this to be a reasonable alternative option.

Education Services assesses this to remain the case

10.4 Mothball Blackness Primary School

Analysis of responses indicates that of all the options tabled in the proposal paper this is the least preferred. On further assessment, there is nothing to add following the consultation on the **effects on education benefits, travel arrangements or local community**.

Summary of Review

In summary, Education Services stated in the Proposal Paper that the previous proposal to mothball in 2022 was met with opposition by those who responded to the consultation. The Scottish Government Statutory Guidance advises that mothballing a school is only appropriate for a temporary period. If parents oppose this, they should not be denied access to consultation thus it would be appropriate to move to a statutory consultation process on closure. Mothballing the school in anticipation of increased pupil numbers is therefore not considered a reasonable alternative by the Education Service.

Education Services reassessed this to remain the case.

10.5 Blackness Primary School remains open

Effect on education benefits and the local community

Responses to the consultation indicate overwhelming support to this option from the Blackness Primary School and wider Blackness community, stating

concerns about the impact closure would have on children's education and the Blackness community.

The Blackness community feel strongly that children currently attending Blackness Primary School benefit from the small school experience and individualised learning this can bring. Blackness parents want their children to continue to be educated in a rural school setting.

This is the preferred option for most respondents to the consultation.

The main driver for the closure proposal is the small roll and underoccupancy of Blackness Primary School and no assurance that this will increase in any significant way in the future. Underoccupancy is a driver for Education Services when reviewing its learning estate.

Education officers have considered rezoning Blackness Primary School to increase occupancy as set out in section 10.2 but remains of the view that this is not a reasonable alternative. It has also considered representation to promote the uptake of out of catchment placing requests to increase the roll of the school and has responded to this in section 8 above.

Education Services recognises the strength of feeling expressed by the Blackness community, particularly concerns regarding transition of pupils from Blackness to Grange Primary School. Should the proposal be approved, it will be incumbent on Education Services to ensure that children and families are well supported in their transition to Grange Primary School.

Effect on travel arrangements

This option presents no change to travel arrangements for pupils currently attending Blackness Primary School

Summary of Review

In summary, Education Services assessed in the Proposal Paper was that this option was not a reasonable alternative option to the closure proposal. Education Services has reassessed this to remain the case.

11. Review of the Proposal including an Explanation of Compliance with sections 11A, 12, 12 A and 13 of the School (Consultation) (Scotland) Act 2010 when carrying out the Review

When reviewing the proposal, Education Services confirms that it is satisfied that implementation of the proposal is the most appropriate response to the reasons for formulating the proposal identified by the authority under section 12A (2) (a).

Education Services, in the Consultation Proposal Document (Appendix 1), clearly identified the reasons for formulating the proposal. It also detailed the alternatives that were considered prior to formulating the proposal. Education Services has identified that the representations made during the consultation

period have not provided any options which are reasonable alternatives to the closure of Blackness Primary School.

Education Services has reviewed the Educational Benefits Statement that was prepared (see Section 9 of the Proposal Paper at Appendix 1). The review has concluded that the educational benefits; and effects as identified therein are still valid, and that there are positive educational benefits to be derived should education provision at Blackness Primary School be permanently discontinued.

The consultation feedback received has not led Education Services to the view that it is necessary to reconsider the Educational Benefits Statement. It is recognised however, that by highlighting the benefits of Grange Primary School, Education Services are not implying that many of these benefits do not already exist in Blackness Primary School. The benefits are being considered when looking at the proposal in terms of what would be provided in the rezoned school of Grange Primary School.

It is further recognised that should this proposal be approved then it will be incumbent on Education Services to ensure that children and families are well supported in their transition from Blackness Primary School to Grange Primary School.

There was concern expressed by some staff about the risk of losing their jobs. Education Services has informed staffing in both schools, who currently report to the same shared Headteacher that staff working in Blackness Primary School will either be transferred to Grange Primary Schools or an alternative reasonable location and that no one will lose their job.

Education Services remains of the view that implementation of the closure proposal is the most appropriate response to the reasons for the proposal. In line with the principles outlined in the proposal paper, the closure of Blackness Primary School and the rezoning of the catchment area to Grange Primary School represents the only viable way to provide sustainable primary education for the Blackness community.

Education Services has complied with the provisions for rural schools in the Schools (Consultation) (Scotland) Act 2010, as contained in sections 11A, 12, 12A and 13.

Education Services has special regard to the following factors mentioned in section 12 (3),

- (b) the likely effect on the local community in consequence of the proposal (if implemented)
- (c) the likely effect caused by any different travelling arrangements that may be required in consequence of the proposal (if implemented).

Education Services has considered section 12 (4), 'the effect on the community is to be assessed by reference (in particular) to –

(a) 'the sustainability of the community'

Education Services has considered the representations made in terms of the likely effect on the local community in consequence of the proposal being implemented. Falkirk Council does not believe that the closure of the school will have a major effect on the sustainability of the community given its proximity to nearby settlements and services

(b) 'the availability of the school's premises and its other facilities for use by the community'.

Blackness Primary School is not routinely used by the community as there is a separate Village Hall adjacent to the school. The closure of the primary school will not impact on the availability of the Community Hall for community groups/residents. Education Services recognises that should the proposal be approved, the community hall would lose income from school use and as such, equivalent transitional financial support will be negotiated with the Hall Management Committee to cover a period of 3 years.

The Blackness community made strong representation about the involvement of pupils in community activities such as beach cleaning. In consequence of the proposal being implemented, Falkirk Council believes this should not have a significant impact on the ability of the Blackness community to continue to organise such activities.

Education Services has considered section 12 (5), for the purpose of subsection 3 (c)

(a) the effect caused by such travelling arrangements includes (in particular) –

- (i) that on the school's pupils and staff and any other users of the school's facilities,
- (ii) any environmental impact,

(b) the travelling arrangements are those to and from the school of (and for) the school's pupils and staff and any other users of the school's facilities.

Education Services has also considered the transport impact for pupils attending Grange Primary School instead of Blackness Primary School. Whilst there would be a small increase in the carbon footprint for the Council due to a slightly longer commute of up to 3 miles, Education Services is content this distance, and the travel times involved, are within the range which currently exist for other pupils across Falkirk. The transport costs for pupils travelling from Blackness to Grange Primary School is marginally more expensive than the current home to school transport provision in place for Blackness Primary School Pupils and is accounted for in the financial template.

Education Services considers that, in reflecting on the written and oral representations made and in reviewing the proposal in light of those

representations, in light of the report from HMIE Education Scotland and in terms of section 12, 12A and 13, it is appropriate to implement the proposal.

In view of the above Education Services recommends that approval be given to the proposal that:

- **Provision of a school at Blackness Primary School be permanently discontinued with effect from 27 June 2025, or as soon as possible thereafter;**
- **That the pupils of Blackness Primary School catchment area permanently receive their education at Grange Primary School, from 30 June 2025 or as soon as possible thereafter;**
- **That the delineated catchment area of Grange Primary School be permanently extended to include the whole delineated catchment area of Blackness Primary School from 30 June 2025; and**
- **All non-catchment Placing Request pupils currently enrolled at Blackness Primary School will be automatically enrolled at their catchment primary school if they live in the Falkirk Council area. Pupils living out with the Falkirk Council area will require a placing request to transfer to another Falkirk Council school.**

12. Alleged Omissions or Inaccuracies

Section 10(3) of the 2010 Act places a requirement on Falkirk Council to provide details of any inaccuracy or omission in the Proposal Paper which has either been identified by Education Services or raised by consultees. This provision also requires Education Services to provide a statement on the action taken in respect of the inaccuracy or omission, or if no action was taken, to state that fact and why.

During the statutory consultation, there were no areas identified by the authority as being inaccurate or omitted from the Proposal Paper.

While no inaccurate information was presented in the Proposal Paper supporting this consultation, Education Services would like to take the opportunity to note the concern of financial inaccuracy (and the corrected information issued in the updated papers) raised by some consultees. In response to this it is noted this is responded to in section 7 of this Consultation Report.

13. Opportunity to Make Representations to the Scottish Ministers

If Falkirk Council decides to implement the proposal, in whole or in part, the decision in so far as it relates to the closure of Blackness Primary School will be notified to the Scottish Ministers. The Council will notify the Scottish Ministers of the decision and provide them with a copy of the Consultation Proposal Document, this Consultation Report and the notice published under section 11A (3) of the Schools (Consultation) (Scotland) Act 2010, within 6 days of the decision becoming final.

Falkirk Council would also be required to publish a notice on its website of the decision to implement the proposal and why it has been satisfied that closure is the most appropriate response to the reasons for formulating the proposal.

The Scottish Ministers will have an 8-week period from the date of the Council's decision to decide if they will call-in any closure decision made by Falkirk Council. This 8-week timeframe would consist of an initial 3 weeks from the date of decision, during which representation can be made to the Ministers, and a further 5 weeks for the Scottish Ministers to decide whether to issue a call-in notice. During this period Falkirk Council will not proceed to implement any closure decision.