

## **Consultation on the Proposed Closure of Luing Primary School: Supplementary Submission to from Luing Community Council (LCC) and Isle of Luing Community Trust (IoLCT)**

At the formal consultation meeting on Luing on September 26<sup>th</sup> 2023, the HM Inspector, Education Scotland, advised that any inaccuracies in Argyll & Bute Council's Closure Proposal not already noted should be submitted so that these can be taken into account during the Consultation. This note, which is supplementary to our previous submissions, highlights some important inaccuracies and gaps in the Proposal.

1. Para. 5.3 incorrectly states that 'the school roll is not predicted to rise significantly in the future'. No evidence is provided for this judgement of what might happen. In fact, actions in progress should increase the future school roll significantly. Currently there are 80 applicants on the Home Argyll waiting list for Luing, and 19 non-residents have just completed a housing needs survey because they want to move to Luing. The constraint is housing, which LCC and IoLCT are addressing as a matter of urgency, through concerted efforts to encourage and support owners of short-term lets and empty and underoccupied houses to convert these to long-term lets (one house achieved to date, more in the pipeline), and encouraging owners of large houses to divide them in two (by 2025 one such division will create a three-bedroom house for long-term affordable rent). Two other family-sized houses will come available for rent in 2023/2024.
2. Paras. 5.3 and 5.4 also give a thoroughly inaccurate picture of the likely growth and development of Luing. The Proposal Document refers to 'the Local Development Plan', but makes no specific mention of Local Development Plan 2 (LDP2), which the Council has agreed to adopt following its examination by the Scottish Government's Planning and Environmental Appeals Division (DPEA). As the examiners themselves state, LDP2 allows for 'settlement expansion and housing' through 'generous margins' within existing settlement areas on the island of Luing. Moreover, as the Council is fully aware, there are development proposals for Luing, both economic- and employment-related (slate extraction and associated businesses) and housing. Argyll & Bute Council has itself funded a Housing Needs Survey on the island as a prelude to formulating a plan for new housing, and has approved Phase 1 of a Regeneration Capital Grant for Luing, one of only two in Argyll to be successful in this round. These development plans must be taken into account as they are specifically aimed at turning round the demographics of Luing, and meeting local, regional and national priorities.
3. Paras. 5.3 and 5.4 also omit any mention of important – and pertinent - priorities in National Planning Framework 4, which indicates that plans and strategies should 'identify areas for future development...for example planned population growth on the Western Seaboard of Argyll', 'create sustainable places that incorporate principles of 20-minute neighbourhoods' and 'minimise the need to travel whilst sustaining dispersed communities and rural patterns of development'. These support the provision of pre- and primary schooling on Luing.
4. Section 11 is titled 'Broadening the Range of Opportunities', but contains no assessment of the opportunities offered and actually accessible to and used by pupils at Easdale Primary School compared to Luing Primary School, and is inaccurate. Due to the difficulties of travelling between the island of Luing and Easdale, and the downgrading of transport

arrangements, the range of opportunities has diminished not broadened. The difficulties, timetable restrictions and expense of travelling between Luing and Easdale are preventing Luing children from the benefits of extra-curricular activities, thus limiting the range of opportunities. These constraints have been outlined in previous submissions. There is an additional problem that needs to be addressed. Prior to mothballing Luing School, a 15-seater Council minibus was provided with a local driver. This transported the primary-school children between home and school; transported high-school pupils between home and the ferry; transported Luing primary pupils to Easdale school for shared lessons and activities, and vice versa; and was used by Easdale Primary School for local trips for their pupils. It was also used as a community shopping bus on Luing. Since mothballing, the vehicle - and the transport services it is able to deliver - have been downgraded step-by-step, first to a 9-seater minibus, then, when this broke down, to a 7-seater elderly car, then, when this too broke down, to a very elderly 5-seater car. Not only are Luing pupils suffering from the decreased opportunities, but so are all pupils attending Easdale school.

5. Paras. 16.1, 17.2 and 18.12-14 are egregiously inaccurate. Many of the problems arising from the current travel arrangements have been highlighted in our previous submissions, and these must be addressed. However, it is also important to note other omissions and inaccuracies in the Proposal Document, as the overall conclusion – that there are no effects caused by travelling arrangements – is entirely inaccurate. One major inaccuracy concerns a reinterpretation of the 2010 Consultation Act’s requirement to have special regard to ‘the likely effect caused by any different travelling arrangements that may be required in consequence of the proposal’, reformulating this as the ‘effect on the current travel arrangements’ (our emphases). This reformulation allows the Proposal Document to completely ignore the Act’s requirement with respect to travel arrangements. The travel arrangements are substantially different, in distance, duration, cost, complexity, mode of transport, availability due to restricted timetables, and reliability; the effects of these different arrangements are not just likely, they are already causing damaging effects, none of which is addressed in the Proposal Document. The Proposal Document must accurately interpret the 2010 Consultation Act and correctly address this issue as required by the Act.
6. Para. 17.2 of the Proposal Document highlights the problem of transferring ELC learning to Easdale School as no transport is provided and parents are only paid 50% of the travel costs. It suggests that qualified and registered childminders could provide ELC learning, and that discussions could be held with the community about this option should the proposal (to close Luing school) be implemented. There are indeed good reasons to keep ELC learning on Luing. The most suitable place for this is Luing Primary School, which as the Council acknowledges is in good condition; there is no other suitable location on the island. An option that should be explored by the Council is to keep Luing School open as a centre for ELC learning, and for other learning opportunities such as Outdoor Play and Learning and Out of School Care for children from a wider catchment area. Luing community would welcome an opportunity to explore these and other uses of the school in partnership with Argyll & Bute Council. This would make excellent use of the school building, resolve some of the problems caused by the transfer of Luing’s pupils to Easdale, and lay the basis for its eventual re-opening as Luing Primary School.