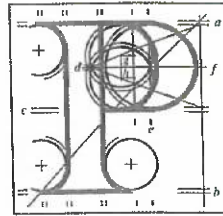


Our Case Number: ABP-314610-22



An
Bord
Pleanála

Our Lady of Victories Girls National School
Board of Management
Dermot Murphy
Ballymun Road
Dublin 9

Date: 07 December 2022

Re: BusConnects Ballymun/Finglas to City Centre Core Bus Corridor Scheme
Ballymun/Finglas to Dublin City Centre

Dear Sir,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. **As you are listed on the associated CPO schedule, there is no fee required to make a submission.** A refund of the payment made will be issued to the debit/credit card used to make payment.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

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Submission to An Bord Pleanála regarding the Bus Connects Project

Proposed locations on Ballymun Road, relative to the operation and long-term viability of the Our Lady of Victories Schools

REF Plot List 1003(1).1i, 1003(2).2i

BACKGROUND:

School History-

Our school campus opened in 1965 and has been the centre of the community of Wadelai, Albert College, Willow Park, Hillcrest and Santry since. Thousands of children have passed through our doors over the last 57 years. Our inclusive school comprises the Infant, Girls and Boys Schools and has a current overall school complement of 588 children, which can reach an enrolment of 800 children depending on population figures– the numbers include up to 230 children with varying levels of Special Educational Needs (SEN).

We are known to be an inclusive campus catering for children from the local parish, nearby communities of Ballymun and Finglas and from as far afield as Bettystown and Balbriggan. We are a DEIS (Band 1) school and have always catered for children who can be considered the most vulnerable and marginalised in society- those coming from extremely difficult socio-economic backgrounds and those with a diagnosis of a Special Educational Needs and/or medical needs including Down's Syndrome, Autistic Spectrum Disorder, ADHD, Developmental Coordination Disorder, Oppositional Defiant disorder, Emotional Behavioural Disorder, Cystic Fibrosis, Fragile X Syndrome, children with visual/hearing/physical impairments and mobility issues etc. We are also fully inclusive employers who have adapted our working environments for staff members who require walking aids due to physical impairments.

Build year- not fit for current volumes as it stands

The school campus was designed in a different era, where the school cohort travelled to their education every day on foot or by bicycle. Following the schools efforts to engage with the new Government initiative *Safe Routes to School* launched in March 2021, 45% of our total student population now travel to school on foot or on wheels (bicycles, scooters etc). The aspect of the campus that fronts onto Ballymun Road is approximately 40 metres wide, comprising a small single width vehicle entrance for staff entrance and one pedestrian entrance of approximately 1.5 metres width, set back from road at a distance of 20m. This access is extremely small relative to the overall size of the campus and already represents a bottleneck. The evolving demographic over the past 50+ years has led to a now vastly developed traffic volume where the majority of parents are dropping children at the school by car, with 87% of those parents parking in the carpark at the rear of Our Lady of Victories Church, as per Board of Management policy. The already out of date infrastructure will be stressed to the level of breaking point when these works commence for both Metrolink and BusConnects.

INITIAL CONCERNS-

The co-location of the Bus Connects corridor on Ballymun Road, and the associated prolonged construction and enabling works alongside the proposed Metrolink excavation at OLV church (TII Ref CAP ML_1609_65) is extraordinary in its disregard for the disruptive potential to our schools. The realignment of Ballymun road, and the constantly changing road, lane and services layout will be compounded by the activities on the Metrolink site and the context of this submission is against this backdrop- one cannot in conscience or reason

consider BusConnects in isolation. The risks are geometric in scale when these two projects are viewed in their real-time delivery plans. There is serious risk to life and limb through the execution of both these schemes in this manner- let there be no doubt that those who claim to have "done the analysis" -they should be held accountable morally and in law for the reckless nature of this folly. To put such stress and pressure on to a school community in the manner proposed where engagement has only been scant and recent, is unconscionable and mortally flawed in conception and execution.

Traffic Management-

The proposed realignment of Ballymun Road services and the associated enabling works have the potential to make the actual access to the school near impossible. The unpredictable nature of these works means that there will be inevitable delays and confusion around access to the school. For the many children who travel alone to school by foot or by bike - any confusion or changes are extremely difficult to negotiate. Children do not adhere to signage well. They need huge levels of input to understand, process and negotiate change. Currently 84% of the children cross the 6 lane dual carriageway on a staggered pedestrian crossing. Our crossing guards regularly express huge concern for the safety of the children and we regularly address the issues around safe use of the road with the children and their parents. There are in fact 19 lanes of traffic within 30 meters of the entrance to the school. The already out of date infrastructure will be stressed to the level of breaking point when these works commence for both Metrolink and BusConnects. When we applied to DCC for pencil barriers to eliminate illegal parking (a common feature available and recommended to most schools) the assessor expressed huge concerns about the amount of illegal turns and blatant ignoring of the lights and the speed limits outside our school. Although these barriers were agreed to in principle over 6 months ago-they have not been implemented. This shows you how, in real terms, we are continually fobbed off and our school community are not given the safety provisions they need. We have been constantly requesting an update on this matter and have not received any update. We have regular communication with Ballymun Garda station to request assistance with illegal parking. We believe that any further deterioration in traffic management will lead to a tragic event at the gates of our school.

The access to the carpark at the rear of the OLV church via the Ballymun road will be impossible to use due to its proximity to the proposed hoarding/barrier to the site. The proposal is that traffic will be directed to this carpark via Collins Avenue during the construction of Metrolink, which cannot be separated from the BusConnects project in this context. The pedestrian access to enable crossing of Ballymun Road to the schools is again, a significant challenge- there is no clear pedestrian route from the carpark to the school, nor is it clear if there is to be a road level pedestrian access route maintained during the realignment phase. The site hoarding will seal off the vehicular access to Albert College Drive, again preventing pedestrian or other access from the rear of the church to the school. The volume of traffic currently using Collins Avenue at school times is already at such a level as to cause significant congestion to traffic travelling east toward DCU from Glasnevin Avenue. The proposal to divert traffic into the rear of OLV church via Collins Avenue will cause serious delays to those parents who must bring children to school by car and raises significant accessibility issues for any pupils who may be wheelchair users, or indeed staff members in this cohort. We have very legitimate concerns that this will have an adverse effect on people's choices and whether they send their children to this school.

Accessibility & Health and Safety

The location of the BusConnects corridor is directly outside our school property. The green area (DCC owned) outside the school is currently fully occupied on a daily basis by many hundreds of parents and guardians to have a safe area to wait for and collect their children. The BusConnects Corridor will take a substantial portion of that ground away from us. This is in tandem with the development of the site and excavation of the Metro project which is 30 metres from the main entrance of our primary school, will substantially affect the safe access to our school. During the construction phase of the Metro, the volume of heavy plant and equipment that will traverse the main thoroughfare immediately outside the gates of the school will be in the hundreds of trips every day. This will make the access to and from the school impossible for children, parents and staff with the obvious increased risk profile to the pupils. 84% of our total student population (regardless of how they travel to school) use the crossing guards directly outside the school at Our Lady of Victories Church to travel safely to and from school. The BusConnects Corridor brings additional buses to the front of our school. When a bus is at the stop, the bus prevents children/parents/teachers and crossing guards crossing the road safely as it is an obstacle in the line of sight.

It is extremely worrying to the Boards that planners have failed to take account of the proximity of a massive construction site to a school premises – in particular a primary school that is catering for 600 children from the ages of 4 to 12 – it is quite extraordinary that no common sense has been applied here. There are likely to be accidents involving children and these plant movements, be they in traffic on Ballymun Road, or through incursion onto the site. In either circumstance it is obvious who will come off worst, and in the event of such an appalling outcome -let the record show that this was highlighted by the Boards of Management and parent body as an accident waiting to happen.

The Boards of Management of the three schools do not consider that the current proposed location of the bus corridor at all suitable in terms of its long term operation due to the proximity to the school and it being located directly outside our extremely small entrance. The impact of the continual movement of buses in the area immediately outside the entrance to our premises is totally at odds with the safe operation of a school campus as is highlighted in the paragraphs that follow. The Boards have made a separate submission to the An Bord Pleanala around this project.

Provision and access to services- Health and Safety

There has been an estimated 2-3 year timeline given to the realignment of Ballymun road and associated enabling works directly outside our schools. The Boards of Management have serious concerns regarding the impending unplanned school closures that will inevitably occur during this three year period, thus interrupting the education of the most vulnerable children in the education system.

In order to be fully open and accessible to students and staff, schools by law must have heating, light and water. Whilst it is currently not a legal requirement, schools now also need a functioning internet to operate at any kind of basic level.

With all due respect to the planning guidelines and agencies involved, if the planned works get the approval of An Bord Pleanala, what guarantees can we be given that there won't be serious disruption to our pupil's education for prolonged periods of time, due to one or more service outages? Even the shortest break in routine can cause serious disruption to the education of children with SEN and those coming from disadvantaged backgrounds, who already display school refusal, punctuality and attendance issues.

What guarantees can we be given that our properties won't be damaged due to service outages- fire alarm, security alarms both depend on 24/7 electricity supply. Flooding of our properties is also a real concern following water outages.

What guarantees can An Bord Pleanála stand by, that during this three year period of service realignment, our campus will be accessible at all times to emergency response vehicles in the event of a life or death situation? There have been several occasions where Emergency Vehicles have been required to gain access to our site to tend to children seriously injured or experiencing fitting episodes etc. This is a real issue and a real risk for our students.

The fact of the matter is that we can't be given any guarantees on any of the above. The consistent reference by TII etc to "modelling" and "analysis" are fine and well in the context of desktop exercises but bear no relation to real world activity.

It is therefore the Boards belief that by granting permission for the Bus Connects and Metrolink plans to proceed, An Bord Pleanála are jeopardizing the education of some of the most vulnerable children in the country, but more significantly An Bord Pleanála are risking the lives of all staff and pupils on the campus.

Again let it be noted, that the Boards of Management and parent body are stating on record that this is an accident waiting to happen, in fact there is a significant risk of loss of life.

Preservation and Enhancement of Outdoor Learning and Habitats on our School Grounds

An alternative entrance to the school must be explored, should Bus Connects proceed as our Outdoor Classroom has been created commencing from the perimeter wall flanking the dual carriageway.

The three schools on the campus have a reputation for being educationally progressive and have embraced and actively promote Outdoor Learning as core to our values, as is evidenced from the entrance of the campus to the far boundary hemmed by several mature towering *Carpinus betulus* trees, the leaves of which are being raked and composted this month. Year on year, we have won several awards based on outdoor initiatives- Global Action Plan Environmental Awards in addition to RTE appearance for All Ireland G.I.Y (Grow it Yourself) winners and we are proud to have an exceptional 7-year-old pupil recently selected on the 35 pupil strong assembly on the Children and Young People's Assembly on Biodiversity Loss (D.C.U., U.C.C., Terre des Hommes). In addition, our school was invited to partner with the National Botanic Gardens Educational Garden and we have close ties with D.C.C and have won Tidy Town awards etc.

Outdoor Inquiry based learning in science, and education for sustainability are key active areas in our plans, guided by Dr Sandra Austin, M.I.E. (Austin, S (2021) Education about, through and for the environment: a scientific approach). We are trialling several outdoor inquiry -based initiatives across the campus for STEAM/Science Week 2022. Outdoor Inquiry Based Learning has been identified in our newly written 2022-2025 DEIS plans which are open to inspectorate assessment.

The exemplary and pioneering work that Our Lady of Victories Infant School is carrying out in this area is to be celebrated and recognised and more importantly protected. Colleges of Education are linking in with our school community for research purposes; it is imperative

that we maintain and improve the opportunities for children on our school grounds, without compromise or any impingement vis-à-vis any potential adverse risk of construction nearby- noise, pollution, dust, access, visiting the local park for STEAM activities etc. which is embedded in our current practice on a very regular basis.

Our schools' values support The United Nations Committee on the Rights of the Child where consideration that play should involve children having both space and opportunity to play outdoors unaccompanied in a diverse and challenging physical environment; opportunities to experience, interact with and play in natural environments and the animal world; and opportunities to explore, understand and shape the cultural and artistic heritage of their community (Committee on the Rights of the Child, 2013). Moreover, the child's education must be directed to, amongst others, 'the development of respect for the natural environment' (art 29(1)), rights which are instrumental to the conservation of natural heritage.

In summary, the prospect of any pejorative impact on our outdoor campus by virtue of major external construction is of a source of highly significant concern to our collective school community, especially voiced by our Children's Wellbeing Committee (Pupils); it is imperative that we listen to the children's voices.

Availability of Expert Advice- not what was indicated.

The School was told on several occasions that expert advice would be provided to the Boards around environmental impact and traffic surveys etc. This did not happen and is a clear indication of the poor planning and execution of the consultation process as run by TII.

The three Boards of Management are deeply concerned that the vibration, dust and vermin which will be disrupted as result of the excavation so close to the school grounds will potentially render the campus uninhabitable for the duration of the build. It is inevitable as the ground works commence that mice and, of more concern rats will be displaced from sewer movements. Our school is in the direct line of fire for this issue. The estimated volume of earth to be extracted from the station box at OLV Church during Metrolink is approximately equivalent in cubic metres to that of the volume of Croke Park Stadium.

This earth and rock will be extracted via drilling, piling and will require the use of heavy plant and equipment all day, every day from early morning throughout the entire school day- for the duration of some children's ENTIRE school life.

The vibration and noise that will result at such close quarters will have significant negative effects on a cohort of children who have sensory processing issues.

Another major concern to the boards is the air quality in the area for the duration of the build as a result of the excavation and piling etc. This is in addition to the use of thousands of tonnes of concrete dust through the mixing and grinding operations on site. TII have undertaken to have some flagging/ monitoring mechanism in place to monitor air quality. The practicalities around potentially having to close a school at short notice due to some such event breaching an established norm begs the question as to how this will work. What independent oversight of this would be provided to ensure that appropriate actions would be taken? It is the Boards view that there is a grave risk to the long-term safety and workability of the schools- windows would likely have to remain sealed to prevent ingress of harmful dust particles. This will make the school uninhabitable in the circumstance where public health guidelines mandate open-windows, such as recently witnessed as part of the

management of the Covid pandemic. No thought has been given to this that we can see, and it cannot be ignored-it is a significant risk that cannot be mitigated- dust will rise and travel.

At its closest, the tunnel bore route will pass approximately 10 linear meters from the foundation perimeter of the school on the southeastern corner of the original infant school building. The vibrational transfer from the TBM will likely render this end of the building entirely unusable due to noise and vibration. The wider geological and structural impacts on the school are unknown at this point, however this is another significant and grave concern.

The School Boards and Principals, charged as we are with looking after the best interests of the children in our care implore An Bord Pleanala to consider these matters, in the context of those children who have issues such as Autism Spectrum Disorder, where noise, vibration and other such external inputs have the potential to be hugely distressing to the individual and how they can manage to regulate their condition.

Documentation for both MetroLink and BusConnects were issued to the Boards on practically the same day by TII and the NTA respectively, with an 8-week response time in which to draft meaningful submissions. To do so without access to the expertise that would be needed to craft an informed response cannot be seen as reasonable in terms of natural justice. Our Boards of Management are ordinary parents and community workers etc. Our Principals and Teachers are Educators- not engineers, not surveyors -They spend their days looking after the futures of these students, they do not have the time nor expertise to interrogate the mountain of information issued around these projects. This process has been manifestly unfair in this respect. Are we seriously expected to believe that this was a coincidence? We are all aware of the concept of "divide and conquer". There has been an attempt to blind the layperson with science, studies and stats and it is beyond belief that two agencies of the state would behave in this manner where children's lives are concerned.

Long Term

Potential impact on numbers

The volume of traffic and disruption to school routine has the potential to erode the viability of the campus where the site becomes so inaccessible to vehicular and pedestrian traffic. The access to the school has the potential to become such a factor so as to render the schools a "white elephant"- a school that cannot attract a quorum of students to guarantee its viability will fail and along with it the heart of a mature community. These schools have formed part of Glasnevin north since the mid 1960s, and have contributed immensely to the social fabric of the surrounding areas of Ballymun and Santry also. With rising population numbers in the district, if this eventuality were to play out, this would put untold pressure on other schools in the who are currently all oversubscribed.

.CONCLUSION

There are severe and grave concerns around how the proposed construction of the BusConnects project in the context of the construction and operation of this metrolink at Collins Avenue/ Ballymun Road will impact on the day to day management of our schools.

The concerns range from the siting of the station through the consultation process and the engagement from TII which has been disappointing from our perspective. The engagement on BusConnects has been equally poor. The positioning of a bus corridor outside our school is further endangering our school community.

The Boards of management of the three schools are obliged to highlight to An Bord Pleanala that we do not consider that any serious consideration has been given to how a primary

school can operate with 2 long term, major infrastructural construction sites so close. We, as a collective have a duty of care to our children, their parents and the wider community as well as our stakeholder in the St. Laurence O'Toole trust. We are charged with providing a safe environment to these amazing young people to allow them to become their best selves whilst they are under the care of our dedicated Principals and their teaching staff.

There has been a manifest plain failure to engage on the part of TII regarding the potential damage possible to the day to day experience of going to school for a huge cohort of these pupils. During the course of the construction phase of the Metrolink project 2024-2032, we estimate that 1300-1500 pupils will pass through our doors. Is An Bord Pleanala prepared to take responsibility for the potential damage that could be caused to the education of these children, and indeed to guarantee their physical safety across this 8 year period, or for the concurrent period of near equal disruption thrown up by BusConnects? There appears to be a blind push to get this into place regardless of issues raised.

Children and Parents are entitled to a reasonable expectation to be able to travel to ,and leave the school and get home without being forced into significant detours, potentially placing them in harm's way. As noted above, children do not manage these type of changes well and the authorities behind these plans have no real understanding of the risks these projects are introducing.

Should ABP decide that this BusConnects project and concurrent station site construction should go ahead in its current format, then that is to endorse the TII position that the above does not apply, and that our children are second class citizens, and not "as entitled" as those in other schools nearby where changes were made to locations. This will not go unchallenged, should this be the outcome These are not scaremongering statements or exaggeration. The issues raised above are highly likely outcomes affecting the school building and community in the context of two woefully planned concurrent projects- Safety, Noise. Dirty Air. Pest. There can be no equivocation on these matters and we do not accept that "mitigating" measures will allay these problems.

The current siting of the main entrance of our schools is not compatible with a construction site and access compound, nor the radical realignment of the carriageways proposed in the current plan.

The argument that this is "for the greater good" in the "long run" is of zero benefit to us when we have serious concerns about the risk to life of all who access our wonderful school community. This is all pain and no gain for the schools at Our Lady of Victories.

On Behalf of the Boards of Management

Our Lady of Victories Infant School

Ballymun Road

Dublin 9

Our Lady of Victories Girls' National School

Ballymun Road

Dublin 9

Our Lady of Victories Boys' National School
Ballymun Road
Dublin 9

Signed:

Dermot Murphy 15-11-22

Dermot Murphy