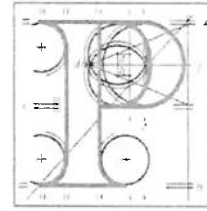


Our Case Number: ABP-317660-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Ruth Glennon & Others
Harold's Cross Educate Together National School
151/153 Harold's Cross Road

Date: 18 December 2023

Re: Bus Connects Kimmage to City Centre core bus corridor scheme
Kimmage, Dublin

Dear Sir / Madam,

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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

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

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

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Glaó Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Harold's Cross Educate Together National School
Roll Number: 20520o

An Bord Pleanála
Strategic Infrastructure Division
64 Marlborough Street
Dublin 1
D01 V902

November 5th 2023

Re: Kimmage to City Centre Core Bus Corridor Scheme

Dear Sir / Madam,

We are writing to you as representatives of the school community of Harold's Cross Educate Together National School. We thank you in advance for considering the attached document, which details our observations on the proposed Kimmage to City Centre Core Bus Corridor Scheme with a focus on the safety of the children, parents and staff traveling to and from our campus on a daily basis.

Yours faithfully,

A handwritten signature in black ink that reads 'Ruth Glennon'.

Ruth Glennon
Principal
Harold's Cross Educate Together National School

A handwritten signature in black ink that reads 'John Lavelle'.

John Lavelle
Board of Management Chairperson
Harold's Cross Educate Together National School

A handwritten signature in blue ink that reads 'Danielle Veon'.

Danielle Veon
PSA Committee Chairperson
Harold's Cross Educate Together National School

Address: 151/153 Harold's Cross Road, Dublin 6W, D6W HP44.
Website: www.haroldscrossetns.com



The permanent campus at the Harold's Cross Educate Together will comprise both a primary and secondary school, with capacity of c.1400 students (1000 secondary and 400 primary) and c. 99 staff. As set out in our School Travel Plan, the target modal split for the school commute to the permanent campus is 85% sustainable means of transport including walking, cycling, scooting and public transport. The School Travel Plan aims to minimise private car use as far as possible. This was strongly supported by the NTA, who invited engagement to improve the pedestrian and cyclist offer in the vicinity of the proposed school campus in conjunction with the BusConnects Scheme. On review of the 'Kimmage to City Centre Core Bus Corridor Scheme' (the Proposed Scheme), we, the Parent Staff Association (PSA) are concerned that the invited engagement has not taken place. The proposed design does not adequately address the changes in traffic flow associated with the proposed bus gates, and at some locations the pedestrian and cyclist environment in the vicinity of the school is worsened by the scheme.

Please find below a detail of the associated concerns:

1. The main entrance to our schools is at 151 - 153 Harold's Cross Road. Considering that extra traffic is expected on this road due to the bus gates nearby, we have a number of concerns.
 - Our schools are currently hoping to have a 'School Zone' treatment installed, with the consultation period having just closed on 30th November 2023. We have been requesting school signage here since the school opened in 2019, as there has been no signage or traffic calming measures to indicate the presence of a school at this site. Bus Connects plans do not acknowledge the School Zone plans, or indeed the presence of a school, and contain no reference to school signage. By the time Bus Connects is implemented, our school will be bigger and the roads will be busier, and it is imperative that the maximum possible measures are implemented to indicate large numbers of schoolchildren in the area.
 - We propose that a reduced speed limit of 30km/h be instated outside our school, in line with the national RSA campaign for urban areas. This would

have very little impact on journey times, but would significantly improve road safety for our pupils, as well as reducing air and noise pollution for children travelling to school. It is particularly important for young children cycling and walking to be able to hear instructions from parents - this is made difficult over the noise of fast-moving traffic.

- Our school differs from others in that children do not cross the road opposite the school gates, as there is no footpath on the opposite side. Instead, children cross at various crossings on Harold's Cross Road, alongside children from many other neighbouring schools. It is a common occurrence to see cycle-lane users (and indeed motorists) disregarding these pedestrian lights. A cyclist-pedestrian collision has already resulted in an injury to a young child from our school, who was crossing at a green man. We welcome the use of 'yield' road markings for cyclists at pedestrian lights, and request any extra measures that can be instated (e.g. separate cycle traffic lights, school signage) to ensure that all road users are aware of the high numbers of schoolchildren at all of these crossings.
 - We welcome much-needed improvements to the urban realm on this stretch, including proposed tree planting and pavement resurfacing.
2. We have specific concerns relating to cyclists on Harold's Cross Road, and are particularly concerned in relation to cyclists turning right into the school and right-turning cyclists out of the site.
- The provision of a yellow box at our school entrance is welcome.
 - While we welcome the use of separator kerbs to keep cyclists safe in general, the use of them approaching our school may be hazardous to cyclists entering our school. Entering the school from the south is currently best done by 'taking the lane' at the traffic lights, so as to be able to make the right turn without crossing three lanes of traffic. Nervous and unfamiliar cyclists may

not be comfortable doing this, and if sticking to the cycle lane may end up trapped behind the separator kerb and unable to turn right.

- The volume of cyclists on this stretch at peak hours is already very high, with this electoral area being the highest in the city for cycle commuting. There is high potential for cyclist-cyclist collision when moving out to turn right into the school, particularly with cyclists now to be squeezed into a 1.5m cycle lane.

We request that a revised design is considered along Harolds Cross Road in the vicinity of the main entrance of our school to enable safe access for cyclists, including children and cargo bikes.

3. We note the removal of the outbound Bus Lane on Harold's Cross road, and its replacement with a cycle track which looks to be '1.5m - 2.0m'. Many of our school community cycle alongside very young children and many use cargo bicycles, which are wider than average. It is imperative that the maximum cycle width be maintained here, given the slower speeds of children and the high volume of cyclists already using the road. The use of a separator kerb, whilst very welcome, will limit the potential of faster cyclists to overtake, therefore a minimum width of 2.0m is requested here.
4. It is noted that the proposal of a Bus Gate on Kimmage Road Lower will increase private vehicles funneled into turning right from Kimmage Road Lower on the section of Harold's Cross Road at the southern end of Harold's Cross Park. Similarly it is anticipated that additional traffic will use this small section of road turning right when traveling southbound on Harold's Cross Road. Moreover, the proposed drawings include the removal of the section of footpath on the southern end of Harold's Cross Park, impacting on pedestrian space in this regard. While many pedestrians can use the park, it should be noted that park opening hours during the winter are significantly restricted. The other footpath is discontinuous, with a wide entrance into Shamrock Villas. With this increased vehicular movement on this section of the southern end of Harold's Cross Road, it is concerning that there is no proposed signalised crossing

onto Kimmage Road Lower to aid pedestrians in this regard. As well as students walking to school, this will impact children getting the bus, as it is a pedestrian route from the school to the bus stops of the proposed scheme. It is requested that a pedestrian crossing is included here in the interest of pedestrian safety.

5. With the aforementioned removal of the section of footpath on southern end of Harold's Cross Park, it is unclear what the arrangement will be at the termination of this footpath in terms of directing pedestrians, visually impaired and other and vulnerable road users alike, who are approaching from the footpath on the eastern side of Kimmage Road Lower.
6. The proposed bus gate from Kimmage Road Lower at the junction with Sundrive Road outlines a left-turn ban from Sundrive Road onto Kimmage Road Lower for general traffic. The potential impact of this is rat-running through adjacent roads such as Larkfield Avenue, Larkfield Grove, Priory Road, Westfield Road, Kenilworth Park in order to access units on Kimmage Road Lower. It is requested that turn-ban or similar restrictions be investigated on these roads particularly at peak times to ensure that rat runs aren't enabled which in turn can impact on the otherwise safe neighborhoods of these roads used by local children to commute to school.
7. A particularly difficult crossing point for many of our school community is at the junction of Clareville Road and Kenilworth Park, with many pedestrians and cyclists choosing to continue on the quiet route down Wilfrid Road and Tivoli Avenue. With volumes of traffic set to increase on Clareville Road, we can only see this getting worse. We request a review of the priority at this junction and provision of a safer crossing point.

It should be noted that our schools run a wide range of after-school activities and full-time on-site childcare, therefore safe access to the school is imperative at all times, and not just at school opening and closing hours.



Harold's Cross Educate Together National School
Roll Number: 20520o

We are seriously concerned for the safety of the current and future school community on their commute with regard to the issues highlighted above. If the issues are not addressed, they may impact how our students choose to commute and may make it difficult for us to meet our ambitious targets for sustainable commuting.

The Design Manual for Urban Roads and Streets, 2019, states that to encourage more sustainable travel patterns and safer streets, designers must place pedestrians at the top of the hierarchy, followed by cyclists, public transport and lastly the private motor vehicle.

We ask that pedestrians and cyclists are prioritised and that additional space is allocated and facilities provided to them, where necessary, to address our concerns.