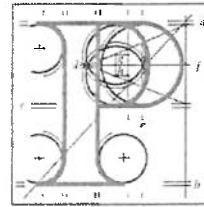


**Our Case Number:** ABP-317742-23

**Your Reference:** Rathmichael Parish School



**An  
Bord  
Pleanála**

IMG Planning Limited  
75 Fitzwilliam Lane  
Dublin 2

**Date:** 11 October 2023

**Re:** BusConnects Bray to City Centre Core Bus Corridor Scheme  
Bray to Dublin City Centre.

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 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](mailto:laps@pleanala.ie)

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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64 Sráid Maoilbhríde 64 Marlborough Street  
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Chief Officer  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

9 October 2023

Dear Madam

**BusConnects Bray to City Centre Core Bus Corridor Scheme  
An Bord Pleanála Case Reference: HA27.317742**

**Bray to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2023  
An Bord Pleanála Case reference: KA27.317780**

**1. Introduction**

IMG Planning Limited is instructed by the Board of Management of Rathmichael Parish National School, Stonebridge Road, Shankill, Dublin 18 to make this submission in respect of the above Scheme and associated Compulsory Purchase Order submitted to An Bord Pleanála by the National Transport Authority on 11 August 2023.

Having examined the information submitted to An Bord Pleanála the Board has significant concerns about the probable impact that the Scheme will have on the school both during and after its implementation. The Board considers it necessary to make An Bord Pleanála aware of these concerns; to request that regard is had to them in the assessment of the Scheme; and to seek appropriate adjustments to the Scheme as submitted to address them.

**2. Rathmichael Parish National School**

Rathmichael Parish National School is under the patronage of the Church of Ireland Archbishop of Dublin and Glendalough. It is one of three National Schools in Shankill.

The school, which has been on its present site since 1892, has 8 classes and a current enrolment of 202 children.

The school body is active in the local community in a number of areas. A number of community groups and sports clubs make use of the school grounds and hall throughout the week, Shankill GAA Academy on Saturday mornings, Shankill Football Club, Beavers, Cubs and Scouts and Rathmichael Montessori to name but a few.

**75 Fitzwilliam Lane, Dublin 2, Ireland**

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Directors: IM McGrandles, M McGrandles. Registered in Dublin, Ireland. Registered Office: As above.

### 3. Location and Features of School

Rathmichael Parish National School is located to the north west of the junction of Dublin Road and Stonebridge Road.



1.	Burton Hall (Protected Structure)
2.	School Buildings
3.	Multi-Use Games Area
4.	Car Parking
5.	Grassed Area
6.	Junior and Senior Infants' play space
7.	Pedestrian and Vehicle Entrance

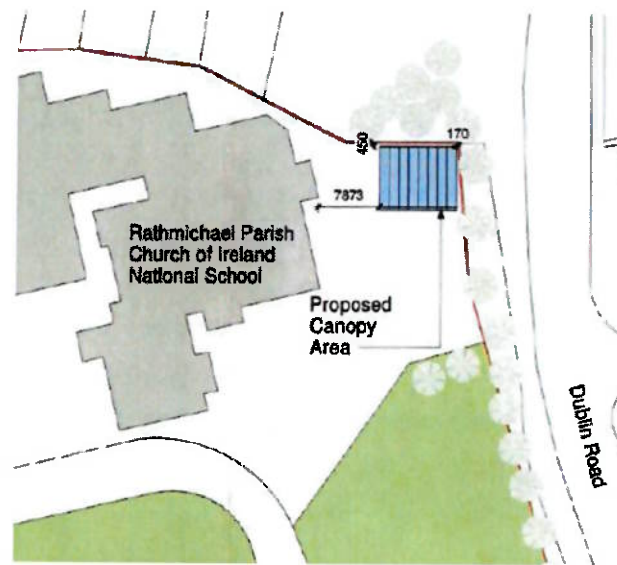
**Figure 1:** Location and features of Rathmichael Parish National School

The original school building, Burton Hall, which a Protected Structure, is located to the centre of the site with the later extensions and additions located to the north of it towards the boundary with the adjoining Woodbank residential estate and to the north east. Car parking is located to the west of the school building adjacent to the boundary with the adjoining Stonebridge Wood residential estate. To the south of the school building there is a grassed area that is used for informal play and an artificial multi use games area abutting the Dublin Road and the junction with Stonebridge Road boundaries. The pedestrian and vehicle entrance to the school is from Stonebridge Road.

The school is elevated above the surrounding roads – the biggest difference is at the junction of Dublin Road and Stonebridge Road that reduces on Dublin Road as it rises to the north and reduces on Stonebridge Road as it rises to the south west to the old railway crossing bridge. Presently there is a heavily planted bank behind the boundary walls along Dublin Road and on Stonebridge Road up

to the entrance to the school. A low maintenance regime has allowed the area of the bank to become a habitat for a diverse range of native flora and fauna, which will be lost in the proposed Scheme. The Board would require that the proposed replanting of this area provides for native species that will promote the reestablishment of the habitat in the future.

It should also be noted that planning permission was granted in May 2023 for the construction of an outdoor canopy for an outdoor classroom the north eastern corner of site immediately adjacent to the construction area (in location 6 in Figure 1 above). The existence of this proposal has not been factored into the Scheme design and the Board would require that its construction is not impacted by the Scheme.



**Figure 2:** Location of approved outdoor classroom

#### **4. Bus Corridor Scheme**

The accuracy of the maps and the areas for permanent and temporary land acquisition in the schedules of the Draft Compulsory Purchase Order submitted to An Bord Pleanála must be questioned given the dense planting around the boundaries and consequently the absence of a measured survey of the positions of the existing boundary walls and fences.

Further, the scales of the maps and drawings are such that in most respects the detail of the impact that the Scheme will have on the school cannot be ascertained with a high degree of certainty. Within these limitations it is however evident that the Scheme will have significant impacts on the integrity of the school site.

### ***Dublin Road***

Dublin Road is to be widened towards the school to allow for a southbound bus lane on the eastern side of the road and the construction of a 2.1 metre wide footpath along the full length of the boundary with the school.

It is proposed to construct 50 metres of 2 metre high retaining wall on repositioned boundary line on Dublin Road and 40 metres of 2.5 metre high retaining wall around the repositioned boundary line at the corner of the Dublin Road/Stonebridge Road junction to a point just east of the entrance to the school. It is stated that the area behind the new wall will be a graded slope with new ornamental planting, the detail of which is "to be agreed with school".

To carry out the Scheme, land along the boundary with Dublin Road is to be acquired permanently and further land beyond that abutting the multi use games area is to be acquired temporarily.

It is stated that "retaining walls will generally be constructed of reinforced concrete, with railing and cladding as required with suitable materials depending on local environs". Other than this there are no further details as to the manner in which the new wall will be finished.

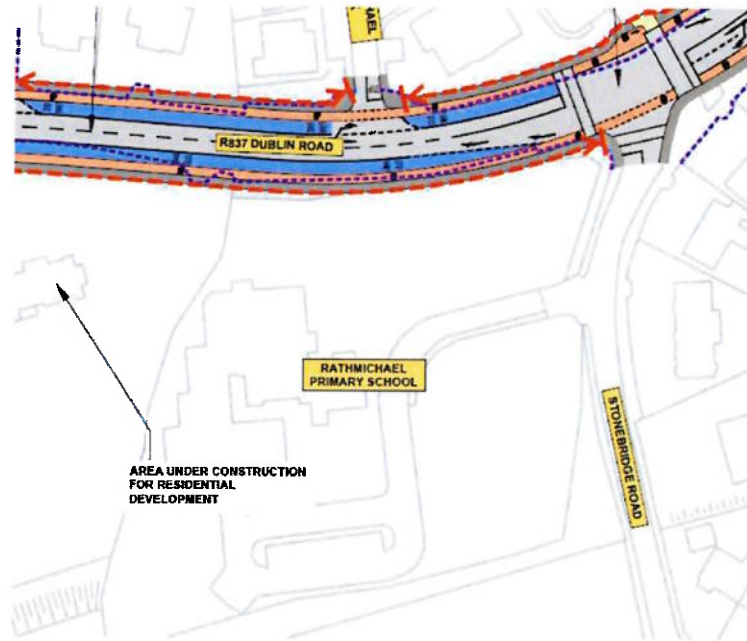
The Board requires that the details of the finishes of the two proposed retaining walls are agreed to its satisfaction prior to any construction works commencing.

The Board requires that prior to the commencement of construction a detailed landscape plan and planting specification for the boundaries with the school which provides for native species that will promote the reestablishment of the existing native flora and fauna habitat is agreed to its satisfaction.

### ***Stonebridge Road***

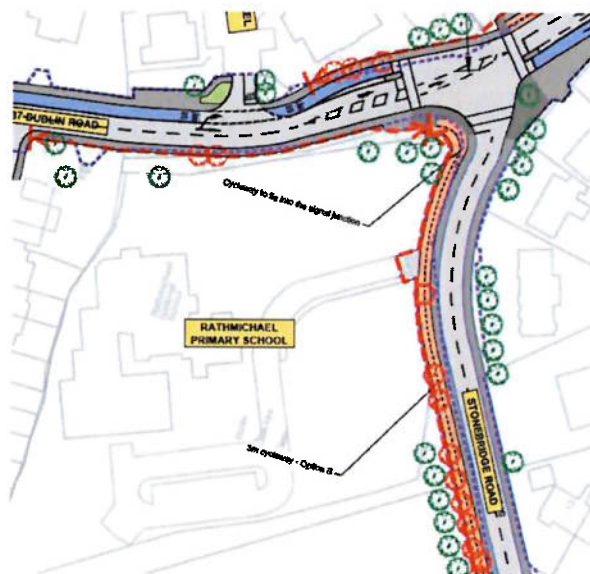
The Scheme proposes the repositioning of the school boundary to the north and the construction of a 2 metre wide footpath and 2.6 metre wide two-way cycle track along the boundary with the school from the Dublin Road/Stonebridge Road junction through the new Stonebridge Wood development to a new crossing at St Anne's National School to the west.

The Emerging Preferred Route that was the subject of public consultation in February 2019 indicated that one bus lane, one general traffic lane and a single segregated cycle track was to be provided in each direction on Dublin Road to St Anne's Church to the south. It was further indicated that the existing Dublin Road/Stonebridge Road junction was intended to be upgraded to facilitate bus priority. (See Figure 3 overleaf.)



**Figure 3:** Extract of Map 44: Emerging Preferred Route  
February 2019 (NTA)

As a consequence of the consultation process, the Emerging Preferred Route was changed – the segregated cycle tracks on Dublin Road between Loughlinstown Roundabout and Stonebridge Road were omitted and a two-way cycle track from the Shanganagh Road/Dublin Road Junction along the Dublin Road and along Stonebridge Road as far as St Anne’s National School was included to provide a local cycle link to the two schools. The NTA stated that *“these proposals have been introduced following local community engagement and consideration of submissions from the public.”* (See Figure 4 below).



**Figure 4:** Extract of Map 44: Preferred Route  
March 2020 (NTA)

The Board has a number of concerns about this aspect of the proposed Scheme.

The utility of the proposed cycle tracks and the achievement of their stated purpose are questioned. As shown in Figure 5 below the cycle tracks do not link the two schools to the wider area. There are no segregated tracks on Dublin Road – these were omitted from the Emerging Preferred Route; at the proposed reconfigured Corbawn Lane/Dublin Road junction the very short section of cycle track on Corbawn Lane is separated from the track on the eastern side of Dublin Road by a pedestrian priority zone; and there are no segregated tracks along Corbawn Lane or along Dublin Road through the village centre.



**Figure 5:** Proposed cycle tracks (highlighted in blue)

The proposed cycle tracks do not form part of a larger network and whose benefit to connectivity in the wider area has not been assessed or justified in the Scheme.

The fact that the tracks are proposed as a consequence for local consultation and did not form part of the published Emerging Preferred Route, they are clearly not integral to the achievement of the overall Scheme objectives.

The impact of the land take to provide the tracks, which falls exclusively and disproportionately on the school, will be substantial and having regard to the above is not required and therefore unjustified.

The Board considers that the proposal in the Scheme to provide cycle tracks along the northern side of Stonebridge Road must be reconsidered and should be reviewed with a view to omitting them from the overall Scheme as their benefit to connectivity in the wider area has not been assessed or justified in the Scheme.

## 5. Construction Management

As the expected construction period is 12 months, the school will be operational for the majority of that period.

Given that the school is a teaching environment for young children, construction noise will be a significant issue. The school is identified as a 'Noise Sensitive Location' in the EIAR submitted.

It is noted that the total Construction Noise Level at the school 20 metres from the edge of works is predicated at 80 dB LAeq,T, which being 5 dB LAeq,T above the relevant Construction Noise Threshold (75 dB LAeq,T) is a 'Significant, to Very Significant' impact.

Given the particular and sensitive nature of the school environment, it is considered that the standard approach to construction management contained in the Construction Environmental Management Plan submitted (Appendix 5.1 to Volume 4 of the EIAR) is not appropriate.

The Board considers that it is imperative that a specific and detailed construction management plan for works around and on the school grounds is put in place before any works commence and that the Board of Management is engaged by the appointed contractor from the outset in the preparation of this plan to ensure that the operation of the school can continue during the construction period without undue disruption and in a safe manner

The Board would require that construction management plan addresses such matters as:

- Noise mitigation measures by means of hoarding/baffles and/or restrictions on the periods when high noise generating machinery will be used during the hours of operation of the school
- Measures to securely separate the construction area from the school grounds
- Access by construction staff through or onto the school grounds
- Measures to maintain safe access on the surrounding roads for staff and parent vehicles and emergency vehicles



- Measures to maintain safe pedestrian access
- Measures to prevent damage to school assets including but not limited to the multi use games area and the repair/replacement of same should such damage occur
- Measures to ensure continued access to and safe usage of the multi use games area by pupils and community groups during the construction period
- Measures to ensure that construction works do not impact on the construction of the outdoor canopy for an outdoor classroom the north eastern corner of site

## 6. Conclusion

We are obliged to the Board for this opportunity to make comments on the proposed Scheme.

We have been requested to advise the Board that our clients reserve the right to make further representations at the Oral Hearing to be convened into the consideration of the Scheme and on foot of this letter we would request that we are advised in due course of the arrangements for the Hearing.

Yours faithfully



**Ian McGrandles MRTPI MIPI**  
**Director**