

**SECTION 38 PUBLIC CONSULTATION FOR SAFE ROUTES
TO SCHOOL - POPE JOHN PAUL II NATIONAL SCHOOL,
MALAHIDE, CO. DUBLIN
SECTION 38 CONSULTATION REPORT**



SAFE ROUTES TO SCHOOL - POPE JOHN PAUL II NATIONAL SCHOOL, MALAHIDE, CO. DUBLIN

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IDENTIFICATION TABLE

Client/Project owner	Fingal County Council
Project	Safe Routes to School - Pope John Paul II National School, Malahide, Co. Dublin
Study	Section 38 Consultation Report
Type of document	Report
Date	16/09/2024

APPROVAL

Version	Name		Position	Date	Modifications
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1. INTRODUCTION

1.1.1 Safe Routes to School (SRTS) is a national programme funded by the National Transport Authority, administered by An Taisce and delivered by Fingal County Council. The SRTS Programme has three key aims¹:

- Improve safety at the school gate by providing ‘front of school’ treatments to alleviate congestion and improve access.
- Improve access routes to school by improving walking and cycling infrastructure; and
- Increase the number of students who cycle to school by expanding the amount of cycle parking.

1.1.2 Pope John Paul II National School (PJP II NS) applied, and successfully qualified for Round 1 of the programme being rolled out to encourage children and their guardians to walk or cycle to school. The proposed scheme consists of the following improvements around PJP II NS:

- Creation of a car-free School Street each morning and afternoon.
- Tightened junctions at Inbhir Íde with Caves Strand, Sea Road. Tightened junctions slow down approaching traffic and make crossing the road quicker and safer.
- Resurfaced footpath on Caves Strand adjacent to junction.
- Building of a short ramp to enable cycling access to Inbhir Íde Drive.
- Extended footpath around the green area in Inbhir Íde, with flexible bollards protecting the path.
- Added school zone signs and coloured road surfacing at Inbhir Íde Drive.
- Tightened junction at Inbhir Íde Close with Inbhir Íde Drive, and tightened junction at Sonesta.
- Extended footpath from the corner of Inbhir Íde Close to the school along Inbhir Íde Drive.
- Tightened junction at Árd na Mara with Yellow Walls Road.
- Upgraded zebra crossing at Caves Marsh.
- Signage to formalise the one-way system already in place during school drop off and pick up times.
- A series of other minor changes to signage, junctions and crossings to support the Safe Routes to School scheme.

1.1.3 Together, all these changes will make the approach to the school, and the school entrance, safer for children which will encourage increased walking and cycling to school. The changes will also make the area around the school more accessible for people on foot and safer for people of all ages to walk or cycle. These changes will make drivers more aware of the proximity of the school.

1.1.4 As part of the development of the proposed scheme, FCC has consulted with key stakeholders, including a two-week public consultation hosted online, as part of the process under Section 38 of the Road Traffic Act, 1994 (as amended). The feedback given during these

¹ <https://www.nationaltransport.ie/planning-and-investment/transport-investment/active-travel-investment-programme/safe-routes-to-school-srts-programme-active-travel/>

consultations has been grouped into themes, and this report provides a response to each theme. Details of public consultations to date are outlined below.

2. STAKEHOLDER ENGAGEMENT 2021 – 2024

2.1 Overview of Stakeholder Engagement Events

2.1.1 Consultation with various stakeholders was held by FFC between July 2021 and February 2024. A full list of the engagement events, held by FFC during this period, are presented in Table 1.

Table 1 Summary of stakeholder engagement events held by FFC for the PJP II safe routes to school scheme

Date	Details
02 July, 2021	Meeting with Pope John Paul II National School.
April, 2022	An Taisce Parent Survey.
17 November, 2022	Meeting with Residents to discuss general proposals.
22 February, 2023	Briefing to Howth Malahide Elected Members.
March, 2023	Meeting with FCC Active Travel Unit, Representatives of School & An Taisce.
April, 2023	Further meeting with FCC Active Travel Unit, Representatives of School & An Taisce.
17 May, 2023	17 May 2023 (3pm-4pm): Meeting with Malahide Forum, and 1 no. resident of Inbhir Íde Drive. 17 May 2023 (4pm-5pm): Meeting with the residents of 1-10 Inbhir Íde Drive (the portion of the road we are proposing to provide a “School Street” i.e., restricted access to vehicular traffic for a time in the mornings and afternoons).
24 May, 2023	(3pm-5pm): Meeting with residents of the wider area (invitation sent via the Inbhir Íde Drive and Close Residents Association).
11 July, 2023	FCC Response to multiple identical letters sent to Active Travel Unit RE: proposal.
25 July, 2023	Briefing to Howth Malahide Elected Members.
01 August, 2023	Meeting with FCC Active Travel & Residents RE: Requested One-way system.
17 October, 2023	Meeting with FCC Active Travel and Parent’s Association.
November, 2023	Email correspondence to resident’s associations.

2.2 Stakeholder responses 2021 to August 2024

2.2.1 They key themes raised during the above engagements with stakeholders, as well as the responses from the Design Team are presented in Table 2 below.

Table 2 Overview of key themes from stakeholders on the PJP scheme along with relevant responses

Theme ID	Theme/Observation	Comments	Response
T1	Bollards between caves strand and Inbhir Íde Drive	Concern regarding the removal of these concrete bollards	The design team have reviewed this request and these bollards will not be removed as requested
T2	Narrowing of carriageway at Inbhir Íde Green	Concern regarding the remaining available carriageway width, loss of space for parking.	<p>The existing carriageway width is 7.4m, the provision of a footpath (2m) is to provide a safer route to the school and along the green area on Inbhir Ide closer to the desire line. The access for emergency vehicles and residents will be still provided by the 5.4m carriageway width.</p> <p>In 2020, the speed limits in housing estates throughout Fingal were reduced to 30kph in accordance with national guidelines. In order to achieve the speed reduction in housing estates and reduce incidents of inconsiderate parking, traffic control measures as road narrowing or reduction of corner radii were introduce. The narrowing of carriageways and reducing corner radii is a traffic control measure to reduce speed and reduce incidents of inconsiderate parking.</p> <p>The designs for the roads in Inbhir Íde are provided in accordance with Clause 4.4.1 of the Design Manual for Urban Roads and Streets, 2019 (DMURS) which deals with carriageway widths, and the proposed change to the carriageway is in accordance with this clause. It is anticipated that the provision of new and widened footpaths by narrowing excessively wide carriageways, will provide space for pedestrians, reduce vehicle speeds, and deter vehicles from parking/idling on the carriageway, in accordance with the Safe Routes to School Design Guide.</p> <p>The remaining width of the carriageway will lend itself to parking on one side of the road, if required, which will result in a give-and-take method of navigating the road by vehicle, which is a natural traffic calming measure.</p>

T3	Narrowing of carriageway at Inbhir Íde drive opposite the school at 11a-23 Inbhir Íde Drive	Concern regarding the remaining available carriageway width, loss of space for parking.	<p>The existing carriageway width is 7.4m, the provision of a footpath (2m) is to provide a safer route to the school and along the green area on Inbhir Íde closer to the desire line. The access for emergency vehicles and residents will be still provided by the 5.4m carriageway width.</p> <p>In 2020, the speed limits in housing estates throughout Fingal were reduced to 30kph in accordance with national guidelines. In order to achieve the speed reduction in housing estates and reduce incidents of inconsiderate parking, traffic control measures as road narrowing or reduction of corner radii were introduced. The narrowing of carriageways and reducing corner radii is a traffic control measure to reduce speed and reduce incidents of inconsiderate parking.</p> <p>The designs for the roads in Inbhir Íde are provided in accordance with Clause 4.4.1 of the Design Manual for Urban Roads and Streets, 2019 (DMURS) which deals with carriageway widths, and the proposed change to the carriageway is in accordance with this clause. It is anticipated that the provision of new and widened footpaths by narrowing excessively wide carriageways, will provide space for pedestrians, reduce vehicle speeds, and deter vehicles from parking/idling on the carriageway, in accordance with the Safe Routes to School Design Guide.</p> <p>The remaining width of the carriageway will lend itself to parking on one side of the road, if required, which will result in a give-and-take method of navigating the road by vehicle, which is a natural traffic calming measure.</p>
T4	Bridge over Caves Marsh	Raised as a potential alternative solution	<p>Fingal County Council has secured funding from the National Transport Authority (NTA) for improvements around Pope John Paul II National School under the 'Safe Routes to School' programme. Safe Routes to School is a national initiative which aims to improve safety and congestion at the school gate and on the journey to school each day. This is achieved by changing road layouts and road safety measures at the front of schools, creating new and improved infrastructure for walking and cycling to school and increasing the number of children who choose to walk and cycle through education programmes.</p>

			<p>A bridge over caves marsh is not within the scope of this project.</p> <p>Works on Barrack Bridge do not form part of this scheme but may be looked at in future works programmes.</p>
T5	Use of removable bollards instead of permanent infrastructure	Concern about the permanency of the measures, and query regarding whether removable bollards can be used during school times to create the same effect.	<p>While the 'Safe Routes to School Design Guide' provides technical guidance on design principles and considerations that will enable the creation of safer, calmer, more attractive routes to school and front of school environments, Design Manual for Urban Roads and Streets, 2019 (DMURS) is the principal road design document for all roads and streets within the urban speed limit zone, more generally. Clause 4.4.1 of the DMURS deals with carrying out upgrades, or traffic calming works on existing streets. Permanent reduction in carriageway widths is in accordance with this clause. Further to the above, temporary measures require significant logistics, are difficult to manage, often result in unsightly measures and do not provide consistency in terms of behavioural changes. The proposals in the design presented are permanent and adhere to the design guidance's as detailed above in line with government policy.</p>
T6	Apartment complex at 1-4 Inbhir Íde Drive only has 1 no. Car parking space in the shared driveway	Concern that the proposed footpath widening at the concrete bollards on the school side, will result in loss of parking for residents of these apartments.	<p>The width of the resulting carriageway after narrowing would still lend itself to parking at this location. However, we are widening of the footpath in this location is not critical to the successful delivery of this project and therefore the footpath width at this location will remain as is.</p>
T7	Residents of 1-10 Inbhir Íde Drive unable to leave their home during the proposed school-street times	Concern that these residents will be unable to leave their home during the school streets period in the morning and afternoon.	<p>The school street will not prevent/restrict residents from leaving their homes. It will limit access to vehicles into/out of this section of the street for a brief period in the morning and afternoon.</p> <p>The proposals to provide a school street is to restrict unnecessary vehicles entering the cul-de-sac during the hours of drop off and collection. The aim of the proposal is to provide a potential</p>

			<p>solution to the issues raised by residents to the school in relation to inconsiderate parking/driving/idling etc.</p> <p>The current situation makes entering or leaving the cul-de-sac serving 1-10 Inbhir Íde Drive during school drop-off and pick-up times is often difficult. The proposed school-street and wider treatments are aimed at reducing the risks, by removing as far as practicable the conflict between vehicles and people, children/residents/parents/guardians. Whilst providing a safe area for children, parents/guardians to be and at the same time improving the area and living experience for the residents of the cul de sac.</p> <p>In addition, a solution can be agreed whereby residents are given a key to lower the bollards if it is necessary to leave the school street during these intervals in the morning or afternoon.</p> <p>Emergency service vehicles can drive over these bollards. Residents can always enter/leave on foot or bicycle, mobility scooter etc. via the footpaths or through the bollards.</p>
T8	Existing one way system	Can the existing informal one way system be included in the designs?	The designers can review the existing one way system and include a formalised similar system in the final design.
T9	Are school wardens required?	Concern that wardens are required to enforce parking/idling.	1-10 Inbhir Íde forms a cul-de-sac, this, combined with the provision of a 'school street', would ensure that the road self-contained and does not require a school warden to cross children across the road. Therefore, it is deemed that a warden is not required.

3. SECTION 38 CONSULTATION 17 AUG- 30 AUG, 2024

The Section 38 Public Consultation, for the PJP II Safe Routes to School Scheme, was held on the Fingal Online Consultation Portal from the 17th August 2024 to the 30th August 2024. During this period, a total of 84 responses were submitted to FFC.

Table 3 provides a summary of the key themes from the feedback to the proposals, alongside a written response from the design team to each theme.

Table 3 Summary of key themes from negative comments and associated responses from section 38 consultation

Theme	Observation ID	Response
General Support for the Scheme	15354	Examples of positive feedback:
	15356	<i>"I strongly support this scheme. It's a no brainer that the journey to school for students should be made safer and that a safe option to walk and cycle should be provided for them"</i>
	15353	
	15350	<i>"This is a very positive proposal, that will help keep our children safe from traffic and further encourage families to have their children go to school by foot or bicycle. I particularly like the proposed improvement to the zebra crossing at Caves Marsh and the cycling ramp to Inbhir Ide Drive"</i>
	15360	
	15359	
	15361	
	15364	<i>"I am grateful for the opportunity to support the Safe Routes to School Programme at Pope John Paul II National School.</i>
	15374	<i>As a teacher in PJPs and a parent of two children attending the school, I have seen first-hand how dangerous the journey to school can be. Although there is an informal one-way system at drop-off and collection time, this is not adhered to by all e.g. delivery companies are notorious for driving too quickly in the wrong direction outside the school. I understand that the programme aims to formalise this arrangement, which I appreciate. Furthermore, a car-free school street during these times would allow more children to make the journey to school safely by foot or bicycle"</i>
	15387	
	15405	
	15409	
	15424	
	15437	<i>"Thanks to Fingal County Council for the opportunity to comment on the proposed work under Section 38 to Pope John Paul II National School in Malahide.</i>
	15438	<i>This important safety work, as replicated all over the country in other Safe Routes to School projects, will offer really significant benefits to pupils and staff at Pope John</i>
	15357	

15358	<i>Paul II. Being able to negotiate the school entrance area safely on foot, with a bit of space away from moving and parked cars, will make current journeys much safer and more pleasant, while also helping some of the surveyed</i>
15443	<i>31% of kids who don't now walk, wheel or cycle to</i>
15439	<i>school to do so.</i>
15425	<i>Ireland has a huge problem with sedentary lifestyles - a recent study found that one in four primary school children 'cannot run properly' due to getting too little</i>
15436	<i>physical exercise - and a key place to tackle this terrible health epidemic is at the school gates. Decades ago I</i>
15423	<i>went to school in the Reds, on Malahide Road, and then to St Sylvesters (now Oliver Plunkett School, site of one of the first Safe Routes to School projects) and I walked</i>
15422	<i>every day as did nearly all of my fellow pupils. But nowadays the prevalence of the school run being done</i>
15408	<i>by car means that roads around schools are made too dangerous for kids to independently travel. It's a tragedy.</i>
15406	<i>We used to dawdle happily on our way home from school, socialising and playing, and today's kids are denied that fun and social interaction, instead being</i>
15400	<i>locked into the polluting atmosphere of their parents' car, while the parents in turn are locked -- by their own</i>
15388	<i>and fellow parents' dependence on driving -- into being available for the school run day in and day out.</i>
15386	<i>Only a brave, well-planned change in the way we use our streets can stop the silliness of short distances being</i>
15384	<i>driven to school. This Safe Routes to School project is a great example. I commend the Council for proposing and</i>
15373	<i>designing it, and call on you to resist those who fear slower car traffic and delays in travelling by car"</i>
15372,	<i>"Hi</i>
15363	<i>I support the plans to make the area around PJP safer for children and pedestrians.</i>
15362	<i>Well done"</i>
15478,	<i>"I am emailing to support the plans to improve the route for kids to school at Pope John Paul's II National School in Malahide. The national stay safe routes to school</i>
15479	<i>programme is much needed to keep the kids safe to school."</i>
15444	The above are just a small example of the positive submissions received but give a flavour of the endorsements and outlined requirements for the scheme
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15457	

	15355	
General Objection to scheme - No specific points	15333	No specific points raised in these submissions, but the specific items raised in additional submissions are outlined below.
	15367	
	15431	
Objection to bollards on Inbhir Drive	15370	<p>The Purpose of the bollards is to create a "Car Free street" outside the school gates during pick up and drop off times. This aims to address concerns raised by residents in past consultation in relation to inconsiderate parking and driving around the school entrance.</p> <p>Following public submissions, the provision of these bollards can be further reviewed with feedback from residents.</p> <p>Whilst it is preferable the hours of operation are observed by everyone to ensure a safe environment, the project design team are happy to meet with residents to review the bollard placing where by a sufficient gap may be left to allow traffic exit if required while still controlling school parking.</p> <p>In addition, residents can always enter and leave via foot and bicycle.</p>
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	15450	
Objection to road narrowing on Inbhir Íde Drive and Inbhir Íde	15348	<p>Inbhir Íde: The existing carriageway width is 7.4m, the provision of a footpath (2m) is to provide a safer route to the school and along the green area on Inbhir Íde closer to the desire line. The access for emergency vehicles and residents will still be provided by the 5.4m carriageway width.</p> <p>Inbhir Íde Drive: The existing carriageway width is 7.6m, the provision of wider footpath is to provide a safer route to the school. The access for emergency vehicles and residents will be still provided by the 6.4m carriageway width.</p> <p>In 2020, the speed limits in housing estates throughout Fingal were reduced to 30kph in accordance with national guidelines, as such, in order to achieve the speed reduction in housing estates, the narrowing of carriageways and reducing corner radii is a traffic control measure to reduce speed and reduce incidents of inconsiderate parking.</p> <p>The designs for the roads in Inbhir Íde are provided in accordance with Clause 4.4.1 of the Design Manual for Urban Roads and Streets, 2019 (DMURS) which deals</p>
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		<p>with carriageway widths, and the proposed change to the carriageway is in accordance with this clause.</p> <p>It is anticipated that the provision of new and widened footpaths by narrowing excessively wide carriageways, will provide space for all pedestrians, reduce vehicle speeds, and deter vehicles from parking/idling on the carriageway, in accordance with the Safe Routes to School Design Guide.</p>
Feels like there is lack of Consultation	15352	<p>Fingal County Council has run an extensive engagement campaign with various stakeholders since 2021. This includes regular meeting and correspondences with the school, residents and residents' association. A list of all the stakeholder meetings is available in Section 2 of this report.</p> <p>There has now been a further non statutory consultation process held on our online portal from 17 Aug, 2024 to 30 Aug, 2024.</p> <p>Many of the concerns raised in the engagements from 2021 to 2024 have previously been included in the drawings published for consideration in the August 2024 non statutory consultation.</p> <p>All new submissions raised in the non statutory consultation have been considered in the final design of the project.</p>
	15376	
	15396	
	15336	
The scope of the scheme should be extended, or it is inadequate	15383	<p>Fingal County Council has secured funding from the National Transport Authority (NTA) for improvements around Pope John Paul II National School under the 'Safe Routes to School' programme. Safe Routes to School is a national initiative which aims to improve safety and congestion at the school gate and on the journey to school each day. This is achieved by changing road layouts and road safety measures at the front of schools, creating new and improved infrastructure for walking, or cycling to school and increasing the number of children who choose to walk and cycle through education programmes.</p> <p>Fingal County Council are aware of broader road safety concerns for children accessing the school particularly at Barrack Bridge which may be addressed in future works programs but currently a bridge over caves marsh is not within the scope.</p> <p>Fingal also note alternat routes through Caves March which have been proposed by local residents but these are not included in the scope of this scheme.</p>
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Safety to school should be managed by the school, not through infrastructure changes	15451	The safety of all road users is the responsibility of Fingal County Council. The main objective of the scheme is to provide safe access to the school and a safe front of school environment which is under the remit of Fingal County Council.
	15370	
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Scheme only positively impacts a limited range of people	15379	<p>Whilst the primary purpose of the scheme is to provide safe routes to school for children and their parents, residents and school goers alike will benefit from improved safety infrastructure in the area all year round.</p> <p>The reduced corner radii will result in shorter crossing distances and slower traffic speeds which will assist safe crossing of all vulnerable road users as well as all others on the street.</p> <p>The install of raised table crossings will remove trip hazards and elevation changes associated with road crossings and give priority to all pedestrians resulting in a safer crossing for all vulnerable road users.</p>
	15397	
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	15448	
Concerns with loss of parking spaces	15345	<p>Inbhir Íde: The existing carriageway width is 7.4m, the provision of a footpath (2m) is to provide a safer route to the school and along the green area on Inbhir Íde closer to the desire line. The access for emergency vehicles and residents will still be provided by the 5.4m carriageway width.</p> <p>Inbhir Íde Drive: The existing carriageway width is 7.6m, the provision of wider footpath is to provide a safer route to the school. The access for emergency vehicles and residents will be still provided by the 6.4m carriageway width. The net effect of removal of spaces here amounts to the loss of approximately 7 spaces.</p> <p>The scheme is designed to reduce parking directly outside the school to create a safer environment for school users. However, the remaining width of Inbhir drive will allow for parking at one side of the carriageway with vehicles navigating using a give and taken method which helps with traffic calming.</p>
	15365	
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There have been no issues before why change now	15368	<p>The scheme is designed to improve front of school safety and encourage transport modal shift and increase the number of pupils walking and cycling to school.</p> <p>Traffic at the front of school during drop-off and pick-up times presents a safety hazard for school children and impacts on air quality in the vicinity of the school gates. Traffic congestion and parked cars can reduce visibility of children crossing the road. In addition, parking on</p>
	15370	
	15381	
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	15441	

		<p>footpaths can block access as well as reduce available footpath width, leading to overcrowding on footpaths or forcing children to walk on the road. Traffic turning at school gates also creates a significant risk in congested front of school locations.</p> <p>Idling cars in and around the school gates also increases air pollution levels.</p> <p>An Taisce funded by the National Transport Authority advertised the Safe Routes to School Scheme in 2020. The management of Pope John Paul applied for the scheme requesting an improvement to the area around the school. Through the process of the SRTS a parent's survey was carried out which found 97% of the parents and guardians supported better walking and cycling access to the school.</p>
Concerns with no plans for Inbhir Íde / Texas Lane entrance which is already congested	15345	<p>The scope of the works will focus on providing safe routes to school and front of school treatments. It wasn't identified that parking management was required along this road.</p>
Alternative Traffic Management Plan	15395	<p>Through the design process a number of traffic management options were studied and assessed. Residents previously requested that the current informal one way system be formalised along Inbhir Íde Drive and Sonesta. This system is already known by the parents and residents.</p>
No plans for Inbhir Íde junction, outside houses 73 and 78	15400	<p>It is proposed to provide an uncontrolled crossing at this junction. However, it is not proposed to implement junction tightening at this location.</p>

4. CONCLUSION

As part of the development of the Pope John Paul II – Safe Routes to School Scheme Fingal County Council undertook a three-year consultation program with key stakeholders. Through this process the design was refined a number of times to include residents' suggestions where possible. Following this consultation the final design for construction will be issued with works to progress based on this design.