

Brussels, 7 July 2022

To:

Brian GOGGINS, Director, European School Brussels 1
Jan BELIEN, Deputy Director for Finance/Administration

SUBJECT: Decision to open Opstal Gate and closure of Vert Chasseur Entrance for pedestrians and bicycles

Dear Mr Goggins, Dear Mr Belien,

We are writing to express our deep concerns about the decision taken by the school to close the Vert Chasseur Entrance to pedestrians and bicycles and to open the Opstal Gate instead. The APEEE welcomes efforts to improve security and safety at our school. We regret, however, that decisions were taken without a proper impact assessment and without consultation. We recall that the *European School Guidelines on Ethics and Security* (Ref.: 2013-01-D-9-en-1) state that: “We should serve the interest of the European Schools with competence and responsibility, in accordance with the highest professional standards. *Conclusions or decisions should be balanced and based on a thorough analysis of the facts and context.*”

We ask the school management to reconsider its decision and in particular the strict limitations placed on entrance through the Vert Chasseur Gate. In the meantime, all measures should be put on hold to allow a proper evaluation of the situation.

In more detail, we would highlight the following:

1. Lack of proper evaluation of the June pilot

The school informed parents that a “pilot project” would be implemented in June 2022. By its very nature any pilot project is subject to evaluation before its final implementation. We are seriously concerned about the plan of the school management to implement final measures in September without any evaluation and ignoring the numerous concerns expressed by parents in the few weeks of its trial application in June. Specifically, we regret that the school could not organise an extra-ordinary meeting of the Safety and Hygiene Committee to discuss the matter before the end of the school year as the APEEE requested. We were also surprised to learn from the Échevin, during the Uccle Communal Council held on 23 June 2022, that the school had requested kiss-and-drive places on Chaussée de Waterloo already months ago. This suggests that the June trial was never intended as a real pilot.



2. Measures not supported by VIAS report

The school has stated that the decision to open the Opstal Gate to pedestrians and bicycles, and to limit entry through Vert Chasseur, is based on the VIAS audit report. However, this is not the case. The VIAS report indeed outlines several flaws as regards the safety at the entrances to our school, at both Vert Chasseur and Waterloo. Importantly, the report particularly recommends that actions be taken to improve safety at the Waterloo entrance as a matter of priority. For Vert Chasseur, the report recommends to widen the sidewalk for pedestrians and to separate cars (coming in and out) and pedestrians in terms of time, not space: *“Lorsque les usagers de la route ne peuvent pas être séparés dans l'espace, il peut être possible de les séparer dans le temps. Cela pourrait signifier qu'aux heures d'affluence, l'accès aux voitures est réservé à la direction de l'affluence et que les voitures qui veulent circuler dans l'autre direction doivent attendre un certain temps. Il ne s'agirait pas de longues périodes de temps, mais par exemple de 20 minutes. On pourrait examiner si cela peut être organisé d'une manière lisible et pratique, et s'il existe un soutien suffisant à cet égard dans la communauté scolaire.”* The VIAS report concludes that for the Vert Chasseur, *“une meilleure gestion du trafic (un réglage de feux plus adéquat et/ou un schéma de circulation dans le quartier) pourrait rendre les mouvements plus fluides et ainsi réduire considérablement le risque d'accidents mineurs.”* It does not recommend to completely close the entrance to pedestrians and bicycles in Vert Chasseur nor to open the Opstal Gate as a solution. In fact, the VIAS report does not assess the Opstal Gate as such and in particular does not assess the safety and security of its use for all pedestrian and bicycle access.

3. Serious safety risks of Opstal Gate

We believe that the solution implemented by the school in the pilot project is disproportionate to the aim, which is to reduce the risk of accidents at the Vert Chasseur entrance. Instead, it has led to more dangerous situations and more traffic on Chaussée de Waterloo, which the VIAS report described as the most problematic entrance to our school in terms of safety and traffic. Moreover, the Opstal Gate itself, because of its location (down a winding access street hidden from general view by buildings) is not a safe solution, especially considering that it is the only entrance and exit for pedestrians and bicycles, that are now forced to go around cars and trucks to get into the school. The fact that the Opstal Gate is not visible from the main street, raises other security issues, especially for younger children, who risk encountering strangers on their way, for instance coming out of the very narrow Cité du Vert Chasseur alleyway. Without proper monitoring of the drop off and controls on access to the street, the entrance now risks becoming the most dangerous entrance to the school. And indeed just two weeks after the start of the pilot, a young pupil was hit by a car while crossing the road at Chaussée de Waterloo 1004, the first such accident in our memory. If the Opstal Gate is to remain one of the entrances of the school, we believe it is crucial that surveillance is placed by the school not only at the gate, but also along the street up to the Chaussée de Waterloo as well as at the drop-off point in order to ensure that the children can enter the school safely.

Therefore before any further implementation in September 2022, we demand that the Uccle pilot project is suspended and further evaluated, including an assessment of the safety and security of



the Opstal Gate, which is completely missing in the VIAS report, and that parents are properly informed and consulted in the process.

Rather than moving forward with the proposed access policy, we ask the school to consider different solutions to reduce the risk at the entrance of Vert Chasseur (for example by creating a proper drop-off/kiss-and-drive zone; separating the entrances for Primary and Secondary pupils; having cars entering through the Waterloo Gate in the morning and exiting through Vert Chasseur in the afternoon; arranging different entrance times for cars and pedestrians; allowing the exit of garderie pupils through Vert Chasseur in the afternoon; etc). In general, we believe prioritising cars over pedestrians and bicycles should be avoided as it sends the wrong message to the school community.

We are ready to cooperate in finding suitable solutions not requiring a complete ban on pedestrians and cyclists from entering or exiting via the Vert Chasseur entrance. To this end, we would ask that a meeting be scheduled as soon as possible after the holidays.

We thank you very much for your attention and look forward to your response on this important issue.

Kind regards,

Valentina PAPA

President EEBI APEEE

Copy:

Simona CAJHEN, Deputy Director for Nursery and Primary

Susanne KÜNSTER, Deputy Director for Nursery and Primary

Jonathan Adam GUYOT, Prevention Advisor

APEEE Bureau