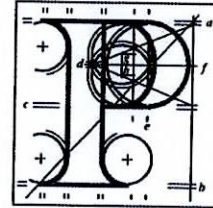


Our Case Number: ABP-316272-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Philip and Sally Berman
122 Leinster Road
Dublin 6
D06E5F7

Date: 15 August 2023

Re: Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme
Templeogue/Rathfarnham to City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) 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.

If you have any queries in the mean time, 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.

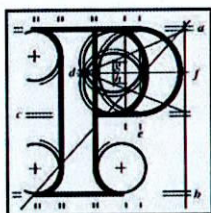
Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Philip and Sally Berman

(b) Observer's postal address

122 Leinster Road
Dublin D06E5F7

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to?
(Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

316272

- (b) **Name or description of proposed development**

Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Templeogue/Rathfarnham to City Centre

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

It is clear that there are three principal aims behind this planning application - improving bus speeds, improving air quality and enhancing cycle routes.

We believe that the option of introducing congestion charges has not been given adequate consideration. The report states that “congestion charges on its own would not remove the need for additional bus transport or cycling infrastructure along the route of the proposed scheme”.

We believe that there are three principal responses to this:

1. A congestion charge would very significantly reduce car traffic if the charge was high enough and, unlike the proposed scheme, would allow cars to enter the city at all hours if prepared to pay the charge. The reduced car traffic would make cycling much easier along the existing cycle lanes and would significantly increase bus movement.

James Cleeton, Sustrans London Director, said: “The [Congestion Charge](#) was a ground-breaking scheme when it was introduced 20 years ago. It delivered dramatic reductions in traffic levels and congestion overnight, and showed that we don’t just need to accept congestion, pollution and roads dominated by traffic as the inevitable consequence of modern life. What was key to the success of the Congestion Charge was the provision of high quality, viable alternatives to driving to work in central London that accompanied the introduction of the scheme – more buses and better tubes, and more recently quality cycle routes and wider pavements.” (see <https://www.intelligenttransport.com/transport-news/143883/londons-congestion-charge-celebrates-20-years-of-success/>).

Research from Sweden’s Lund University Centre for Sustainability Studies, which screened almost 800 peer-reviewed reports and case studies published since 2010 from across Europe – seeking those that quantified where and how cities had successfully reduced car use, concluded that the Introducing congestion charges can reduce urban car traffic by up to 33 percent. (see <https://cities-today.com/congestion-charges-ranked-as-the-most-effective-way-to-reduce-car-use-in-cities/>).

The International Transport Forum Discussion Paper 170 on “Long-Term Effects of the Swedish Congestion Charges” concludes that “Congestion charges work, instantly and over time, and can be recommended for implementation in congested metropolitan areas. It is almost 12 years since congestion charges were

5. Grounds

introduced in Stockholm. They were extremely controversial ten years ago but have become increasingly accepted among decision makers in Sweden. Many view the charges as a policy to reduce congestion, but also to combat climate change, to finance new infrastructure, and to reduce local air pollution and noise." (chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.itf-oecd.org/sites/default/files/docs/swedish-congestion-charges.pdf).

2. However, there is no reason why the cycle lanes should follow the same route as the bus corridor. Indeed, routes that (largely) avoid bus corridors would greatly enhance the cycling experience. For example, making Upper and Lower Mountpleasant Avenue primarily cycle routes would take cycles off the bus routes. We have not fully explored this option but I believe the principle of properly separating cyclists from buses hasn't been adequately considered in the plans.

3. The cost of implementing a congestion charge would be substantially less than the current enormously complex proposal and - more importantly - would be far less disruptive to the Rathmines community. The current plan would, we believe, be very detrimental to the growing sense of community in Rathmines with, for example, the loss of outdoor cafe seating. Furthermore, a congestion charge would generate income that would contribute to a budget for better public transport.

We therefore urge that the planning application be rejected on the following grounds:

1. That the current plans will be seriously detrimental to the Rathmines community, impacting local businesses as well as social interaction;
2. That inadequate consideration has been given to the significantly cheaper solution of a congestion charge which would achieve the principal aims of the planning application.
3. That the provision of cycle lanes along the same route as the bus corridor is inappropriate when alternative routes exist which would provide a safer and more enjoyable experience both for cyclists and for pedestrians,
4. That the likely financial cost of the scheme cannot be justified either by the saving in bus journey times or when considering the substantially lower costs – and income-generating potential - of a congestion charge.
5. The environmental and climate costs of the proposed scheme cannot be justified when considering the substantially lower costs of a congestion charge.
6. That the substantial and lengthy disruption caused by the construction of the scheme cannot be justified in comparison with the minimal disruption involved in the establishment of a congestion charge scheme.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes