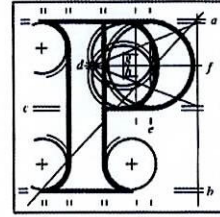


**Our Case Number:** ABP-314056-22



**An  
Bord  
Pleanála**

Ballmore Group  
One Royal Canal House  
Royal Canal Park  
Dublin  
Dublin 15  
D15 DKW4

**Date:** 26 September 2022

**Re:** Liffey Valley to City Centre Core Bus Corridor Scheme.  
Fonthill Road to High Street all in the County of Dublin.

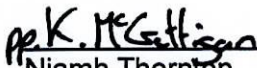
Dear Sir / Madam,

An Bord Pleanála has received your observation or submission in relation to the case mentioned above 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 be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the Local Authority and at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at [www.pleanala.ie](http://www.pleanala.ie) and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,



Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

BL50A

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<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

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An Bord Pleanála (Strategic Infrastructure Division),  
64 Marlborough Street,  
Dublin 1,  
D01V902

13th September 2022

Re: St. James's Gate Development, James Street, Dublin

Dear Sir/Madam,

This submission is prepared by Marbelsand Holdings Limited (on behalf of Ballymore) for the statutory public consultation for the Core Bus Corridor initiative of BusConnects.

## Introduction

Marbelsand Holdings Limited (on behalf of Ballymore) has submitted a planning application to Dublin City Council (planning ref: 4588/22) to open the gates of the historic St. James's Gate brewery to become a world class, modern, and dynamic urban neighbourhood in Dublin 8.

The masterplan for over 12 acres of currently disused brewery lands is proposed to be transformed into Dublin's first Zero Carbon District, comprising of over 100,000sqm of mixed-use development, including new residential, commercial and leisure uses all set within over 2 acres of new public spaces and pedestrian focused streets. The masterplan retains the site's industrial heritage with the refurbishment, repurposing, and extension of heritage structures. This has retained the essence of the place, while providing distinctive and successful modern buildings and spaces. Once planning is granted, construction will take approximately 7-10 years.

The proposals will include:

- 336 new homes, including apartments for sale, rent and social housing. The Iveagh trust will be the operator of the social housing element of the scheme.
- Fixed and flexible inside and outside spaces for culture and community use will be created, including a multi-use space in the heart of the scheme
- A new destination market and foodhall, showcasing the best of craft and produce
- Hotel accommodation, including repurposed within the heritage buildings along James Street
- A wide range of commercial office space and retail spaces, complementing the nearby GEC Guinness Enterprise Centre.
- A dedicated, secure, and accessible cycle park containing over 1500 spaces

The masterplan introduces more than two acres of landscaped public outdoor space, creating both intimate pockets of greenery alongside a significant versatile public square for people to gather and

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socialise. New streets will connect through to the surrounding area, integrating with the neighbourhood through new sustainable walking and cycling routes.

This development will represent one of the most exciting and significant development and regeneration opportunities in Dublin, Ireland and Europe.



Image 1 - View from James's Street, east towards proposed hotel

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Image 2 - View from James's Street, west towards proposed hotel



Image 3 – View south across Main Square, towards Guinness Storehouse

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## Context

The development is intended to be an exemplar of sustainable mobility, making use of its central location to attract trips primarily via walking, cycling, and public transport. On that basis, we are fully supportive of the BusConnects Liffey Valley CBC Route 7, Liffey Valley to City Centre, part of which runs along James' St, which will significantly improve the accessibility of the area by bus. We welcome the improvements to cycling infrastructure which will provide a safe and attractive route to the site, which is particularly important given the large number of cycle parking spaces proposed. The provision of a bus gate to the west along James St will lower traffic volumes in peak hours passing the site, improving the characteristics of the road, reducing noise and air pollution in the area which is very welcome.

The proposals immediately adjacent to the site were understandably designed without cognisance of the proposed St. James's Gate Masterplan. In light of the submission of the planning application for the St. James's Gate Masterplan, there are some relatively minor changes needed to the proposed BusConnects layout which better take account of the St. James's Gate development masterplan proposals.

The particular details of the relevant section as currently proposed will prevent the required access to the development and more particularly to the building which fronts on to James' Street.

The latest CBC infrastructure proposals for the relevant area along James's St/Thomas St are shown for reference in Image 4 below.

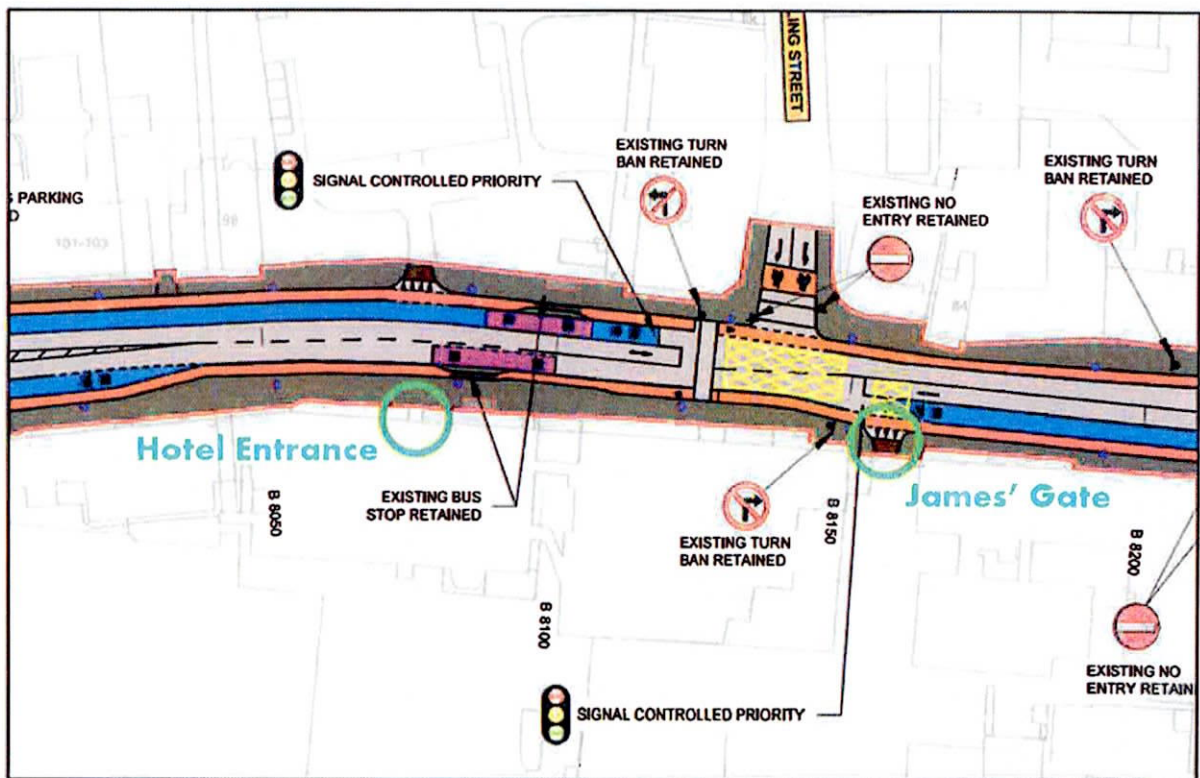


Image 4 – Proposed Liffey Valley to City Centre BusConnects CBC extract (with added labels for reference)

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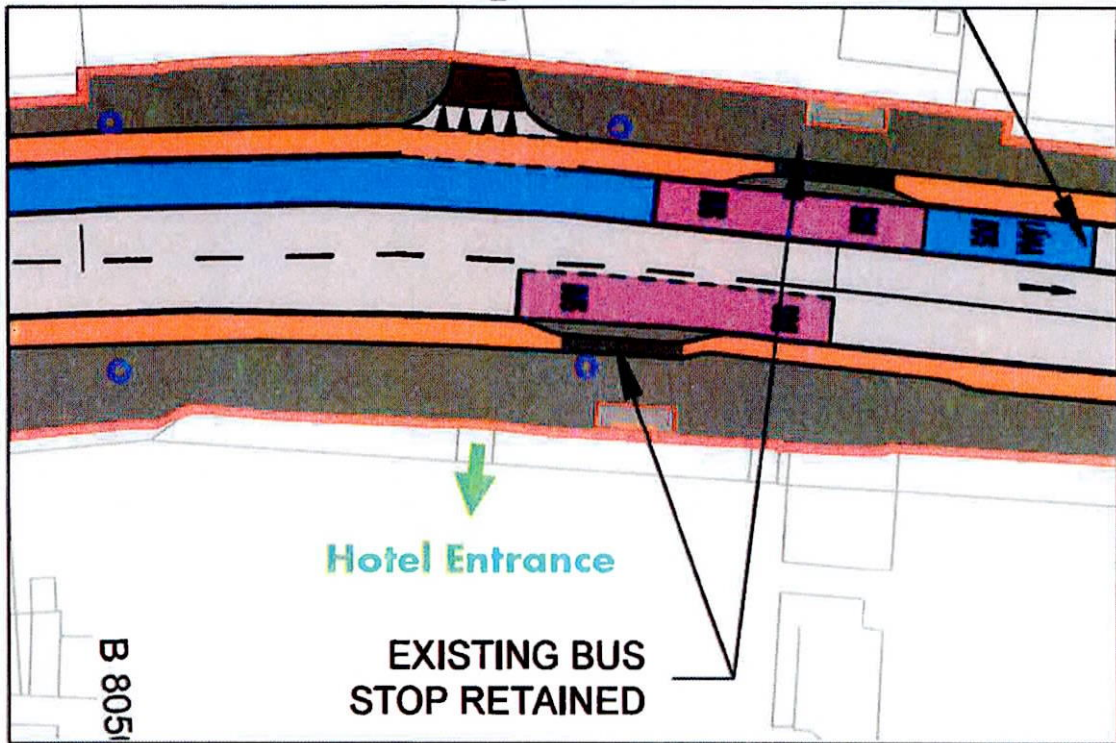


Image 5 – Detail of Proposed BusConnects Bus Stop Layout (with added label for reference)

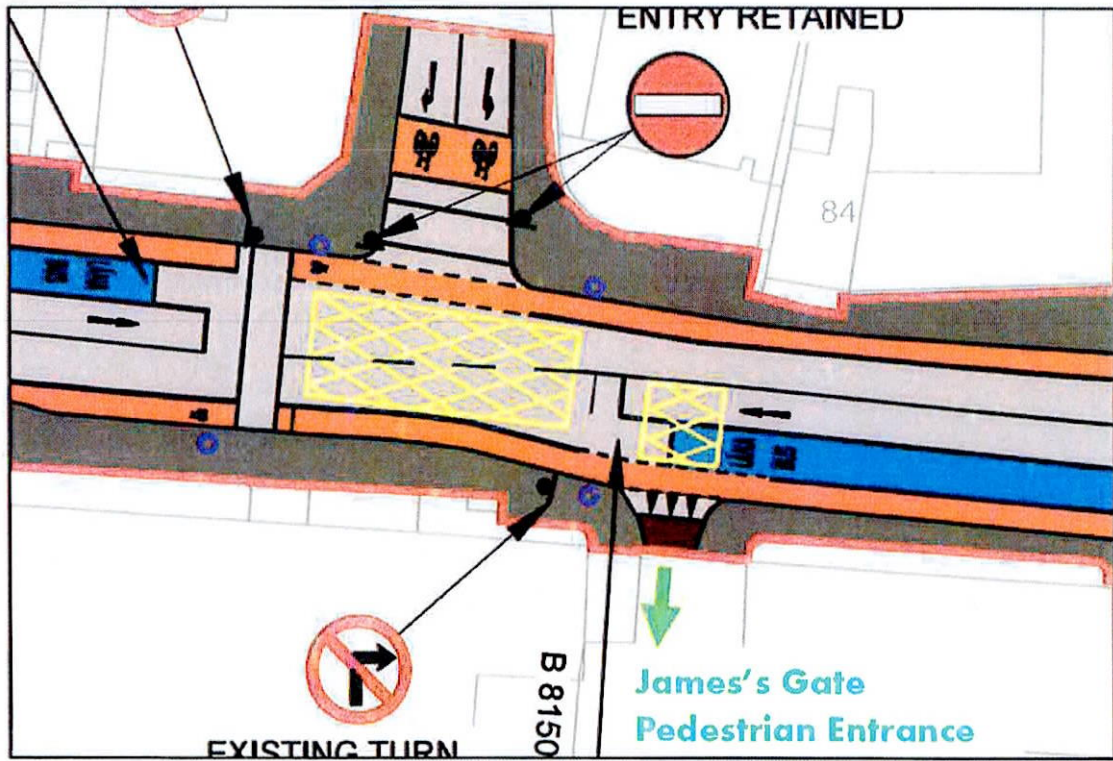


Image 6 – Detail of Proposed BusConnects James's Gate Layout (with added label for reference)

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## Footpath width

In pre-planning discussions held with the NTA based on the Draft CBC proposals, we raised issues and concerns regarding the width of the footpath in front of James's Gate. The NTA agreed that the footpath width was below the desired width of 2m. From a review of the current NTA proposals, the footpath width is still insufficient in the latest proposals as can be seen in image 4 above. This area is particularly important as James' Gate will no longer be a vehicular entrance with limited usage but will instead become the main pedestrian entrance to the proposed masterplan and will form part of the primary route from the city centre to the Guinness Storehouse. It has been estimated that, at peak times, up to 1,300 people per hour could pass through this entrance. As the gate itself is a landmark in the city, it is expected that visitors will also congregate in its proximity, further increasing the need for adequate and safe pedestrian space in front of it.

Images 7 and 9 below show a potential configuration that provides for an increased footpath area in front of the gate, along with an additional pedestrian crossing on this arm of the junction. This is made possible by moving the westbound lanes' (vehicular and bus) stop line further to the east.

## Set down layby

Similarly, concerns previously raised regarding the provision of a layby for hotel set-down/pick-up have not been addressed in the latest BusConnects proposal. Due to the nature of the Hotel buildings' existing layout and orientation, the primary entrance to the Hotel will be located along the James's St frontage. Although there is some vehicular access provided to the south of the development, James' St is a far more appropriate drop off point due to the location of the main entrance.

It is our strong belief that, should no layby be provided at this location, it is highly likely that informal set-down occurs using the carriageway or bus lane, thus negatively impacting on the operation of the buses and general traffic through this section. A suitably designed layby that does not disrupt the traffic lane (adequate tapers, enough depth to avoid vehicles encroaching onto the circulation lane, etc.) would result in less disruption to the operation of buses than without a layby.

Images 7 and 8 below show an example of a potential layby location which does not interfere with the provision of adequate cycle infrastructure or bus lanes. It is important to note that the design of this layby has referred to the manner by which existing laybys have been incorporated along the various BusConnects Core Bus Corridor proposals.

## Relocation of bus stop

The westbound bus stop location was also discussed with the NTA during the pre-planning stage, as it was deemed that it would have a significant impact on the proposed St. James's Street masterplan and its hotel fronting the street. Although the location has been corrected since the draft proposals with the stop now proposed to remain in the same location as the existing stop, this location is still very close to the proposed primary entrance to the hotel as can be seen in image 5 above.

At present, this entrance to the front building is unused, and so understandably was not considered when determining the bus stop location. However, it forms an important part of the proposed plans for the hotel and wider St. James's Gate masterplan, which have now been submitted for planning. A

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relocation of the bus stop away from the entrance is necessary and would be welcome in order to improve the interface between the stop and the building entrance. Images 7 and 8 below show an example of a potential bus stop relocation further to the west, that we strongly believe is adequate and does not detract from the quality of service associated with the BusConnects proposals.

## Dublin Bikes

As part of the submitted planning application, a new pedestrian entrance is proposed in the north-western corner of the site, through the northern wall of the Open Gate Brewery yard. In order to facilitate this, a rearrangement or relocation of the current DublinBikes station is required. This will be planned in conjunction with Dublin City Council and JC Decaux in order to determine the optimal solution and will take full account of the BusConnects CBC infrastructure plans so as not to impact the proposals.



Image 7 – Required local changes to BusConnects layout, showing increased pedestrian space, hotel layby, and relocated bus stop

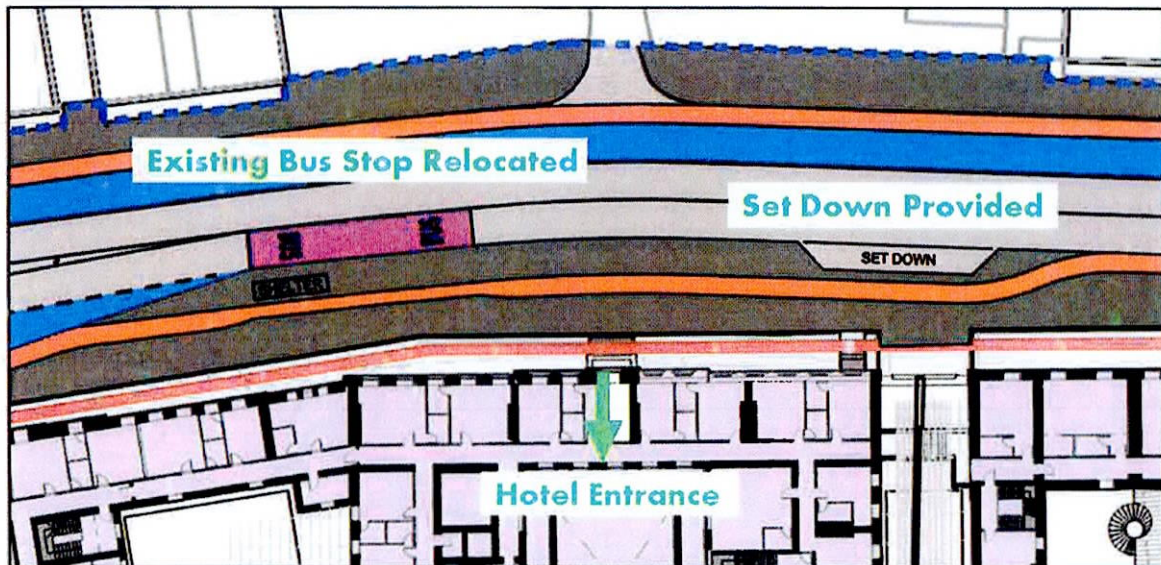


Image 8 – Detail of redesigned bus stop and set down layby example

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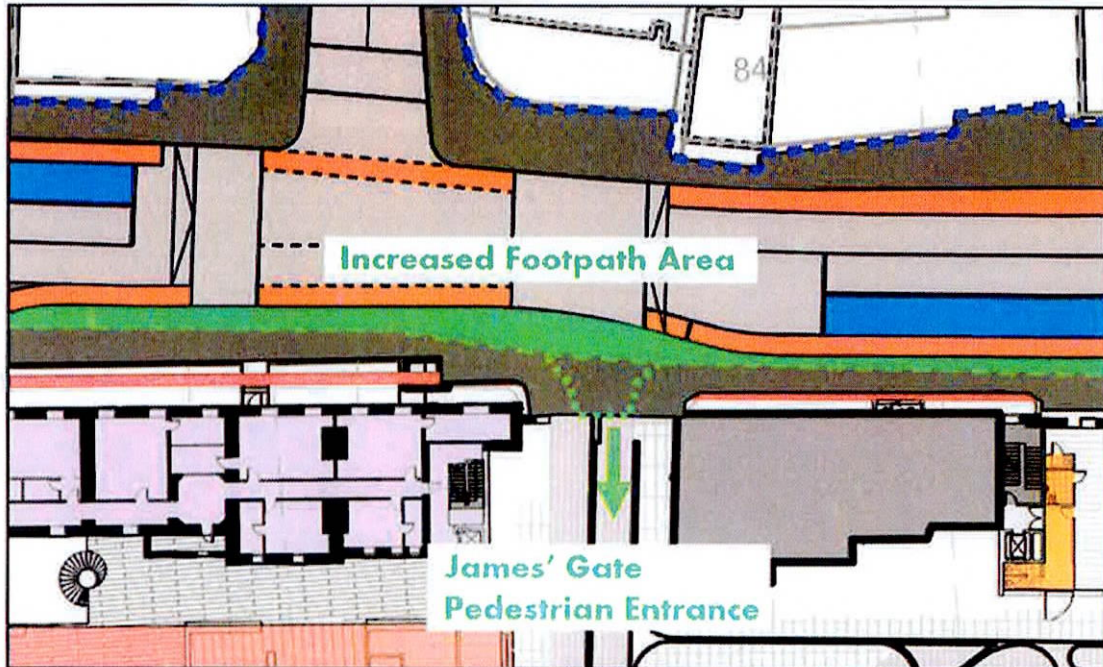


Image 9 – Detail of redesigned James's Gate entrance with widened footpath and pedestrian crossing

Further to these specific requirements, our longer-term desire would be to see James's St/Thomas St develop into a mostly traffic free area, primarily with provision for public transport, pedestrians, and cyclists, along with further public realm enhancements and landscaping. This is something that has been discussed with DCC and considered in the context of the BusConnects proposals.

The St James's Gate development will be a world class, sustainable development in the heart of the city. It needs to sit side by side with BusConnects. It is critical that the changes are made to the local section of the BusConnects route to allow for the proper and orderly operation of the St. James's Street development. These proposed changes are nominal changes to the BusConnects route, however they are fundamental to the proper and orderly operation of the St. James's Gate development.

We respectfully request that these changes are conditioned as part of the BusConnects project. We are available at your convenience to discuss any of the issues requested.

Yours sincerely,

Davis Killion  
Developments Director  
Ballymore Group

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