

murray & associates
landscape architecture

CLARIFICATION OF FURTHER INFORMATION
Landscape Architect's Report

for

Warehousing / Logistics and Office Development
Calmount Road & Ballymount Avenue, Dublin 12

CLIENT:
Blackwin Ltd.

November 2022

Planning Reg. Ref. SD22A/0099

murray & associates
landscape architecture

16 The Seapoint Building
44-45 Clontarf Road, Dublin 3
Tel: +353 (0)1 8540090

mail@murray-associates.com
www.murray-associates.com

Member of the Irish Landscape Institute

Site at Calmount Road and Ballymount Avenue, Ballymount Industrial Estate, Dublin 12**Register Reference: SD22A/0099****CLARIFICATION OF FURTHER INFORMATION [CFI]**

This report aims to respond to the following items 3b and 3f of the CFI [numbering as per Decision Order no. 1283]:

3. Item 8 Clarification.

In light of the new CDP, the applicant is requested to clarify the following:

b. GSF - The applicant sets out in their report that a score of 0.18 is achieved. The minimum score required is 0.5. The applicant is requested to demonstrate that the minimum score is achieved on site.

f. 12.8.6 Public Art - the applicant is requested to submit details indicating compliance with this.

This report has been prepared by Murray & Associates, Landscape Architecture as the above items relate primarily to Landscape Architecture and / or Green Infrastructure. Murray & Associates have also had input into other CFI responses and worked with the team to clarify or contribute to coordinated design responses.

Landscape Plans and Sections have also been updated where necessary and are included in the submission. Note that the plans were updated in order to coordinate with the wider changes to the site layout responding to roads and infrastructure changes within the site and around the perimeter. There are no substantive changes or impacts to the landscape as was previously proposed that would alter earlier reports or assessments in regard to green infrastructure, landscape design intent or design outcomes.

The following drawings have been updated and resubmitted with this CFI submission:

- 1878_PL_P_00 Landscape Masterplan, Rev. B
- 1878_PL_P_01 Soft Landscape Plan and Details, Rev. B
- 1878_PL_P_02 Hard Landscape Plan and Details, Rev. B
- 1878_PL_S_01 Landscape Sections Sheet 1 of 4, Rev. B
- 1878_PL_S_04 Landscape Sections Sheet 4 of 4, Rev. B

3. Item 8 Clarification.

B – GSF

GREEN SPACE FACTOR

From South Dublin County Development Plan 2022-28:

GI5 Objective 4: To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq m. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirement based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 12: Implementation and Monitoring, Section 12.4.2).



Calmount Road site - Current Aerial Photograph (Google Maps)

The site at Calmount Road is currently a greenfield and would be classified as 'improved agricultural grassland'. The site has been managed to keep the vegetation under control for many years and has no features of landscape interest such as trees, hedgerows or woodland, and there are no hydrological or topographical features present. It should be noted that the aerial photography record shows that

the site has been in this condition since at least the late 1990s. No vegetation was removed from this site by the applicant. The site is zoned EE.

International best practice would suggest that 30% of the site should be given over to green cover. This site has achieved 22.5% green cover and 12.5% Permeable GI (35% total green/blue infrastructure).

[Note: SDCC CDP doesn't give a percentage cover but the City Edge Strategic Framework plan looks to achieve a total of 50% Green Cover for the plan area, which would include parks and green spaces, so it follows logically that the typical EE zoned site would not be expected to achieve 50% within its site area.]

Much of the planting and vegetation proposed in this application is of high biodiversity and environmental value, including Miyazaki-style mini-woodlands. Further, the site aids in the achievement of several GI policies, objectives and aspirations in the CDP and City Edge Strategic Framework plan.

As has been demonstrated elsewhere in the planning submission, buildings like those proposed are not suited to green roofs for reasons of engineering, but all suitable building roofs have been greened as intensive green roofs with substantial native planting, not just sedum. [We also note that part of the roofs are used for Solar panels which is part of the Applicant's wider commitment to sustainability.]

It is our view that this development goes further than many similar developments in recent times and will create a positive effect on local biodiversity. We appreciate the urgency of environmental reform in terms of planning for the county in the context of climate change and accept that all development should contribute to positive environmental change to the greatest possible extent.

SDCC CDP GI5 Objective 4: Green Space Factor (GSF) proposes a mathematical system for the evaluation of the green infrastructure on sites. The basis for the assignation of a given factor is not clear, but the factor required for this site – zoned EE – is 0.5.

A calculator is provided to allow the GSF to be calculated. Following the methodology prescribed, the result for this site is 0.31, i.e. the proposed development fails to meet the target factor.

With regard to the calculation of GSF, we respectfully submit the following theoretical ways in which the factor could be achieved:

1. The site has no existing vegetation and the mathematics of the calculator are heavily weighted towards the retention and protection of existing vegetation, assigned a factor of 1.2 in the scoring calculator. So, if this c.7-hectare site had 3 hectares of vegetation to retain and protect, it would reach the factor of 0.5.
2. The site has no existing water bodies and the mathematics of the calculator are heavily weighted towards the retention of open water, assigned a factor of 2.0 in the scoring calculator. If the site had a retained body of water of 1.8 hectares, it would reach 0.5.
3. In order to achieve the GSF of 0.5 with new planting alone, the total surface area of greening factors could be achieved by the following:
 - a. New Trees (0.6 calculation factor) – 60,000sq.m (i.e. 85% coverage)

- b. Tall Lawn, Vegetation- Shrub / Hedgerow, Vegetation- Pollinator-friendly planting (0.6 calculation factor) – entire site would have to be planted
- c. Green Roofs – Intensive (0.7 calculation factor) – c.50,000 sq.m (i.e. 71% coverage)
- d. If the entire proposed roof area (c.21,000 sq.m) could be converted to green roof, an additional 35,000 sq.m of New Trees would be required (i.e. 78% coverage, combined total).
- e. Green walls could increase the greening factor, but it would take an additional 5.7 hectares of green wall to achieve the GSF, in combination with the current site proposals.

It is quite simply impossible to reach the target set out in any reasonable manner, in our view and retain a development that would be viable.

In our experience to date in applying this new policy, only those sites that have existing landscape features to retain are capable of passing the GSF. Even then, only those with substantial areas of trees to be retained are passing.

This office met with Mr. Oisín Egan of South Dublin Co. Council Parks Dept on 4th November to discuss the CFI. We talked through the issues raised in this paper with specific reference to this site and more general examples. Mr. Egan clarified some of the methodology for calculating the GSF, and this has improved the result from the Response to the Request for Further Information stage where the result was 0.18, to 0.31 currently. However, it is still short of the target of 0.5.

We submit that the policy as set out is very commendable in its aim, and we are very supportive of measures that will improve the provision of Green Infrastructure. However, it is our view that it is not currently realistic in how it is applied, at least in the context of this site, where there are no existing trees or water bodies.

In our view, a target for green cover on any site of c.30% would be a reasonable aim in line with emerging norms across Europe, and would achieve a very strong contribution to local biodiversity. Where a site meets or is close to this target, it would stand to reason that it should pass the GSF criteria. This implies that either the weighting system for the calculation of GSF should be changed for sites with no existing landscape features, or that the GSF target itself should be lowered for such sites.

The CDP goes on to note that *“Where site-specific constraints do not allow for adequate landscaping features in line with minimum requirements (for example, for infill development or certain brownfield sites) a developer will be permitted to provide alternative GI interventions or contributions to make up for this shortcoming...”*

If contributions towards provision of Green Infrastructure were to be calculated for this site, it would appear to us that this could be potentially inequitable, where all sites are not treated equally, due to the happenstance of their current condition. We will, of course, work with SDCC post planning (if granted) to ensure the best possible outcome for green infrastructure, landscape and local biodiversity in balance with the other considerations on this development site.

It would appear that the GSF Policy is not modulated or calibrated to accord with the general GI policies in the CDP. We would submit that the proposed development:

- Complies with the GI policies and objectives of the CDP and the non-statutory City Edge Strategic Framework plan
- Creates a positive effect on local biodiversity in comparison with the existing
- Delivers c.35% green/blue cover on the site, which is in line with international best practice
- Delivers a huge diversity of landscape types – native hedgerow & mini-woodland (Miyawaki method as per SDCCDP), water and wetland elements (integrated with SuDS proposals), street trees, pollinator planting, green roofs planted with native shrubs, green facades with pollinators.

In conclusion, in the context of the current application, we would respectfully suggest that the site proposals are very strong in terms of Green Infrastructure provision, enhancement of local biodiversity and improvement of the public realm and that the landscape proposals substantially comply with all GI policies, objectives and standards of the Development Plan. The applicant, Blackwin Ltd. is committed to a high quality of landscape and green infrastructure provision, as well as other sustainable energy and environmentally friendly strategies on this site. If this project is granted permission, the project team will work with SDCC to ensure best outcomes for Green Infrastructure, landscape and local biodiversity.

See Addendum for Green Space Factor Calculator (for this site).

Please also refer to Landscape Plans (submitted separately to this report), as follows:

- 1878_PL_P_00 Landscape Masterplan, Rev. B
- 1878_PL_P_01 Soft Landscape Plan and Details, Rev. B
- 1878_PL_P_02 Hard Landscape Plan and Details, Rev. B
- 1878_PL_S_01 Landscape Sections Sheet 1 of 4, Rev. B
- 1878_PL_S_04 Landscape Sections Sheet 4 of 4, Rev. B

The landscape plans have been updated to reflect changes made to the site layout plan as a result of the CFI which relate primarily to site engineering / roads. The GSF calculations are based on this current layout.

3. Item 8 Clarification.

f. 12.8.6 Public Art - the applicant is requested to submit details indicating compliance with this.

Under this SDCCP policy **12.8.6 Public Art**, as the proposed development is more than 5,000sq.m in size the Applicant "*will be required to incorporate a physical artistic feature into the scheme to improve the built environment / public realm.*" Further, the policy states that "*This may include high quality features within the environment or landscaping, in agreement with the Council.*"

We would contend that the proposed landscape scheme as shown on the submitted Murray & Associates landscape drawing, which includes a public plaza with intricate paving patterns, high quality site furniture & lighting and semi-mature tree planting would constitute "high quality features within the environment or landscaping".

However, we acknowledge that there would be many options that could satisfy this policy and fully agree with the spirit of the policy to create features in the public realm that reflect local character with bespoke artistic or designed elements. The applicant has indicated their willingness to explore the options post-planning. We believe it would be too early to engage with an artist or develop intricate proposals prior to a grant of planning, due to the level of engagement that would be required with all stakeholders, potentially including local authority departments, local community, artist(s), client and landscape architect.

We invite the Planning Authority to include a condition in the grant of permission (if granted) which would enable a dialogue between the Planning Authority (Parks & Landscape Services, Arts Office, Planning Dept., etc.) and Applicant to agree a suitable intervention in the public realm. This would afford the time and facilitate a process to enable an artist and/or landscape architect to design a truly bespoke, locally relevant artistic piece or landscape element with input from SDCC, as required by this policy, for agreement with the Planning Authority during the construction of the development.

ADDENDUM

Green Space Factor calculator (for this site)

User input indicated by **Orange fields**

User Input	
Zoning lookup	Minimum GI Score
EE	0.5

1. Enter Development Site Area m ² HERE ▶		71101	
Surface Type (see tab for detailed descriptions)	Factor	Proposed Surface Area m ²	Factor Values
1. Short Lawn	0.3	2711	813.3
2. Tall Lawn (wild, not mown)	0.5	11249	5624.5
Permeable Paving	0.3	8709	2612.7
Vegetation			0
4a. Vegetation-Shrub below 3cm	0.4	0	0
4b. Vegetation-Shrub / Hedgerow above 3cm	0.5	5337	2668.5
4c. Vegetation-Pollinator friendly perennial planting	0.5	4914	2457
4d. Vegetation-Preserved hedgerow	1.2	0	0
Trees		0	0
5a. New trees	0.6	6950	4170
5b. Preserved trees	1.2	0	0
7. SuDS intervention (rain garden, bioswale)	0.6	4102	2461.2
Green Roof		0	0
9a. Green Roofs- Intensive green roof (substrate is 1 metre or greater in depth)	0.7	1643	1150.1
9b. Green Roofs - Extensive green roof (less than 1 metre in depth)	0.6	0	0
10. Green wall	0.4	650	260
11. Retained Open Water	2	0	0
12. New open water	1.5	0	0
Total Equivalent Surface Area of Greening Factors		46,265.00	

Green Factor Numerator	22217.30
-------------------------------	-----------------

Minumum Required GI score	Final GI score	Result
0.5	0.31	Fail