

Planning Department,
1st Floor,
Menapia Building,
The Mall,
Waterford,
X91 PK15.

Monday, 30th August 2021
[By Consultation Portal]

Dear Sir / Madam

Re: Draft Waterford City and County Development Plan 2022 - 2028

1.0 Introduction

Stafford Wholesale Limited¹ has retained Tom Phillips + Associates² to prepare a submission to the Draft Waterford City and County Development Plan 2022-2028 in respect of its landholding at Lockheed Avenue, Airport Business Park, Killowen, Ballygarron, Lisselan, Co. Waterford (Refer Appendix A).

Stafford Wholesale Ltd trading as Stafford Bonded was founded in 1892 and has been involved in the manufacturing, distribution, and storage of alcohol since its foundation. The company's core operations are the import and export of wines, beers, and spirits. This includes the storage and distribution of 3rd party alcohol products and more recently the maturation of Irish Whiskey for distilleries and brand owners.

With the continued global investment in Irish Whiskey, Stafford Bonded has seen demand for its services increase and to facilitate this growth it has constructed a number of bonded whiskey maturation warehouses at Waterford Airport Business Park. Our client has purposely selected the land at Waterford Airport Business Park to expand its whiskey maturation services given its access to the airport, its limited sensitive interfaces, its ease of accessibility and the serviceable nature of the site. Stafford Bonded now has a significant presence within the Business Park and has made significant investment in securing its long-term future within the County.

Our client is well experienced in the provision of not only maturation warehousing but also the construction, management, and operation of various bonded warehouses in Ireland and abroad. It is

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commonplace across Europe for bonded warehouses to be cited in close proximity to Airports and this complimentary relationship has proven to be an essential means of servicing the supply chain of goods and products.

Stafford Bonded commend Waterford City & County Council for its preparation of the Draft Development Plan for 2022-2028 and look forward to seeing the achievement of the objectives and policies as set out within the plan as they relate to the continued growth of the Airport Business Park and County in general.

What follows is an overview of our key observations following review of the Draft Plan.

2.0 Key Observations

2.1 Seveso Site Designation

Paragraph 4.9 of the Draft Waterford City and County Development Plan 2022-2028 relates to Seveso Directive/Major Accidents.

The Draft Development Plan states that at present there are no industries which are established Seveso Directive sites within Waterford City and County. With regard to such sites, consultation distances are established within which there is an obligation to consult with the Health and Safety Authority and Waterford City and County Fire service, in respect of any development proposals.

Planning Permission (WCC Reg. Ref: 20/338) for the change of use of the existing and permitted (19/603) 5 no. twin portal warehouses at our client's landholdings in the Airport Business Park was granted by Waterford City and County Council on 22nd September 2020. The change of use consists of the development becoming an establishment to which the European Communities (Major Accident Hazards involving Dangerous Substances) Regulations 2006 apply.

A subsequent application (WCC Reg. Ref: 20963) was submitted to WCC in December 2020 for the construction of 16 no. single and twin bay warehouses for the maturation of whiskey, 2 no. storage warehouses (1 single and 1 twin bay) with a total gfa of c.26,136sqm to an overall height of 11.75 metres. Permission was also sought for a two-storey ancillary office (overall height of 10.53m) and staff welfare building, comprising c.551 sqm. The proposed development consists of an extension of c.6.35ha to the existing warehouse development. The development is classified as a modification to a permitted establishment to which the European Communities (Major Accident Hazards Involving Dangerous Substances) Regulations 2015 apply. This application was granted by WCC on 04th May 2021.

The site at Waterford Airport Business Park is considered to be a Notified Seveso Establishment and is contained on the List of Lower Tier Establishments as of 19th April 2021 (see Appendix B).

Recommendation:

We suggest that the Draft Waterford City and County Development 2022-2028 is amended to identify the above-mentioned landholdings as having Seveso Status. This should be corrected to ensure that the land is protected from inappropriate encroachment from sensitive uses without proper consideration.



2.2 Waterford Regional Airport and Business Park Masterplan

An updated Waterford Regional Airport and Business Park Masterplan (Business Park Masterplan) is appended to the Draft Development Plan (Appendix 12) and identifies our client’s landholdings as being zoned GZT C2.1 which is welcomed. As previously mentioned, Stafford Wholesale Ltd are well experienced in the provision of not only maturation warehousing but as well as the construction, management, and operation of various bonded warehouses. The location of the Business Park adjacent to Waterford Airport was a key criterion in our client’s selection of the site for bonded storage.

Paragraph 1.6.2 of the Business Park Masterplan states that the *‘Airport Business Park offers an opportunity to facilitate not only airport-dependent enterprises, but also the types of those which can offer long-term prospects for generating revenues in new technologies and knowledge-based areas, such as Information and Communications Technology, Medical Devices, Biotechnology, Pharmaceuticals, the Green Economy and Renewable Energy’*.

Paragraph 1.6.2 includes no reference to the existence of Bonded Storage or anything similar to the use of our client’s land. Given the extent of our client’s landholding within the Business Park and recent permission issued by WCCC for the expansion of the existing warehousing, the provision of bonded warehousing will account for a significant percentage of the overall Business Park. We consider that the lack of reference to this existing and permitted development is a gap and reference to the existing of bonded storage should be made.

Recommendation:

In addition to uses contained with Paragraph 1.6.2 of Appendix 12, we recommend that Bonded Warehousing be added to this list in line with current use of land at Waterford Airport Business Park.

2.3 Landscape and Seascape Character Assessment, Scenic Routes and Protected Views

As part of this review of the Draft Waterford Development Plan 2022-2028, we have examined Appendix 8 (Landscape and Seascape Character Assessment, Scenic Routes and Protected Views).

Table 1 (see Figure 4.1) of Appendix 8 categorises Waterford City and County by Landscape Sensitivity.

1. Most Sensitive	Very distinctive features with a very low capacity to absorb new development without significant alterations of existing character over an extended area.
2. High Sensitivity	Distinctive character with some capacity to absorb a limited range of appropriate new developments while sustaining its existing character.
3. Low Sensitivity	A common character type with a potential to absorb a wide range of new developments.
4. Least Sensitive	Areas of existing development and infrastructure. New development reinforces existing desirable land use patterns.

Figure 1: Table 1 Appendix 8 – Sensitivity Classifications

Neither Waterford Regional Airport nor Waterford Airport Business Park are annotated on the Landscape Sensitivity Map (see Figure 2) within Appendix 8 of the Draft Plan but appear to be located in part of the county which appears to be designated as 'Low Sensitivity', abutting land designated as 'Most Sensitive'.

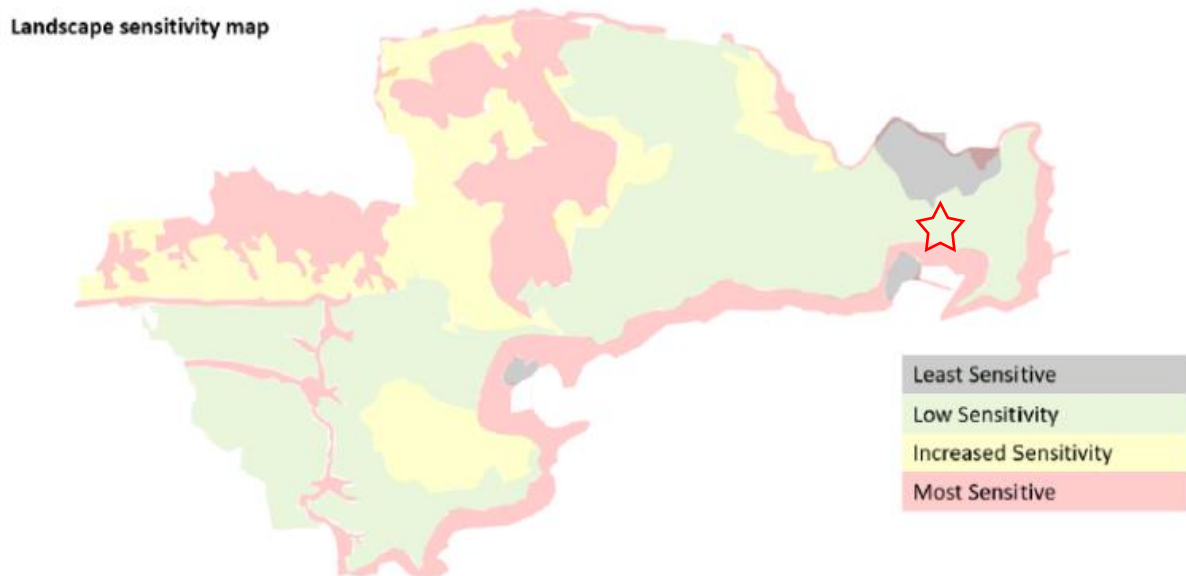


Figure 2: Landscape Sensitivity Map. Approximate Location of Waterford Airport and Airport Business Park lands annotated by TPA.

Notwithstanding the above Sensitivity Map, *Table 2: Sensitivity areas and classification*, within Appendix 8, identifies that Waterford Regional Airport falls within areas which are 'Least Sensitive'. The Landscape Sensitivity Map does not appear to be reflective of the Airport's landscape sensitivity as set out in Table 2 within Appendix 8. It is further noted that Table 2 does not include reference to the Airport Business Park, despite referencing other industrial and commercial lands within the County as being 'Least Sensitive'.

Reviewing the above Landscape Sensitivity Map (Figure 2), it could be construed that both the Airport and the Airport Business Park are either in a 'Low Sensitivity' or 'Most Sensitive' area. It is considered that the context of our client's land is one that is contiguous to the more robust setting of the adjoining Airport and existing Business Park Lands as well as surrounding farmland. This contextual setting, in reality, results in a more 'normal' farmland setting with the backdrop of a robust commercial development, being the Airport and Business Park. As such, we consider that the *Appendix 8 (Landscape and Seascape Character Assessment, Scenic Routes and Protected Views)* fails to acknowledge the true level of sensitivity of our client's lands.



Recommendation:

We suggest that Waterford Airport Business Park is included in the Industrial or Commercial Lands Section of Appendix 8 Table 2 (Sensitivity Areas and Classifications) as an area of 'Least Sensitivity' to complement Waterford Regional Airport's inclusion.

Furthermore, for the purposes of clarity, we suggest that Waterford Regional Airport and Waterford Airport Business Park are included on the Landscape Sensitivity Map contained with Appendix A, identified as 'Least Sensitive' (grey shading).

3.0 Conclusion

As discussed in this submission, our client's land is located at Airport Business Park.

The Draft Waterford Development Plan 2022-2028 does not identify our client's landholdings as having Seveso Status and we ask for this to be changed accordingly.

The Landscape and Seascape Character Assessment, Scenic Routes and Protected Views is misleading and unclear. We request that the relevant changes suggested above are made to designate both the Airport and the Business Park as Least Sensitive while also including both sites on the Landscape Sensitivity Map.

The updated Waterford Airport Masterplan is zoned for Industrial, Enterprise and Employment uses, with greater flexibility to include not only airport-dependent enterprises, but also the types of those which can offer long-term prospects for generating revenues in new technologies and knowledge-based areas. We welcome this land use zoning and the general guidance provided within the Waterford Airport & Business Park Masterplan; however, we request that existing and permitted land use of bonded warehousing be appropriately recognised within the *Waterford Regional Airport and Business Park Masterplan (Appendix 12)*.

We would be happy to discuss the contents of this submission at a time convenient to you.

Yours sincerely

Brian Minogue
Associate
Tom Phillips + Associates
Encl.

Appendix A – Stafford Wholesale Ltd Landholdings
Appendix B - Seveso Lower Tier Establishments



Appendix A – Stafford Wholesale Ltd Landholdings





Appendix B – Seveso Lower Tier Establishments³

Lower Tier Establishments

19 April 2021

Establishment Name	Establishment Address
Analog Devices International	Raheen Business Park, Raheen, Limerick
Astellas Ireland Co., Ltd	Damastown Road, Damastown Industrial Park, Mulhuddart, Dublin 15
BAK Bulk Services	Red Barns, Drumcar Road, Dunleer, Co. Louth
BOC Gases Ireland Ltd.	Little Island Co. Cork
Brenntag Chemicals Distribution (Ireland) Ltd	Unit 405, Greenogue Business Park, Rathcoole, Dublin 24
Calor Teoranta	Claremorris Bulk Station, Ballindine Road, Claremorris, Co. Mayo
Carbery Food Ingredients Ltd.	Ballineen, Co Cork
Carbon Chemicals Group Ltd	Raheens, Ringaskiddy, Co. Cork
Chemical Bulk Storage Ltd	Unit 19, Tivoli Industrial Estate, Cork
Circle K Terminal 1	Terminal 1, Alexandra Road, Dublin Port, Dublin 1.
Circle K Yard 3	Yard 3, Alexandra Road, Dublin Port, Dublin 1.
Clarochem Ireland Limited	Damastown, Mulhuddart, Dublin 15
Cooley Distillery	Riverstown, Cooley, Co. Louth
Ecolab Ltd.	Forest Park, Zone C Mullingar Industrial Estate, Mullingar, Co. Westmeath
Electricity Supply Board	Aghada Power Station, Whitegate, Co. Cork
Electricity Supply Board	North Wall Generating Station, Alexandra Road, Dublin 1
Enva Ireland Ltd	Smithstown Ind Est. Shannon Co. Clare
Exolum Aviation Ireland Ltd (formerly CLH)	Corballis Road, Dublin Airport, Dublin 2
Exolum Shannon Ltd (formerly Interterminals Shannon)	Foynes Harbour, Foynes, Co. Limerick
Farragh Proteins	Monnery Upper, Crossdoney, Co. Cavan
Flogas Ireland Ltd	Hazelhill, Ballyhaunis, Co. Mayo
Gas Networks Ireland	Mitchelstown Central Gas Injection Facility, Corracunna, Mitchelstown, Co Cork
Gensys Power Ltd.	Huntstown Power Station, Huntstown Quarry, Dublin 11
Goulding Chemicals Ltd	Centre Park Road, Cork
Goulding Chemicals Ltd	Stokestown, New Ross, Co. Wexford
Grassland Agro	Dock Road, Limerick City
Grassland Agro	The Pound Road, Slane, Co. Meath
Hovione Limited	Loughbeg, Ringaskiddy, Co. Cork
Iarnrod Eireann	Alexandra Rd, North Wall, Dublin 1
Iarnrod Eireann	Iarnrod Eireann Maintenance Works, Inchicore, Dublin 8
Irish Distillers Ltd.	Robinhood Road, Fox & Geese, Clondalkin, Dublin 22
Irish Oxygen Co. Ltd	Waterfall Road, Cork
Janssen Pharmaceutical Services UC	Little Island, Cork
Kayfoam Woolfson	Bluebell Industrial Estate, Naas Road, Dublin 12
Lakeland Dairy Food Services Ltd.	Church Street, Killeshandra, Co. Cavan
LPG Cylinder Filling Ltd	Quartermown Industrial Estate, Mallow, Co. Cork
Merck Millipore Ltd.	Tullagreen, Carrigtwohill, Co. Cork
Sigma Aldrich Ireland Ltd	Vale road, Arklow, Co. Wicklow
SK Biotek	Watery Lane, Swords, Co. Dublin.
SSE Generation Ireland Ltd	Great Island Generating Station, Campile, New Ross, Co. Wexford
Staffords Wholesale Ltd	Lockheed Avenue, Airport Business Park, Waterford
Synergen Power Ltd t/a ESB Dublin Bay Power	Pigeon House Road, Ringsend, Dublin 4
Synergy Health Ireland Ltd.	I.D.A Business & Technology Park, Tullamore, Co. Offaly
Tervas Ltd	Knockburden, Ovens, Co. Cork
Tynagh Energy Ltd.	Tynagh Power Station, Derryfrench, Tynagh, Loughrea, Co. Galway
Upjohn Manufacturing Ireland Unlimited	Little Island Active Pharmaceutical Ingredient Plant, Little Island Co. Cork
West Cork Distillers Limited	Marsh Road, Skibbereen, Co. Cork
William Grant & Sons Irish Brands Ltd	Clonminch, Tullamore, Co. Offaly
Xtratherm Limited	Liscarton Industrial Estate, Kells Road, Navan, Co Meath
Zoetis Belgium S.A. Ireland Branch	Laragh Road, Rathdrum, Co. Wicklow

³ https://www.hsa.ie/eng/your_industry/chemicals/legislation_enforcement/comah/list_of_establishments/lower_tier_sites_6april21.pdf