

Submission no: 111

**AVISON
YOUNG**



**Submission on behalf of An Post
Clare County Development Plan 2022-2028**

Pre-Draft Stage

November 2020

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For and on behalf of Avison Young Planning and Regeneration Limited

1. Introduction

- 1.1 This submission has been prepared by Avison Young on behalf of An Post, GPO, O'Connell Street, Dublin 1 in response to the publication of a pre-draft Strategic Issues Paper for the Clare County Development Plan 2022-2028 (hereafter, Clare CDP 2022). An Post welcomes the opportunity to make a submission on the preparation of a new Development Plan for the County that will provide a basis for the sustainable development of Clare over the next 6 years in line with the objectives of the National Planning Framework (hereafter, NPF) and the Regional Spatial and Economic Strategy for the Southern Region (hereafter, RSES).
- 1.2 An Post operates a number of post offices and delivery service units across the County and throughout the State. Due to the age of some of these facilities as well as the requirement to efficiently modernise postal facilities as a result of recent trends in the postal services market, the Company, over the coming years, will seek to enhance facilities at existing and new locations. This submission will provide detail on their ongoing assessment of facilities and their ambition to develop new facilities that provide for their current and future operational requirements.
- 1.3 We would request that the Local Authority carefully consider this submission in the preparation of the Clare CDP 2022 and accommodate future engagement with An Post. An Post, as a semi state body, is committed to the objectives of Project Ireland 2040 and the NPF which seeks to guide the sustainable development of Ireland's primary settlements over the next number of decades.

2. Background

- 2.1 An Post, operates two distinctive businesses in an increasingly digital environment: An Post Mails & Parcels providing world class national and international mails and e-commerce parcel logistics services and An Post Retail providing a growing range of Financial Services in an omni-channel environment, including Ireland's largest retail network of 950 Post Offices. As one of Ireland's most reputable companies, An Post plays a central role in Irish life and society, providing an essential public service delivering mail and parcels to more than 2.2 million business and residential addresses six days a week. 950 Post Offices offer a broad range of postal, communication and FS services to upwards of 1.5 million customers every week. The company employs more than 9,000 full-time and part-time staff and operates a number of subsidiary companies including An Post Insurance and Air Business (UK).
- 2.2 An Post owns and operates a significant number of properties throughout the State including 45 directly operated post offices (the remainder are run by independent Postmaster contractors) and small, medium and large scale delivery depots. The efficient operation of these facilities is central to the successful provision of the postal service for business and personal customers. As highlighted above, these facilities are operated by almost 9,000 staff nationwide, who in turn utilise a road fleet of more than 3,000 vehicles. The number of Electric Vehicles on the fleet is steadily increasing and Cork City will have emission-free deliveries by the end of 2020.
- 2.3 In the last decade the postal market has changed utterly with a move away from the old world of letters to the new world of ecommerce parcels. The Covid-19 crisis has expedited this change with far more people shopped online. An Post now delivers 1 million more parcels every week than it did in 2017 and this pattern is set to continue. Additionally, over recent decades, Ireland's population has risen quite significantly and across the Country, new urban settlements have emerged alongside enhanced infrastructural development. These changes have resulted in a requirement for An Post to assess its estate to ensure its portfolio of facilities meets the operational needs of an expanding population and a growing market.
- 2.4 An Post is currently undertaking detailed assessments of its existing facilities nationwide and considering a programme of works to ensure these facilities are best in class while also seeking new sites capable of accommodating modern delivery operations to serve new and expanding catchment areas.

- 2.5 The Strategic Issues Paper details how the population of Clare increased from 2006-2016 by 7.1% and the recently published RSES projects that the County's population will increase by 12.6% to 15.1% by 2031 (2016 base year). In this regard, this submission is being made to set out An Post's current and future requirements to adequately serve expanding catchment areas and to request that Clare County Council provide a supportive policy framework for the future provision of postal infrastructure. An Post are happy to engage with Clare County Council as part of the preparation of the Clare CDP 2022 and as part of its future assessment of postal facilities in the County.
- 2.6 This submission is also being made to request that Clare County Council have due regard to the operational requirements of An Post as part of the consideration and implementation of public realm schemes in the County's towns and villages. The removal of loading bays and restrictions on 24-hour vehicular access at post offices or other postal facilities could have significant impacts on the smooth operation of the postal service and have longer term impacts on the commercial viability of postal premises. It is, therefore, requested that the Local Authority engage closely with An Post as part of future public realm schemes to ensure viable solutions can be explored to improve town centre areas whilst also safeguarding the efficient operation of postal facilities.

3. Supportive Policies and Objectives

3.1 As set out in Section 2, An Post are currently assessing their existing facilities and formulating a nationwide programme of development that will enhance their capability of providing a robust and reliable public service. This will include the modernisation of existing postal facilities as well as the provision of new facilities. Given the projected population growth in Clare over the period of the Clare CDP 2022, it is requested that Clare County Council provide appropriate policies and zoning objectives that will accommodate new postal infrastructure. It is considered that the inclusion of such policies and objectives cannot only accommodate improved public infrastructure but also spur employment growth and increase the vitality and viability of some of the County's primary settlements.

Supportive Policies

3.2 We would request that Clare County Council include supportive policies to facilitate enhanced postal services in the County over the next 6 years. Policies, such as the below would assist greatly in the delivery of future An Post projects in the County.

"To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the County."

"To facilitate the provision of postal infrastructure at suitable locations in the County."

"To promote the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement."

3.3 The inclusion of policy objectives such as the above would provide a supportive policy framework that could assist An Post as they invest in the mails and parcels infrastructure in the County over the next decade.

3.4 It also requested that the Local Authority recognise the specific operational requirements of An Post with regards the operation of post offices and mail sorting offices. These facilities are central to the operation of a reliable public postal service and their long-term viability should be protected. Specific requirements, which will be set out in Section 4, primarily relate to car parking, access and deliveries.

Flexible Zoning Objectives for Public Infrastructure

- 3.5 It is important that appropriate zoning objectives are included as part of the Clare CDP 2022 to allow for the enhancement of existing facilities and the development of new postal infrastructure. It is submitted that postal infrastructure should be deemed important public infrastructure and it is requested that flexible land use zonings that accommodate such infrastructure and services at suitable locations are included throughout the County's settlements. Providing clarity under the Clare CDP 2022 in this regard is important to assist An Post in ensuring the County is capable of facilitating postal infrastructure that is considered appropriate from a planning perspective.

4. Operational Requirements

4.1 As part of An Post's assessment of their existing facilities, they have considered their current and future operational requirements, which continually evolve due to a number of factors including market changes, technological advances and consumer habits. This section will set out some of the primary operational requirements of An Post delivery service units and post offices. It is requested that these requirements are considered as part of the preparation of the Clare CDP 2022 and that appropriate development standards are included that will not hinder the efficient operation of new and existing facilities.

Car Parking

4.2 As set out in Section 2 of this submission, An Post requires use of c.3,000 vehicles on a daily basis to transport mail within and between settlements throughout the Country. Due to the increasing number of larger parcels being processed, it is considered likely that this requirement will increase over time and as such, An Post facilities may require greater levels of parking spaces including electrical vehicle charging points as a steady transition is made to the use of environmentally sustainable vehicles. It is important to note, however, that car parking spaces are not only required for An Post delivery vehicles but also for vehicles used by staff that typically travel to An Post facilities by private car and customers collecting mail items.

4.3 As outlined above, older postal facilities have been adapting to the increased volumes of mails and parcels and changing operational requirements. In this regard, older town centre facilities, in particular, face challenges regarding additional space and car parking requirements. In addition, as shifts typically start early in the morning, at times when public transport is not in operation, staff generally travel by private car. As such, these facilities generally require areas of car parking for staff as well parking storage areas for the delivery vehicles used to transport mail. This requirement is relatively specific to An Post and is of particular importance given that An Post operates an essential public service.

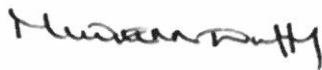
4.4 It is, therefore, requested that Clare County Council provide flexibility with car parking standards for postal facilities, which as demonstrated above, require sufficient car parking spaces to operate in an efficient manner. Postal facilities may require a greater quantum of car parking spaces going forward as postal trends continue to evolve thus it is imperative that facilities are future proofed to ensure the long-term viability of An Post's operations.

Deliveries & Access

- 4.5 Postal facilities which are located in town centre areas have relatively specific requirements, primarily with regards access and deliveries. Access is typically required to premises on a 24-hour basis although early morning deliveries and late evening collections are of particular importance to ensure mail can be delivered onward to catchment areas in a timely manner. In this regard, any restrictions on the times of deliveries/collections to/from An Post facilities could have a serious impact on the ability of An Post to meet the postal needs of the public and agreed service legal agreements with the State. We request that the Local Authority recognise this requirement as part of the Clare CDP 2022 and in the future assessment/ preparation of planning policy. Additionally, we request Clare County Council to engage with An Post should any future area plan propose to amend delivery hours in town centre locations. An Post is committed to working with the Local Authority and local residents in minimising potential disturbances to adjacent properties and to providing emission free deliveries in town centres.
- 4.6 Whilst An Post welcomes public realm improvements that make town centre areas more attractive and pedestrian-friendly places, it is imperative that Clare County Council carefully consider the operational requirements of commercial operators in towns when such improvements are being implemented. As noted above, delivery facilities such as on-street loading bays are of critical importance for the smooth operation of An Post premises and any restrictions on same could have a serious impact on the operation of the postal system. In this regard, it is important that Clare County Council ensure that such facilities are protected to ensure these premises, which typically contribute considerably to the vitality of towns and villages, can be sustained going forward.
- 4.7 Further to the above, it is important that a sufficient level of vehicular access is maintained to accommodate the collection and delivery of mail and to accommodate customers who require use of a vehicle to visit an An Post facility. We would request that during the preparation of future public realm and movement strategies, Clare County Council consult with An Post to ensure sustainable solutions are considered to maintain a sufficient level of access whilst also improving the appearance and function of town centre areas for the public.

5. Conclusion

- 5.1 Our Client welcomes the opportunity to comment on the future development of Clare and the commitment to provide a new County Development Plan that will guide the sustainable development of the County over the next 6 years. An Post are currently assessing lands within their ownership including their established facilities thereon, to understand the best approach to optimise these facilities to better serve their catchments and contribute to the objectives on the National Planning Framework. We would request that the Local Authority engage with An Post as they progress with this assessment and to ensure that the commercial viability of existing postal premises in the County is protected through careful consideration of An Post's delivery and access requirements, as set out in this submission.
- 5.2 We trust that the matters outlined above will be taken into consideration as part of the preparation of the Clare County Development Plan 2022-2028. We are available for discussion on any of the matters referred to above and would also appreciate if you could confirm receipt of this submission by return.



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