

**AVISON
YOUNG**

Submission on behalf of An Post

Clare County Development Plan 2023 – 2029

Draft Stage

March 2022

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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 the Draft Clare County Development Plan 2023-2029 (hereafter referred to as the Draft Development Plan). 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 plan period, 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 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. We would request that the Local Authority carefully consider this submission in the preparation of the Clare County Development Plan 2023-2029 and accommodate future engagement with An Post.
- 1.4 This submission requests that Clare County Council consider the following during the finalisation of the new County Development Plan:
- Provide additional flexibility under the land use zonings and objectives in the County Development Plan in relation to An Post's existing facilities and operational requirements for both its retail and distribution/logistics-type land uses;
 - The inclusion of a new land use classification – *postal facilities* – in the County Development Plan and identifying this use as 'Permitted in Principle' or 'Open for Consideration' across all zoning objectives;
 - The inclusion of new policy objectives in the County Development Plan in relation to supporting and facilitating both existing and new postal facilities in the County; and
 - That existing and future operational requirements for postal facilities are considered within the County Development Plan including parking, deliveries and access.

2. Background

2.1 An Post, operates two distinctive businesses in an increasingly digital environment:

- An Post e-Commerce (Mails & Parcels): providing world class national and international mails and e-commerce parcel logistics services; and
- An Post Customer (Retail): providing a growing range of Financial Services in an omni-channel environment, including Ireland's largest retail network of 950 Post Offices.

2.2 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 financial 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).

2.3 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.

2.4 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 a greater number of people shopping online. Pre Covid-19, An Post was delivering 1 million more parcels every week than it did in 2017 and Post Covid-19, it is expected that the growth levels for parcel delivery are set to continue to rise. 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.

2.5 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.

- 2.6 The core strategy of the Draft Development Plan sets out a growth plan for County Clare that includes population targets and locations for future growth up to 2028 and beyond, which are in line with the overarching ambitions and targets set for the County in the NPF and RSES. The Draft Development Plan outlines that the population of County Clare is expected to increase by approx. 11,637 no. people in the period of 2023-2029. Furthermore, the Draft Development Plan states that approx. 4,500 new residential units are required to support the projected growth in the County.
- 2.7 In light of the above, 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 would be happy to engage with Clare County Council, as part of its future assessment of postal facilities in the County.
- 2.8 It is considered that the enhancement of An Post's facilities and the future provision of new facilities could generate employment in the County, increasing economic development; reinvigorate redundant and underutilised lands; and support climate change mitigation with the transition to e-vehicles in An Post's fleet.

3. Operational Requirements and Supportive Requirements

3.1 As set out in Section 2, An Post is currently assessing their existing facilities and lands within their ownership to devise a nationwide programme of development that will enhance their capability of providing a robust and reliable public service. In this regard, An Post are seeking to engage with Local Authorities to ensure this future development can be undertaken in a sustainable and efficient manner that benefits local areas and accords with local and national planning policy.

County Clare

3.2 An Post own and/or operate a number of postal services within County Clare including An Post Retail and An Post Mails and Parcel Distribution facilities in Ennis, Shannon and Kilrush. The Draft Development Plan includes Settlement Plans for the Ennis Municipal District and the Shannon Municipal District. The West Clare Municipal District Settlement Plan includes Kilrush as a Service Town. The Draft Development Plan also includes an objective to prepare Local Area Plans for Ennis and Shannon.

3.3 The Settlement Strategies included in the Draft Development Plan aim to ensure that future development is directed in a balanced, sustainable and plan-led manner across the County. The Draft Development Plan seeks to proactively pursue further economic development opportunities, to facilitate conditions that foster enterprise and enhanced resilience to economic vulnerabilities and to attract and retain high-quality jobs that will allow for better standards of living.

3.4 The Draft Development Plan includes the following objectives considered of relevance:

- **CDP6.4 Economic Development in Ennis:** *It is an objective of Clare County Council: ...b) To support the future development of the 'Key Town' of Ennis as a self-sustaining, regional economic driver and as a key location of choice for investment in the Region; c) To support a future development of Ennis which capitalises on its strategic location relative to Limerick and Galway Cities and Shannon International Airport, as well as its role as a centre of employment and economic activity within the Region....*
- **CDP6.5 Development of Shannon:** *It is an objective of Clare County Council: a) To protect and promote Shannon as a significant regional asset and an employment centre in the Limerick-Shannon MASP and as a primary location for industrial, manufacturing, warehousing, distribution, and transport operating centres, and to facilitate, where required, the adaptation of industrial areas to new employment generators; ...c) To support the redevelopment and renewal of enterprise and industrial units in the Shannon Area, in particular works to enhance the energy efficiency of the buildings and the physical appearance of the existing business park/industrial zones in the Town;*

- **CDP6.14 Availability of Land and Infrastructure:** *It is an objective of Clare County Council: a) To ensure that an adequate supply of land is zoned in appropriate locations throughout the County to support economic development and employment-generating activities; b) To maximise the efficiency of zoned lands by advocating for and facilitating the provision, upgrade or refurbishment of necessary infrastructure; c) To protect land zoned for employment-generating uses from inappropriate development that would negate future economic activity; and d) To ensure that lands are zoned for industry and enterprise development in towns and villages across the County at a scale appropriate to the size and role of the settlement as per the Settlement Hierarchy.*

3.5 As stated previously, as part of a nationwide programme, An Post may consider the expansion and consolidation of their existing sites in order to ensure the ability to continue to meet the operational needs of an expanding population and a growing market. Additionally, as part of their overall consolidation and optimisation strategy, An Post may consider the potential to redevelop sites which are no longer fit for purpose and may consider the potential to relocate to new sites that are considered better suited to meet the operational requirements of An Post.

Ennis:

3.6 The Ennis Settlement Strategy identifies a number of 'Transformational and Opportunity Sites' in the Town Centre that are considered key to the achievement of the overall Vision for the town and the Settlement Strategy states that *"these sites represent gaps in the fabric of the townscape and their redevelopment and regeneration can make a valuable contribution to both the appearance of the Town Centre and the range of services and activities that take place there"*.

3.7 In this regard, there are two Opportunity Sites identified immediately adjacent to the An Post facility at Bank Place (TS3 - Harvey's Quay & Post Office Field Including: OP4 Analogue Building adjoining Infill Site, Bank Place OP5 The Post Office Field). The strategy for this Transformational Site seeks to create a new riverside park and mixed riverside quarter all connected by a much improved legible and exposed promenade. All development in this area will be required to maximise their relationship to the river, open up access and showcase its amenity qualities.

3.8 While An Post welcomes the opportunity for new development and significant urban renewal to assist in the revitalisation of the Town Centre as part of the aforementioned Transformational Project, it is considered important that the operational requirements of the existing postal facility at Bank Place are considered as part of the implementation of any redevelopment proposals at this location. It is imperative that An Post's services in this area can continue uninterrupted and without any conflict that may arise as a result of the redevelopment of this area through development under either OP4 or OP5.

Further detail on An Post's operational requirements is outlined below – including the importance of vehicular access and car parking.

- 3.9 Furthermore, the Ennis Settlement Strategy states that the Gort Road Business Park (LI3), which has been zoned for 'Light Industrial' use, is a long-established business location and the maintenance and upgrade of the premises located in the Business Park in the future will be supported by the Council. In this regard, the Settlement Strategy states that proposals may arise for the modification/expansion or redevelopment of some of the units and that development proposals must be accompanied by a Construction Method Statement detailing how surface water run-off, during construction and operation stage, will be controlled.

Shannon:

- 3.10 The Shannon Settlement Strategy outlines that the Shannon Town Centre Masterplan is currently in preparation for the town centre with the aim to develop a distinct shopping character to increase Shannon's attraction and to deliver a vibrant and viable town centre for Shannon with a range of retail, service, recreation and cultural facilities. The Masterplan will inform the forthcoming Local Area Plan.
- 3.11 As An Post have previously submitted to Clare County Council in relation to the draft Shannon Town Centre Masterplan, it is important to highlight the operational requirements of the existing postal facility at the Sky Court Shopping Centre to ensure these requirements are considered as part of the implementation of any redevelopment proposals under the Shannon Town Masterplan.

Flexible Zoning Objectives

- 3.12 It is requested that Clare County Council provide flexibility under their land use zonings and objectives in relation to An Post's facilities and operational requirements. It is important that appropriate zoning objectives are included as part of the County Development Plan, and any subsequent Local Area Plan, to allow for the enhancement of existing facilities and the development of new postal infrastructure.
- 3.13 Both An Post Customer (Retail) and An Post e-Commerce (Mails & Parcels distribution/logistics) operations are a necessity in urban locations in order to effectively provide an essential public service, and it is submitted that these uses can, and do, work within tight urban constraints and amongst a variety of other land uses including in Town/Village/Neighbourhood Centres. In this regard, in the interests of compact urban growth, sustainable travel and employment, it is considered that the co-locating of different commercial activities in proximity to other urban uses can be achieved.

- 3.14 On foot of the above, it is therefore requested that Clare County Council include provisions for An Post postal facilities (An Post Customer and An Post e-Commerce) as 'Permissible in Principle' or 'Open for Consideration' land uses across all zoning objectives in the Clare County Development Plan 2023-2029.
- 3.15 Notwithstanding the above, it is also requested that Clare County Council include a specific land use classification for postal facilities in the new County Development Plan as outlined below:
- **Postal Facilities:** *A building which facilitates mail services that can include the processing, sortation and distribution of mail.**
- *Note: This use can be assessed on a case-by-case basis appropriate to site context and all other relevant policies, objectives and standards set out in this Plan.*
- 3.16 It is also requested that a 'Postal Facilities' land use is considered as 'Permitted in Principle' or 'Open for Consideration' across all zoning objectives in the County Development Plan, and any subsequent Local Area Plan within the County.
- 3.17 Providing clarity in relation to the above would greatly assist An Post in their ambition to ensure that their current sites or any potential new sites in the County are considered appropriate from a planning perspective and are capable of facilitating postal infrastructure that will enable An Post to provide a highly efficient postal service that can cope with modern requirements. The inclusion of policy objectives, which provide a supportive policy framework that can assist An Post in ensuring their ability to continue to meet the operational needs of an expanding population and a growing market, is encouraged for the Clare County Development Plan 2023-2029.

Supportive Policies

- 3.18 It is considered important that during the finalisation of the County Development Plan and any associated Local Area Plans or Masterplans, Clare County Council carefully consider the existing and future operational requirements of An Post and include appropriate policies to support An Post's ambition to enhance postal facilities in the County. We would request that Clare County Council include supportive policies to facilitate enhanced postal services in the County over the 6-year Development Plan period. 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 facilities and infrastructure at suitable locations in the County."*

- *“To promote the integration of appropriate postal facilities, including post offices, processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement.”*

3.19 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.

3.20 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 below, primarily relate to car parking, access and deliveries.

Car Parking

3.21 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.

3.22 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 facilities 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. Moreover, as An Post transition to the use of environmentally sustainable vehicles, appropriate parking facilities are required to support same, with one EV parking station required per vehicle. This requirement is relatively specific to An Post and is of particular importance given that An Post operates an essential public service. In this regard, any relevant parking standards in the Draft Development Plan should only apply to visitor and staff parking associated with An Post postal facilities, while the storage of all other vehicles used for the operation of the Irish postal service should not be included within parking standards.

3.23 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. It is also important to note that Postal facilities may require a greater quantum of car parking spaces going forward as postal trends continue to evolve, making it imperative that facilities are future proofed to ensure the long-term viability of An Post's operations.

Deliveries & Access

3.24 Postal facilities which are located in town/city 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, or any restrictions such as HGV bans on certain roads, 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 County Development Plan 2023-2029 and in the future assessment and preparation of planning policy for any Public Realm/Urban Area Plans.

3.25 Additionally, we request Clare County Council to engage with An Post should any future Local Area/Public Realm/Urban Area Plan or Mobility Plan (e.g. Ennis - CDP4.1) 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 in providing emission free deliveries in Town Centres.

3.26 Further to the above, it is important that a sufficient level of vehicular access is maintained, and that sufficient loading bay space is provided 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 any 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.

4. Conclusion

4.1 Our client welcomes the publication of the Draft Clare County Development Plan 2023-2029 and the opportunity to comment on the future development of the County. As outlined previously, An Post own and operate a number of post offices and delivery service units across County Clare and are continually aiming to enhance their capability of providing a robust and reliable public service.

4.2 This submission has requested that Clare County Council consider the following during the finalisation of the new County Development Plan:

- Provide additional flexibility under the land use zonings and objectives in the County Development Plan in relation to An Post's existing facilities and operational requirements for both its retail and distribution/logistics-type land uses;
- The inclusion of a new land use classification – postal facilities – in the County Development Plan and identifying this use as 'Permitted in Principle' or 'Open for Consideration' across all zoning objectives;
- The inclusion of new policy objectives in the County Development Plan in relation to supporting and facilitating both existing and new postal facilities in the County; and
- That existing and future operational requirements for postal facilities are considered within the County Development Plan including parking, deliveries and access.

4.3 We trust that the matters outlined above will be taken into consideration as part of the finalisation of the Clare County Development Plan 2023-2029. 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.

Contact Details

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