

Submission on behalf of An Post

Leitrim County Development Plan 2023 – 2029

Draft Stage

April 2022

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Status: Final

Date: April 2022

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 Leitrim 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 Leitrim 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 Northern and Western 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 Leitrim County Development Plan 2023-2029 and accommodate future engagement with An Post.
- 1.4 This submission requests that Leitrim 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 seeks to guide the future development of the County in line with the principles and objectives provided in the NPF and in the RSES. The Draft Development Plan outlines that the Housing Strategy provides for up to 13,934 households occupied in Leitrim by the end of the Plan period which would provide accommodation for a population range of 34,278 – 35,532. This would be an increase of approx. 3,000 people over the Plan period.
- 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 Leitrim County Council provide a supportive policy framework for the future provision of postal infrastructure. An Post would be happy to engage with Leitrim 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.

Leitrim County

3.2 An Post own and/or operate postal services within the County including An Post Retail and An Post Mails and Parcel Distribution facilities in Carrick-on-Shannon. The Draft Development Plan states that it is an objective to prepare a Joint Local Area Plan (LAP) for Carrick-on-Shannon/Cortober in conjunction with Roscommon County Council (CS OBJ 9) which will determine the land use zoning objectives for Carrick-on-Shannon. It is also a policy of the Draft Development Plan to deliver and offer support to existing businesses in Carrick-on-Shannon to ensure their continued existence and expansion (Carrick Pol 1).

3.3 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.

Flexible Zoning Objectives

3.4 It is requested that Leitrim 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.

3.5 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 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.

- 3.6 On foot of the above, it is therefore requested that Leitrim 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 Leitrim County Development Plan 2023-2029.
- 3.7 Notwithstanding the above, it is also requested that Leitrim 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.*
- 3.8 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.
- 3.9 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 Leitrim County Development Plan 2023-2029.

Supportive Policies

- 3.10 It is considered important that during the finalisation of the County Development Plan and any associated Local Area Plans or Masterplans, Leitrim 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 Leitrim 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.”*

3.11 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.

3.12 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

3.13 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.

3.14 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.

3.15 It is, therefore, requested that Leitrim 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

3.16 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, 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 Leitrim County Development Plan 2023-2029 and in the future assessment and preparation of planning policy for any Public Realm/Urban Area Plans.

3.17 Additionally, we request Leitrim County Council to engage with An Post should any future Local Area/Public Realm/Urban Area Plan or Mobility Plan propose to amend delivery hours or restrict HGV movements in the County. 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.

3.18 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 Leitrim 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 Leitrim 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 postal services in County Leitrim and are continually aiming to enhance their capability of providing a robust and reliable public service.

4.2 This submission has requested that Leitrim 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 Leitrim 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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