

Submission on behalf of An Post

Louth County Development Plan 2021-2027

Draft Stage

November 2020

Contents

1.	Introduction	3
2.	Background.....	4
3.	Operational Requirements & Supportive Policies	6
4.	Conclusion.....	9

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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 Louth County Development Plan 2021-2027 (hereafter, Draft Louth CDP 2021). 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 Louth 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 Eastern and Midland Regional Assembly (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 Louth CDP 2021 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 a greater number of people shopping 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 As highlighted in the Draft Development Plan, the National Planning Frameworks Implementation Roadmap provides that Louth's projected population, in conjunction with the permitted 25% headroom, will be in the range of 141,500 – 148,375 persons by 2026. Using the higher projected growth rate and factoring into the equation that this Plan runs from 2021 to 2027, the population projection for the County in 2027 is 149,966 persons, representing an increase in population of 21,082 on the 2016 Census figure. It is further noted that the strategically located settlements of Drogheda and Dundalk will continue to grow into centres of scale and create a critical mass of population that will enable them to fulfil their function as regional drivers of economic and population growth, with a targeted population 50,000 by 2031.

In light of the above projections, 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 Louth County Council provide a supportive policy framework for the future provision of postal infrastructure. An Post would be happy to engage with Louth County Council, as part of its future assessment of postal facilities in the County.

2.6 It is considered that the enhancement of An Post's facilities and the future provision of new facilities could generate employment in the County and increase economic development in key towns such as Drogheda and Dundalk which have been designated as Regional Growth Centre in the Regional Spatial and Economic Strategy (RSES) Settlement Hierarchy.

3. Operational Requirements & Supportive Policies

3.1 As set out in Section 2, An Post are 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.

Supportive Policies

3.2 It is considered important that during the finalisation of the Louth CDP, Louth 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 Co. Louth. We would request that Louth 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 below, primarily relate to car parking, access and deliveries.

Car Parking

- 3.5 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.
- 3.6 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.
- 3.7 It is, therefore, requested that Louth 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 thus it is imperative that facilities are future proofed to ensure the long-term viability of An Post's operations.

Deliveries & Access

- 3.8 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 Louth CDP 2021 and in the future assessment and preparation of planning policy. Additionally, we request Louth 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.
- 3.9 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 future public realm and movement strategies, Louth 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. It is recognised in the Draft Development Plan in relation to Dundalk that the Urban Design Framework published in 2008 will continue to provide the platform for future development for the town centre area.

Dundalk and Drogheda

- 3.10 The Draft Louth CDP notes that Urban/Local Area Plans will be prepared for:
- Drogheda – a Joint Urban/Local Area Plan is to be prepared in collaboration with Meath County Council; and
 - Dundalk.
- 3.11 As previously mentioned, the Local Authority is requested to note that An Post would welcome the opportunity to engage with Louth County Council during the preparation of these plans and would encourage flexible land use zoning objectives and recognition of An Post services and facilities within the land use zoning matrix, where appropriate. It is also requested that the Local Authority consider the specific requirements of An Post as set out in this Section during the preparation of these future local area plans.

4. Conclusion

- 4.1 Our Client welcomes the publication of the Draft Louth County Development Plan 2021-2027 and the opportunity to comment on the future development of the County. As outlined previously An Post own a number of post offices and delivery service units across the County and are continually aiming to enhance their capability of providing a robust and reliable public service.
- 4.2 We trust that the matters outlined above will be taken into consideration as part of the preparation of the Louth County Development Plan 2021-2027. 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.