

**Submission on behalf of An Post**

**Meath County Development Plan 2021-2027**

**Proposed Material Amendments to Draft Plan**

June 2021

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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 proposed Material Amendments to the Draft Meath County Development Plan 2021-2027 (hereafter referred to as the Draft Development Plan). An Post welcomes the opportunity to make a submission on the finalisation of the new Development Plan for County Meath which will provide a basis for the sustainable development of the area 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 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 This submission is being made in respect of Proposed Material Amendment Chapter 11.1 - *'Development Management Standards and Land Uses Zoning Objectives'*. We would request that the Local Authority carefully consider this submission in the finalisation of the Meath County Development Plan 2021-2027 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.

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 Proposed Material Amendments to the Draft Development Plan (Proposed Amendment Chapter 2.5) outlines that the population projection for Meath is 228,300 people by 2027, an increase of c. 33,800 people from 2016 (195,044). In light of the above population projections for the County, it is important that a supportive policy framework for the future provision of postal infrastructure is incorporated into the new County Development Plan, in line with An Post's operational requirements to ensure the needs of a growing market and an expanding population can continue to be met.
- 2.7 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.

#### **Proposed Amendment Chapter 11.1**

- 3.2 Chapter 11 of the Draft Development Plan, *'Development Management Standards and Land Uses Zoning Objectives'*, includes the following relevant sections Section 6 - Employment Development; Section 7 - Community Development; Section 9 - Parking Standards; and Section 14 - Land Use Zoning Objectives. An Post own and/or operate a number of postal services within Meath, including An Post Retail and An Post Mails and Parcel Distribution facilities in Dunshaughlin, Kells and Navan.
- 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.
- 3.4 In this regard, 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 Meath County Development Plan 2022-2028.

#### **Section 14 - Land Use Zoning Objectives**

- 3.5 It is requested that Meath County Council provide flexibility under their land use zonings and objectives in relation to An Post's facilities and operational requirements. Both An Post Retail (retail) and An Post 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 District and 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 residential and other urban uses can be achieved without detriment to either residents or businesses. On foot of the above, it is therefore requested that Meath County Council include provisions for both

An Post Retail and An Post Mails & Parcels operations as permissible or open for consideration land uses across all zoning objectives in the Meath County Development Plan 2021-2027.

Section 6 - Employment Development; Section 7 – Community Development & Section 9 - Parking Standards:

- 3.6 It is considered important that during the finalisation of the County Development Plan, Meath 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 Meath. We would request that Meath County Council include supportive policies to facilitate enhanced postal services in the County over the 6-year Development Plan period.
- 3.7 The inclusion of 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 encourage and 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."*
- 3.8 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.
- 3.9 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
- 3.10 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.

3.11 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. This requirement is relatively specific to An Post and is of particular importance given that An Post operates an essential public service.

3.12 It is, therefore, requested that Meath 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

3.13 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 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 Meath County Development Plan 2021-2027 and in the future assessment and preparation of planning policy.

3.14 Additionally, we request Meath County Council to engage with An Post should any future area plan propose to amend delivery hours in town/city 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/city centres.

3.15 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, Meath 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 Proposed Material Amendments to the Draft Meath County Development Plan 2021-2027 and the opportunity to comment on the future development of Meath. As outlined previously, An Post own and operate a number of post offices and delivery service units in 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 finalisation of the Meath 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.

# Contact Details

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