

**Submission on behalf of An Post**

**Cork City Development Plan 2022 – 2028**

**Draft Stage**

October 2021

# Contents

1.	Introduction .....	3
2.	Background.....	5
3.	Operational Requirements and Supportive Requirements .....	7
4.	Conclusion.....	12

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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 Cork City Development Plan 2022-2028 (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 City that will provide a basis for the sustainable development of Cork 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 City, 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 Cork City Development Plan 2022-2028 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.
- 1.4 This submission requests that Cork City Council consider the following during the finalisation of the new City Development Plan:
- Provide additional flexibility under the land use zonings and objectives in the City Development Plan in relation to An Post's existing facilities and operational requirements for both its retail and distribution/logistics-type land uses;
  - Amend the land use zoning objective in relation to the Inishmore Industrial Estate in Ballincollig to a more appropriate Employment zoning i.e. Z10 or Z11;
  - The inclusion of a new land use classification – *postal facilities* – in the City 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 City Development Plan in relation to supporting and facilitating both existing and new postal facilities in the City; and

- That existing and future operational requirements for postal facilities are considered within the City Development Plan including parking, deliveries and access.

## 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 core strategy of the Draft Development Plan sets out a growth plan for Cork City 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 Cork City in the NPF and the RSES. The Draft Development Plan outlines that the population of Cork City is expected to increase by approx. 49,580 no. people in the period of 2016-2028, resulting in a total population for the City of 260,194 no. people. The Draft Development Plan states that approx. 18,741 new residential units could be developed in the City in the period up to 2028.
- 2.7 The Strategic Vision of the Draft Development Plan is for Cork City to take its place as a world class city, driving local and regional growth, embracing diversity and inclusiveness, and growing as a resilient, healthy, age-friendly, and sustainable compact city with placemaking, communities and quality of life at its heart.
- 2.8 In this regard, the Draft Development Plan sets out a number of Core Strategy Objectives to support the future growth of the City and these include *inter alia*:
- **Objective 2.4:** *To develop Cork City in a manner that strengthens the role of the Cork Metropolitan Area as an international location of scale and a primary driver of economic and population growth in the Southern Region.*
  - **Objective 2.10:** *Support the delivery of a diverse mix of suitable uses that enhance Cork City's network of neighbourhoods, towns and communities as places to live, work, provide, care, learn and enjoy.*
- 2.9 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 Cork City Council provide a supportive policy framework for the future provision of postal infrastructure. An Post would be happy to engage with Cork City Council, as part of its future assessment of postal facilities in the City.
- 2.10 It is considered that the enhancement of An Post's facilities and the future provision of new facilities could generate employment in the City, 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.

#### Cork City

3.2 An Post own and/or operate a number of postal services within Cork City including An Post Retail and An Post Mails and Parcel Distribution facilities at Oliver Plunket Street, Churchfield Industrial Estate, Inishmore Industrial Estate and Togher Industrial Estate

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.

#### Employment and Economic Development

3.4 The Cork Metropolitan Area (CMA) is recognised as a key employment base and economic driver in Ireland. Cork City offers a range of business services, hospitality, cultural, tourism and retail to support the needs of both businesses along with residents and visitors to the region.

3.5 In relation to 'Light Industrial and Other Related Uses', the Draft Development Plan states that there is a need to protect space for these uses due to increasing land values and higher density developments and this can be done effectively through zoning. Furthermore, the Draft Development Plan states that the general strategy will be to retain the majority of these light industrial areas and where possible, provide for their expansion. The Draft Development Plan outlines that primary uses under 'Light industrial and Related Uses' include *inter alia* the following: warehousing, logistics, storage and distribution.

3.6 Employment and Economic Development Objectives included in the draft Development Plan include the following:

- **Objective 7.15 Light Industry:** *To protect areas zoned for light industry for such uses in order to maintain an adequate supply of light industrial space and employment in order to help ensure a diverse range of employment opportunities in the city.*
- **Objective 7.27 City Centre:** *To protect and enhance the role of Cork City Centre as the primary retail centre in the Cork Metropolitan Area and the region by facilitating the continued regeneration and modernisation of existing building stock and supporting appropriate new development, coupled with a range of complimentary residential, leisure, recreational and cultural uses and investment in the public realm.*

### Flexible Zoning Objectives

- 3.7 It is requested that Cork City 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 City Development Plan, and any subsequent Local Area Plan, to allow for the enhancement of existing facilities and the development of new postal infrastructure.
- 3.8 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 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.
- 3.9 On foot of the above, it is therefore requested that Cork City Council include provisions for both An Post Retail (retail) and An Post Mails & Parcels (distribution/logistics) as 'Permissible in Principle' or 'Open for Consideration' land uses across all zoning objectives in the Cork City Development Plan 2022-2028.
- 3.10 Notwithstanding the above, it is also requested that Cork City Council include a specific land use classification for postal facilities in the new City 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.



- 3.11 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 City Development Plan, and any subsequent Local Area for the City.
- 3.12 Furthermore, it is considered that the zoning objective outlined for the established Inishmore Industrial Estate area of Ballincollig as 'ZO1 Sustainable Residential Neighbourhoods' is wholly inappropriate and it is requested that the zoning objective for this location is changed to one of the Employment Zoning Objectives i.e. 'Z10 Light Industrial and Related Uses' or 'Z11 Business and Technology' in order to accurately reflect the existing uses operating in the Estate.
- 3.13 An Post operates mail services from a facility in the Industrial Estate and considering the established nature of the commercial/industrial/logistic activities in this location, as well as the strategic importance of postal facilities, it is requested that an appropriate zoning be placed on this site in order to protect and enhance the existing postal services at this location. The inclusion of policy objectives and appropriate zoning designations for existing light industrial/logistics/employment sites within the Ballincollig environs will ensure that a holistic approach to planning and development for the area is achieved.
- 3.14 Providing clarity in this regard would greatly assist An Post in their ambition to ensure that their current sites or any potential new sites in the City 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 Cork City Development Plan 2022-2028.

#### Supportive Policies

- 3.15 It is considered important that during the finalisation of the City Development Plan, Cork City 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 City. We would request that Cork City Council include supportive policies to facilitate enhanced postal services in the City 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 City:
- *"To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the City."*

- *“To facilitate the provision of postal infrastructure at suitable locations in the City.”*
- *“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.”*

3.16 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 City over the next decade.

3.17 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

3.18 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.

3.19 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.

3.20 It is, therefore, requested that Cork City 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

- 3.21 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 Cork City Development Plan 2022-2028 and in the future assessment and preparation of planning policy for Local and Urban Area Plans.
- 3.22 Additionally, we request Cork City Council to engage with An Post should any future Local/Urban 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 in providing emission free deliveries in Town Centres.
- 3.23 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, Cork City 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 Cork City Development Plan 2022-2028 and the opportunity to comment on the future development of the City. As outlined previously, An Post own and operate a number of post offices and delivery service units across Cork City and are continually aiming to enhance their capability of providing a robust and reliable public service.

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

- Provide additional flexibility under the land use zonings and objectives in the City Development Plan in relation to An Post's existing facilities and operational requirements for both its retail and distribution/logistics-type land uses;
- Amend the land use zoning objective in relation to the Inishmore Industrial Estate in Ballincollig to a more appropriate Employment zoning i.e. Z10 or Z11;
- The inclusion of a new land use classification – postal facilities – in the City 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 City Development Plan in relation to supporting and facilitating both existing and new postal facilities in the City; and
- That existing and future operational requirements for postal facilities are considered within the City 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 Cork City 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.

# Contact Details

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