

RMLA.

Planning Consultants

Submission on behalf of An Post

Clonmel Local Area Plan 2024-2030

Draft Consultation

Prepared by RMLA Limited

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1. Introduction

This submission has been prepared by RMLA on behalf of An Post, GPO, O'Connell Street, Dublin 1 in response to the publication of the Draft Clonmel Local Area Plan 2024-2030 (hereafter referred to as the Draft LAP). An Post welcomes the opportunity to make a submission on the preparation of a new Local Area Plan for Clonmel that 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 Southern Regional Assembly (hereafter, RSES).

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.

We would request that the Local Authority carefully consider this submission in the preparation of the Clonmel Local Area Plan 2024-2030 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

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.

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).

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.

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.

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.

The Draft LAP sets out the overall development strategy and planning policy objectives for the Town for the coming years, which seeks to provide for the medium-term planning and development benefit for Clonmel as a Key Town identified in the RSES and which is also reflected in the County Development Plan. The Local Area Plan will support economic growth, education services and community-related development in line with proper planning and sustainable development

principles. The LAP's policy objectives, guidance and standards have been informed by best practice, national planning guidance and the County Development Plan.

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

It is considered that the enhancement of An Post's facilities and the future provision of new facilities could generate employment in the Town, 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 and Supportive Requirements

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.

Clonmel

An Post own and operate a retail and mails postal facility at Emmet Street, Clonmel. 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 acquire adjoining lands to facilitate expansion or to relocate to new sites that are considered better suited to meet the operational requirements of An Post.

Town Centre First

A vision for the town centre, Clonmel 2030 Transformational Regeneration, was created encompassing and focusing on transforming the town centre into a space that would meet, accommodate and grow with the changing needs of its population. A significant number of projects and initiatives were proposed under this plan and have been undertaken in recent years, improving the town centre and encouraging increased footfall and spend in the area.

Furthermore, the Town Centre First Action Plan was adopted in December 2022 and focuses on strategic regeneration and compact development, with a town centre first ethos that celebrates the town's heritage, encourages town centre living, supports the development of a night time economy, and positions Clonmel Town Centre for current and future generations. Together with this LAP, and the various projects and strategies already being progressed for Clonmel, the Action Plan will aid the delivery of the town centre vision as well as creating a pipeline of key projects.

An Post is supportive of the Clonmel Regeneration Plan for the Town in line with Policy 3.5 of the Draft LAP:

- **Policy 3.5:** *Support new town centre development and regeneration proposals which align with the vision of 'Clonmel 2030 – Transformational Regeneration', with continued emphasis and support for Kickham Barracks Regeneration, Clonmel Flights of Discovery and Clonmel Public Realm Enhancement.*

Local Transport Plan

The Clonmel LAP includes a Local Transport Plan (LTP) which will help integrate local land use with transport policy with the goal of enhancing quality of life while improving the urban environment. The key purpose of the LTP is to guide the future transport and mobility needs of Clonmel, taking into account the transport demand arising from existing and projected development both within the study area and the wider area of influence. The LTP focuses on active modes measures and is centred on the delivery of a safe, integrated walk and cycle network that will improve accessibility across Clonmel encouraging an increase in sustainable travel.

An Post is supportive of the LTP for the Town in line with Policy 6.2 of the Draft LAP:

- **Policy 6.2:** *Support the implementation of the active travel and demand measures identified in the Local Transport Plan (Appendix 2) and require proposals for new development to compliment and demonstrate how they will integrate with the provisions of the Local Transport Plan.*

Additional Policy Objectives

An Post supports the following policy objectives included in the Draft LAP:

- **Objective 3G:** *Support delivery of the Clonmel Public Realm Enhancement project.*
- **Objective 6A:** *Actively seek funding for investment in active travel and public transport in the town in line with the provisions of the LTP as outlined in Appendix 2 (and any review thereof).*

Deliveries & Access

Regarding accessibility, it is important that the specific requirements regarding access and deliveries to postal facilities, including post boxes and collection points, which are located in town centre areas are recognised. 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, it is imperative that, in order to protect the smooth operation of the existing postal service in Clonmel, any restrictions on the times of deliveries/collections to/from An Post facilities as well as customer access are protected at all collection points including retail offices, Delivery Service Units and post boxes as this 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 Clonmel Local Area Plan 2024–2030 and in the future assessment and preparation of planning policy.

Additionally, we request Tipperary 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 in providing emission free deliveries in town/city centres.

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, Tipperary 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.

Flexible Zoning Objectives

In relation to An Post's existing and future facilities and operational requirements, it is considered that Tipperary County Council should provide flexibility under their strategic land use zonings and objectives. It is important that appropriate zoning objectives are included as part of the Local Area Plan to allow for the enhancement of existing facilities and the development of new postal infrastructure.

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. It is therefore requested that Tipperary 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 Clonmel Local Area Plan 2024-2030.

In this regard, the inclusion of policy objectives and appropriate zoning designations for existing logistics/enterprise/commercial sites within the Town will ensure that a holistic approach to planning and development for Clonmel is achieved.

Notwithstanding the above, it is also requested that Tipperary County Council include a specific land use classification for postal facilities in the new Local Area 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.*

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 Local Area Plans for the Town.

Providing clarity in this regard would greatly assist An Post in their ambition to enhance their current sites or to find new sites in the Town that are capable of facilitating postal infrastructure and considered appropriate from a planning perspective. Furthermore, 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 Clonmel Local Area Plan 2024-2030.

Supportive Policies

It is considered important that during the preparation and finalisation of the Clonmel Local Area Plan, Tipperary 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 Town. An Post's postal facilities include both retail post offices and postal buildings which facilitate the processing, sortation and distribution of mail. We would request that Tipperary County Council include supportive policies to facilitate enhanced postal services in Clonmel over the Local Area Plan period.

Policies, such as the below would assist greatly in the delivery of future An Post projects in the Town:

- *“To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the Town.”*
- *“To facilitate the provision of postal infrastructure at suitable locations in the Town.”*
- *“To promote the integration of appropriate postal facilities, including both post offices and processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement.”*

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 Town and County over the next decade.

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

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 electric 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.

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 new Local Area 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.

It is, therefore, requested that Tipperary 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 areas 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.

Engagement with An Post

As mentioned previously, the efficient operation of postal facilities is central to the successful provision of postal services for businesses and personal customers across the area. It is imperative that access for deliveries/collections are protected and will not be impacted or restricted in any way, at all postal facilities in order to protect the operations of the service.

An Post welcomes and supports the undertaking of public realm works within Town Centres. However, it is requested that the Local Authority carefully consider the operational requirements of An Post at all stages of the development process for any public realm works and it is further requested that full collaboration and discussions are held with An Post prior to and during any such works.

It is requested that the Local Authority have regard for HGV movements and all other operational requirements associated with the postal service throughout both the construction and operational phases of any works.

4. Conclusion

Our Client welcomes the publication of the Draft Clonmel Area Plan 2024-2030 and the opportunity to comment on the future development of the Town. As outlined previously, An Post own and operate postal facilities in Clonmel and are continually aiming to enhance their capability of providing a robust and reliable public service.

We trust that the matters outlined above will be taken into consideration as part of the preparation of the Clonmel Local Area Plan 2024-2030. 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.

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