

Planning Act 2008

DCO Application for Wheelabrator Kemsley Generating Station (K3) and Wheelabrator Kemsley North (WKN) Waste to Energy Facility

Introduction

Royal Mail Group Limited (Royal Mail) hereby wishes to notify the Examining Authority under section 89(2A) b of the Planning Act 2008 that Royal Mail is to become an Interested Party to the Examination into Wheelabrator Kemsley Generating Station (K3) and Wheelabrator Kemsley North (WKN) Waste to Energy Facility.

Relevant information and Royal Mail's position on the DCO application for K3 and WKN Waste to Energy Facility is summarised below.

Statutory and operational information about Royal Mail

Under section 35 of the Postal Services Act 2011 (the "Act"), Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom.

The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards.

Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any statutorily authorised project.

The Government imposes financial penalties on Royal Mail if its Universal Service Obligation service delivery targets are not met. These penalties relate to time targets for:

- collections,
- clearance through plant, and
- delivery.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

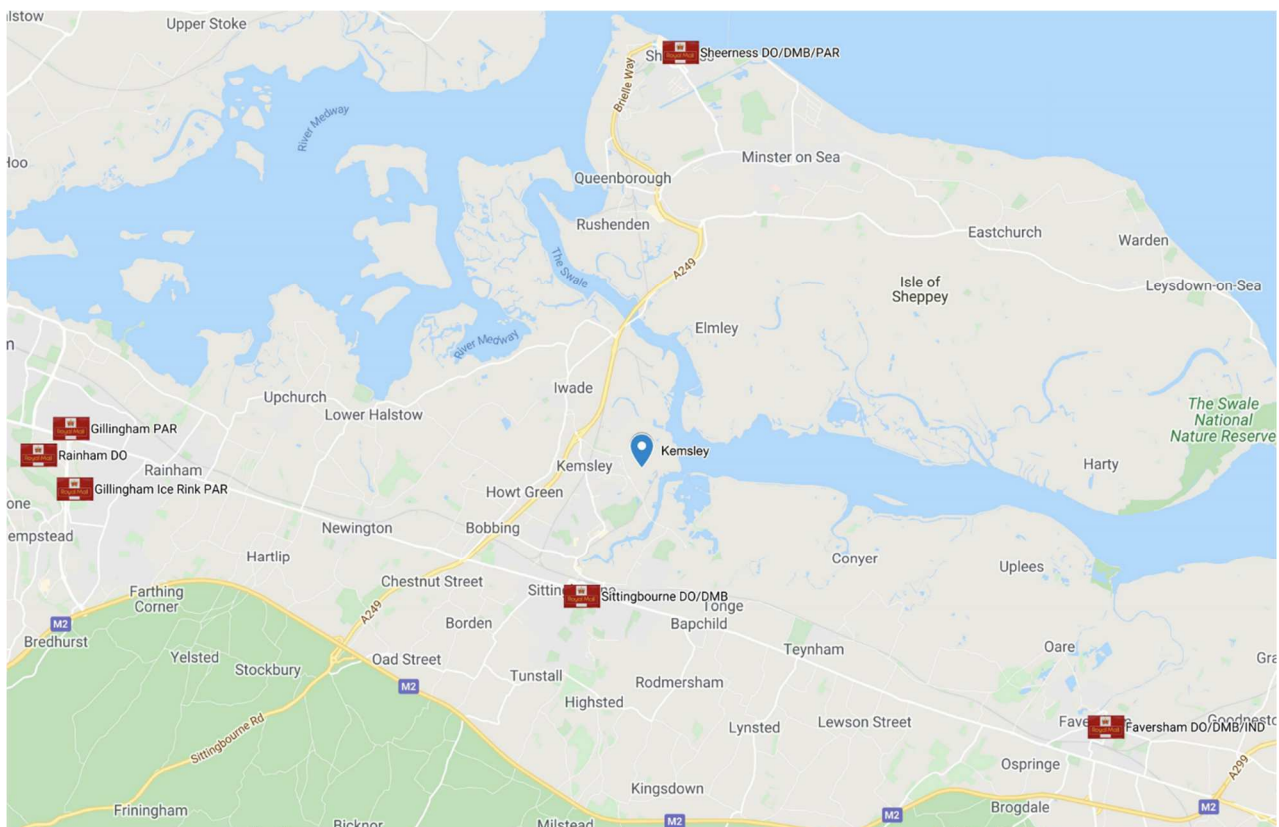
Affected Properties

The construction and operational phases of K3 and WKN Waste to Energy Facility may present a risk to Royal Mail operations through traffic impact. Although, the approach and content of both the Traffic and Transportation section of the PEIR and the Traffic and Transport chapter of the draft ES (Chapter 4) look generally adequate to Royal Mail. It is noted that the new generating station is

expected to produce an average of 34 additional HGV deliveries per day as a result of the additional 107 tonnes of waste with WKN adding a further 125 HGV deliveries per day. If these estimates are accurate then the impact on Swale Way and the surrounding highway network should be insignificant.

Royal Mail has seven operational sites within 10 miles of the proposed DCO boundary:

Sittingbourne DO/DMB	Central Avenue, Sittingbourne, ME10 4AA	3.0 miles
Sheerness PAR	Trinity Place, Sheerness, ME12 1TW	7.7 miles
Sheerness DO/DMB	33 Broadway, Sheerness, ME12 1AA	7.8 miles
Faversham DO/DMB/IND	East Street, Faversham, ME13 8AA	9.2 miles
Rainham DO	7-8 Saracen Close, Gillingham, ME8 0QN	10 miles
Gillingham PAR	The Ice Bowl, Ambley Road, Gillingham, ME8 0PU	10 miles
Gillingham Ice Rink PAR	The Ice Bowl, Ambley Road, Gillingham, ME8 0RU	10 miles



Operations

Every day, in exercising its statutory duties Royal Mail vehicles use all the main roads that may potentially be affected by additional traffic arising from the construction of K3 and WKN Waste to Energy Facility. Any periods of road disruption / closure, night or day, will have the potential to adversely impact Royal Mail operations.

Royal Mail's position on K3 and WKN Waste to Energy Facility

Royal Mail does not wish to stop or delay K3 and WKN Waste to Energy Facility from coming forward for development. However, Royal Mail does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service to the public from and to the above identified operational facilities in accordance with its statutory obligations.

In order to do this, Royal Mail requests that:

1. the DCO includes specific requirements that during the construction phase Royal Mail is consulted by WTI/EFW Holdings Limited or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working, and the content of the final Construction Traffic Management Plan (CTMP) and,
2. the final CTMP includes a mechanism to inform major road users (including Royal Mail) about works affecting the local highways network (with particular regard to Royal Mail's distribution facilities in the vicinity of the DCO application boundary as listed above). As well as, where possible provide potential alternative access arrangements for impacted Royal Mail sites and other business road users.

Royal Mail reserves its right to object to the DCO application if the above requests are not adequately addressed.

Royal Mail welcomes contact from WTI/EFW Holdings Limited or its consultants during the Examination in order to assist with addressing the above requests.

Royal Mail will be monitoring the progress of the Examination. It may simply rely on this statement but reserves the right to make further representations to the Examination in due course once further information is available.

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