

Medworth Energy from Waste Combined Heat and Power Facility – DCO application by Medworth CHP Limited

Royal Mail Group response to Examination Deadline 2 – 24 March 2023

Introduction

Set out below is Royal Mail's consultation response at Deadline 2.

Royal Mail has submitted the following representations on this scheme:

- Non Statutory Consultation representation May 2020
- Section 42 consultation response August 2021; and
- Relevant representations November 2022.

Royal Mail is an Interested Party to the Examination (IP Registration Number: 20033413).

This short further representation confirms Royal Mail's position as at Deadline 2.

Wisbech Delivery Office, which provides mail and parcel sorting and delivery to Wisbech and the surrounding area, is situated in close proximity to this proposed Energy from Waste Power Facility. Following review and risk assessment by Royal Mail, the scheme has been identified as having potential for operational disruption to services from Wisbech Delivery Office caused by traffic impact on surrounding road network during both the construction and operational stages of this scheme.

Royal Mail's objective is to eliminate or minimise potential impacts of the construction and operation of this proposed new Energy from Waste facility on its operational and business interests. Royal Mail does not wish to prevent or delay this proposed development from coming forward.

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.



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.

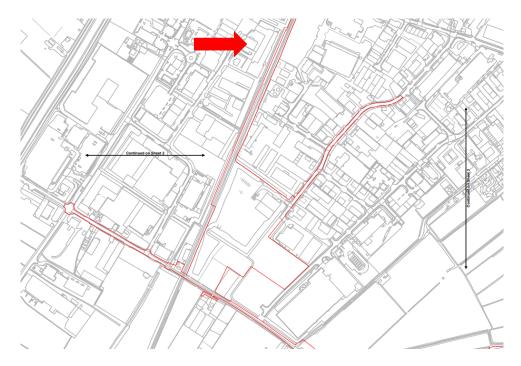
Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk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

Potential impacts of the scheme on Royal Mail

Royal Mail has two operational facilities within 10 miles of the proposed DCO boundary as listed below:

Site	Address	Distance
WISBECH DELIVERY OFFICE	Cromwell Court, Wisbech, PE14 ORA	0.1 miles
MARCH DELIVERY OFFICE	Dartford Road, March, PE15 8AA	9.3 miles

The approximate location of Wisbech Delivery Office relative to the red line DCO boundary is shown with an arrow below.



Wisbech Delivery Office is approximately 500 metres to the north of the proposed Energy from Waste Facility site. The proposed Combined Heat and Power connection corridor runs less than 100m to the east of Wisbech Delivery Office.



New Bridge Lane, Enterprise Way, Salters Way, Cromwell Road, Algores Way, Weasingham Lane and Churchill Road / Elm High Road are all used daily by Royal Mail and are important to access in to and out from Wisbech Delivery Office to from the A road network and for deliveries. Any congestion on these roads has potential to adversely affect Royal Mail operations from Wisbech Delivery Office.

The nearby section of the A47, particularly between Wisbech and Ring's End is a strategically important distribution route for Royal Mail services, important to mail handling and delivery at a local and regional level.

In exercising its statutory duties, Royal Mail vehicles use the A47, the A1101 and all of the adjacent local roads on a daily basis. Any additional congestion on these roads during the construction phase has the potential to significantly disrupt Royal Mail's operations.

All Royal Mail vehicles / services that use the affected sections of the A47 and the A1101 are at risk of delays during the construction period, which may potentially have an impact on Royal Mail being able to meet its Universal Service Obligation.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may be adversely affected by the construction of this proposed new Energy from Waste Power Facility in close proximity to Wisbech Delivery Office.

Royal Mail's position on the scheme at March 2023

Following submission of Royal Mail's section 46 consultation response in August 2021 it has had helpful contact with Medworth CHP Limited as a result of which wording has been included within the applicant's Environmental Statement Appendix 6A Outline CTMP paragraphs 7.4.32 to 7.4.35. This wording is in line with RM's section 46 consultation requests and the applicant has accepted it as a commitment, which if fully implemented, will provide Royal Mail with satisfactory advance consultation, liaison and information on works that affect the highway network.

Royal Mail registered as an Interested Party to the Examination in order to protect its position and ensure that Outline CTMP paragraphs 7.4.32 to 7.4.35 are implemented by Medworth CHP Limited and take effect during the construction phase.

Accordingly Royal Mail requests that Outline CTMP paragraphs 7.4.32 to 7.4.35 are not altered during the Examination and are included in the final CTMP.

Royal Mail looks forward to hearing further from Medworth CHP Limited on the mechanism referred to in the third bullet point of Outline CTMP paragraph 7.4.34.

Royal Mail welcomes further contact from Medworth CHP Limited or its consultants in order to assist with addressing the above requests. Please contact the following non-operational contacts for Royal Mail:



Holly Trotman @royalmail.com) Senior Legal Advisor - Town Planning & Environment

Daniel Parry-Jones (@realestate.bnpparibas) Director, BNP Paribas Real Estate