



## **Proposed DCO Application by Longfield Solar Energy Farm Limited for Longfield Solar Farm**

### **Royal Mail Group Limited's response to the Secretary of State's Rule 8 Letter (Examination Timetable)**

#### **Introduction**

Royal Mail and its consultants BNP Paribas Real Estate have reviewed the consultation material for the above project and wish to submit this holding response as part of the consultation exercise.

#### **Royal Mail – relevant information**

Under section 35 of the Postal Services Act 2011, 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.

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.

#### **Royal Mail position**

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the consultation documents, including the "Outline Construction Environmental Management Plan ("OCEMP")" February 2022 and "Framework Construction Traffic Management Plan ("FCTMP")" February 2022.



Royal Mail has seven operational property within 10 miles of the proposed scheme:

- North Essex LD – approx. 2.5 miles south-east;
- Chelmsford MC/RTW/MED – approx. 3.4 miles south-east;
- Chelmsford DO – approx. 5 miles south-east;
- Witham DO – approx. 8 miles north-east;
- Maldon DO – approx. 9 miles south-east;
- Tiptree DO – approx. 9 miles west; and
- Braintree DO – approx. 10 miles north.

Royal Mail's position remains unchanged from its response to the proposed Longfield Solar Farm ("LSF") Section 42 consultation in July 2021. LSF has potential to impact on Royal Mail's operations during its construction phase.

Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads that may potentially be affected by the proposed scheme. Any periods of road disruption / closure, night or day, on or to the roads immediately connected to these developments or the surrounding highway network will have the potential to impact operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets.

Royal Mail notes that the main construction access will be via road at Junction 19 of the A12 (A130 and B1137) and that abnormal loads are expected to be required.

The A12 is of very high strategic importance to Royal Mail's operations. National, regional and local mail and parcel distribution services use it, including services to Ipswich and Norwich.

Royal Mail understands that all construction access arrangements will be confirmed as the scheme design progresses and in consultation with Highways England and the County Highways Authorities.

The timing of the construction works for the Longfield Solar Farm relative to those for Highways England's proposed A12 Chelmsford to A120 Widening Scheme and proposed M25 J27 Improvement works will need careful consideration. Any overlap between the construction phases of these schemes would potentially have cumulative impacts that could be highly disruptive to Royal Mail services between London and the Eastern region.

The OCEMP dated February 2022 states *"a detailed CTMP will be required to be produced by the contractor(s) prior to commencement of construction"*, and the FCTMP Feb 2022 that *"certain details [relating to the management of construction traffic] will remain to be developed as the Scheme progresses into detailed design. The full details of all measures may not be available until after consent for the Scheme has been granted"*.

Therefore, as the consultation documents only provide estimate construction phase vehicle movements and mitigation measures, Royal Mail are unable to assess the level of potential risk to its operations and assets, and the available mitigations for any risk. As such, Royal Mail are unable to provide a robust consultation response.

Royal Mail therefore wishes to reserve its position to submit a consultation response/s later in the DCO consenting process when sufficient information is available.



In the meantime, any further consultation information on this infrastructure project and any questions of Royal Mail should be sent to:

**Holly Trotman** [REDACTED] **Senior Planning Lawyer, Royal Mail Group Limited**

**Suzy Crawford** [REDACTED] **Associate Director, BNP Paribas Real Estate**

Please can you confirm receipt of this consultation response by Royal Mail.

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