



Proposed DCO Application by National Grid Energy Transmission for Bramford to Twinstead Reinforcement

Royal Mail Group Limited Deadline 2 Representation 11 October 2023

Introduction

Royal Mail is an Interested Party to the Examination (IP registration no. 20041132) and submitted a relevant representation about this DCO scheme on 10 July 2023.

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.

The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. There is, in effect, a statutory obligation on Royal Mail to provide at least one collection from letterboxes and post offices six days a week and one delivery of letters to all 29 million homes and businesses in the UK six days a week (five days a week for parcels). Royal Mail must also provide a range of "end to end" services meeting users' needs, e.g. First Class, Second Class, Special Delivery by 1pm, International and Redirections services.

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.

Royal Mail position at October 2023

Royal Mail supports this proposed electricity line reinforcement scheme, but is seeking to secure reasonable mitigations to protect its road based operations during the construction phase.

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the Construction Traffic Management Plan Final Issue A document dated April 2023 (PINS ref EN020002).

There are fourteen Royal Mail operational properties within 10 miles of the proposed scheme. Hadleigh Delivery Office IP7 5AA is less than 1 mile distant, Ipswich Delivery Office and Road Transport Workshop IP1 1AA is circa 3.7 miles distant.



Thirteen other Royal Mail operational properties lie within 11 to 20 miles of the proposed electric line, and nine further operational properties within 21 to 30 miles.

In exercising its statutory duties, Royal Mail vehicles use all local roads on a daily basis for access to the Delivery Offices and for deliveries. Any periods of road congestion, disruption / closure, night or day, on the surrounding highway network will have the potential to adversely impact Royal Mail operations.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail does not wish to stop or delay Bramford to Twinstead Reinforcement 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 achieve this Royal Mail request that:

1. the DCO includes specific requirements that during the construction phase Royal Mail is notified by National Grid Energy Transmission or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working, and on the content of the final Construction Traffic Management Plan,
2. the final Construction Traffic Management Plan 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 near the DCO application boundary), and
3. Royal Mail is invited to join any stakeholder traffic management consultation group that is set up during the operational phase.

Re 2. above, an example of wording to address this requirement that was recently agreed for inclusion in a National Highways Construction Traffic Management Plan currently at DCO Examination is provided below:

“Advance notifications of programmed diversions and closures will be issued to Royal Mail. This would include providing not less one month notice of any road closures, diversions or alternative access arrangements that may affect travel on those routes and the agreed hours of working. The method of communication would be agreed as part of the Traffic Management Plan which is submitted to the Secretary of State for approval.”

Royal Mail reserves its position to submit a further representation to the Examination if these requests are not adequately addressed.

Any questions of Royal Mail in relation to this representation should be sent to:

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