



Richborough Connection Project

Written representation to the Examination by Royal
Mail Group Ltd (Deadline 2)

PINS IP Registration number 10032072

14 July 2016

Introduction

As a statutory consultee and registered Interested Party, Royal Mail Group Ltd (Royal Mail) wishes to register an objection to the Development Consent Order (DCO) application by National Grid for the proposed Richborough Connection Project.

Royal Mail briefly sets out its position below and requests that the Examination has due regard to the content of this written representation.

Royal Mail is concerned that its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations may be adversely affected during the construction of the proposed Richborough Connection Project.

However, Royal Mail's Legal Services Team is at an advanced stage of negotiations with National Grid's solicitor over a Legal Agreement that should, once signed, give Royal Mail sufficient comfort to lift this objection.

Operational information

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

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, putting at risk its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services.

In exercising its statutory duties, Royal Mail uses on a daily basis all the roads that will be affected by the construction of the Richborough Connection Project.

The construction of the proposed electricity transmission connection between Richborough and Canterbury has potential to cause operational disruption to Royal Mail operations through traffic delays, most likely on the A28, the A253 the A28 and the A256.

If such traffic disruption were to occur during the construction phase, the local Royal Mail operational properties that would be most susceptible to disruption through traffic delay during the construction phase are likely to be:

1. Canterbury Delivery Office, Military Road, Canterbury CT1 1AA
2. Sandwich Delivery Office, 34 King Street, Sandwich CT13 9AA
3. Broadstairs Delivery Office, 20 The Broadway, Broadstairs CT10 2AA
4. Ramsgate Delivery Office, 42 Wilfred Road, Ramsgate CT11 7RA

Delivery Offices typically generate four different categories of traffic:

- a. Strategic delivery/collection of mail (principally via the motorway system and A roads).
- b. Local delivery/collection by van (via all road types).
- c. Employee trips (via all road types).
- d. Public trips (via all road types).

Summary of Royal Mail's current position

Royal Mail supports the principle of the proposed Richborough Connection, but Royal Mail is concerned about the potential for disruption to its mail collection, transport and delivery during the scheme's construction period. Any such disruption on the surrounding highway network, could affect Royal Mail's future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations. Clearly, this presents a risk to Royal Mail's business.

In order to address this identified risk to its business, as indicated above Royal Mail is seeking to sign a Legal Agreement with National Grid. The draft Agreement is close to being signed, so this objection is being made in order to protect Royal Mail's operational position and future ability to make representations to the Examination should the Agreement fail to be signed on terms that are fully satisfactory to Royal Mail.

To conclude, until such a time as it can be shown that:

- either the risk to Royal Mail's operations from the construction of the Richborough Connection Project can be satisfactorily addressed through the signing of the proposed Legal Agreement between National Grid and Royal Mail,
- or it can be demonstrated by National Grid to Royal Mail's satisfaction that its operations will not be adversely affected,

then Royal Mail's objection will be maintained.

Royal Mail reserves the right to alter its position or make further representations in due course.

Royal Mail requests that this brief representation is taken into account by the Examination in determining National Grid's DCO application.

Should any queries or information requests arise then please contact Holly Trotman (holly.trotman@royalmail.com) of Royal Mail's Legal Services Team in the first instance.