



## **River Humber Gas Pipeline Replacement Project**

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

12 October 2015

## **Introduction**

As a statutory consultee, Royal Mail Group Ltd (Royal Mail) wishes to register an objection to the Development Consent Order (DCO) application by National Grid Gas plc for the proposed River Humber Gas Pipeline Replacement 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 River Humber Gas Pipeline Replacement Project.

Included in this brief document are:

- details of relevant Royal Mail operational information, and
- a summary of Royal Mail's current position on the scheme.

## **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 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.

In exercising its statutory duties, Royal Mail uses on a daily basis all the roads that will be affected by the construction of the River Humber Gas Pipeline Replacement Project.

The construction of the proposed River Humber Gas Pipeline Replacement Project may cause operational disruption to Royal Mail operations through any traffic delays on the local highway network, with traffic being generated by construction staff, civil and mechanical works traffic and abnormal loads.

Construction traffic routing to Paull would inevitably have to pass through Kingston upon Hull on the A1033 and A63 which will increase traffic volumes and could add to congestion. Construction traffic to Goxhill is likely to be less sensitive given the more rural locality and linkage to the A15.

There are several other NSIP proposals in the area (including A63 Castle Street Improvements, Hull and A160 / A180 Port of Immingham Highway Improvements) and in assessing highways impact full regard will need to be had to risk of cumulative impact of these and other major development proposals alongside the construction of the River Humber Gas Pipeline Replacement Project. It is noted that both these other NSIP proposals are included in the list of Major Planned Developments set out in Figure 5 and section 4.11 of the ES Non-technical summary.

If 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:

1. Hull Mail Processing Unit, Malmo Road, Hull HU7 0AA
2. Hull Central Delivery Office, St Peter Street, Hull HU9 1AA
3. Immingham Delivery Office, Middleplatt Road, Immingham DN40 1BL

Delivery Offices (DOs) 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 on the proposed River Humber Gas Pipeline Replacement Project**

Royal Mail supports the principle of the proposed River Humber Gas Pipeline Replacement Project, but 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, Royal Mail requests that in advance of construction works taking place National Grid Gas plc should fully consult with all major road users, including Royal Mail. Royal Mail requests that these consultations should cover traffic management proposals and ensure the provision of advance information on programmed construction activities to enable Royal Mail to instigate contingency measures, if required.

To conclude, until such a time as it can be shown that either Royal Mail operations will not be adversely affected by the construction of the River Humber Gas Pipeline Replacement Project together with the other NSIP proposals and major development proposals in the area, or the construction impact on Royal Mail's operations can be fully mitigated through appropriate consultation and traffic management measures, then Royal Mail's objection will be maintained.

Royal Mail reserves the right to alter its position or make further representations in due course once the above highlighted issues have been addressed by National Grid Gas plc and, if required, an opinion is provided by Royal Mail's consultants on whether the action taken satisfactorily addresses its above stated concerns.

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

Should any queries or information requests arise then please contact Holly Trotman of Royal Mail ([holly.trotman@royalmail.com](mailto:holly.trotman@royalmail.com)) in the first instance.