



Proposed DCO Application by Liverpool Bay CCS Limited for HyNet Carbon Dioxide Pipeline

Royal Mail Group Limited Deadline 1 Representation

Introduction

Royal Mail has previously submitted representations on this scheme:

- EIA Scoping consultation – July 2021;
- Section 42 consultation – July 2022; and
- Relevant representations – January 2023.

Royal Mail is an Interested Party to the Examination (IP Registration Number: 20034001).

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 April 2023

Royal Mail supports this proposed Hynet Carbon Dioxide Pipeline, 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 Outline Construction Traffic Management Plan (OCTMP) Revision A document dated September 2022 as included within the Environmental Statement (Volume III).



Royal Mail has 4 operational properties within 8 miles of the proposed HyNet Carbon Dioxide Pipeline:

- BE 2472 Flint DO;
- BE 2475 Chester MC;
- BE 2454 Chester DO; and
- BE BE2528 Ellesmere Port DO.

The draft OCTMP 2022 states construction traffic will use the M53, A55, A494, B roads, and other adjacent local roads. In exercising its statutory duties, Royal Mail vehicles use all of these 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 or to the roads immediately connected to the Pipeline or the surrounding highway network will have the potential to adversely impact Royal Mail operations.

As indicated above, 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 the HyNet Carbon Dioxide Pipeline 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 CTMP includes specific requirements that during the construction phase Royal Mail is notified by Liverpool Bay CCS Limited or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working,
2. where road closures / diversions are proposed, Liverpool Bay CCS Limited or its contractors liaise with Royal Mail at least one month in advance to identify and make available alternative highway routes for operational use, where possible, and
3. the CTMP includes a mechanism that informs Royal Mail about works affecting the local highways network (with particular regard to Royal Mail's distribution facilities near the DCO application boundary as identified above).

Whilst it is noted from the OCTMP that a Transport Review Group would be put in place, it is requested that Royal Mail is included as a Stakeholder and provided with named contacts at Liverpool Bay CCS Limited or its contractor/s for all consultations and notifications during the construction period at least two months before any works commence.

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

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