

From: [REDACTED]
To: [A303 Stonehenge](#)
Cc: [REDACTED]
Subject: A303 Stonehenge (A303 Amesbury to Berwick Down) consultation
Date: 02 August 2022 09:52:41
Attachments: [A303 Amesbury to Berwick Down - Royal Mail response to SoS request for comments Aug 2022.pdf](#)

Dear A303 Stonehenge Team

On behalf of our client, Royal Mail, please find attached their comments on the Applicant's response to the questions in the Secretary of State's Letter dated 13 July 2022.

We would be grateful if you could confirm receipt of this response.

Should you require anything further, please do not hesitate to contact myself/my colleague Suzy (copied).

Kind regards
Jia Mei

Jia Mei Tristodianto-Lee

Graduate Planner – Guildford Planning
Strutt & Parker, 215 High Street, Guildford, Surrey, GU1 3BJ



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A303 Amesbury to Berwick Down - Re-determination of the Application by National Highways (formerly Highways England)

Secretary of State's invitation for Interested Parties to comment on the Applicant's response to the questions in the Secretary of State's Letter dated 20 June 2022.

Comments by Royal Mail Group Limited as at August 2022.

Introduction

Royal Mail was an Interested Party (PINS ref 20019998) during the initial Examination into A303 Amesbury to Berwick Down.

Royal Mail wishes to make comments on the information provided by the Applicant in response to the Secretary of State's letter dated 20 June 2022, which requested comments related to the following:

1. Consortium of Stonehenge Experts – requests the Applicant confirm whether the four assets identified by the Consortium are included in the Applicant's assessment;
2. Conclusion on alternative routes – requests the Applicant fully explain how they reached the conclusion that the alternative tunnel routes would only have minimal additional heritage benefits over the Development;
3. Information and assessments – requests the Applicant to comment on the consultation responses received in April 2022 from bodies such as Stonehenge Alliance and Historic England, and to provide additional information if necessary;
4. Stonehenge Alliance – requests the Applicant to respond on the accuracy of the Alliance's statement that biodiversity baseline surveys and reports and issues relating to adverse impacts of tunnelling through chalk bedrock were not provided;
5. Environmental Statement on heritage matters – requests the Applicant provide further information on the methodology of approach that was applied to the newly assessed assets to fully understand any change in the assessment of heritage assets; and
6. Newly assessed assets – requests the Applicant provide clarification of whether the newly assessed assets have been considered where they form part of asset groups.

Summary Royal Mail's previous involvement

Due to the importance of the A303 to Royal Mail as a strategic distribution route, the proximity of operational Royal Mail properties to the scheme and existing traffic conditions in the area, the construction phase of Highways England's A303 Stonehenge was identified on initial review in November 2017 as having potential to present risk to Royal Mail's operations, which rely on road distribution of mail and parcels.



Accordingly, Royal Mail has submitted the following representations over the course of the consultation/determination period:

1. EIA scoping representation on 20 November 2017;
2. Section 42 consultation response on 23 April 2018;
3. Relevant representation submitted at Interested Party registration on 10 January 2019;
4. Written representation to Examination 21 October 2020 (following close of the Examination on 2 October 2020); and
5. Relevant representation submitted at the Re-determination of the Application on 4 April 2022.

Schedule 2, Requirement 9 of the DCO as made by the Secretary of State on 12 November 2020 states:

“Traffic management

9.—(1) No part of the authorised development is to commence until a traffic management plan which makes provision for traffic management proposals required to facilitate the construction of that part and which is substantially in accordance with the OEMP has been submitted to and approved in writing by the Secretary of State, following consultation with the local highway authority and the Royal Mail Group Limited.”

Royal Mail welcomed this DCO Requirement and subsequently notified relevant local operational staff of it in preparation for consultation by Highways England.

During December 2020, Royal Mail liaised with Highways England’s Stakeholder & Customer Operational Lead on the Consultation File Repository (“CDF”) Preliminary Works Traffic Management Plan under DCO Requirement 9. In March 2021, Royal Mail submitted an initial consultation response on this basis.

In April 2021, Royal Mail submitted a second consultation response on the CDF Preliminary Works Traffic Management Plan. This included suggested wording for the Preliminary Works Traffic Management Plan, provision of relevant Royal Mail operational contacts for consultation and a request for Royal Mail to be invited to join Highways England’s Corridor Traffic Liaison Group or other such other stakeholder liaison group as is set up by Highways England in relation to the Preliminary Works and in due course the Main Works.

Highways England Solicitors, Pinsent Masons, sought a DCO Correction Order on 21 December 2020 requesting the removal of the reference to Royal Mail within DCO Requirement 9 on the basis that it was “*unnecessary, as its concerns are addressed through the OEMP measures.*” Royal Mail submitted a response to this by letter to the Department for Transport on 17 February 2021. The subsequent Correction Notice rejected the request by Pinsent Masons on behalf of Highways England.

The DCO decision was quashed by High Court on 30 July 2021 following Judicial Review by Save Stonehenge World Heritage Site Ltd.



Royal Mail position at August 2022

Royal Mail's statutory obligations under section 35 of the Postal Services Act 2011 as set out in the October 2020 and April 2022 representations (**see Appendix 1 and 2**) are unchanged since the granting of the DCO by the Secretary of State on 12 November 2020.

Since Royal Mail's representations were submitted in April 2022 and the granting of the DCO in November 2020 there have been no changes to importance of the A303 to Royal Mail as a strategic distribution route, or in the number of operational Royal Mail properties that rely on it.

The content of the representation submitted by Royal Mail in all previous representations remain relevant today. Royal Mail's position on the need for engagement and consultation by Highways England as set out in the 17 February 2021 response to the DCO correction order request is unchanged.

Accordingly, Royal Mail requests that if on re-determination of the application by National Highways the Secretary of State is minded to grant DCO, a Requirement is included in the new DCO which would ensure the same level of consultation between National Highways and Royal Mail on construction Traffic Management as resulted from Schedule 2 Requirement 9 of the quashed DCO. Royal Mail would be pleased to provide more information or answer any queries resulting from the above.

In the meantime, any further consultation information on this infrastructure proposal 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

Attached:

Appendix 1 – Royal Mail representation dated October 2020

Appendix 2 – Royal Mail representation dated April 2022



Appendix 1 – Royal Mail Representation dated October 2020



A303 Stonehenge

Post Examination representation by Royal Mail Group Limited – October 2020

Introduction

Further to an email exchange with PINS' A303 Stonehenge Case Team on 14 October 2020 after the closure of the Examination into the DCO application, as a Statutory Consultee and Interested Party to the Examination Royal Mail wishes to draw to the attention of the ExA and Highways England / DfT the following post examination representation.

Statutory and operational information about Royal Mail

Under section 35 of the Postal Services Act 2011 (the "Act"), 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.

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.

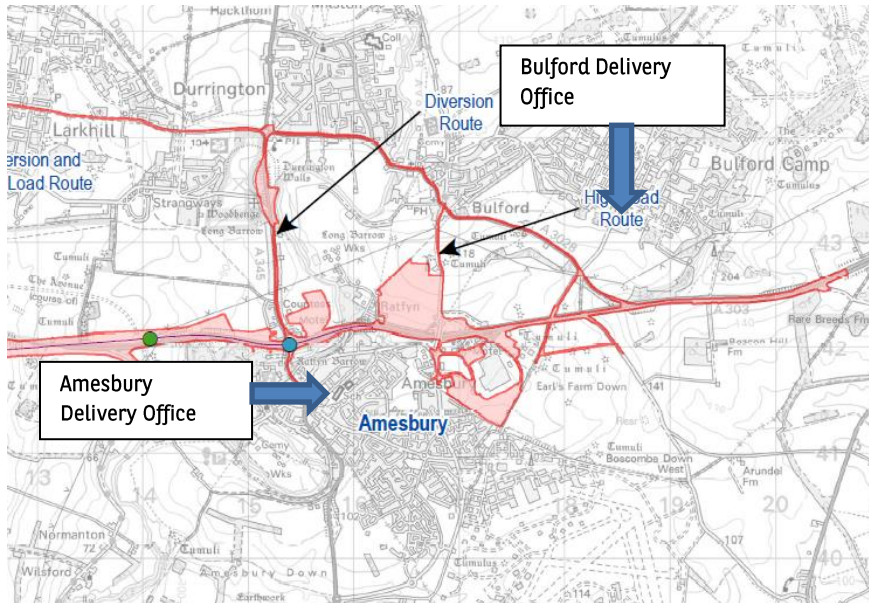
The Government imposes financial penalties on Royal Mail if its Universal Service Obligation service delivery targets are not met. These penalties relate to time targets for:

- 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.

The A303 is a strategically important distribution route for Royal Mail. Royal Mail's has a two operational Delivery Offices both within 0.5 km of the proposed DCO boundary near Amesbury, as shown on plan below:



In exercising its statutory duties, Royal Mail uses the affected section of the A303 and all of the main roads in the vicinity of it on a daily basis.

Royal Mail is concerned that its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its Universal Service Obligation may be adversely affected by the construction of this major road scheme.

In exercising its statutory duties, Royal Mail vehicles use the A303 and all of the proposed diversion routes on a daily basis. Any additional congestion on these roads during the construction phase has the potential to significantly disrupt Royal Mail's operations.

Based on current traffic conditions, Amesbury Delivery Office (SP4 7EW) reports traffic congestion on the A303, The Packway, Larkhill Road, A345. Bulford Delivery Office (SP4 9JB) reports existing traffic congestion at A303, Countess Road, London Rd.

Particularly in view of the above identified existing traffic congestion in the area, Royal Mail wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may be further adversely affected by the construction of this proposed road improvement.

Royal Mail's position on the scheme at October 2020

Royal Mail does not wish to stop or delay Highways England's A303 Stonehenge improvements from being implemented. 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 in accordance with its statutory obligations.



In seeking to do this, Royal Mail requests that:

1. Royal Mail is consulted by Highways England or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working, and the content of the final Construction Traffic Management Plan (CTMP),
2. where road closures / diversions are proposed, Highways England 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 final CTMP includes a mechanism to inform Royal Mail about works affecting the local highways network (with particular regard to access to and from Amesbury and Bulford Barracks Delivery Offices).

Royal Mail welcomes contact from Highways England or its consultants in order to assist with addressing the above requests.

Contacts for Royal Mail:

Denise Stephenson [REDACTED] of Royal Mail's Legal Services Team.

Daniel Parry-Jones ([REDACTED]) of BNP Paribas Real Estate.



Appendix 2 – Royal Mail Representation dated April 2022



A303 Amesbury to Berwick Down - Re-determination of the Application by National Highways (formerly Highways England)

Secretary of State request to Interested Parties for comments on the Secretary of State's Statement of Matters of 30 November 2021, the Applicant's response to the Statement of Matters of 11 January 2022 and 8 February 2022 and all representations that have been published on the Planning Inspectorate website

Comments by Royal Mail Group Limited as at April 2022

Introduction

Royal Mail was an Interested Party (PINS ref 20019998) during the initial Examination into A303 Amesbury to Berwick Down.

Royal Mail wishes to make the following comments in response to the Secretary for State's request of 24 February 2022 for comments from all Interested Parties and the Applicant. These relate to the re-determination of the application for the A303 Amesbury to Berwick Down and specifically the final bullet point of section 2 of the Secretary of State's Statement of Matters dated 30 November 2021:

- *“any other matters arising since 12 November 2020 which Interested Parties consider are material for the Secretary of State to take into account in his re-determination of the application.”*

Summary Royal Mail's previous involvement

Due to the importance of the A303 to Royal Mail as a strategic distribution route, the proximity of operational Royal Mail properties to the scheme and existing traffic conditions in the area, the construction phase of Highways England's A303 Stonehenge was identified on initial review in November 2017 as having potential to present risk to Royal Mail's operations, which rely on road distribution of mail and parcels.

Accordingly, Royal Mail has submitted the following representations:

1. EIA scoping representation on 20 November 2017.
2. Section 42 consultation response on 23 April 2018.
3. Relevant Representation submitted at Interested Party registration on 10 January 2019.
4. Written representation to Examination 21 October 2020 (following close of the Examination on 2 October 2020).

A copy of 4. above is attached for ease. It is referenced as document number 190 in the Post-Examination Correspondence Log.

Schedule 2, Requirement 9 of the DCO as made by the Secretary of State on 12 November 2020 states:

“Traffic management

9.—(1) *No part of the authorised development is to commence until a traffic management plan which makes provision for traffic management proposals required to facilitate the construction of that part and which is substantially in accordance with the OEMP has been submitted to and approved in writing by the Secretary of State, following consultation with the local highway authority and the Royal Mail Group Limited.*



Royal Mail welcomed this DCO Requirement and subsequently notified relevant local operational staff of it in preparation for consultation by Highways England.

During December 2020 Royal Mail received contact from Highways England's Stakeholder & Customer Operational Lead for A303 Amesbury to Berwick Down in relation to the first round of consultation on the CDF Preliminary Works Traffic Management Plan under DCO Requirement 9. In March 2021 Royal Mail submitted an initial consultation response on this following various helpful and positive liaison between Highways England and Royal Mail.

Following further constructive information exchange between Highways England and Royal Mail, in April 2021 Royal Mail submitted a second consultation response on the CDF Preliminary Works Traffic Management Plan. This included suggested wording for the Preliminary Works Traffic Management Plan, provision of relevant Royal Mail operational contacts for consultation and a request for Royal Mail to be invited to join Highways England's Corridor Traffic Liaison Group or other such other stakeholder liaison group as is set up by Highways England in relation to the Preliminary Works and in due course the Main Works.

Highways England Solicitors, Pinsent Masons, sought a DCO Correction Order on 21 December 2020 requesting the removal of the reference to Royal Mail within DCO Requirement 9 on the basis that it was "*unnecessary, as its concerns are addressed through the OEMP measures.*" Royal Mail submitted a response to this by letter to the Department for Transport on 17 February 2021 (copy attached for information). The subsequent Correction Notice rejected the request by Pinsent Masons on behalf of Highways England.

The DCO decision was quashed by High Court on 30 July 2021 following Judicial Review by Save Stonehenge World Heritage Site Ltd.

Royal Mail position at April 2022

Royal Mail's statutory obligations under section 35 of the Postal Services Act 2011 as set out in the attached October 2020 and representation are unchanged since the granting of the DCO by the Secretary of State on 12 November 2020.

Since Royal Mail's representations were submitted in October 2020 and the granting of the DCO in November 2020 there have been no changes to importance of the A303 to Royal Mail as a strategic distribution route, or in the number of operational Royal Mail properties that rely on it.

The content of the representation submitted by Royal Mail in October 2020 remains relevant today.

Royal Mail's position on the need for engagement and consultation by Highways England as set out in the 17 February 2021 response to the DCO correction order request is unchanged.

The consultation between Highways England and Royal Mail that took place between December 2020 and April 2021 in line with DCO Schedule 2 Requirement 9 of the quashed DCO was constructive and beneficial to Royal Mail's operation. Clearly, that consultation related to the Preliminary Works Traffic Management Plan, the impacts of which on the highway network will be considerably lower than that of the Main Works. The consultations worked well and served to set up a process and lines of communication between Highways England and Royal Mail which will be helpful for any future consultation on the Main Works Traffic Management Plan.



Accordingly, Royal Mail requests that if on re-determination of the application by National Highways the Secretary of State is minded to grant DCO, a Requirement is included in the new DCO which would ensure the same level of consultation between National Highways and Royal Mail on construction Traffic Management as resulted from Schedule 2 Requirement 9 of the quashed DCO.

Royal Mail would be pleased to provide more information or answer any queries resulting from the above.

Contacts for Royal Mail:

Holly Trotman [REDACTED] of Royal Mail's Legal Services Team.

Daniel Parry-Jones [REDACTED]) of BNP Paribas Real Estate.

Attached:

1. Royal Mail representation dated October 2020
2. Royal Mail letter to the Department for Transport dated 17 February 2021