

## **Planning Act 2008**

### **DCO Application for M25 Junction 28 Improvements**

#### **Royal Mail Examination Statement – Procedural Deadline B 21 December 2020**

##### **1.0 Introduction**

Royal Mail supports this road improvement scheme which, once complete, will be beneficial to Royal Mail and other major road users.

However, Royal Mail is concerned about the scheme's potential construction phase impacts on its road based operations which could interfere with Royal Mail's ability to meet its service delivery targets as a provider of the Universal Postal Service under the Postal Services Act 2011 and possibly result in financial penalties.

In order to address this risk, Royal Mail requested in its Relevant Representation at Interested Party registration on 7 September 2020, advance consultation on and notification of by Highways England on any works that will affect the local highway network, with particular regard to Royal Mail's distribution facilities in the area, where possible providing alternative access arrangements.

Advance consultation and notification by Highways England will enable Royal Mail to plan its operations, so as to minimise impact on its business and ability to meet its Universal Service Obligations.

##### **2.0 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.

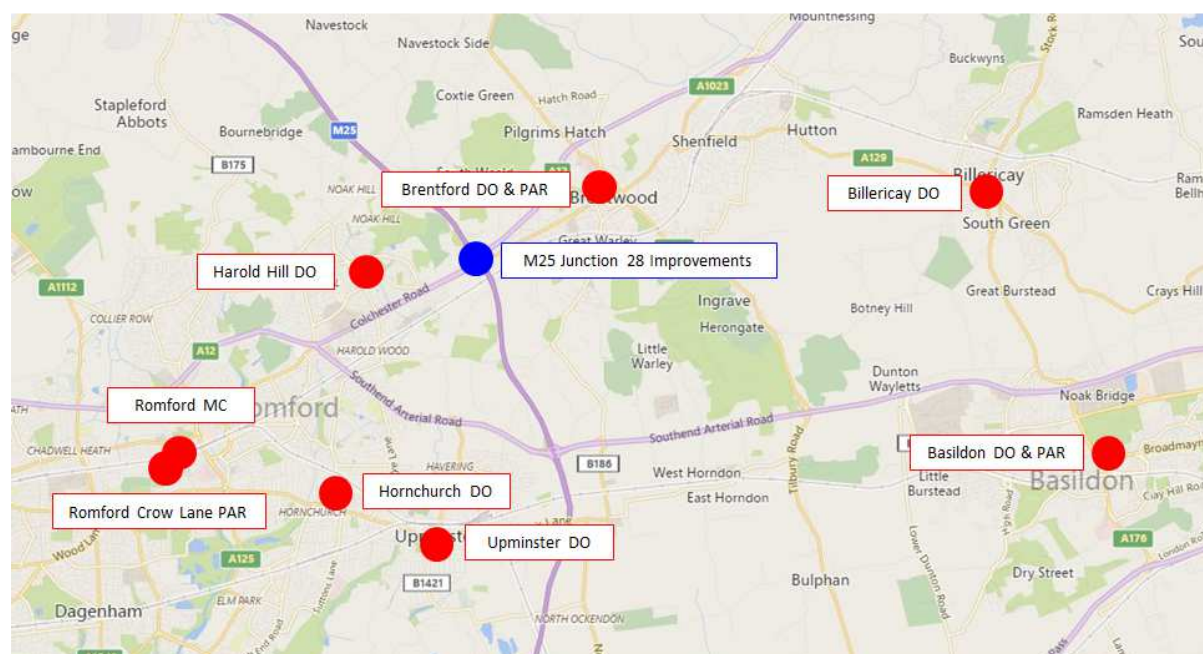
Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail’s operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail’s business.

### 3.0 Relevant Royal Mail Operational Information

In exercising its statutory duties Royal Mail vehicles use on a daily basis all of the local roads that may potentially be affected by the construction of the proposed junction improvements.

Royal Mail’s has ten operational properties within 12 miles of the proposed M25 Junction 28 improvement scheme as listed and shown on plan below:

Brentwood Vehicle Park	William Hunter Way, Brentwood CM14 4SS	1.6 miles
Brentwood Delivery Office	30 High Street, Brentwood CM14 4AA	1.8 miles
Harold Hill Delivery Office	Trowbridge Road, Romford RM3 8YN	2.6 miles
Hornchurch Delivery Office	154 Abbs Cross Gardens, Hornchurch RM12 4AZ	5.3 miles
Romford Mail Centre	Queen Elizabeth House, Romford RM7 0AB	5.8 miles
Romford Crow Lane Vehicle Park	Crow Lane, Romford RM7 0EP	6.0 miles
Upminster Delivery Office	58 Corbets Tey Road, Upminster RM14 2AS	6.3 miles
Billericay Delivery Office	135 High Street, Brentwood CM12 9AA	7.2 miles
Basildon Vehicle Park	Great Oaks, Basildon SS14 1AH	11.4 miles
Basildon Delivery Office	25 East Square, Basildon SS14 1AA	11.8 miles



The M25 and the A12 are both of very high strategic importance to Royal Mail’s operations. National, regional and local mail distribution services use them.

Royal Mail's Operational planners have indicated that any delays at this junction during the construction of Highways England's improvement scheme will affect its services.

Royal Mail vehicles use M25 J28 run 24 hours a day 7 days a week to travel to Romford Mail Centre. If these vehicles have to be re-routed to M25 Junction 29 and Junction 27 and go back on themselves it will substantially increase journey times, impact on arrival profile and increase costs. The potential knock on impact of traffic delays at J29 and J27 is also a significant concern to Royal Mail. In addition, Chelmsford Mail Centre, accessed via the A12, currently runs 35 night duties (22:00- 06:00) which will use M25 Junction 28.

There are existing congestion issues on this section of the M25. Royal Mail Operational Managers have indicated that advance information will be required from Highways England on the extent and timing of further delays to journey times during construction. Highways England's proposed M25 Junction 28 improvement works may necessitate Royal Mail having to change Romford Mail Centre's work plan. Royal Mail may also need to look at how guaranteed delivery services could be achieved during the construction phase for these improvements.

The timing of the construction works for the M25 Junction 28 improvement works relative to those for Highways England's A12 improvements will need careful consideration, any overlap between the two schemes would potentially be highly disruptive to Royal Mail services between London and the Eastern region.

Once complete, Highways England's proposed improvements to M25 Junction 28 will undoubtedly improve traffic conditions on it and the surrounding highway network, so Royal Mail does not wish to prevent it from going ahead. However, in view of the high operational importance of this junction to Royal Mail's business as outlined above, it wishes to protect of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may potentially be adversely affected by the construction of this proposed improvement scheme.

### **3.0 Summary of Royal Mail's position at Procedural Deadline B 21 December 2020**

Royal Mail is seeking to take all reasonable steps to protect its operational interests a provider of the Universal Postal Service under the Postal Services Act 2011 with the resources that are available to it to do so.

Royal Mail's preference to provide certainty of advanced consultation and notification of road works affecting the highways network by Highways England is by means of a DCO requirement similar to 10 (1) of the DCO for M42 Junction 6, or 9 (1) of the more recent (12 November 2020) DCO for A303 Amesbury to Berwick Down.

The two requests made in Royal Mail's Relevant Representation remain unchanged, namely:

1. the DCO includes specific requirements that during the construction phase 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 CTMP, and

2. The final CTMP 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 as identified above).

As Royal Mail has finite resources it will not be appearing at the Examination and requests that the Examining Authority relies on this written representation (and Royal Mail's Relevant Representation) for decision making purposes. However, Royal Mail wishes to remain an Interested Party in order that it can have full visibility of the Examination and reserves the right to submit further written representations if considered necessary.

Should Highways England or the Examining Authority have specific questions arising from this representation then Royal Mail will be pleased to respond in writing.

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