



A417 Missing Link - Royal Mail written representation to the Examination in response to Planning Inspectorate letter dated 5 April 2022 to all Interested Parties, Affected Persons and Statutory Parties

1.0 Introduction

Royal Mail is a provider of the Universal Postal Service under the Postal Services Act 2011 (please see section 2.0 below).

Royal Mail registered as an Interested Party on 2 September 2021 and submitted Relevant Representations (as attached) in which it requested that:

1. the DCO includes specific requirements that during the construction phase Royal Mail is notified 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 on 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.

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. Its 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 and thus its operation is vulnerable to changes in capacity within the highway network.



Disruption to the highway network and traffic delays can have direct consequences on 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 A417 Missing Link.

Royal Mail has a number of properties which are in the vicinity of the A417 Missing Link, the operations run from which have the most direct potential to be affected during the construction phase:

Site Name / function	Address	Distance from scheme in miles
Gloucester North Delivery Office	[REDACTED]	5.6
Cheltenham Delivery Office	[REDACTED]	7.3
Cheltenham Vehicle Park	[REDACTED]	7.4
Gloucester Storage/Vehicle Workshop/Office	[REDACTED]	8.1
Gloucester South Delivery Office	[REDACTED]	11.4





In addition, services from other Royal Mail operational properties use this section of the A417 as it provides an important link between the Midlands/North and South of England, Gloucester and Swindon as well as an alternative to the M5/M4 route via Bristol. These services may also be affected during the construction phase of the A417 Missing Link.

4.0 Summary of Royal Mail's position on A417 Missing Link as at April 2022

Royal Mail supports National Highways' proposed A417 Missing Link improvements. Once these are complete there will be benefits to Royal Mail operations, but Royal Mail is concerned about the scheme's potential construction phase impacts on its road based operations. Any such impacts 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 may result in financial penalties by the Government.

The Deadline 2 (January 2022) version of the Construction Traffic Management Plan at section 2.3 contains helpful information on the proposed Traffic Management Measure and the duration periods, but it does not contain programming information or start and finish dates.

As was requested in Royal Mail's September 2021 relevant representation, the January 2022 Construction Traffic Management Plan does not include a specific requirement to consult with or notify major road users, including Royal Mail, in advance of works or traffic management events that may significantly affect the highway network.

Despite its September 2021 relevant representation, Royal Mail is not specifically included in the list of "Key Customers and Stakeholders" at section 2.1.1 of the January 2022 revised Construction Traffic Management Plan. Also, Royal Mail is not referred to as a Stakeholder within the "Communication Plan" section (paragraphs 2.3.28 to 2.3.31) of the January 2022 revised Construction Traffic Management Plan.

Royal Mail seeks to take all reasonable steps to protect its operational interests as a provider of the Universal Postal Service under the Postal Services Act 2011. As a reasonable step to address risk of construction phase impact on its business, Royal Mail requests that National Highways' Construction Traffic Management Plan is further revised to include a specific mechanism to notify Royal Mail in advance about works affecting the local highways network, with particular regard to Royal Mail's distribution facilities in the vicinity of A417 Missing Link, as identified above.

A good example of potential wording for National Highways to consider including is provided by the Construction Traffic Management Plan for the A1 Birtley to Coal House Improvement Scheme:

"2.8.1 Advanced notifications of programmed diversions and closures will be issued to major road users in the vicinity of the scheme including Royal Mail. This will include providing major road users with not less than 7 working days' notice of any road closures, diversions or alternative access arrangements that may affect travel on those routes and (if available) in all cases the agreed hours of working. This will form part of a wider communications plan associated with the scheme. The method of communication will be agreed as part of the final Construction Traffic



Management Plan. Highways England will consult with Royal Mail on the content of the final Construction Traffic Management Plan."

This wording was agreed between Highways England and Royal Mail in June 2020 during the Examination into that DCO application. In May 2021 a similar wording was agreed between Highways England and Royal Mail for inclusion in the Construction Traffic Management Plan for the A1 in Northumberland Morpeth to Ellingham Improvement Scheme.

More recently, in February 2022 a similar form of wording was agreed by the Secretary of State in determining the DCO application Thurrock Flexible Generation Plant Project as being appropriate for inclusion in the Outline Construction Traffic Management Plan for this scheme, this wording however provided for advance consultation about roadworks and road closures by the developer as distinct from advance notification.

It is also requested that Royal Mail is added to the list of "Key Customers and Stakeholders" at section 2.1.1 and is referenced as a Stakeholder within the "Communication Plan" section (paragraphs 2.3.28 to 2.3.31) of the January 2022 revised Construction Traffic Management Plan.

Royal Mail would be pleased to have the opportunity to review and comment on a further revised Construction Traffic Management Plan to include provisions along the lines suggested the above.

Should National Highways have specific questions arising from this consultation response then Royal Mail will be pleased to assist. The points of contact with Royal Mail for non-operational matters will continue to be:

Holly Trotman [REDACTED] **Senior Planning Lawyer Royal Mail Group Limited**

Daniel Parry Jones [REDACTED] **Director BNP Paribas Real Estate**