

Planning Act 2008

DCO Application for A1 in Northumberland – Morpeth to Ellingham

Royal Mail Examination Statement – Procedural Deadline 2

1.0 Introduction

Royal Mail supports this road upgrade 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 30 October 2020 that:

- 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)."***

Advance consultation and notification by Highways England would 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.

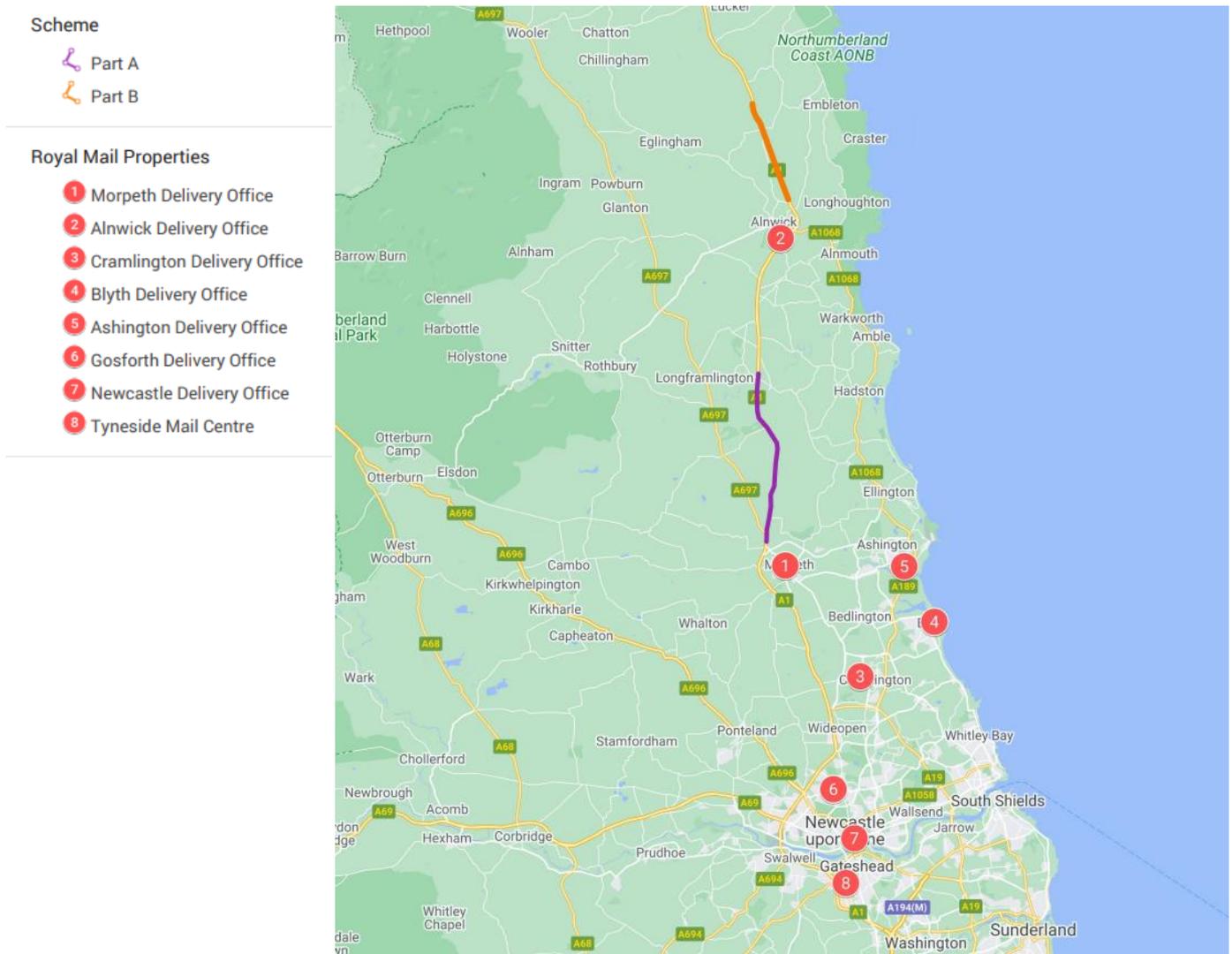
Royal Mail’s postal sorting and delivery operations rely heavily on road communications. Royal Mail’s ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

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 this proposed road upgrade to the A1.

Royal Mail has eight operational facilities within 20 miles of the affected section of the A1:



BE No.	Site Name	Street	Postcode	Distance
2752	MORPETH DO	18-22 OLDGATE	NE61 1AA	1.9
2756	ALNWICK DO	GREENSFIELD ESTATE	NE66 2DD	2
2768	CRAMLINGTON DO	CROWHALL LANE	NE23 1DJ	9.4
2762	BLYTH DO	21 BRIDGE STREET	NE24 1AA	11.9
2755	ASHINGTON DO	4 ARMSTRONG WAY	NE63 0LA	12.1
2837	GOSFORTH DO	JUBILEE ROAD	NE3 3UA	13.7
2769	NEWCASTLE DO/OFF/PRO	FORTH STREET	NE1 1AD	15.8
2772	TYNESIDE MC/RTW/MED/OFF	LINDISFARNE HOUSE EARLSWAY	NE11 0YY	20

The A1 is of high strategic importance to Royal Mail's operations. National, regional and local mail distribution services use it.

The location, nature and scale of the proposed works could present risk of construction phase impact / delays to Royal Mail's road based operations on the surrounding road network.

The key concerns to Royal Mail's operations will be the impact to collection mail coming from Alnwick DO and Berwick DO (30 miles north of the scheme), en route to Tyneside Mail Centre for processing, as well as potential for impacts on inward mail deliveries from Tyneside to Alnwick DO.

Royal Mail's Operational planners have indicated that any traffic delays during the construction of Highways England's proposed upgrade to this section of the A1 have potential to affect Royal Mail services.

Once complete, Highways England's proposed upgrade to the Morpeth to Ellingham section of the A1 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, Royal Mail 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 scheme.

3.0 Summary of Royal Mail's position at Procedural Deadline 2

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 Schedule 2 paragraph 9 (1) of the 12 November 2020 DCO for A303 Amesbury to Berwick Down:

"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."

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).

It is relevant to note that, in similar circumstances, amendments to paragraph 2.8.1 of the draft Construction Traffic Management Plan for A1 Birtley to Coal House Improvement Scheme were agreed between Highways England and Royal Mail in June 2020 during the Examination into that DCO application:

"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 CTMP. Highways England will consult with Royal Mail on the content of the final CTMP."

Following the granting of the DCO for the A1 Birtley to Coal House scheme on 19 January 2021, Royal Mail is awaiting contact from Highways England to finalise the CTMP for this scheme.

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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