



## **Examination into National Highways' A12 Chelmsford to A120 widening scheme**

### **Royal Mail update statement to the Examining Authority at Deadline 2 - 13 February 2023**

#### Background

Royal Mail has previously submitted representations on this scheme during the following stages:

- Section 42 consultation in August 2021
- Supplementary consultation in December 2021
- Relevant representations November 2022

Royal Mail is an Interested Party to the Examination (IP Registration Number: 20033079).

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.

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.

Any periods of road disruption / closure, night or day, on or to the roads immediately connected to these developments or the surrounding highway network will have the potential to impact operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets.

The A12 is of very high strategic importance to Royal Mail's operations. In exercising its statutory duties, Royal Mail vehicles use on a daily basis the A12, the A120 and all of the other local roads that may potentially be affected by National Highways' proposed widening works. Royal Mail's



operational planners have indicated that any delays on this stretch of the A12 during the construction of this widening scheme will mainly affect services to the CO, CM, IP Postcode areas, and the Royal Mail Delivery Offices within them.

Royal Mail has 15 operational facilities within 12 miles of the proposed DCO boundary. Estimated distances from the scheme are provided below:

- Marks Tey Vehicle Parking, CO6 1EB - c. 0 miles
- Chelmsford Mail Centre / Road Transport Workshop, CM2 5AA - c. 0.2 miles
- North Essex Parcel Force Depot, CM2 5AE - c. 0.2 miles
- Witham Delivery Office, CM8 2AH - c. 0.8 miles
- Kelvedon Vehicle Parking, CO5 9AE - c. 0.8 miles
- Chelmsford Delivery Office, CM2 6ZZ - c. 1.5 miles
- Tiptree Delivery Office, CO5 0LD - c. 1.8 miles
- Colchester Vehicle Parking, CO1 2TJ - c.3.3 miles
- Maldon Delivery Office, CM9 4LD - c. 5.3 miles
- Colchester Delivery Office, CO1 2GB - c. 6.5 miles
- Wivenhoe Sub Unit Delivery Office, CO7 9AB - c. 6.5 miles
- Braintree Delivery Office, CM7 3SR - c. 7 miles
- South Woodham Ferrers Delivery Office, CM3 5YA - c. 10 miles
- West Mersea Sub Unit Delivery Office, CO5 8QQ - 11.1 miles
- Halstead Vehicle Parking, CO9 2LS - 11.4 miles

Update on Royal Mail’s position as at February 2023

Royal Mail supports National Highways' A12 Chelmsford to A120 Widening Scheme which, once completed, will enhance journey times and road capacity in the area. However, the construction phase of the scheme has potential to cause significant disruption to Royal Mail's operations on the A12 and A120 which are both important distribution routes already prone heavy traffic, congestion and delays.

Royal Mail has reviewed National Highways’ response to its Relevant Representation as below:

**RR-073 - BNP Paribas Real Estate on behalf of Royal Mail Group**

Sub-Part Reference	RR-073-001
<b>Sub-Part</b>	<p>Royal Mail (RM) does not have an in principle objection to this proposed road scheme but is seeking to secure mitigations to protect its road based operations during the construction phase. Under section 35 of the Postal Services Act 2011 (the "Act"), RM has been designated by Ofcom as a provider of the Universal Postal Service. RM 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 RM, 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. RM 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 should not be affected detrimentally by any statutorily authorised project. RM's postal sorting and delivery operations rely heavily on road communications. RM's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network. RM is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on RM'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 RM's business. RM has fifteen operational facilities within 12 miles of this road scheme, including Chelmsford Mail Centre. The Traffic Management proposed for this scheme has potential to present risk of construction phase impact / delays to RM's road based operations on the surrounding road network. Every day, in exercising its statutory duties RM vehicles use all the main roads that may be impacted by any additional traffic arising / delays during construction of this scheme. Any periods of road disruption / closure, night or day, have the potential to impact operations. RM does not wish to stop or delay this</p>



	scheme from being constructed, but does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service.
<b>Response</b>	The Applicant is committed to continuing engagement with the Interested Party in terms of the proposed scheme's impacts on their operational capability and how this can be mitigated.
<b>Sub-Part Reference</b>	<b>RR-073-002</b>
<b>Sub-Part</b>	In order to do this, RM requests that: 1. the DCO includes specific requirements that during the construction phase RM is consulted by National Highways 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, 2. the final CTMP includes a mechanism to inform major road users (including RM) about works affecting the local highways network (with particular regard to RM's distribution facilities near the DCO application boundary), and 3. RM is able to join National Highways' consultation group with the Local Highways Authority and other major road users.
<b>Response</b>	As stated in the Outline Construction Traffic Management Plan (OCTMP) [APP-272], section 3.1.  "3.1.3 Diversion routes and closures would be confirmed and publicised as early as possible (within a minimum of five working days). The stakeholder team would identify the preferred communication methods of stakeholders, residents and businesses and in collaboration with traffic management teams, ensure the delivery of relevant, accurate and timely information. This may include National Highways' website and social media platforms, local and national traffic information sites, and targeted letter deliveries to local communities."

	Section 1.3 details that the OCTMP would be superseded by the Construction Traffic Management Plan (CTMP) ahead of commencement of the construction phase of the proposed scheme. The communication strategy would be further developed within the CTMP.  Information in section 3.2 of the OCTMP details user forum groups with key stakeholders such as Royal Mail. Table 3.1 shows the proposed traffic management forums to which Royal Mail would be invited, namely the Local Business and Strategic Road User Forum.
<b>Sub-Part Reference</b>	<b>RR-073-003</b>
<b>Sub-Part</b>	RM reserves its position to object to the DCO application if the above requests are not adequately addressed.
<b>Response</b>	The Applicant considers that the commitments made in the Outline Construction Traffic Management Plan (OCTMP) [APP-272] sufficiently respond to and address the Interested Party's requests.

Royal Mail wishes to make the following comments to the Examining Authority on these applicant responses:

**Sub-Part Reference RR-073-001**

National Highways' response is fully agreed.

National Highways has shown commitment to continuing engagement with Royal Mail in relation to how impact of the scheme on Royal Mail's operations can be mitigated. Royal Mail has welcomed the recent contact from and consultations with National Highways' Project team in response to the previously submitted representations as above. Most recently, a helpful meeting took place on 10 February 2023 between National Highways' Project Team and representatives of Royal Mail. Good progress has been made with addressing most of Royal Mail's stated requests which were set out in its representations as listed above.

**Sub-Part Reference RR-073-002**

National Highways' response is not fully agreed.



OCTMP paragraph 3.1.3, section 1.3 and section 3.2 and table 3.1 are all welcomed by Royal Mail, but they do not address the first of Royal Mail's three requests, namely that :

*"the DCO includes specific requirements that during the construction phase Royal Mail is consulted by National Highways 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".*

A good example of potential wording for National Highways to consider for inclusion in A12 Chelmsford to A120 widening scheme's OCTMP / CTMP is provided in the CTMP for Highways England's 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 National Highways and Royal Mail in June 2020 during the Examination into that DCO application. In May 2021 similar wording was agreed between Highways England and Royal Mail for inclusion in the Construction Traffic Management Plan for A1 in Northumberland Morpeth to Ellingham.

### **Sub-Part Reference RR-073-003**

National Highways' response is not fully agreed.

Good progress has been made by National Highways in addressing the three requests set out in Royal Mail's Relevant Representation. However, in view of Royal Mail's position on Sub-Part Reference RR-073-002 above it wishes to remain an Interested Party and reserve its right to object to the DCO application if necessary in order to protect its position and ensure that OCTMP paragraph 3.1.3, section 1.3 and section 3.2 and table 3.1 remain unchanged during the Examination and take effect during the construction phase.

Finally, as flagged in the 10 February 2023 meeting with National Highways' Project Team, Royal Mail additionally requests that a new provision is added to the OCTMP obliging National Highways to provide Royal Mail with the named contacts at National Highways or its contractor/s for all consultations and notifications during the construction period at least two months before any works commence.

Any queries or information requests arising from this update statement by Royal Mail should be directed to:

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