



## **Proposed DCO Application by National Highways for A66 Northern Trans-Pennine Project**

### **Royal Mail Group Limited's registration to become an Interested Party**

#### **Introduction**

BNP Paribas Real Estate are submitting this application to become an Interested Party for the A66 Northern Trans-Pennine Project on behalf of its client, Royal Mail Group Limited.

Royal Mail has previously submitted comments on this scheme during the EIA Scoping Consultation in July 2021 and the Section 42 consultation in November 2021.

#### **Royal Mail – relevant information**

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.



Royal Mail has three operational facilities within 6 miles of the A66 Northern Trans-Pennine Project: Penrith DO (c. 0.5 miles), Appleby Doomgate Garage (c. 0.5 miles), and Barnard Castle DO (5.2 miles).

The A66 Penrith to Scotch Corner is a strategically important distribution route for Royal Mail services, important to mail handling and delivery at the regional and national levels. Accordingly, Royal Mail welcomes National Highways' proposed improvements which, once complete, will improve journey times and reduce delays to mail and parcel distribution / deliveries. However, all Royal Mail vehicles / services that use the affected section of the A66 are at risk of any traffic congestion and delays that occur during the construction period.

In exercising its statutory duties, Royal Mail vehicles also use all of the adjacent local roads to this section of the A66 on a daily basis. Any additional congestion on these roads during the construction phase has the potential to significantly disrupt Royal Mail's operations.

Royal Mail therefore requests to reserve its position as an Interested Party to be able to submit a consultation response/s at a later stage in the consenting process and to give evidence during the Examination process.

In the meantime, any further 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