



## **Gatwick Airport Northern Runway Project**

### **Royal Mail Written Representation to the Examination at Deadline 4 - 15 May 2024**

**Interested Party Registration ref: 20046189**

#### **1.0 Introduction**

As set out in its Relevant Representation submitted on 17 November 2023, Royal Mail supports this major airport improvement scheme, but is concerned about the scheme's potential for construction phase impacts on its road-based mail and parcel distribution operations. Any such impacts have potential to 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.

Royal Mail and its consultant BNP Paribas Real Estate have reviewed the Outline Construction Traffic Management Plan (OCTMP) dated July 2023 at Appendix 5.3.2 of the Environmental Statement. From this document it is noted that a full Construction Traffic Management Plan (CTMP) will be developed by Gatwick Airport Limited and its contractors generally in accordance with the OCTMP before the commencement of construction works. We also note that the CTMP will be approved by the relevant highway authority (in consultation with the relevant planning authority where relevant).

#### **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.

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. 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

Reference the appended plan, Royal Mail has eight operational facilities within 8.4 miles of the proposed DCO boundary as listed below with estimated distances from the scheme in miles:

1	Horley Delivery Office	107 Victoria Road, Horley, RH6 7AA	1.3
2	Gatwick Parcelforce Depot	James Watt Way, Crawley, RH10 9ZX	1.7
3	Gatwick Mail Centre (Crawley)	James Watt Way, Crawley, RH10 9AA	1.8
4	Crawley Delivery Office	7 Boulevard, Crawley, RH10 1AA	3.8
5	Redhill Parking	St Anne's Drive, Redhill, RH1 1AB	6.1
6	Redhill Delivery Office	Redstone Hill, Redhill, RH1 1AA	6.4
7	Reigate Delivery Office	Rushworth Road, Reigate, RH2 0PR	7.2
8	East Grinstead Delivery Office	76 London Road, East Grinstead, RH19 1AA	8.4

Gatwick Mail Centre, which is 1.8 miles from the proposed DCO boundary and is of national importance to Royal Mail's operations, processes mail and parcels for the below locations. Any impact on vehicular access to and from Gatwick Mail Centre during the construction and operation of the Gatwick Airport Northern Runway Project may have a knock-on effect on services to and from each of the following other operational facilities:

<b>Operations Manager Area - SE Central (RH)</b>
Bilingshurst
Burgess Hill & Hassocks
Crawley & Lingfield
Dorking
East Grinstead
Haywards Heath
Horley
Horsham
Pulborough
Oxted
Redhill
Morden
Wallington
Banstead
Sutton
Reigate
Storrington
<b>Operations Manager Area - SE West (BN)</b>
Arundel
Brighton
Eastbourne
Goring
Hailsham
Henfield
Hove
Lancing
Lewes
Littlehampton
Newhaven
Peacehaven
Portslade
Polegate
Rottingdean
Seaford
Shoreham
Westham
Worthing



The busy periods for Gatwick Mail Centre are typically between 20:00-22:00, 02:00-06:00 and 11:00-14:00. Gatwick Mail Centre will need to maintain access to M23 and to the surrounding Delivery Offices (early morning). The main operational concerns are traffic congestion and diversion routes.

As above, there are two other Royal Mail operational facilities within 2 miles of the proposal site, a Delivery Office and a Parcelforce Depot. Both of these operational facilities are of regional / local importance to Royal Mail's business and any changes to Royal Mail's ability to run services to and from them 24 hours 7 days a week may potentially affect operations.

Therefore, the construction phase of the Northern Runway scheme has potential to impact on Royal Mail operations nationally, regionally and locally.

Advance notification of works that affect the highway network by Gatwick Airport Limited or its contractors will help Royal Mail's operational managers to limit and mitigate their impacts on Royal Mail operations.

The following principal operational contact within Royal Mail for consultation and notification by Gatwick Airport Limited going forward has been identified:

Special Events Planner – Jon Snelling ([REDACTED]@royalmail.com)

#### **4.0 Summary of Royal Mail's position on the Gatwick Airport Northern Runway proposal as at Deadline 5**

Royal Mail supports this major airport improvement scheme, but as a provider of the Universal Postal Service under the Postal Services Act 2011 it is also seeking to take all reasonable steps to protect its operational interests from adverse impacts that may arise from the construction phase of this scheme.

To do this, Royal Mail requests that:

1. the CTMP includes a requirement that during the construction phase Royal Mail is notified by Gatwick Airport Limited or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements and hours of working,
2. the CTMP includes a requirement on Gatwick Airport Limited or its contractors to inform Royal Mail about all works affecting the local highways network, with particular regard to Royal Mail's distribution facilities within and near Gatwick Airport, as identified above, and
3. Royal Mail is able to join any stakeholder consultation group that is set up by Gatwick Airport Limited or its contractors with the Local Highways Authority and other major road users.

Any queries in relation to the above representation should be directed to:

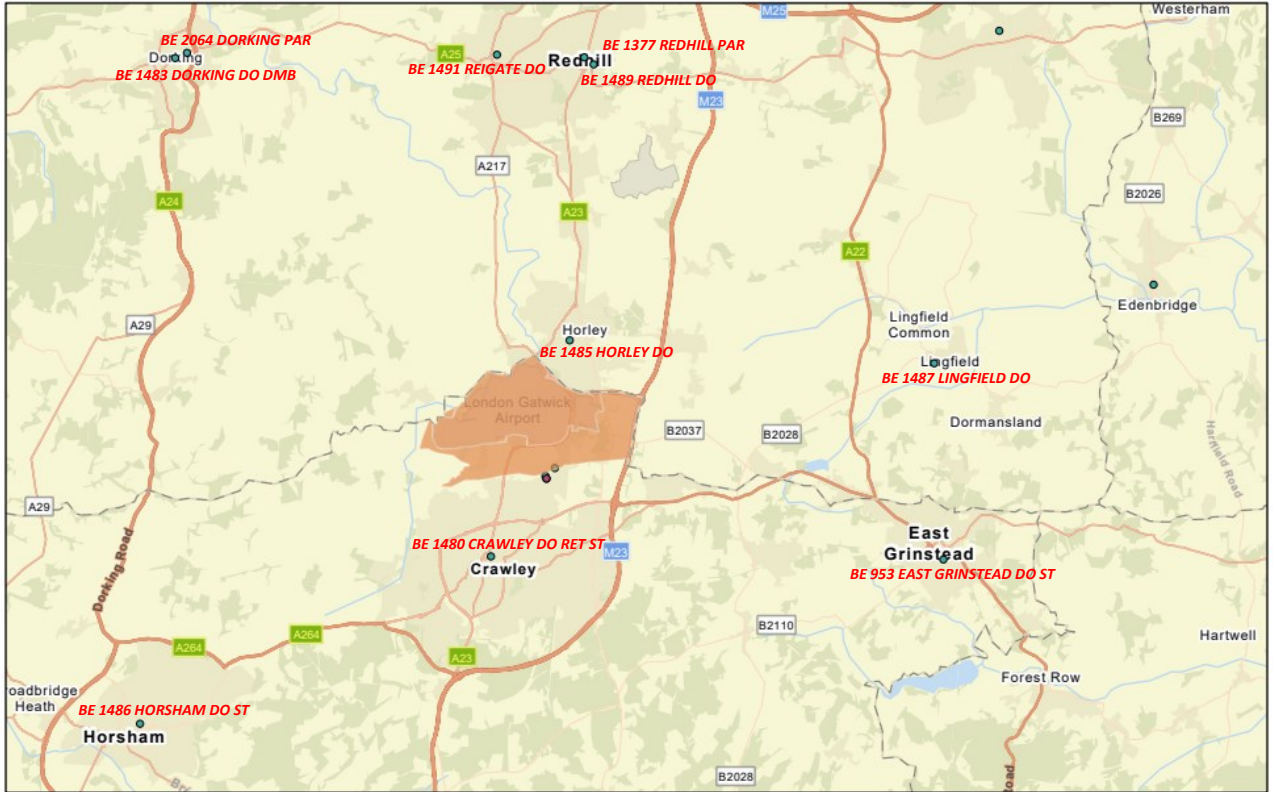
**Holly Trotman** ([REDACTED]@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

**Daniel Parry Jones** ([REDACTED]@realestate.bnpparibas), Director, BNP Paribas Real Estate



## Appendix – Plan of scheme and nearby Royal Mail Operational properties

### Gatwick Airport Northern Runway Plan



10/05/2024

