



Proposed DCO Application by Associated British Ports for Immingham Eastern Ro-Ro Terminal

Royal Mail Group Limited Deadline 7 Representation 11 December 2023

Introduction

Royal Mail submitted a section 42 consultation response on this proposed DCO development in February 2022 and is an Interested Party to the Examination (IP registration no. 20037322), having submitted a relevant representation on 10 November 2023.

Royal Mail – general 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.

The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. There is, in effect, a statutory obligation on Royal Mail to provide at least one collection from letterboxes and post offices six days a week and one delivery of letters to all 29 million homes and businesses in the UK six days a week (five days a week for parcels). Royal Mail must also provide a range of "end to end" services meeting users' needs, e.g. First Class, Second Class, Special Delivery by 1pm, International and Redirections services.

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.

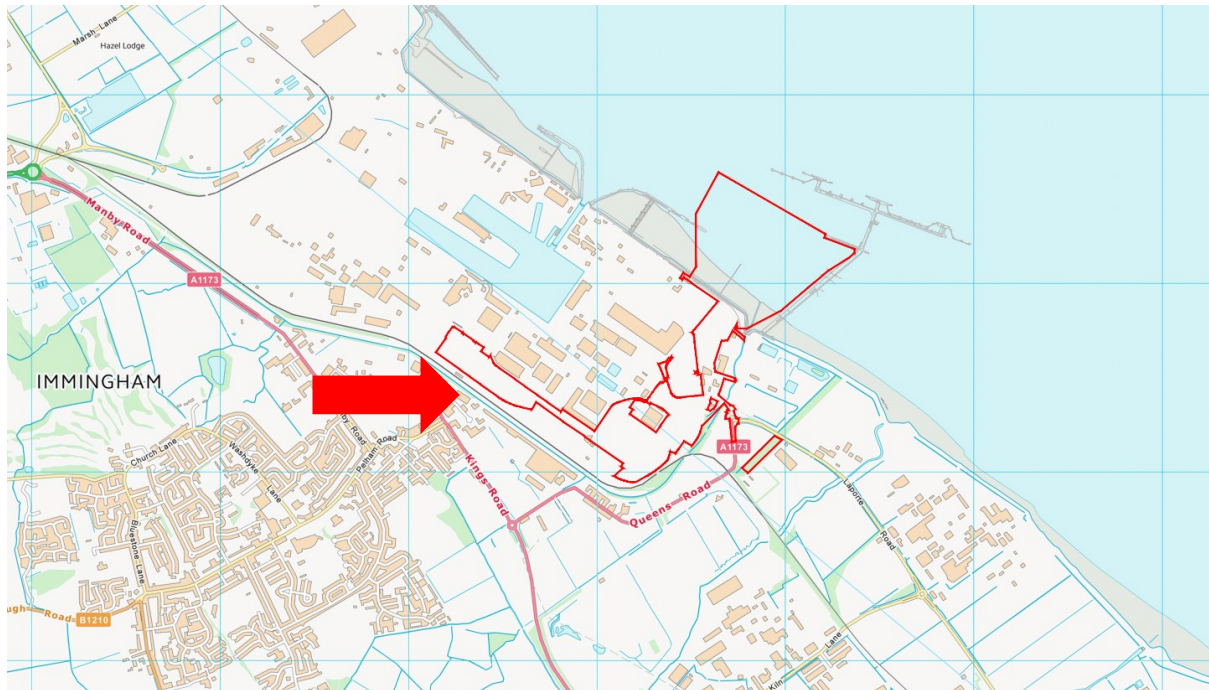
Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

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.

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 and operation of Immingham Eastern Ro-Ro Terminal.

As the nearest Royal Mail operational property (Immingham Delivery Office, Middleplatt Road, DN40 1BL) is less than 250m from the DCO boundary as shown by the red arrow below, Royal Mail wishes to draw its operational obligations and requirements to the attention of Associated British Ports.



Any works and Traffic Management affecting the local highways network around Immingham Delivery Office have significant potential to disrupt Royal Mail operations.

Royal Mail is of the view that both the construction and operational phases of this infrastructure proposal have potential to impact on its operational interests, especially when combined with the cumulative highways impact of other major developments in the Immingham area including:

- A160 – A180 Port of Immingham Improvement (Highways Agency)
- Immingham Green Energy Terminal (Associated British Ports)
- VPI Immingham OCGT (VPI Immingham B Ltd)

Royal Mail position at December 2023

Royal Mail supports Immingham Eastern Ro-Ro Terminal but is seeking to secure reasonable mitigations to protect its road based operations during the construction phase.

In exercising its statutory duties Royal Mail vehicles use all local roads on a daily basis for access to the Delivery Offices and for deliveries. Any periods of road congestion, disruption / closure, night or day, on the surrounding highway network will have the potential to adversely impact Royal Mail operations.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.



Royal Mail does not wish to stop or delay Immingham Eastern Ro-Ro Terminal from coming forward for development. However, Royal Mail does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service to the public from and to Immingham delivery Office in accordance with its statutory obligations.

In order to protect Royal Mail's position, it is requested that wording is added to the Construction Transport Management Plan (CTMP) to secure the following mitigations with particular regard to Royal Mail's Delivery Office at Immingham:

1. the CTMP includes specific requirements that during the construction phase Royal Mail is notified by Associated British Ports or its contractors at least one month in advance of any proposed road closures / diversions / alternative access arrangements, hours of working;
2. where road closures / diversions are proposed, Associated British Ports or its contractors liaise with Royal Mail at least one month in advance to identify and make available alternative highway routes for operational use, where possible;
3. cumulative highways impact from other major developments in the Immingham area is fully addressed during the Examination; and
4. Royal Mail is invited to join any stakeholder traffic management consultation group that is set up during the operational phase.

Re 2. above, an example of wording to address this requirement that was recently agreed for inclusion in a National Highways Construction Traffic Management Plan at DCO Examination is provided below:

“Advance notifications of programmed diversions and closures will be issued to Royal Mail. This would include providing not less one month notice of any road closures, diversions or alternative access arrangements that may affect travel on those routes and the agreed hours of working. The method of communication would be agreed as part of the Traffic Management Plan which is submitted to the Secretary of State for approval.”

Royal Mail reserves its position to submit a further representation to the Examination if these requests are not adequately addressed.

Any questions of Royal Mail in relation to this representation should be sent to:

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

Dan Parry-Jones [REDACTED], **Director, BNP Paribas Real Estate**