



## **Proposed DCO Application by Tritax Symmetry (Hinckley) Limited for Hinckley National Rail Freight Interchange (NRFI)**

### **Royal Mail Group Limited Deadline 2 Representation 24 October 2023**

#### **Introduction**

Royal Mail submitted a section 42 consultation response on this proposed DCO development in April 2022 and is an Interested Party to the Examination (IP registration no. 20040278), having submitted a relevant representation on 22 June 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.

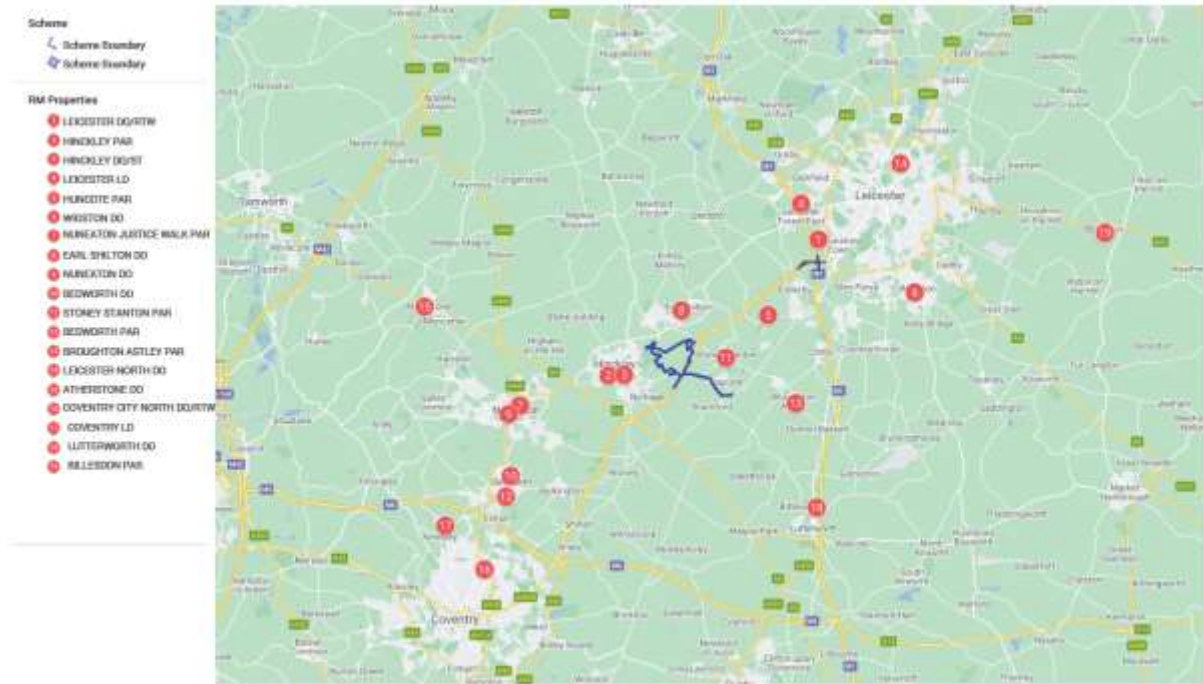
Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

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 the proposed Hinckley NRFI.

Royal Mail has nineteen operational properties within 12 miles of the proposed Hinckley NRFI DCO boundaries:



These properties include Delivery Offices for both Royal Mail and Parcel Force, Road Transport Workshops and vehicle parking areas. The operations run from these locations have potential to be affected by the proposed Hinckley NRFI. The nearest three operational properties (Leicester Delivery Office / Road Transport Workshop, Hinckley Road Transport Workshop and Hinckley Delivery Office) are 1.6 miles, 1.8 miles and 2 miles distant respectively:

Operational Property	Address	Postcode	Distance (miles)
Leicester Delivery Office / Road Transport Workshop	Centurion Way	LE19 1TH	1.6
Hinckley Vehicle Park	St Marys Close	LE10 1AT	1.8
Hinckley Delivery Office	22 Station Road	LE10 1BA	2
Leicester Parcel Force Depot	1 Elland Road	LE3 1TU	4.2
Huncote Vehicle Park	8 Main Street	LE9 3AU	4.2
Wigston Delivery Office	Long Street	LE18 2AL	4.6
Nuneaton Justice Walk Vehicle Park	Justice Walk	CV11 4DN	5.5
Earl Shilton Delivery Office	19 Oaks Way	LE9 7GY	5.8
Nuneaton Delivery Office	3 Church Street	CV11 4AA	5.8
Bedworth Delivery Office	50A King Street	CV12 8AA	7.1
Stoney Stanton Vehicle Park	25 Long Street	LE9 4DQ	7.2
Bedworth Vehicle Park	Rye Piece Ringway	CV12 8NF	7.3
Broughton Astley Vehicle Park	134 Station Road	LE9 6PW	8
Leicester North Delivery Office	91 Loughborough Road	LE4 5HQ	9
Atherstone Delivery Office	7 Coleshill Street	CV9 1AA	9.2
Coventry City North Delivery Office / Road Transport Workshop	1 The Stampings	CV6 5AB	9.8
Coventry Parcelforce Depot	Unit DC7 West Avenue, 3 Logis Park	CV6 4QE	11.1
Lutterworth Delivery Office	Bilton Way	LE17 4JA	11.8
Billesdon Vehicle Park	7 Church Street	LE7 9AE	11.8



M1 Junction 21 and M69 Junction 2 are both of high strategic importance to Royal Mail operational vehicle movements and its distribution network, meaning that all works and Traffic Management affecting these junctions have significant potential to disrupt Royal Mail operations.

### **Royal Mail position at October 2023**

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the Construction Traffic Assessment dated November 2022 and Construction Traffic Management Plan dated November 2022, both prepared for Tritax Symmetry (Hinckley) Limited by BWB Consulting Ltd.

Royal Mail supports Hinckley NRFI but is seeking to secure reasonable mitigations to protect its road based operations during the construction phase.

As indicated above, 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 Hinckley NRFI 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 the above identified operational facilities in accordance with its statutory obligations. In order to achieve this Royal Mail requests that:

1. the DCO includes specific requirements that during the construction phase Royal Mail is consulted by Tritax Symmetry (Hinckley) Limited and / or its contractors at least two months in advance on any proposed road closures / diversions / alternative access arrangements, hours of working, and on the content of the final Construction Traffic Management Plan,
2. the final Construction Traffic Management Plan 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), and
3. 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 currently 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]@royalmail.com), Senior Planning Lawyer, Royal Mail Group Limited

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