



Proposed DCO Application by Highways England for A428 Black Cat to Caxton Gibbet Road Improvement Scheme

Royal Mail Group Limited's response to the Secretary of State for Transport's Consultation Letter dated 22 June 2022.

Introduction

BNP Paribas Real Estate are appointed as advisors to Royal Mail. Consultation responses have been made in respect of the scheme previously in April 2019 and June 2021. This further response seeks to secure mitigation to protect Royal Mail's road based operations during the construction phase of this development.

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.

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.

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.



Objective of Representation and Royal Mail's Position

Royal Mail and its advisor BNP Paribas Real Estate have reviewed the Highways England's response to the Secretary of State's questions 4 (Request for comments from the Applicant on the implications of changes to the construction programme) and 7 (Request for an update from the Applicant on negotiations with Affected Persons).

Specifically, question 4 asks Highways England whether the anticipated construction commencement date of March 2022 would affect the construction programme, which underpins the project's Environmental Statement ("ES"), and whether the traffic modelling as reported in the ES can still be relied upon. The Applicant's response to this question states that the traffic modelling data which underpins the Transport Assessment ("TA") and ES are reliable and accurate as the forecasted traffic growth of the scheme being delayed by one year would be negligible, and thus would not alter the conclusions reported in the TA and ES. Highways England last reviewed their construction programme in mid-2020 and stated their traffic forecasts remained valid, and that it was not considered necessary to prepare revised forecasts.

Royal Mail has four operational properties within 10 miles of the proposed works at Sandy, St Neots, St Ives, and Huntingdon. Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads that may potentially be affected by the proposed A428 Black Cat to Caxton Gibbet Road scheme. Any periods of road disruption / closure, night or day, on or to the roads immediately connected to Oxford SRFI 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'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 wishes 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 do this, Royal Mail requests that:

1. The forecasted traffic flows (in the TA and ES) be updated to reflect the change in the construction programme, as it has now been two years since these were last reviewed;
2. The DCO includes specific requirements that during the construction phase, that Royal Mail is consulted by Highways England 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 Construction Traffic Management Plan ("CTMP"); and
3. The final CTMP 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 as identified above). It is noted in Highways England's CTMP at paragraph 3.16.3 notes an intention to notify all affected stakeholders of temporary traffic management changes at least ten working days in



advance. Considering 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, it is requested that Highways England notifies Royal Mail at least one month in advance rather than ten working days.

In the meantime, any further consultation information on this infrastructure project 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

Please can you confirm receipt of this consultation response by Royal Mail.