



Proposed Network Rail (Leeds to Micklefield Upgrades) Transport and Works Act Order (TWAO)

Royal Mail Group Limited's response to public consultation ending on 29 August 2023

Introduction

Royal Mail and its consultants BNP Paribas Real Estate have reviewed the documents for the above Order as emailed on 24 July 2023. Royal Mail wishes to submit this holding response to the public consultation ending 29 August 2023.

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.

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.

Royal Mail position

Royal Mail has the following operational properties within approximately 10 miles from the proposed works:

- Garforth Delivery Office
- Leeds Mail Centre
- Hunslet Delivery Office
- Leeds Vehicle Park
- Holbeck Delivery Office
- Harehills Delivery Office

Every day, in exercising its statutory duties Royal Mail vehicles use all of the main roads that may potentially be affected by the proposed Leeds to Micklefield works. Any periods of road disruption / closure, night or day, on or to the roads immediately connected to the Leeds to Micklefield works 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 does not wish to stop or delay the Leeds to Micklefield enhancements from occurring. 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 facility in accordance with its statutory obligations.

The Leeds to Micklefield enhancements consist of twenty-one elements of construction works. Although on an individual basis the risk of operational disruption from these proposed rail overbridge and level crossing works is likely to be low, cumulatively there is potential for impact on Royal Mail operations without appropriate mitigation / construction traffic management.

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:

1. the CTMP includes specific requirements that during the construction phase Royal Mail is notified by Network Rail or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working;
2. where road closures / diversions are proposed, Network Rail 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; and
3. the CTMP includes a mechanism that informs Royal Mail about works affecting the local highways network (with particular regard to Royal Mail's distribution facilities near the proposed works, as identified above).

In addition, Royal Mail will require Network Rail to provide a named contact and timetable for the proposed works at least two months before any works commence.

Royal Mail wishes to reserve its position to submit further consultation response/s on the proposed Leeds to Micklefield Upgrades, if necessary.

Please note, on other Network Rail schemes where Royal Mail considers the potential risks to its operation may be higher and otherwise unacceptable, Royal Mail reserves the right to request inclusion within Network Rail's CTMPs a requirement for advance consultation (as distinct from advance notification and liaison) on works affecting the local highway network.

Any further consultation information on this infrastructure project and any questions of Royal Mail should be sent by email to:

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