

Planning & Development Control
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

**Email
Direct**

Your Ref 22/0900/OUT

19th May 2022

Dear Sir / Madam

COMMENTS ON BEHALF OF ROYAL MAIL GROUP LIMITED

HYBRID APPLICATION TO INCLUDE: 1. DEMOLITION OF EXISTING BUILDINGS (EXCEPT THE MALTINGS AND THE FAÇADE OF THE BOTTLING PLANT AND FORMER HOTEL); 2. DETAILED APPLICATION FOR WORKS TO THE EAST SIDE OF SHIP LANE TO PROVIDE RESIDENTIAL APARTMENTS AND FLEXIBLE FLOORSPACE OF 3 TO 9 STOREYS PLUS BASEMENT, HOTEL / PUBLIC HOUSE WITH ACCOMMODATION; CINEMA AND OFFICES; AND 3. OUTLINE APPLICATION, WITH ALL MATTERS RESERVED FOR WORKS TO THE WEST OF SHIP LANE TO PROVIDE RESIDENTIAL APARTMENTS OF 3 TO 8 STOREYS, PUBLIC OPEN SPACE, ACCESS AND HIGHWAY WORKS

APPLICATION REF. 22/0900/OUT

On behalf of our client Royal Mail Group Limited ('Royal Mail'), Cushman and Wakefield have been instructed to submit comments to the planning application ref. 22/0900/OUT for the redevelopment of Stag Brewery and the surrounding land immediately adjacent to Barnes Delivery Office.

We submitted representations to the previous application (for similar development) in September 2018 (ref. 18/0547/FUL). This letter reiterates the Royal Mail position and comments on the updated hybrid application.

Under section 35 of the Postal Services Act 2011, Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week at an affordable and geographically uniform price to every address in the UK. Royal Mail's services are regulated by Ofcom

The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service and includes a set of minimum standards for Universal Service Providers which Ofcom must secure. 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. Meeting Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any highways or development project.

Barnes Delivery Office - Existing Use

The Delivery Office's operating hours are typically 0600 hours to 1400 hours Monday-Saturday, with approximately 50 staff members usually arriving at 0530 hours. Mortlake has 17 delivery duties divided between 14 trolley walks and 3 drivers and Barnes has 15 delivery duties divided between 5 shared vans (with 2 duties per van), 3 trolley walks and 2 drivers. The peak hours of this Delivery Office are between 0800 hours and 1000 hours.

The vehicle entry and exit points for the Delivery Office are located on Vineyard Path through two motorised roller shutters, but typically only one is in use during operational hours.

Trollies are only able to leave the Delivery Office from via Vineyard Path and the only pedestrian access is located at the front of the site along Mortlake High Street. In addition to the extremely busy environment throughout the operational hours, there are also usually 3 arrivals at the Delivery Office outside of the abovementioned times which takes place at approximately 2230 hours, 0300 hours and 0430 hours.

While mail is being prepared for delivery, the yard is used heavily. Numerous movements, van checks, and clearing diesel filters on vans (which requires running the engines at higher revs for around 15 minutes while stationary) take place. It is a health and safety rule of delivery yard use that a vehicle's horn must be sounded when crossing the pedestrian walkway which crosses the yard and when leaving the yard.

Planning Policy Framework

Paragraph 112 of NPPF (2021) states that development should “*allow for the efficient delivery of goods, and access by service and emergency*”.

Paragraph 187 of the NPPF (2021) states that “*existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.*”

Construction Management Statement

A Construction Management Statement (CMP) has been submitted as a part of the planning application. Barnes Delivery Office is closest to Phase 1, where construction works are due to start in June 2023. Phase 1 is scheduled for completion October 2029.

The CMP states that “*where practical, and subject to Principal Contractor(s) appointment, vehicle movements/deliveries will be reduced during weekday highway peak hours 8am-9.30am and 4.30pm-6pm.*”

The above times are also the peak times for the delivery office movements. Closure or obstruction of any nearby roads during Royal Mail peak times would adversely affect the efficient operation of the Delivery Office and distribution of mail.

The CMP also states as a general principle “*all deliveries to site will be off-loaded within the site boundary (to include public foot paths and carriage way by agreement with LBRuT, where required)... Full road closures are to be avoided throughout the works on redevelopment with temporary lane closures to be the primary proposal. If a full road closure is required it is considered that this would be a temporary requirement and would be undertaken through the LBRuT and TFL road closure procedures.*”

Royal Mail request to be consulted on any temporary road closures.

The statement continues: *“All Logistic Routes will be planned prior to commencement of works, and route management to reflect TfL requirements, LBRuT sensitivities (either regarding areas, or specific events etc.) and traffic loading due to existing traffic patterns and that of adjacent sites will be taken into consideration.”*

As above, Royal Mail request to be notified of proposed Logistics Routes to ensure their vehicle movements can be appropriately managed.

And finally: *“For Phase 1, additional access/egress at the corner of Bulls Alley and Mortlake High Street will also be utilised. Gates to site will be designed so as not to encroach on to the footpaths or highway.”*

Mortlake High Street is a main traffic route for vehicles traveling north from Barnes Delivery Office and any disruptions might negatively affect the smooth running of the delivery of mail.

We request peak times are avoided and Royal Mail are consulted on any temporary road closures and logistics routes to ensure the existing operation is protected with no unreasonable restrictions.

In determining the application, London Borough of Richmond upon Thames should recognise the importance of Royal Mail and other neighbouring businesses in the planning balance, particularly the significant contribution Royal Mail makes to the local economy and the importance of protecting existing businesses and operations.

The importance of maintaining free access to the Delivery Office, particularly during peak times, should be referenced in the Construction Management Plan to ensure it is robust, manages risk, and that Royal Mail use is not adversely affected.

If the Council is deemed to approve the planning application, a condition requiring detailed Construction Management Plan should be requested:

“Construction Management

NO DEVELOPMENT SHALL TAKE PLACE BEFORE a method statement for the demolition and/or construction of the development hereby approved has been submitted to, and approved in writing by, the Local Planning Authority. The demolition and construction works shall be carried out in accordance with the approved method statement. Details submitted in respect of the method statement, incorporated on a plan, shall provide for wheelcleaning facilities during the demolition, excavation, site preparation and construction stages of the development. The method statement shall also include details of the means of recycling materials, the provision of parking facilities for contractors during all stages of the development (excavation, site preparation and construction) and the provision of a means of storage and/or delivery for all plant, site huts, site facilities and materials.”

Summary

The NPPF is clear that the development should allow efficient delivery of goods, and protect existing business and facilities.

As an existing operation, Royal Mail should be appropriately considered. Royal Mail is open for discussion to find a solution, which will have a minimal impact on their operations.

A revised Construction Management Plan should be prepared and agreed to confirm no impact on Royal Mail established operation.



Whilst Royal Mail acknowledge the need for residential development and redevelopment of the shopping centre, the proposed development has potential impact on Royal Mail's established use through the construction phase and appropriate mitigation should be secured by condition.

I would be grateful if you could confirm receipt of the comments and keep me informed of any changes to the application or additional assessment submitted.

If you have any questions please do not hesitate to contact me.

Yours Sincerely

Ugne Staskaускаite LRTPI
Planning Consultant – Development & Strategic Advisory
Cushman & Wakefield on behalf of Royal Mail Group Limited