Dear Sir/Madam,

ROYAL MAIL GROUP REPRESENTATIONS:
DRAFT LOCAL PLAN STRATEGY AND SITES CONSULTATION (JULY 2014)

We are instructed by Royal Mail Group Ltd (Royal Mail) to submit representations to the Draft Local Plan Strategy And Sites Consultation (July 2014).

Background

Royal Mail is the successor to the former statutory corporation, The Post Office. Royal Mail is currently the sole designated provider of the Universal Postal Service pursuant to the Postal Services Act 2011 and as such is required to deliver the minimum postal service requirements set out by the 2011 Act and Orders made thereunder. These include the Royal Mail letter post delivery and collection service handling letters, postal packets, and high value (registered) packets. Its services are regulated by Ofcom. It also operates Parcelforce Worldwide which is a parcels carrier. Post Office Counters Ltd who operate the national network of post offices and sub-post offices are no longer part of the Royal Mail group of companies and remain wholly owned by HM Government.

The United Kingdom letter post business was fully liberalised in January 2006 by Postcomm and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has and continues to change and its real estate needs to respond accordingly.

Previous Representations

In October 2013, DTZ submitted representations to the Guildford Strategic Housing Land Availability Assessment. DTZ put East Horsley Delivery Office forward as potential residential development sites for inclusion in the Plan.
These representations remain valid in relation to the current Draft Local Plan Strategy And Sites Consultation (July 2014) consultation. We request that in addition to this letter, they are taken forward as part of the on-going plan preparation. A copy of these representations is enclosed with this letter for ease of reference.

Royal Mail Properties

Royal Mail has a statutory duty to provide efficient mail sorting and delivery services for the administrative area of the Guildford Borough Council. The following freehold Royal Mail properties are located in Guildford:

- East Horsley Delivery Office, Ockham Road South, Leatherhead, KT24 6RU

The following leasehold Royal Mail properties are located in Guildford Borough Council:

- Guildford Delivery Office, 28-31 Woodbridge Meadows, Guildford, GU1 1AA
- Guildford RTW, Unit 4-4A Dennis Way, Guildford, GU1 1AE

Representations

The redevelopment of the Freehold site for residential /mixed use is appropriate in accordance with the requirement of the National Planning Policy Framework for the development of sustainable communities.

The site has been assessed (reference 2079) as capable of residential redevelopment and included within the Strategic Housing Land Availability Assessment (May 2014) document. The East Horsley Delivery Office has not been included within the Draft Local Plan strategy and sites – Site allocations.

The Strategic Allocation of the above site within the Local Plan will provide the Council with the opportunity to deliver sustainable strategic residential and economic development as part of a high quality development that will meet the requirements of Guildford Borough Council.

The Royal Mail are supportive of the objectives and vision of the Draft Local Plan in relation to the suitability of the sites to meet local residents needs through the delivery of appropriate infrastructure, housing development and development that secures economic growth, all in accordance with the National Planning Policy Framework (NPPF). However we request that the East Horsley Delivery Office is included with the Draft Local Plan in accordance with the National and Local Development Plans.

Accordingly, Royal Mail provides support to the Council’s commitment to deliver beneficial development through the statutory development plan. We are of the opinion site 2076 could accommodate higher density housing redevelopment given the nature and need for housing in sustainable locations.

Re-provision

Our initial representations highlighted the fact that the Royal Mail has a statutory duty to provide efficient mail sorting and delivery services. It is therefore imperative that if these existing, active sites are to be considered for alternative uses, that alternative provision can be found and delivered elsewhere in the vicinity in order to meet this requirement. The sites put forward for development could and would only come forward for development in the circumstance where an alternative, suitable reprovision was made, to retain the level of service required at that time and for the foreseeable future and the associated jobs.

From Royal Mail’s perspective, in the context of their obligations, it is vital to use the correct terminology when the council are assessing sites in the public domain. We therefore request that all future policy and supporting text is worded to include the phrase that redevelopment may be forthcoming ‘should the site
become surplus to requirement following the reprovision of a suitable alternative Delivery office'.

The relocation/re-provision of Royal Mail’s operations is essential prior to redevelopment of the site to meet their legal obligations in this regard. This will ensure that their operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2011.

For your reference, in order for the site to be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of the site will need to yield both sufficient values to fund the purchase and fit-out of a new site and the relocation of their operations thereto. There will also need to be a commercial attractiveness that would incentivise the business to relocate the operations. In addition, it would be essential that any new facilities are provided prior to the demolition of those existing, to ensure Royal Mail’s continuity of service.

Should the site then become surplus to requirement (following the reprovision of a suitable alternative Delivery Office) the site will then come forward for redevelopment.

This approach accords with adopted Government guidance set out in the National Planning Policy Statement (NPPF) (March 2012) which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The NPPF also advises that local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting. It also states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Paragraphs 20-21).

**Next Steps**

We formally request that this letter of representation is taken into account in the preparation of the Draft Local Plan document.

**Royal Mail reserves the right to amend or supplement these representations at a later date if necessary.**

Royal Mail will continue to closely monitor plans for growth throughout Guildford Borough Council and would welcome further discussion with the Council on the delivery of new infrastructure as the plans for the administrative area evolve.

I trust that these representations and enclosed site plans are acceptable and would be grateful if you could acknowledge receipt and keep me informed of future stages of the preparation of the Draft Local Plan. Yours faithfully,

Thomas Price BA (Hons) MSc MRTPi
Development Consulting, DTZ

cc Tony Haines Royal Mail Group

Enc.