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085/28

Secretary of State for Transport
c/o Transport and Works Act Orders Unit
General Counsel's Office
Department for Transport
Zone 1/18
Great Minster House
33 Horseferry Road
London SW1P 4DR

Your Ref

Our Ref

LCT/ENB/Y068522

Date

14 February 2012

BY EMAIL AND POST

Dear Madam

**The Croxley Rail Link Order
Application by Hertfordshire County Council and London Underground Limited ("the Promoter")
Objection of Royal Mail Group Limited**

We act for Royal Mail Group Limited ("Royal Mail"). Although Royal Mail does not object to the general principle of the Croxley Rail Link Order ("the Order"), it has interests in property that will be directly affected by the provisions of the Order. In addition, Royal Mail will be adversely affected in respect of the exercise of its duties, powers and operations due to the construction of the Croxley Rail Link project.

The objection is set out in more detail below.

1 Introduction

Royal Mail, formerly Consignia plc, is the successor company to the former statutory corporation called the Post Office. The undertaking of the Post Office Corporation was transferred to Consignia plc on 26 March 2001 pursuant to the Postal Services Act 2000. Consignia plc was renamed the Royal Mail Group plc on 4 November 2002 and subsequently reincorporated as a limited company on 20 March 2007. Royal Mail is the operator of universal postal service functions, through the Royal Mail letter post delivery and collection service handling letters, postal packets and high value (registered) packets. It also operates Parcelforce Worldwide, which is a parcels carrier.

2 Caxton Way Delivery Office

2.1 Royal Mail operates a Delivery Office at Caxton Way, Watford WD18 8AA ("the Caxton Way Delivery Office").

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- 2.2 Royal Mail is the leasehold owner of the Caxton Way Delivery Office pursuant to a lease dated 14 March 2011 between Penning's Limited and Royal Mail Group Limited for a term of 15 years expiring on 13 March 2026.
- 2.3 The Caxton Way Delivery Office provides postal delivery services to the WD 4, 5, 17, 18, 19, 24 and 25 postcode districts. It also acts as a collection hub for the WD3, 4, 5, 17, 18, 19, 21, 23, 24 and 25 postcode districts. All incoming mail is received from and all outgoing mail is sent to, the new Home Counties North Mail Centre at Park Lane, Hemel Hempstead, HP1 1AA. The Caxton Way Delivery Office also includes a Public Callers' Office to enable customers to collect mail and postal packets.
- 2.4 Approximately 215 people are based at the site together with 69 vans and approximately 100 staff vehicles. Operational traffic to the Caxton Way Delivery Office includes 130 van deliveries per day and seven 7.5 tonne lorry dispatches between 14.00 and 19.00 daily. Further vehicles serving the site are present between 21.30 and 06.30 and range from 7.5 tonne to 17.5 tonne loading vehicles.
- 2.5 Access to the site is normally by road from Watford Road via Ascot Road, Greenhill Crescent and Caxton Way. The site is open and operational 23 hours a day and constant, unimpeded, access is therefore required along these roads.

3 Ascot Road Vehicle Service Unit

- 3.1 Royal Mail also currently retain a leasehold interest in the former Watford Mail Centre site, at Ascot Road, Watford WD18 8AA ("the Ascot Road Vehicle Service Unit"). This site is currently used for the servicing of Royal Mail vehicles of all sizes from 40 cubic foot vans to articulated lorries and trailers and therefore unimpeded access is required.
- 3.2 Royal Mail plans to move this operation to their site in Hemel Hempstead during the spring or early summer of 2012, however should this for any reason not proceed, access to the Ascot Road Vehicle Service Unit will be required during the implementation of the Order.

4 Royal Mail's concerns

Temporary closure of roads between points T1 and T2, T3 and T4, T5 and T6 and T7 and T8.

- 4.1 The proposed temporary closures of New Ascot Road between points T5 and T6 and Ascot Road between points T7 and T8 will affect access to Royal Mail's existing premises at Ascot Road and its recently acquired site at Caxton Way. These temporary closures will therefore interfere with Royal Mail's ability to carry out its operations. This will cause significant problems as operations will continue at the Caxton Way site throughout the period of implementation of the Order.



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- 4.2 Royal Mail does not consider that alternative accesses, for example via Beggars Bush Lane and Blackmoor Lane to Greenhill Crescent, have sufficient capacity for Royal Mail's level of use. Temporary closures of Baldwins Lane between points T1 and T2 and Watford Road between points T3 and T4 may also hinder any alternative access.
- 4.3 Due to the security arrangements necessary for certain types of deliveries, it is essential that no disruption or interference with vehicular or pedestrian access should occur and Royal Mail is concerned that the temporary closure of roads may affect the delivery of mail to, or collection of mail from, Royal Mail's customers.

Letterboxes and postal pouchboxes

- 4.4 As the terms of the Order contains provisions which would empower the Promoter to compulsorily acquire land, execute street works, stop up streets permanently or temporarily and lay out new means of access, Royal Mail is concerned that the exercise of these powers may affect the delivery or collection of mail and access to post offices in the vicinity of the works, and may require re-siting of letterboxes and postal pouchboxes. Access along streets to deliver and collect mail from postboxes is essential to Royal Mail's continued ability to carry out their statutory duties.

Additional costs

- 4.5 Royal Mail is also concerned to ensure that any additional costs it incurs consequent upon the implementation of the Order's powers are reimbursed by the Promoter.

Royal Mail would therefore ask the Secretary of State not to confirm the Croxley Rail Link Order unless appropriate provision is made to satisfy and meet the above concerns. To ensure minimum disruption and avoidance, where practicable, of interference to Royal Mail's premises and letter boxes, consultation procedures and advance warning should be given prior to the commencement of works.

To ensure there is no deterioration in the service provided to Royal Mail's customers, Royal Mail requires that provision be made, as far in advance as is practicable, to ensure that vehicular and pedestrian access remains available to affected streets during, and after, construction in relation to works which may affect mail collections and deliveries. Reasonable steps must be taken to minimise any disturbance arising to collections and deliveries.

Royal Mail would hope to enter into an agreement with the applicant to meet its concerns prior to any public inquiry held into the application for the Order. Pending such negotiations, Royal Mail would wish to have the opportunity to appear at any public inquiry held into the application.



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Any correspondence relating to these objections may be sent to Bircham Dyson Bell LLP at the address above, or by email to iancameron@bdb-law.co.uk.

Yours faithfully

A handwritten signature in black ink that reads "Bircham Dyson Bell". The signature is written in a cursive, flowing style.

Bircham Dyson Bell LLP