Dear Sir or Madam

ROYAL MAIL GROUP REPRESENTATIONS TO SEVENOAKS DISTRICT COUNCIL – ALLOCATIONS AND DEVELOPMENT MANAGEMENT PLAN DOCUMENT SUPPLEMENTARY SITE ALLOCATIONS CONSULTATION MARCH 2012

We write on behalf of our client, Royal Mail Group Ltd (referred herein as ‘Royal Mail’), to submit representations to Sevenoaks District Council’s Allocation and Development Management Plan Document (ADM DPD) Supplementary Site Allocations Consultation March 2012.

We understand that the Council are consulting on a total of nine sites where there has been a change in the proposed use of the site; and/ or a new site has been put forward for future development.

1. BACKGROUND

Royal Mail formerly Consignia Plc, is the successor to the former statutory corporation, The Post Office. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by Ofcom. Its letters business, Royal Mail, is the operator of universal postal service functions through the Royal Mail letter post delivery and collection services handling letters, postal packets, and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide which is a parcels carrier. Post Office Ltd (a “sister” company to Royal Mail) operates the national network of post offices and sub post offices.

The United Kingdom letter post business has been fully liberalised since the Postal Services Act 2000 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 Royal Mail’s real estate needs to respond accordingly.

Royal Mail has a number of land holdings throughout the District, each of which are strategically important to Royal Mail. These are set out below:

- Swanley Delivery Office (DO)/ Post Office (PO), London Road, Swanley, BR8 7AA;
- Edenbridge Delivery Office (DO)/ Storage (ST), High Street, Edenbridge, TN8 5AA;
1.1 Previous Representations

Royal Mail previously submitted representations to the ADM DPD consultation in 2010, supporting the following designations of Royal Mail’s sites in the document:

- Royal Mail’s Swanley DO is designated within the Swanley Town Centre Regeneration Area allocation;
- Royal Mail’s Sevenoaks DO/DMB is designated within the Post Office/BT Exchange, South Park, Sevenoaks Area of Opportunity; and
- Sevenoaks Rural DO is designated within the Vestry Road, Sevenoaks Employment allocation and is allocated for employment uses.

In addition, we requested the designation of Royal Mail’s Edenbridge DO/ST for future comprehensive residential mixed use development.

We note in the draft ADM DPD that Royal Mail’s Edenbridge DO/ST site has not been identified as one of the nine allocated sites. As such, it is on this basis that we submit these representations and reiterate our previous request to allocate Royal Mail’s Edenbridge DO/ST.

2. REPRESENTATIONS

Royal Mail’s Edenbridge DO/ST is an operational site. It is located within Edenbridge Town Centre boundary.

The property is situated at the northern end of the High Street, adjacent to a church and on the fringe of the retail area. The majority of shops are independent retailers serving the local community although Boots and most recently Costa Coffee are present in the town, along with the majority of High Street banks. There are a number of residential developments that have taken place to the rear of the retail units. The site is approximately 0.486 acres. Please refer to the attached site location plan.

As detailed above, we note that Royal Mail’s Edenbridge DO/ST is not identified in the draft ADM DPD for future redevelopment as requested in our previous representations.

Given the site’s Town Centre location and the range of uses in the immediate surrounding area, we remain of the opinion that this site provides a good opportunity for comprehensive residential mixed use development in the future.

Therefore, should Royal Mail no longer require their site, we are of the opinion that this site would provide a good opportunity for future comprehensive residential mixed use development.

We therefore request that the Council includes their Edenbridge DO/ST site within the ADM DPD for residential or residential led mixed-use development including retail uses.

Notwithstanding this, given that Royal Mail’s site is operational, we request that the supporting policy and/or text to the inclusion of these sites in the ADM DPD explicitly states that the re-provision / relocation of Royal Mail’s operations will be required prior to the redevelopment of the respective sites. This will ensure that Royal Mail’s operations will not be prejudiced and they can continue to comply with their statutory duty to maintain a ‘universal service’ for the UK pursuant to the Postal Services Act 2000.

Furthermore, we note that in order for Royal Mail’s 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 their site will need to yield both sufficient value to fund the...
purchase and fit-out of new sites and the relocation of their operations thereto. There will also need to be a commercial attractiveness that would incentivise the business to relocate their operations. In addition, it would be essential that any new facility is provided prior to the demolition of the existing and / or that suitable temporary accommodation is provided, if necessary, to ensure the continuity of service.

3. POLICY CONSIDERATIONS

Our request accords with the Government's National Planning Policy Framework (NPPF) (Published March 2012) which “provides a presumption in favour of sustainable development” and from which we consider the following to be of particular relevance:

- that plan-making should “positively seek opportunities to meet the development needs of their area… with sufficient flexibility to adapt [to] rapid change, unless:
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits” (Para 14);

- that planning should “encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century” (Para 19 – 20);

- that planning policy should “support existing business sectors, taking account of whether they are expanding or contracting… Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances” (Para 21);

- “Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies” (Para 35);

Given our request to allocate Royal Mail’s Edenbridge DO/ST for residential/residential-led development, we note that the Government seeks to significantly boost the supply of housing. The NPPF states, to enable this, local planning authorities should:

- “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15” (Para 47);

- “seek to provide a wide choice of quality homes should be provided, with a variety of sizes, types and tenure, reflecting the local demand” (Para 50);

- “identify and bring back into residential use empty housing and buildings… They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate” (Para 51);

- use their evidence base to assess:
  - “the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land” (Para 161).
Notwithstanding our promotion of Royal Mail’s site for inclusion within the Council’s ADM DPD for alternative uses (namely residential led mixed-use development including retail uses), we would like to reiterate that should their site come forward for redevelopment in the future, the relocation/re-provision of Royal Mail’s existing operations would be required prior to any redevelopment of that site.

We reserve the right to amend or supplement these representations at a later date if necessary.

We would be grateful if you could acknowledge receipt of our representations and advise us as to the next stages of the ADM DPD as well as other emerging Local Development Framework documents.

Please contact Grace Sim on the above contact details or Lisa Bowden (020 7338 4045 or lisa.bowden@bnpparibas.com) should you have any queries.

We look forward to hearing from you in response to the above.

Yours faithfully

BNP Paribas Real Estate

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