Dear Sir or Madam

ROYAL MAIL REPRESENTATIONS TO SEVENOAKS DISTRICT ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (OPTIONS) FEBRUARY 2010

We are instructed by Royal Mail Group Ltd (Royal Mail) to submit representations to the above Allocations Development Plan Document. We have submitted separate representations to the Core Strategy ‘Draft for Submission’.

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 the Postal Services Regulator, Postcomm. 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 wholly owned subsidiary of Royal Mail) operates the national network of post offices and sub post offices.

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 Royal Mail’s real estate needs to respond accordingly.

Royal Mail has a number of land holdings throughout the District, each of which is 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;
- Sevenoaks Delivery Office (DO)/ Directly Managed Branch (DMB), South Park, Sevenoaks, TN13 1AA; and
- Sevenoaks Rural Delivery Office (DO), 12b Vestry Industrial Estate, Sevenoaks, TN14 5EL.
Should any of the properties surrounding Royal Mail’s sites be redeveloped, it would be vital that any new uses be designed and managed so that they are both cognisant of and sensitive to Royal Mail’s operations.

This approach accords with adopted Government guidance set out in the recently adopted Planning Policy Statement 4 (PPS4): Planning for Sustainable Economic Development. We note that PPS4 states that Local Planning Authorities (LPAs) should plan positively and proactively to encourage economic development, in line with the principles of sustainable development. In particular, PPS4 states that LPAs should develop flexible policies to allow a quick response to changes in economic circumstances and a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.

REPRESENTATIONS

We set out below representations to the Allocations Development Plan Document in a format that corresponds with the Document.

APPENDICES SITE MAPS – EMPLOYMENT SITES

- Vestry Road, Sevenoaks

Royal Mail’s Sevenoaks Rural DO is located within the Vestry Road, Sevenoaks Employment allocation and is allocated for employment uses.

The industrial estate currently comprises mixed office and industrial uses. The “allocation criteria” details that Vestry Industrial Estate will be retained for employment with the opportunity for refurbishment or redevelopment for employment purposes on older or currently vacant units.

Royal Mail supports the identification of the Vestry Industrial Estate for employment use and the opportunity to redevelop and refurbish units on the estate. It is important for Royal Mail to retain their operations on the Vestry Industrial Estate.

APPENDICES SITE MAPS – AREAS OF OPPORTUNITY

- Post Office/BT Exchange, South Park, Sevenoaks

Royal Mail’s Sevenoaks DO/DMB is located within the Post Office/BT Exchange, South Park, Sevenoaks Area of Opportunity.

This Area of Opportunity is identified for comprehensive redevelopment including replacement car parking. The Council states that “the scale and extent of development will depend on agreement to the relocation of the BT Telephone Exchange and the Royal Mail Sorting Office”. Further the retention of the Post Office facility should be retained within the town centre.

Part 3 of Allocations DPD Policy 11 states that the proposed mix of uses as part of any future redevelopment for this site, these include retail, residential, commercial, community and leisure and including replacement car parking. The supporting text to Policy 11 states that the objective for the Council at this stage is to clarify the exact boundaries of the Areas of Opportunity sites and seek comments on the proposals.

Royal Mail support the Council’s designation of the Post Office/BT Exchange, South Park, Sevenoaks Area of Opportunity for future comprehensive redevelopment and the requirement to retain the Post Office facility within the town centre. However, we request that the “allocation criteria” be amended to reflect the potential for Royal Mail’s site to be brought forward for redevelopment independent of the BT Exchange. We understand that the timescales associated with the development of each site could be quite different.
Further we request that the Council clarifies the extent of the replacement car parking required as part of any redevelopment and whether any would be required if Royal Mail’s site was to be independently brought forward for redevelopment.

We support the principle of Allocations DPD Policy 11. However we request that Point 3 of the Policy be amended to reflect the potential for hotel uses and for Royal Mail’s site to be brought forward independently for redevelopment.

Given the central location of Royal Mail’s site, as part of the emerging Detailed Development Policies Document and revised Proposals Map, we request that the frontage of Royal Mail’s Sevenoaks DO/DMB is designated as a secondary retail frontage.

APPENDICES SITE MAPS – REGENERATION SITE

- **Swanley Town Centre Regeneration Area**

  Royal Mail’s Swanley Delivery Office is located to the south east of the Swanley Town Centre Regeneration Area allocation. This area is identified for comprehensive redevelopment including replacement car parking medical and community facilities and pedestrian cycle link to Swanley Station.

  Section 6.7 of the Allocations DPD states that the Council will work with landowners, retailers and community and interest groups to encourage and implement Core Strategy Policy LO5. Further the Council states that the objective at this stage is to identify the exact boundary of the land which is covered by the regeneration proposals.

  We support the identification of Royal Mail’s Delivery Office as part of the Swanley Town Centre Regeneration Area for future comprehensive redevelopment. However, we request that the “allocation criteria” is amended to acknowledge that Royal Mail’s Delivery Office could be brought forward for redevelopment independent of the neighbouring sites.

  In addition, we request that the Council clarifies the extent of the replacement medical and community facilities required and whether this is to be provided on-site in or off-site. If off-site, we request for the Council to confirm whether they have identified any potential sites for the relocation of the medical and community facilities.

  Further we acknowledge that the Council proposes to work with landowners, retailers and community and interest groups. Royal Mail welcomes the opportunity to work with the Council in developing the regeneration plans for Swanley Town Centre.

  Should Royal Mail’s site or sites surrounding Royal Mail be redeveloped, it would be vital that the operations should be appropriately re-provided/relocated and that any new uses surrounding their sites be designed and managed so that they are both cognisant and sensitive of and to Royal Mail’s operations.

APPENDICES SITE MAPS – PROPOSED REGENERATION SITE

- **Edenbridge DO/ST, High Street, Edenbridge**

  Royal Mail’s Edenbridge DO/ST is located within Edenbridge Town Centre boundary as detailed on Page 117 of the Allocations Document.

  The Edenbridge DO/ST is located within the Edenbridge Town Centre Boundary. One of the Core Strategy objectives for the town centres is “to focus the majority of new housing, employment and retail development on the towns of Sevenoaks, Swanley and Edenbridge, with smaller scale development in the larger villages which have a more limited range of facilities.”
Royal Mail’s Edenbridge DO/ST is not identified in the Allocations DPD for future redevelopment.

We support the identification of Edenbridge Town Centre for new housing, employment and retail development. However, given the prime town centre location of Royal Mail’s site we request for the site to be promoted in the Allocations DPD for future comprehensive residential mixed use development. This request accords with PPS4 where policy seeks to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use including town centres.

As previously stated, should Royal Mail’s site and/or sites surrounding Royal Mail be redeveloped, it would be vital that the operations should be appropriately re-provided/relocated and that any new uses surrounding their sites be designed and managed so that they are both cognisant and sensitive of and to Royal Mail’s operations.

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

We should be grateful if you would acknowledge receipt of our representations and advise as to the next stages of the Allocations Development Plan Document, Core Strategy and forthcoming Development Management Policies Document. Please contact Emma Andrews 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