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Your Ref
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27 October 2016

Dear Sir / Madam

PLANNING APPLICATION REFERENCE SMD/2016/0412 - PROPOSED OUTLINE PLANNING FOR 2 NO. RESIDENTIAL BLOCKS CONSISTING OF 10 NO. ONE BED AND 17 NO. TWO BED APARTMENTS WITH ASSOCIATED PARKING ON LAND AT HIGH STREET, LEEK – SUBMISSION OF REPRESENTATIONS ON BEHALF OF ROYAL MAIL GROUP LIMITED

On behalf of our client Royal Mail Group Limited ('Royal Mail'), Cushman and Wakefield has been instructed to respond to the submitted proposal for outline planning permission with all matters reserved (except access) for 2 no. residential blocks consisting of 10 no. one bed and 17 no. two bed apartments with associated parking on land at High Street, Leek.

Background

Royal Mail occupy and own the freehold of the Leek Delivery Office. The Delivery Office directly adjoins the land off the High Street, which is subject to the current outline planning application.

Royal Mail has benefited from operating in a mixed use area, the majority of which comprises retail use, for many years. There are residential uses within the vicinity of the Delivery Office but none directly adjacent to the delivery yard. The Delivery Office yard is accessed from Strangman Street, which leads off the High Street.

The introduction of residential development directly adjoining the Delivery Office is of significant concern to the Royal Mail. If the application is approved, sensitive residential neighbors will be introduced immediately adjacent to an operational Delivery Office and yard. From previous experience, this is likely to give rise to future amenity issues and challenges, in particular noise and operational hours.

The Leek Delivery Office is an important asset for Royal Mail in meeting its statutory duty to deliver a Universal Service. 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 (and packets five days a week) at an affordable and geographically uniform price to every address in the UK.

Operations

The Delivery Office operates between 0630 hours and 1815 hours (Monday to Friday). Vehicles movements start at 0400 hours, when the first wave of mail to be processed arrives via LGVs from the Mail Centre. Mail is processed between 0630 and 0900 hours ready for delivery by 33 team members. The Delivery Team depart for their rounds from 0900 hours onwards.

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 rule of delivery yard use that a vehicle's horn must be blown when crossing the pedestrian walkway which crosses the yard and also when leaving the yard.

The Delivery Team return to the Delivery Office from 1300 hours, when the yard is subject to heavy activity again until around 1500 hours. Two LGVs from the Mail Centre arrive at 1500 hours and 1700 hours to collect mail. Activity then continues in the yard between 1545 hours and 1815 hours.

On Saturdays the Delivery Office operates between 0630 hours and 1300 hours. As with weekdays, the mail arrives from the Mail Centre and is processed in the morning between 0630 and 0900 hours, ready for delivery. Delivery vans then return to the yard between 1200 and 1300 hours. An LGV from the Mail Centre arrives at the Delivery Office to collect mail at around 1300 hours.

We understand from Royal Mail employees on site there is a significant amount of on street parking surrounding the Delivery Office and also the application site, due to lack of parking for nearby residential properties and the proximity of the High Street. The Delivery Office have previously had problems with drivers blocking their access and unauthorised vehicles entering the premises. Access to the Royal Mail site is shared with BT, who also occupy the site, so it cannot be blocked off.

Royal Mail are concerned that the reduced visibility that currently exists when entering and existing the site will be exacerbated by increased traffic as a result of the proposals.

Potential Conflict of Land Uses/Residential Amenity

Royal Mail acknowledge the need for new housing delivery across Leek to meet local housing need however through introducing residential development in close proximity to major business operations, there is a real risk of impact on residential amenity and highway safety.

The Royal Mail site is a well-established, existing use that has operated successfully from this location for a number of years. The site is an important asset for Royal Mail and provides an important service to the local area. Royal Mail concerned the nature of Delivery Office use and potential noise issues and hours of operation, will conflict with the proposed residential development immediately adjoining the Delivery Office.

Introducing a sensitive residential use as a direct neighbour is not compatible with the Delivery office use. Detrimental impact on residential amenity is likely to reduce occupants' ability to enjoy their homes and lead to noise complaints and potentially sanctions on Royal Mail operation. Locating dwellings to the immediate west of the Delivery Office would put these dwellings at unacceptable risk from noise and would likely generate complaints to Environmental Health, the consequences of which could be costly for Royal Mail in ensuring it can continue to operate and meet its statutory obligations, and in some cases such complaints could result in Royal Mail having to remove certain operations from the site altogether.

It does not appear that a noise impact assessment has been submitted in support of the proposals. In accordance with National Planning Policy, the planning system should prevent *"both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of....noise pollution"* (NPPF, Paragraph 109:4). An assessment should be undertaken to determine if residents are likely to be subject to unacceptable noise pollution.

Royal Mail respectfully request that Staffordshire Moorlands Borough Council appropriately test the likely impact of RMG operation on the proposed use before determination. Royal Mail and other existing businesses in the vicinity make an important contribution to the local economy and it is important these are protected.

Paragraph 123 of the NPPF is clear *"existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established"*.

Without proper assessment and mitigation, the proposals could be considered contrary to principles contained within the NPPF and Policy SD4 of the adopted Core Strategy. A noise impact assessment be undertaken and appropriate design or mitigation measures put in place to reduce the impact of Royal Mail's operations on residential amenity.

I trust that the above letter of representation is clear and comprehensive, however should you have any queries that you wish to discuss, please do not hesitate to contact me.

Yours sincerely

Claire Biddle MRTPI
Consultant
UK Development