



St Pauls House
23 Park Square South
Leeds
LS1 2ND
UK

www.dtz.com

Plans and Research Team
Scottish Borders Council
Council Headquarters
Newtown St.
Boswells
Melrose
TD6 0SA

Your Ref:
Our Ref:

03 March 2014
Email: localplan@scotborders.gov.uk

Dear Sir / Madam

ROYAL MAIL GROUP REPRESENTATIONS: SCOTTISH BORDERS LOCAL PLAN

We are instructed by Royal Mail Group Ltd (Royal Mail) to submit representations to the above document.

Background

Royal Mail, formerly Consignia plc, is the successor to the former statutory corporation, The Post Office. Royal Mail is a publicly listed company. Its services are regulated by Ofcom. Its letters business, Royal Mail, is the operator of universal postal functions through the Royal Mail letterpost delivery and collections services, handling letters, postal packets and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide, which is a parcels carrier. Post Office Limited (a "sister" company to Royal Mail) operates the national network of post offices and sub post offices.

Royal Mail Properties

Royal Mail has the following leasehold and freehold properties within the Scottish Borders Council area:

- Galashiels MHR, Lauder, TD2 6SR – RMG reference 2299
- Galashiels Road Transport Works, 11-13-15 Park Street, Galashiels, TD1 1BZ - RMG reference 2920
- Galashiels Delivery Office, 1 Channel Street, Galashiels, TS1 1AA - RMG reference 2939
- Selkirk Delivery Office, 30 Market place, Selkirk, TD7 4BP - RMG reference 2918
- Peebles Delivery Office, 14 Eastgate, Peebles, EH45 8AA - RMG reference 2919
- Duns Delivery Office, 37 – 39 South Street, Duns, TD11 3AB - RMG reference 2921
- Eyemouth Delivery Office, Upper Houndlaw, Eyemouth, TD14 5BP – RMG reference 2922
- Kelso Delivery Office, 42-44 Horsemarket, Kelso, TD5 7AF - RMG reference 2923
- Kelso Industrial, The Butts, Kelso, TD5 7BA - RMG reference 2924
- Hawick Delivery Office, St Georges Lane, Hawick, TD9 0BB - RMG reference 2925
- Coldstream Delivery Office, Guards Road, Coldstream, TD12 4EQ - RMG reference 2928
- Jedburgh Delivery Office, 37 High Street, Jedburghj, TD8 6DG - RMG reference 2940
- Melrose Delivery Office, Buccleuch Street, Melrose, TD6 9LE - RMG reference 2941

These properties are operational and Royal Mail Group currently has no plans to close or relocate them.

Representations

We set out our representations to the current consultation document as follows:

Policy ED1 Protection of Business and Industrial Land

Policy ED1 states at point 2, that whilst there remains a preference to retain employment use on District Sites, development (other than Classes 4, 5 and 6) may be accepted to allow a more mixed use area. The policy sets out a number of criteria which non-employment proposals would be assessed against as follows:

- a) the loss of business and industrial land does not prejudice the existing and predicted long term requirements for industrial and business land in the locality, and
- b) the alternative land use is considered to offer significant benefits to the surrounding area and community that outweigh the need to retain the site in business and industrial use, and
- c) there is a constraint on the site whereby there is no reasonable prospect of its becoming marketable for business and industrial development in the future, or
- d) the predominant land uses have changed owing to previous exceptions to policy such that a more mixed use land use pattern is now considered acceptable by the Council.

We do not consider that the criteria listed give sufficient protection to existing business uses from the introduction of potentially incompatible new uses within the area. It should be noted that, for example, the introduction of noise sensitive development such as residential development in close proximity to a Royal Mail Delivery Office may result in noise complaints from new residents and sanctions being imposed on the Delivery Office. Accordingly, we request that the following criterion should be included in the policy:

“Development proposals will be resisted where these may be incompatible with existing uses, particularly in relation to their sensitivity to noise.”

This measure will ensure that Royal Mail’s 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 2000.

Policy ED3: Town Centres and Shopping Development

Policy ED3 sets out the type of development which will be acceptable within town centres. The policy states that complementary-non retail uses will be encouraged in centres. A significant number of Royal Mail’s properties are located within town centre boundaries. We do not consider that the policy as worded will give sufficient protection to existing business uses located in town centres from the introduction of potentially incompatible new uses within the area. Accordingly, we request that the following criterion should be included in the policy:

“Development proposals will be resisted where these may be incompatible with existing uses, particularly in relation to their sensitivity to noise.”

This measure will ensure that Royal Mail’s 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 2000.

Policy ED5: Regeneration

Policy ED5 states that development on brownfield land will be approved in all cases providing that a number of criteria are satisfied. Criteria ‘a’ sets out the provision that development should not conflict with the established land use of the area. We consider that this policy does not give sufficient protection to existing business uses and as such we request that criterion a is reworded as follows

a) It is compatible with the ongoing operation of existing business uses in the area

This measure will ensure that Royal Mail's 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 2000.

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.

We would be grateful if you could acknowledge receipt of our representations and keep us informed of future stages of the *Scottish Borders Local Plan* preparation.

Yours faithfully,



Janet Entwistle
Senior Consultant, Planning, DTZ

cc Dennis McCafferty Royal Mail Group