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BY POST AND EMAIL

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23 April 2012

Dear Sir or Madam

**ROYAL MAIL REPRESENTATIONS TO LONDON BOROUGH OF LEWISHAM SITE
ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD) PROPOSED SUBMISSION
VERSION CONSULTATION 2012**

We are instructed by our client, Royal Mail Group Limited (referred to herein as "Royal Mail"), to submit the following representations to the London Borough of Lewisham Site Allocations DPD Proposed Submission Version consultation 2012.

We note here that, we submitted representations to the London Borough of Lewisham Site Allocations consultation in December 2010.

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 wholly owned subsidiary of 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.

1.1 Royal Mail Property

Royal Mail has a number of sites within the administrative boundary of the London Borough of Lewisham. It is with regards to their Blackheath Delivery Office, Sub Post Office and Office, 41 Blackheath Grove, London, SE3 0AT that we submit these representations.

The aforementioned Royal Mail site is operational. As such, should any sites surrounding this property 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.



2 REPRESENTATIONS

The Blackheath Delivery Office is currently operational however, not all of the premises is utilised by Royal Mail, with part leased to a third party.

The site is located in a predominantly residential area and is within short walking distance to Blackheath Village and Blackheath train station.

Given the above, we consider that the site presents a good opportunity for residential or residential-led mixed-use development comprising a range of uses including commercial and/or retail uses. Should Royal Mail's Blackheath Delivery Office come forward for redevelopment in the future, the relocation or re-provision within the Borough of Royal Mail's existing operations on site would be required prior to development.

We therefore request that the Council includes Royal Mail's Blackheath Delivery Office site within the emerging Site Allocations DPD, for residential-led mixed-use development, supported by an appropriate flexible policy requiring the re-provision/relocation of Royal Mail's operations prior to the site's redevelopment. 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. Please find enclosed a copy of the site location plan.

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 (emphasis added) "*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); and
- "*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 include Royal Mail's Blackheath Delivery Office for residential 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); and



- *“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).*

Notwithstanding our promotion of Royal Mail’s Blackheath DO, as detailed above, for inclusion within the emerging Site Allocations DPD for alternative uses (namely residential or residential led mixed-use development including retail uses), we would like to reiterate that should the site come forward for redevelopment in the future, the relocation/re-provision of Royal Mail’s existing operations at this site 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 emerging Site Allocations DPD.

Please contact Lisa Bowden on the above contact details 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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Enc Site Location Plan