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Your Ref Belfast Local Development Plan
Our Ref RMG_Belfast_DO_BelfastCC

By Email

15 November 2018

Dear Sirs,

The Royal Mail Group – Belfast City Centre Delivery Office

On behalf of our client, The Royal Mail Group (RMG), we wish to respond to the Council's publication of a **Local Development Plan - Draft Plan Strategy** for Belfast.

RMG own and operate several assets across the City of Belfast including the Belfast Delivery Office at 20 Donegall Quay BT1 1AA. This site in the City Centre is located between Donegall Quay and Tomb Street. The company has operated a mail delivery and distribution business from a substantial building at this site since 1972 and the property remains a strategic asset of immense importance to our client's business in Northern Ireland.

The company has an interest in the formulation of planning policies and proposals for development of land that may influence the continued operation of the business and the operational efficiency of the estate. Considering the significant change underway in the City Centre the company also would wish to enter direct dialogue with the Council about long-term physical planning of the area and prospectus for the Waterfront particularly around Donegall Quay and consider the possible consequences for estate management and long-term operational planning.

Cushman and Wakefield acts for the Royal Mail throughout the UK as Property Services Consultants. We recently lodged representations in respect of a planning application adjacent to the Belfast City Centre Delivery Office in the City Centre and we are therefore aware of significant physical change underway in the City Centre.

The Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. 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. It also operates Parcelforce Worldwide which is a parcels carrier. Royal Mail's services are regulated by Ofcom.

The protection of existing operations is a crucial issue for RMG, particularly where there is potential for future statutory intervention and sanctions to be placed upon the business when uses of a sensitive nature are introduced near existing Mail Centres and Delivery Offices involved in the distribution and delivery of mail and parcels. These activities are determined to fall into **Use Class B4** of The Planning (Use Classes) Northern Ireland Order 2015.

Due to the nature of their delivery requirements and targets, Delivery Offices and Mail Centres often operate early in the morning and late into the evenings, generate large volumes of vehicular movements and associated mail sorting and loading activity, all of which result in noise, light and disturbance that is not generally to be expected in a residential environment. This can lead to complaint and pressure for action - although RMG is not the agent of change.

The issue of neighbouring land uses and their compatibility, including potential environmental / amenity impacts is therefore fundamental importance to the Royal Mail, particularly where Local Planning Authorities are assessing the suitability of future land use allocations and development sites.

Given current investment trends and significant changes underway along the Lagan Waterfront the emergence of a new Plan is of interest to our client. The City Council is aware of pressure for change involving new residential and commercial development including permanent residences, serviced apartments and overnight and holiday accommodation. Several schemes have already been implemented nearby including the Obal Project and Marriot AC Hotel that have generally been received positively but nonetheless introduce noise sensitive population relatively close to the site occupied and operated by RMG for mail distribution. Further development proposals nearby appear likely.

RMG has experienced operational difficulty elsewhere in the country where Planning Authorities have granted permission for new housing near Delivery Offices without proper regard to the effects of noise, loading activity and vehicle movements. Some planning decisions unfortunately have resulted in retroactive demands for operational restrictions that interfere with postal operations or require altered shift patterns. This inconvenience and additional cost is disruptive, costly and inequitable to RMG.

On behalf of our client we request that Local Development Plan Policy acknowledges and demonstrates an understanding of business needs of existing land uses and occupiers and actively seeks to avoid land use decisions that might unreasonably fetter established business activities or even displace current business occupiers.

Planning policies and decisions should aim to recognise that existing businesses should not have unreasonable restrictions put on them because of pressure for change nearby. We ask that Belfast City Council have regard to these concerns in the drafting of their Finalised Local Development Plan, for proposed allocations and sites located near all Royal Mail assets and particularly the City Centre Delivery

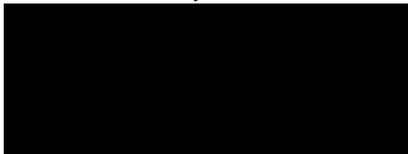
Office at Donegall Quay.

Royal Mail would also welcome early engagement with the City Council particularly where allocations/sites next to or adjacent to Mail Centres, Delivery Offices and / or vehicle yards are identified for development including change of use. It is the experience of our client that the business is made aware of development proposals often late on in the process and sometimes beyond the statutory period afforded to offer meaningful comment. It is in the interests of proper planning and the wider community interest that our client is afforded opportunity to review and respond to proposals likely to have effect upon operations or amenity of land.

We request that this letter is given full consideration in the preparation of the Local Development Plan and we would appreciate it if you could keep Cushman & Wakefield informed of the plan making process to ensure we are able to respond appropriately.

We trust this representation is of assistance and should you have any queries to discuss Royal Mail's position further, please don't hesitate to contact us on the number above.

Yours faithfully,



Martin Hannah MRTPI
Senior Planner
Development and Planning

For and on behalf of Cushman & Wakefield

Date: 15 November 2018