Application by Wrexham Gateway Partnership for the Wrexham Gateway – Eastern Development Zone

Wrexham County Borough Council Reference: P/2025/0697

Royal Mail Objection

By email only – 05/11/2025

Introduction

Royal Mail Group Limited (Royal Mail) and its consultants BNP Paribas Real Estate have reviewed the consultation documents for the Application Reference P/2025/0697.

These representations follow our previous submission to the Pre-Application consultation which were made in August 2025.

Whilst Royal Mail supports the Wrexham Gateway scheme and does not wish to delay or stop the construction works from occurring, Royal Mail must ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations.

Royal Mail's therefore **objects** to the current proposals for the reasons set out in the response below.

Royal Mail – relevant information

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest, and this should not be affected detrimentally by any statutorily authorised project.

Royal Mail's postal sorting and delivery operations rely heavily on the road network. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network. Every day, in exercising its statutory duties multiple Royal Mail fleet, staff and visitor vehicles use the A541 Regent Street which provides the principal access to the Delivery Office. As set out below, it is considered that there is a potential for the A541 Regent Street to be affected by construction traffic and traffic management measures during the construction phase of the Gateway scheme.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Any periods of road disruption / closure, night or day, on or to the surrounding highway network has the potential to impact operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets.

Wrexham Delivery Office

Royal Mail owns and operates the Wrexham Delivery Office ("DO") which sits immediately adjacent to the Partnership's proposed Wrexham Gateway pre-application boundary.

In 2021 Royal Mail invested in a significant expansion and reconfiguration of the DO site to provide additional capacity, demonstrating Royal Mail's ongoing commitment to the site and its key strategic importance.

Royal Mail has no plans to close Wrexham DO or reduce the size of its operation, and the site is currently operating effectively. All mail and parcel movements in to and out of Wrexham Delivery Office are by road, via the A541 Regent Street. Maintaining clear access on this route is therefore essential at all times.

Royal Mail welcomes that the Application boundary excludes the main Wrexham Delivery Office site, however it is noted that the Design and Access Statement retains reference to the 2022 masterplan which includes the entirety of the Delivery Office site. **Royal Mail wishes to repeat, in the strongest sense, it's objection to any redevelopment proposals which include the operational DO site.**

Royal Mail position on Wrexham Gateway as of October 2025

The proposed Wrexham Gateway scheme has the potential to impact upon Royal Mail as follows:

1. The delivery of the Wrexham Gateway scheme as proposed would require acquisition by the Partnership and development of part of the existing Wrexham Delivery Office site.

2. The proposals as submitted include no provision for the requirements which Royal Mail requested at Pre-Application stage. Royal Mail concludes that that the documents submitted confirm the potential for the construction works and the associated traffic management proposals to impact Royal Mail's road-based distribution and delivery services. This is particularly given the proximity of the proposals and the Delivery Office access off Regent Street.

3. The scheme as submitted would represent a significant intensification from the existing uses within the application boundary. The transport hub, the landmark commercial development and the associated leisure would, once built and occupied, increase vehicle movements on the A541 and activity levels and in the area generally. These effects have potential to impact Royal Mail's road-based services in to and out of Wrexham Delivery Office during the scheme's operational phase.

4. Lastly, due to the proximity of the scheme to the DO there is a particular risk during the construction period of other disturbance to RM operations, staff and customers including from noise and dust.

In order to seek to address point 2. above, advanced knowledge and approval of any Traffic Management, road closures or other works affecting the public highway, its capacity or journey times is usually the key to enable Royal Mail to manage impacts on its operations and business. These were requested at Pre-Application stage, and at present no evidence has been found of a commitment to deliver mitigations for Royal Mail. Royal Mail reiterate that they request a firm commitment to advanced consultation in relation to works affecting the highway by the Partnership or its contractors.

As a result, it is requested that the future Construction Traffic Management Plan (CTMP) and/or other approved documents include the following mitigations, which would address Royal Mail's concerns re 2. above:

a. A requirement that during the construction phase Royal Mail is notified by the Partnership or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working; and

b. Where road closures /diversions are proposed, the Partnership or its contractors should be required to liaise and consult with Royal Mail at least two months in advance to ensure any alternative highway routes are suitable for Royal Mail operational use and do not unduly restrict or delay Royal Mail from fulfilling its statutory and commercial obligations; and

c. A mechanism to inform Royal Mail about any other works affecting the local highways network (having regard in particular to the Delivery Office); and

d. A 24-hour emergency contact to ensure resilience in the event of unexpected disruptions to the Delivery Office operation.

Prior consultation and / or notification have previously been secured by Royal Mail in CTMPs for countless large-scale schemes nationwide, including Nationally Significant Infrastructure such as the National Highways Lower Thames Crossing and the SEGRO's East Midlands Gateway scheme. These measures have been considered reasonable by scheme promoters and have worked to good effect in mitigating impact on Royal Mail's assets and operations.

Regarding 3. above, Royal Mail requests that the Partnership undertakes a detailed Traffic Impact Assessment for the proposed Wrexham Gateway development including traffic modelling that has full regard to Royal Mail's traffic flows and its Universal Service Obligation. It is requested that Royal Mail is fully consulted by the Partnership and its consultants on the Traffic Impact Assessment during its preparation and finalisation in advance of submission of any future planning application.

Lastly regarding 4. above, where non highways related disturbance is likely to occur, including but not limited to, noise, dust etc that could affect the operation of the Delivery Office or materially impact its staff or customers (day or night), Royal Mail requests that at least one months' notice of such disturbance is provided by the Partnership or its contractors to be secured in a planning condition to the eventual planning permission. The planning condition should also place an obligation on the Partnership and its contractors to reasonably minimise any such disturbance or potential for it to occur.

Conclusion

Royal Mail **objects** to the scheme as currently proposed for the following reasons:

1. The Application boundary includes land which comprises a secondary access running between the Delivery Office and Wrexham General.

2. The proposals as submitted include no provision for the requirements which Royal Mail outlined at Pre-Application stage. These are due to Royal Mail's conclusion that that the evidence submitted confirms the potential for the construction works and the associated traffic management proposed is likely to impact Royal Mail's road-based distribution and delivery services, particularly given the proximity between the proposals and the access to the Delivery Office off Regent Street. At pre-application stage, Royal Mail requested the following:

    a) A requirement that during the construction phase Royal Mail is notified by the Partnership or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working; and
    b) Where road closures /diversions are proposed, the Partnership or its contractors should be required to liaise and consult with Royal Mail at least two months in advance to ensure any alternative highway routes are suitable for Royal Mail operational use and do not unduly restrict or delay Royal Mail from fulfilling its statutory and commercial obligations; and
    c) A mechanism to inform Royal Mail about any other works affecting the local highways network (having regard in particular to the Delivery Office); and
    d) A 24-hour emergency contact to ensure resilience in the event of unexpected disruptions to the Delivery Office operation.

    We find no reference to any of the above requests in the planning application documentation which is unacceptable to Royal Mail.

3. The scheme as submitted would represent a significant intensification from the existing uses within the application boundary. The transport hub, the landmark commercial development and the associated leisure would, once built and occupied, increase vehicle movements on the A541 and activity levels and in the area generally. These effects have potential to impact Royal Mail's road-based services in to and out of Wrexham Delivery Office during the scheme's operational phase.

    Royal Mail requests that the Partnership undertakes a detailed Traffic Impact Assessment for the proposed Wrexham Gateway development including traffic modelling that has full regard to Royal Mail's traffic flows and its Universal Service Obligation. It is requested that Royal Mail is fully consulted by the Partnership and its consultants on the Traffic Impact Assessment during its preparation and finalisation in advance of submission of any future planning application.

4. Lastly, due to the proximity of the scheme to the DO there is a particular risk during the construction period of other disturbance to RM operations including from noise and dust.

    Royal Mail requests that at least one months' notice of such disturbance is provided by the Partnership or its contractors to be secured in a planning condition to the eventual planning permission. The planning condition should also place an obligation on the Partnership and its contractors to reasonably minimise any such disturbance or potential for it to occur.

Royal Mail wishes to reserve its position to submit representations to the future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure project and any questions of Royal Mail should be sent to:

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Please can you confirm receipt of this statement by Royal Mail.