



Response of the Road Haulage Association to Heathrow Airport Limited.

“Airport Expansion Consultation One”.

27th March 2018

Summary of the Consultation

1. Heathrow Airport Limited are consulting on expansion plans, including building a new northwest runway. These plans include a cargo strategy that will lift freight volumes to 3 million tonnes a year by 2040, from 1.7M tonnes in 2017. This is the first of a number of consultations.

Background about the RHA

2. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 250,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.
3. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.
4. We would like to thank Heathrow Airport Limited for the consultation and the opportunity to comment on the issues raised.

General Comments

5. The RHA will confine our response to road freight cargo issues and aspects concerning the road network.
6. The RHA supports Heathrow Airport expansion and the contribution these plans will make in growing the UK economy.
7. We strongly support the provision of new space for freight activities.

8. A significant number of RHA members are operators using existing infrastructure which was designed decades ago and has not been fit for purpose for many years. An example is the “Horse Shoe” freight area which has been neglected and is now a disgrace - The Scheme Development Report at 11.2.7 acknowledges the problems for freight operators.
9. The lack of facilities are not simply confined to the handling areas within the airport itself. There is a lack of facilities in the area around the airport to cope with the number of vehicles and the operational requirements for those vehicles.

CARGO FACILITIES

10. RHA members experience significant delay and congestion in accessing freight forwarding areas, from both local roads and the Strategic Road Network. This is amplified by a lack of HGV parking, holding, rest facilities and a call forward system.
11. All cargo entering and leaving the airport will be moved by road freight, and facilities to allow this to be done efficiently are essential.
12. The amount of “air” to “air” cargo claimed in the information is unclear. Much airfreight is moved as airfreight by road to other airports, both in the UK and abroad – this is not specified and we are unsure if the claimed “air to air” figure includes or excludes this. The RHA believes this must be clarified as a failure to do so risks underestimating the road freight activity.
13. The Scheme Development Report, 11.3.1 identifies the need for cargo facilities to be able to handle 3.45M tonnes, consequently all cargo infrastructure must be designed and built to handle the projected figure.
14. A study conducted in 2015 identified operational issues with the existing cargo centre including safety, security, access, congestion, outdated facilities (the horseshoe was developed in 1968) and a lack of dedicated parking facilities for lorry drivers.
15. The RHA has no preferred option, but the site development must be designed and future proofed for projected road cargo activity. The operators of Heathrow have a long history of neglecting the needs of the freight customers and operators – sufficient, effective and efficient road cargo handling facilities provided by the airport must be a clear condition of any consent.

16. New cargo facilities described in the Scheme Development Report, at 11.4.13, offers three options, however in Option 3 no theoretical tonnage capacity is mentioned. The Option with the greatest handling capacity is favoured, so that future growth can be accommodated.
17. The Emerging Plans document at 10.3.19 refers to Truck park locations. The RHA considers that all four proposed locations at Fig. 10.5 are used, this will provide capacity, resilience and an area for HGV's and their drivers to take mandatory rest breaks. Proper rest facilities, including toilets, hot and cold showers and catering need to be provided for at least **500** HGV 's, where drivers can take their mandatory daily rest. This must be for all freight traffic and not just the airport directly, but also the freight businesses that are operating air freight services in the area.
18. No mention is made about offsite cargo facilities where freight goods can be marshalled and then called forward to loading and unloading points. This would require a system allowing an electronic ICT based queuing / call forward system and should be something Heathrow considers.

M25 ALIGNMENT AND JUNCTIONS

19. The south western section of the M25 is the busiest road in the UK. There would be an opportunity to redesign a section from junction 14 to junction 16 to improve traffic free flow and reduce congestion – this opportunity should be taken if possible.
20. The Scheme Development Report at 6.1.2 acknowledges capacity and flow problems, the final scheme must include remedial work to accommodate the proposed increase in cargo and passenger traffic, including the creation of collector-distributor roads. If capacity is not increased, this will lead to an already overloaded road network failing.
21. The Department for Transport and Highways England are currently conducting a study on the **M25 South West Quadrant**, which is planned for delivery 2020 to 2025. This study covers a wider area than this consultation. The result of this study must be considered. A fully functioning network which strongly supports the SRN in all places is essential for economic growth and consistent journey times are required to keep the wheels of industry turning efficiently and cost effectively, this must be delivered, not just aspirational.
22. All development activity must maintain capacity and resilience during construction and allow the M25 to operate normally.
23. Where local roads are concerned the simplest option with as few junctions as possible, to maintain free flow traffic, is preferred.



The Road Haulage Association

24. Option 3d is the preferred option for the **A3044**, this has fewer junctions than other options.
25. **Stanwell Manor Junction**, Option 2 is the preferred option. It has a simple roundabout system, with few junctions, which would be easier to navigate.
26. Air Quality and Emission concerns need to recognise that free flowing traffic will be a significant contributor to ensuring the best air quality. Congestion creates poor air quality, we cannot rely on just improved vehicles to deal with air quality and emission issues alone (although they will make a significant contribution).

Final Comments

27. Existing lay-by's on surrounding roads, intended for drivers to take rest breaks, are totally inadequate. It is essential that the Airport development makes full provision for lorry parking, rest and hygiene facilities and for places for freight vehicles to wait to collect and deliver goods.
28. It will also be the case that airport will have to ensure that other vehicles do not take over lorry parking areas (individual employees are parking their cars in lay-bys and then getting in one car to take them to their place of work - RHA members have identified this issue, which prevents these lay-by's from being used for their intended purpose).

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