



UK Airport Consultative Committees - Liaison Group

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Dear Sir/Madam

Airports Commission – Emerging Thinking

The Liaison Group for UK Airport Consultative Committees (UKACCs) welcomes the opportunity to comment on the Airports Commission's emerging thinking.

UKACCs brings together 23 airport consultative committees (ACCs) ranging from major international gateways to smaller regional airports across the UK (member committees listed at the bottom of this letter). UKACCs provides a valuable forum as its membership covers a wide range of airports each with different local operational circumstances.

UKACCs supports the Government's stated objective that UK aviation should be able to grow, but to do so it must be able to play its part in delivering environmental goals and protecting the quality of life of local communities.

We fully recognise the importance of connectivity and its key role in helping the UK economy grow on a sustainable basis. Airports outside the South East have a vital role in providing international and domestic connections across the UK, and contributing to local economies. Regional access into London's airports, especially Heathrow and Gatwick, is also an important element of this connectivity. However UKACCs, particularly its regional airport member committees, continues to have real concerns about the negative impact of capacity constraints. In particular the major London airports have seen a steady reduction in point to point regional services. The crowding out of regional services from the capacity constrained London airports is continuing to have an adverse impact on the economic performance of the far regions of the UK and so affect their contribution to the national economy.

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Aberdeen - Belfast City – Belfast International - Birmingham - Bristol – Bournemouth - Durham Tees Valley - Edinburgh - Inverness – Glasgow - Glasgow Prestwick - Leeds Bradford - Liverpool John Lennon - London City - London Gatwick - London Heathrow - London Luton - London Stansted – Manchester - Newcastle - Nottingham East Midlands - Robin Hood Doncaster Sheffield – Southampton

Faced with capacity constraints, the major airports already appear to be prioritising long haul international services over regional services. Whilst it is clearly open to airports to use their commercial judgement in the best interests of the airport company and its shareholders, such action has wider national and regional implications. Passengers using regional airports faced with limited services to Heathrow will look to interline over European hubs such as Schiphol, Frankfurt and Paris etc. This leads to dilution and loss of revenue to the UK economy and in some cases adds additional journey time as has already been identified by the Airports Commission.

We therefore welcome the recognition given by Sir Howard in his speech that a clear message from regional stakeholders about the importance of regional access to the international connectivity available in London and the South East has been highlighted.

UKACCs has long lobbied the Government to address the issue of protecting domestic services from the far regions of the UK into the London airports and is concerned that any steps to limit access to smaller aircraft will further reduce the number of regional services into London. In addition to this, there has been growing concern about the increase in landing charges at Heathrow and Gatwick airports which has resulted in some regional carriers withdrawing services between the regions and the London airports because a viable operation can no longer be sustained. The recent sale of Flybe slots to easyJet at Gatwick is a good example of further erosion of regional connectivity with a major international London airport. The efforts of Cornwall County Council in trying to secure a service between London and Newquay highlights the importance of this link to their region.

UKACCs notes that the Government has suggested that demand for domestic aviation and much of that for near-European short-haul aviation could be met by high-speed rail although it also acknowledges that air transport will continue to provide essential links to more remote parts of the UK and areas not served by high speed rail. UKACCs welcomes the development of high-speed rail initiatives and the important contribution that these can make to the future UK transport network. However it must be accepted that high speed rail connectivity will not be delivered for many years and that domestic air travel is a reality. There is therefore a vital need to preserve domestic air travel as an essential part of the UK's strategic transport infrastructure for many years to come.

It needs to be recognised that whilst new high-speed rail connections will provide an opportunity to replace existing domestic air services for some regions especially the Midlands and the North, it will not provide a total solution across the UK. There will be a time threshold where rail does not provide a viable option especially for the Scottish airports, and never can for Northern Ireland, the Channel Islands or the Isle of Man. There will still be a requirement for domestic services from these areas if the Government's wish that there should continue to be essential air links to the more remote parts of the UK is met. It must also be recognised that neither Gatwick nor Stansted airports will have a direct connection to the high speed rail network and a connection at Heathrow will only be realised in around 20 years' time.

UKACCs therefore urges the Airports Commission to address in detail the policy towards domestic air services to ensure the future viability of an effective network. UKACCs accepts that the preservation of an effective domestic network is subject to a number of considerations including commercial interests, EU obligations and competition rules. We are aware that the current airport slots regulations are being reviewed by the EC and that the UK Government is continuing to work closely with the EC and other Member States with the aim of ensuring that any amendments to the slot regulations will recognise the importance of domestic access to London airports. We realise that the prospect of securing such amendments may be limited, as the introduction of a mechanism to protect routes which are at present well served by economically viable regional air services would necessitate a fundamental change to the existing applicable EU law. However, it is of vital importance that the appropriateness of the current PSO legislation is reviewed to ensure that it is fit for purpose. If the UK is to have a sustainable domestic network of air services, it would seem essential that slot allocation must be looked at in a different way.

UKACCs therefore welcomes the Airports Commission's emerging thinking that some net additional runway capacity in the South East will be needed in the coming decades but we hope that in considering operational improvements which may deliver some modest capacity in the short to medium term will not be at the expense of vital regional services which rely on the use of smaller aircraft to maintain a viable operation. UKACCs therefore urges the Airports Commission to ensure that the issue of protecting regional access to London's key international airports is addressed in its Interim Report later this year, and that it can identify some alternative mechanism to preserve domestic slots.

I trust our views will be taken into account.

Yours faithfully,



Paula Street
Liaison Group Secretariat