



All Party Parliamentary Group for Aviation (APPGA)

Response to Airports Commission Consultation 6

Utilising UK Existing Airport Capacity

Introduction

The All Party Parliamentary Group for Aviation (APPGA) welcomes this opportunity to respond to the Airports Commission Consultation 6.

The APPGA has met with the Commission twice and drawn the Commission's attention to the APPGA report on Aviation Policy priorities we produced in August 2012.

Members of the APPGA are from all political parties in Westminster and many represent UK regional constituencies, a particular focus of this Consultation.

The Commission's work will be fundamental to informing UK Air Transport Policy for a generation. We hope its conclusions and recommendations can be accepted by whatever administration is formed after the General Election in May 2015 and last beyond one Parliament. APPGA is itself evidence of the ability to gain cross party consensus on such issues.

The UK needs clarity on Air Transport Policy. It is APPGA view that:

- The UK needs two new runways, one first at Heathrow to allow its status as UK's only hub airport to be sustained and UK Global Connectivity ensured.
- A second runway should be built at Gatwick as its local traffic development dictates.
- Splitting hubs between two or more airports in the UK has been tried and failed.
- The needs of UK regional connectivity to the hub airport and the global network of air services that only it offers must be secured in both the short and long term by positive Government action and policy backing. To ensure this happens, and as included in our report of August 2012, the Commission should propose other means of meeting the lack of runway capacity at Heathrow. Critically this should aim to secure vital regional operations using EC Public Service Obligation protection to those UK regional centres that have lost links to Heathrow by use of RAF Northolt's existing 1700 metre runway only some 4 miles north of Heathrow.

We welcome your analysis in the Consultation 6, but have some concerns with the conclusions drawn.

We believe some of the assertions in section 1 are somewhat unsophisticated, where consideration of connectivity is based on load factor and aircraft size. Our view is that it is in fact a much more complex issue and subject than that, being a function of network, frequency, schedules, access, pricing, guaranteed connections and related factors. These are issues that anyone with experience of airline operations, marketing or scheduling would quickly identify; remembering that it is the airlines which make the route development and airport location decisions.

We recommend the Commission reads the 1998 House of Commons Transport Select Committee report into Regional Air Services. The Chairman of APPGA was on that Committee at the time. Most of the findings of that Inquiry are as relevant today as then.

APPGA has responded to the Commission questions repeating those using a Green Italic type and given APPGA responses using standard type.

7.1 The focus of this paper is the connectivity and capacity provided by airports other than those short-listed by the Commission for further consideration as long-term capacity options. The Commission wishes to understand the long term strategic context within which the eventual expansion option is likely to sit, and any recommendations it could usefully make to shape this context. This paper is a call for evidence on that subject.

7.2 To inform those who would wish to prepare submissions on the issues raised in this paper we set out below a number of specific questions on areas of interest:

7.3 Questions on the role that non-London airports currently play in providing connectivity and utility to the UK.

••Is the Commission correct to identify a reduction in air connectivity between the UK regions and the London airport network over the last decade?

In short, yes. There has been a large scale reduction in the number of UK regional centres connected to the London airport network, specifically Heathrow. In addition the frequency and level of competition on such routes has reduced; particularly with the takeover of bmi by British Airways. The growth of the Low Cost airlines has resulted in those routes that still have connections, having a different type of air service with no airline guaranteed connections such as those made through IATA Interline agreements or on-line connections offered by carriers such as British Airways. This means that a passenger who is connecting now has to take the risk and cost of missed connections which was previously covered by the airline he was flying with. The lost almost 20 UK regional routes into the Heathrow hub since the 1970s also means that many of those regions now find access to global markets more difficult with knock on economic and employment consequences. Some say that connections via European hubs

provides adequate connectivity, but the limited frequency and lack of network is not the same for those regions as would be if they were still linked to Heathrow. A passenger from Newquay to London wishing to connect to the Heathrow network, first has to fly to Gatwick and then submit themselves to the vagaries of the 45 miles of the unpredictable M23 / M25 to Heathrow. 20 years ago they had direct links to Heathrow. Even the residual link to Newquay from Gatwick which was once operated on a fully commercial basis is now having to be subsidised and subject to PSO because of lack of CAA regulatory oversight of airport charges and the subsequent withdrawal of all FlyBe domestic operations from Gatwick. The South West being the same area that was completely cut off when the Dawlish rail link was cut last winter but for its airlinks and residual poor road network. There is also a loss of business with millions of UK passengers flying via other European hubs including Paris and Amsterdam and increasingly the Middle East and Turkey with adverse impact on UK airlines and economy.

How do recent new routes to the capital, and the stabilisation in passenger numbers on domestic routes to and from London since 2010, affect this analysis?

The question is misleading. The market is split between point to point and connecting traffic and the difference between services to different airports. Gatwick and Stansted airports are further apart than Edinburgh and Glasgow, so like the two Scottish airports, serve different markets. APPGA believes Public Service Obligation (PSO) protection to regional services to specified airports is fundamental for the future. It is interesting that the Government has only recently recognised this with PSO guarantees for Dundee to Stansted and Newquay to Gatwick; none though to hub at Heathrow. Our APPGA 2012 Inquiry showed that the impact of APD on domestic services where APD is charged on both segments have adversely affected domestic traffic.

APPGA would request the Commission to ensure that there is greater certainty on air service provision for communities in peripheral regional areas as a key part of its recommendations to secure vital worldwide connectivity.

••How do respondents view these trends developing in the future?

The essential requirement is more runway capacity and Public Service Obligation protection of services at key the hub airport. Without that the trend will continue. The FlyBe withdrawal of its Gatwick – Newquay link, a route which is to be one of the first PSO protected and subsidised routes to London, yet the route had been profitable but less so than alternative uses of the slots; the result being a region losing its commercially viable service due to lack of runway capacity. Without more runway capacity at Heathrow, then Gatwick this trend will continue. You refer to the BA route from Heathrow to Leeds / Bradford (page 9 paragraph 1.10 in your paper) but that is only there since BA took over bmi. BA are slot sitting until they can get additional long haul aircraft to make better (for BA and BAA) use of those slots, yet the Yorkshire region would suffer as a result. The solution is more runway capacity at the hub and specific protection of the slots for regional air services at specific airports, which is allowed under EC PSO rules. The Commission is wrong on this point as is DfT; PSO can specify a specific airport to be served. This must be done at the Heathrow hub.

●●Is the Commission's analysis of the multiple factors influencing domestic air connectivity between London and the UK regions accurate?

Not entirely as issues of service, frequency and schedule are also critical. But those depend critically on runway capacity and slots being available at the right hub airport and where traffic wants to fly to and from and connect; all are fundamental factors to consider when determining optimum hub airport location.

Of the factors outlined, which are the most significant or important for explaining how the market has developed?

We have covered this in the forgoing. The availability of service, the frequency and schedule, ability to interline and connect easily and with guarantees are also relevant. A one per day No Frills service to an outer London airport with no on line or interline connectivity is not the same as a full service frequent, at minimum of two frequencies per day regional air service to the hub

What additional factors, if any, should the Commission be mindful of?

That having adequate frequency at the right schedule is crucial. In remote peripheral communities surface links cannot provide an adequate substitute to air services. They do not provide the seamless proven connectivity that air services do. Even on the Channel tunnel link to Paris and Brussels where rail service was to replace air service air services have been regenerated on both routes from London as the rail service did not meet the needs of the whole market; the optimistic traffic estimates for Eurostar have never been achieved. The same is true for the UK regions even where rail is meant to compete. The reality is that rail does not give the day return capability and connectivity to global networks that air services to the hub from the regions alone can provide. The UK Regions need certainty, resilience and alternatives. The loss of hub capacity and slots with links has compromised them economically and socially.

●●Is overall transport connectivity between London and the regions at an appropriate level?

In short no. In many instances it was better before the Second World War despite a better rail network at the time. Air networks in Europe connect 150,000 city pairs, more than by rail. Moreover air services are sustainable with smaller markets of under 100,000 passengers a year for high frequency service, if the right sized aircraft are used. The equivalent rail service requires markets many times that size, if of the right quality, speed and frequency.

Viable air services can be operated from 1200 - 2000 metre runways, which are relatively easy to secure and maintain. It has been said that 2 kilometres of rail line takes you 2 kilometres; 2 kilometres of runway takes you to the world!

The Commission should recommend that all significant UK regional areas are connected by a minimum twice daily air service to the national hub, Heathrow. Places such as Prestwick, Inverness, Humberside, Teesside, Dundee, Newquay, Isle of Man, Jersey, Guernsey and Liverpool need guaranteed access to the hub.

It is unfortunate that the Commission has accepted the CAA ruling on Gatwick charges at Paragraph 1.19. The CAA is also the main aviation advisor to Government and consistently underestimated the impact of the lack of runway capacity on regional air services yet few if any in the CAA Economic Regulation Group have any airline experience.

We cannot agree with your references at Paragraph 1.20 to use of large aircraft on domestic routes in some countries which shows an unrealistic view of the differences in airline markets and operations. It is frequency that is critical to airlines in their maximising revenue and market share, particularly on domestic services.

Even on the UK's largest single US market to New York from London, no 747s or A380s are operated, even though there are 30 services a day with 5 main operators so would under your thesis be ripe for deploying large aircraft. It is frequency that is key. That means use of smaller lower aircraft mile cost aircraft.

British Airways has regularly downgraded the aircraft size on its residual domestic network, firstly from the Lockheed Tristar, down to the Boeing 757 and more recently to the smaller A320 series of aircraft. This is critical to the understanding of the issues of air services to and from the UK regions. But the Commission approach seems to confirm its lack of appreciation of the issues.

The Commission may be aware that Cyprus Airways recently sold slots at Heathrow to a US airline for over \$30 million. The equivalent slots at Gatwick are less than a tenth of that. It is access to the hub that drives that value and UK regional routes cannot compete with slot values that are driven by the Opportunity Cost of their slots for the next best use. So the UK regions lose out; a situation that the Commission should address as a matter of urgency.

Both Heathrow and Gatwick are coordinated under agreed Slot Coordination procedures; a situation that confirms that both are severely capacity constrained to the detriment of UK regional access.

Manchester airport when operating at 2/3rds the throughput of London Gatwick single runway, planned and developed a new second, albeit a close in parallel runway. The rationale was that they wanted to ensure adequate. It helps to underwrite APPGA view that both Heathrow and Gatwick need additional runway capacity and that it's the UK regions links to both Heathrow and more recently Gatwick that have lost out due to runway capacity constraints.

The Commission asserts that the provision of Wi-Fi services on competing rail services (Paragraph 1.27) is one reason for air service decline. This is somewhat disingenuous to many in the UK regions who are APPGA member Constituents who have no air links to the Heathrow hub. We would ask how the availability of Wi-Fi helps passengers whose rail service was lost in the winter from Cornwall and Devon, or those from the Highlands and Islands of Scotland where the rail service option is poor or nonexistent.

What are the social or economic consequences of changes to air connectivity?

We believe they are substantial resulting in reduced investment, economic activity and employment with greater reliance on Government intervention through development programmes and subsidy.

Lack of air services and associated connectivity will ultimately reduce GDP in those areas. A factor understood in other parts of Europe through the Convergence programme which tries to ensure no part of Europe is at less than 70% of the average GDP per capita; air services can help secure that goal.

Can respondents provide any comparisons or other evidence to support their response?

The previous answer refers.

••What future trends do respondents envisage in domestic air connectivity excluding routes into London?

There is no runway capacity problem in the UK regions. If there is a viable market opportunity airlines will respond with an appropriate level of service. The Commission might wish to recommend further use of Public Service Obligation support to secure inter regional air services in the future, potentially at less cost than developing rail alternatives with the associated capital, operating and security cost.

How relevant are the factors explored in relation to London and the regions for these other domestic routes?

The problems are different. They are mostly attributed to peripherality, geography and often how to provide service to small isolated markets. The problem is not runway capacity.

••Is the Commission correct in its analysis of changing purposes of travel and routes types at non-London airports?

It is not necessarily the right question as the problem is the regional links to the Heathrow hub which have been displaced by lack of runway capacity and sometimes CAA not fully appreciating the gravity of the situation in its advice to Government. This situation has not changed since the Transport Select Committee Report on Regional Air Services of 1998.

What are the drivers and ramifications of this trend?

In the longer term what has happened with London airports could happen in other parts of the Country as airports owned by those with a different focus and priorities to those in Public Ownership look to maximise traffic and revenue, whilst increasing charges which will penalise regional air services. It could easily happen in the next 20 years at Glasgow and Edinburgh as amongst the largest UK regional airports.

7.4 Questions on how the business models of these airports are changing, and how they can be expected to change further in time.

●●Is the Commission right to identify particular financial challenges for smaller airports?

Not fully. The Commission must recognise that it is airline not airport economic considerations of the market and prevailing yields that determines which airports and routes are served and at what frequency. Airports are merely the means of allowing airlines to link markets.

Can respondents corroborate or refute any of the Commission's evidence on financial pressures at regional airports?

The economics of airports are fundamentally determined by traffic density. Those at regional airports are less dense in general than at the main London Airports. Airports are heavily influenced by economies of scale.

The Commission should ensure that both the safety regulatory and economic regulatory oversight regime of all UK airports, but particularly those in the regions are consistent and in accordance with internationally agreed protocols and not Gold Plated. We believe there are instances of increased cost imposed by CAA for no discernible improvement in safety or security.

The Commission might wish to review the FAA approach to such airfield licensing issues in the USA. Its oversight is much lighter touch and thus imposes far lower cost.

●●Is the Commission accurate in its analysis of the market dynamics affecting the non-London airports sector?

Subject to the foregoing and subsequent comments, yes.

APPGA is concerned about the level of cost imposed on smaller regional airports and whether it is disproportionate. In addition the whole subsidy, regional aid and support given to air services needs to be coordinated and controlled more effectively, at present it only seems to be helping some no frills carriers without achieving any real long term commitment to specific regions

Many regions with relatively small but important markets which are targeted at links with the main hubs can be operated successfully but only with say 50 seat aircraft, enabling higher frequency but with higher fares.

Is the Commission correct to identify a broad trend, especially since 2007, in larger regional airports retaining or building their route networks, whilst smaller regional airports' route networks shrink? What explanations can respondents provide for this trend?

The Commission is correct in the identification of the trend but not the cause. It also involves broader airline and airport economics and regional economic policy.

The UK has a substantial network of 450 airfields only a small number of which offer commercial air services. Those other airfields provide the facility for regional connectivity by air using air taxis, business aircraft or General Aviation

aircraft and are often overlooked as part of the UK's transport infrastructure and need to be secured through planning and policy.

••Can respondents provide any evidence to counter or support the Commission's analysis of the UK population having quick access to relatively high numbers of airports, or to build on the Commission's comparison between the UK and other countries' airport networks?

The Commission says in paragraph 2.16 that 70% of the population lives within two hours' drive of a 5 million passenger airport. That means 30% do not; two hours can mean being 100 miles away - a distance that would be unacceptable for access to other major modes of transport. The main criteria are the airports' network, destinations and frequency and type of service offered, not its passenger throughput!

Analysis of the CAA Origin Destination survey for London Heathrow traffic shows that many passengers using Heathrow have origins or destinations closer to London Gatwick, a 35 million throughput airport, yet its network and type of service does not meet their needs, particularly for long haul services. For them and many other passengers to and from the UK there is only one real option, London Heathrow. So it is network and frequency and type of service offered that predicated an airport's attractiveness and use, not traffic volume. It is why the Commission's priority must be for the first new runway to be at London Heathrow.

Many countries have a major hub and regional airports of varying size depending upon the type and nature of the markets served. A good example is France, dominated by the Paris hub but with significant operations at Nice, Lyon and Bordeaux as well as many other French regional airports, although increasingly they are by Low Cost Carriers only providing point to point services.

••What analysis ought the national or local Government undertake when faced with a potential airport closure?

To ensure there is a comprehensive analysis of the market; then ensure that against a minimum throughput threshold that the facilities available are appropriate to meet the need. Don't develop and maintain a 3000 metre runway if one of 1200 metres will meet the needs of the local market. Work with the CAA on certification requirements and seek derogation to save cost but maintain standards. The assessment has to be market led, not by cost as seems to have been the recent case for Prestwick in the Constituency of the APPGA Chairman.

The Commission should recommend that the CAA review its operating standard requirements for smaller regional airports to see if they are all necessary and look what happens overseas as in the USA where there is a much more pragmatic approach.

••In the longer term, what is an appropriate, adequate or ideal shape for the UK's airport system?

There is no one size fits all option due to geography, terrain and frontiers (as in Ireland). The system needs adequate runway capacity (not operating to 100%

but ideally 70% of capacity to provide resilience and optimum operation for airlines) to meet foreseeable demand and minimises surface access journeys.

Is consolidation of the airport network desirable, inevitable, both or neither?

Some yes, the best example being in Northern Ireland where the situation in Belfast is particularly disadvantageous to Northern Ireland and has denied market development and ability to compete with Dublin. All services there should be consolidated at the 24 hour Belfast International / RAF Aldergrove and the City airport site developed for the benefit of the local now thriving economy, particularly as it cannot meet all CAP 168 requirements and has Grand-Fathered derogations to secure its operations. But it is an example of many inconsistencies and anomalies around the UK; there are other examples that the Commission will also have noted in its research because the air transport industry gains greatly from economy of scale in both market and operations.

The other priority is to secure vital links to the Heathrow hub for those regions beyond 250 miles radius from London.

7.5 Questions on how the connectivity provided by these airports can be enhanced, and on the options to intervene in this sector.

●●*Has the Commission correctly identified the major options to support or bolster the regional airports sector? Of the options here explored, which have the potential to be most beneficial?*

Not fully, as Commission's interpretation of PSO is not that of APPGA, as they can be used to designate service to a specific airport not just a city. Slots on a new Heathrow runway could be protected by PSO designation of specific air services; as could use of RAF Northolt to help regional access to Heathrow in the interim. As already identified Stansted and Gatwick are further apart than Edinburgh and Glasgow and no one says that the PSO supported services operated to Glasgow are also meant to serve Edinburgh.

The Commission should evaluate the issue in terms of airline economics and the reasons airlines start and continue routes rather than in terms of airports.

Equally the Commission needs to ensure that the whole of Government and its surrogates provide a fully coordinated approach to regional development, to recognise the crucial role that air services have in economic and regional development, providing employment and upholding social cohesion.

7.6 Can respondents suggest means of bringing about positive change in the context of these options?

What recommendations could the Commission make in these areas?

Calling for long term policy that is agreed across party, as per APPGA ethos, together with consistent cross Government Department policy on regional development and full use of PSOs to help the regions and allow them the regain

and sustain access to the Heathrow hub both in the interim and once a third runway has been built there.

APPGA does not accept the assertion at Paragraph 4.5 on page 41, that the break-up of the BAA has increased passenger choice. That choice was always there regardless of airport ownership, and at times maintained by Government policy through regulatory action such as the Traffic Distribution Rules, subsequently rescinded. Passengers at Gatwick had a much wider range of service and destinations, particularly long haul, when under BAA ownership than now. But it was nothing to do with the airport but all about Government policy and airline route development decisions.

Airport ownership influences the airport product and passenger experience, not the market size or value or whether or not an airline will fly there.

APPGA calls on the Commissions to recognise that it is airlines not airports which operate air services and make the route development decisions, thus determine which airports succeed.

7.7 Questions on the constraints to developing further utility and connectivity at airports serving London and the South East, as well as how and by whom these constraints can be mitigated (Chapter 6):

Geographical Constraints

Are there longer-term or more extensive surface transport improvements and developments (beyond those committed to in the National Infrastructure Plan) that could support the other London airports to make best use of their capacity?

Are there any ways that government, or any other stakeholders, could improve airport site access?

The priority must be to ensure an integrated approach to transport and that UKs major airports, crucially the hub airport to HS2, are connected to the UK strategic rail network.

Are there any innovative ways that airports could resolve site access problems?

By using remote Park and ride car parking facilities for the hub at motorway and strategic road junctions such as the M3 / M25, M25 / M40 and M25 / M1 junctions to reduce car journey to and from Heathrow and similarly on the M6 / M62 around Manchester and in Scotland and around Birmingham.

Planning Constraints

Are there particular pros and cons to airport developments moving through the NSIP or Town and Country Planning process for a) developers or b) communities?

Could either the NSIP or Town and Country planning process be improved, either the process itself or development of supporting policy, to support developers and meet the needs of local communities?

Is there a current case for lifting planning caps for any airports in London or the South East?

If not now, when should these caps be reviewed?

Planning needs to be coordinated against national and local needs against a long term agreed plan that hopefully the Commission will provide the guidance for.

Commercial Constraints

Are there any actions stakeholders could take to support airports in mitigating their commercial constraints?

Although capital intensive by nature, airports make substantially higher rates of return by most measures than their airline customers. Failure to invest by the airport in new terminals, access or more particularly runways means that it is the airlines and their customers – passengers and shippers who then face the consequences of underinvestment.

At paragraph 5.5 of the consultation it refers to airport resilience. But it fails to state the consequences to airline operations of running airports at 100% of capacity. Heathrow and Gatwick are already at that level and airlines face increased operating and ownership costs as a direct result. The Consultation assumes that all runway slots have the same and equal value, failing to account for peaks in demand by hour, day, week and season, wave requirements caused by hub operations, aircraft performance and geography and seasonality. The paper makes no reference to FAA and other studies have shown that once an airport reaches 70% of capacity an airport is turning away traffic.

It is the airlines who bear the cost of over use of existing runways by having to deploy more crews and aircraft for any given operation than would be the case if runway capacity were not constrained. For instance in the 1970s the Block Time from Gatwick to Edinburgh or Glasgow was 1 hour. In 2014, the same journey is scheduled to take 1 hour 30 minutes, 50% longer. Airlines now have to allocate 50% more aircraft and crews to maintain the same programme than 40 years ago. This is not progress and is driven by airports lack of willingness to invest in runways at major airports.

The Commission must recognise the impact of airport policy on airlines and recommend penalties on airports that fail to bring forward investment plans.

The CAA or other regulator should set a maximum runway movement rate that seeks to minimise block times and ensures efficient airline operations rather than just maximising use of the runways which is in fact sub optimal and inefficient in overall operational terms.

Are there any examples of best practice in this area?

ICAO, IATA, EASA, EUROCONTROL and the FAA have all undertaken studies which may be relevant to the work of the Commission. See also the work on the Single European Sky in Europe.

Airspace constraints

Are there any medium term airspace developments that could support? Making best use of capacity, beyond those set out in the Interim Report?

The UK already over schedules its limited runway South East major airport capacity to the detriment of the airlines and their passengers. 55 ATMs an hour from a single runway IFR is heralded as best in class, but it is inefficient to the airlines. The Commission must look at the whole picture not just that of airport runway provision.

Performance based navigation and related modern aircraft capability should be allowed wherever possible to ensure direct tracks and routing to save fuel and time are the norm.

••Are there any innovative long term airspace developments which could provide support beyond those set out in the Interim Report?

The CAA and NATS should consider airspace allocated to different purposes depending on the time of day (i.e. Class G usage during night hours) would make a huge difference to the flexibility of the system. Careful development through consultation with other airspace stakeholders such as the military and GA could lead to a system that enables increased capacity in the skies and reducing holding time at the Hub. NATS, GA Alliance and Military Airspace groups would be best placed to assist the commission in developing this strategy.

Regulatory, Tax or Legal Constraints

••Are there any new data available that the Commission should review in reference to its conclusions on regulatory tax or legal changes that could alter our assessment of their usefulness in making best use of capacity?

Regulatory intervention either through application of Traffic Distribution Rules (TDRs), Bilateral Policy or other measures have been shown to be ineffective in "moving" the market. When the TDRs and EC / US Open Skies arrangements were rescinded, UK traffic moved to its favoured location, London Heathrow.

Directing traffic to airports such as Stansted, Luton or Birmingham will not work. It failed in the 1970s and 1980s under the twin hub policy with British Caledonian as a dynamic Second Force airline at Gatwick but the pull of and network available at Heathrow was just too strong to allow it to be successful and ended with BCAL take over by BA and the failure of many Gatwick based airlines over time – Laker, Air Europe, British Island, Donaldson, Dan Air etc.

APPGA has written a paper based on its own Inquiry (August 2012) showing that Air Passenger Duty discriminates against air transport and aviation; neither rail

passengers nor cruise passengers pay such a tax yet both enjoy nil rate of tax on fuel. Although the Government has reduced excessive APD, UK still has amongst the highest APD in the world, adversely affecting its competitive position to the benefit of countries such as the Netherlands and UAE by diverting large volumes of UK traffic via their hubs.

●●Are there any areas of legal, tax or regulatory constraint, not considered by the Commission in its Interim Report, which merit further review?

None of which APPGA is aware.

Impact of Commission final report

●●Are there any topics or areas of further study beyond those set out in the Appraisal framework, that would allow the Commission to understand the impact of development at Heathrow or Gatwick on the other London Airports?

This consultation has focussed on Utilising Existing Airport Capacity. APPGA would like to know what the Commission intends to do to ensure UK maintains its competitive position world air transport whilst reconnecting UK peripheral regions to the Heathrow hub until, a third runway is opened at Heathrow, possibly not until 2030.

APPGA believe there are two options to help achieve this:-

1. Adopt Mixed Mode operations on both runways at London Heathrow to enable a further 50,000 ATMs there.
2. Open up RAF Northolt to UK regional air services to replace the Business aircraft operations there.

We referred to both options in our August 2012 report.