

25th July 2014

Airports Commission
6th Floor
Sanctuary Buildings
20 Great Smith Street
London
SW1P 3BT

Dear Sir or Madam,

Response of the Enterprise M3 Local Enterprise Partnership to the Airports Commission's Discussion Paper 06: Utilisation of the UK's Existing Airport Capacity

Please find below the views of the Enterprise M3 LEP on this discussion paper. Thank you for providing this opportunity to contribute to the aviation policy formulation process.

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

The LEP has no comments on the six questions posed on this issue.

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

The LEP has no comments on the first four questions posed on this issue.

Q5: In the longer term, what is an appropriate, adequate or ideal shape for the UK's airport system? Is consolidation of the airport network desirable, inevitable, both or neither?

The LEP believes that the economy of London and the South East, including the Enterprise M3 area is the powerhouse of the UK economy. There is a place for one hub airport, which should remain at an expanded Heathrow (supported by significant improvements to surface access) and supported by a point-to-point focussed airport at Gatwick. Both airports are geographically well placed, serving a large population of the London and South East area within a reasonable travel time, and Gatwick offers an attractive alternative airport location to Heathrow, which is viable.

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)

The LEP would like to comment on the questions set out on the issues in Chapter 6.

Geographical Constraints

Q1: 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 (*i.e. not the shortlisted options of third runways at Heathrow and second runway at Gatwick*)?

The LEP consider that there may be connectivity benefits if the proposed Regional scheme for Crossrail 2 were to be extended from Cheshunt/ Hertford East to Stansted Airport. This would link the airport directly with Euston (for interchange with High Speed 2) and with Clapham Junction and Wimbledon (for interchange with the South West and Brighton Main Lines). As part of such proposals, there would be a need to improve journey times by rail between Stansted and central London, which are not competitive with journeys by car.

Q2: Are there any ways that government, or any other stakeholders, could improve airport site access? Are there any innovative ways that airports could resolve site access problems?

The LEP would like to reiterate its full support for three rail schemes that would provide a step change in airport surface access quality at Heathrow or Gatwick. The Western Access to Heathrow committed scheme will help improve access by rail from the western part of the EM3 LEP area, via interchange at Reading. The LEP fully supports the study work currently being led by Network Rail on a Southern Rail Access to Heathrow that will identify potential markets by November and a shortlist of options by next June.

The LEP's Strategic Economic Plan published in March 2014, identify a southern rail access to Heathrow and service and infrastructure enhancements on the Reading-Guildford-Redhill-Gatwick 'North Downs' line as being vital rail infrastructure improvements in order to unlock and support economic growth and job creation within the LEP's Sci:Tech corridor of growth towns, which include Basingstoke, Farnborough, Woking and Guildford.

The LEP also fully support the proposals for the Regional option of Crossrail 2 being developed by Transport for London and Network Rail. The LEP would like to see the development Crossrail type funding mechanisms to help accelerate delivery of the schemes mentioned in response to Q1.

Planning Constraints

Q3: 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?

In the view of the LEP, capacity improvements at larger airports in the SE such as Stansted or Luton – that have a strategic role may be better suited to use NSIP process. In these instances, the NSIP process should result in faster decision-making. For proposals for expansion of other smaller airports may be better suited to the Town and Country Planning process, in order that the NSIP process can focus on complex strategic aviation proposals.

Q4: 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?

The LEP would welcome measures that would speed up the NSIP process so can minimise planning delays, reduce associated funding risks for commercial promoters and accelerate delivery of runway capacity improvement projects. Airlines and alliances make decisions over long forward time horizons about their flight networks serving hub airport. Uncertainty and delay over planning decision making is likely to result in airlines choosing to favour more flights to serve hub airports in continental Europe rather than London.

Q5: 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?

The LEP has no comments on this issue.

Commercial Constraints

Q6: Are there any actions stakeholders could take to support airports in mitigating their commercial constraints?

Q7: Are there any examples of best practice in this area?

The LEP has no comments on these issues.

Airspace constraints

Q8: Are there any medium term airspace developments that could support making best use of capacity, beyond those set out in the Interim Report?

The LEP would like to see a comprehensive airspace management strategy put in place that can maximise the effective utilisation of airspace in the London and South East area that can balance the needs of the various different airports.

Q9: Are there any innovative long term airspace developments which could provide support beyond those set out in the Interim Report?

The LEP has no comments on this issue

Regulatory, Tax or Legal Constraints

Q10: 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?

Q11: Are there any areas of legal, tax or regulatory constraint, not considered by the Commission in its Interim Report, which merit further review?

The LEP has no comments on these issues.

Impact of Commission final report

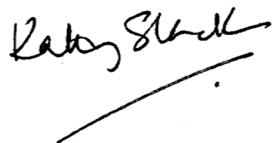
Q12: Are there any topics or areas of further study beyond those set out in the Appraisal framework, that would allow the Commission to understand the impact of development at Heathrow or Gatwick on the other London Airports?

In September 2013, the Enterprise M3 LEP in partnership with four other LEPs jointly submitted a report prepared by consultants Regeneris on the Economic Importance of Heathrow Airport. The LEP would like to take the opportunity to re-iterate the conclusions and findings of this report. The report is available here:

<http://www.westlondon.com/wp-content/uploads/2013/09/130924-Regeneris-Final-Report-24th-Sep.pdf>

Thank you for this opportunity for the LEP to comment on the issues set out in Discussion Paper 6.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Kathy Slack', with a long horizontal line extending from the end of the signature.

Kathy Slack
Director Enterprise M3