

25 July 2014

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

Dear Sir or Madam

Re: Discussion Paper 6 – Utilisation of the UK's Existing Airport Capacity

I am writing to contribute the thoughts of London Chamber of Commerce and Industry on some of the questions of relevance to the under-utilised airports within the London airports system. As we are not a national body, we are not best place to comment on the use of airports outside the capital, so have not done so.

Introduction

London Chamber of Commerce and Industry (LCCI) is the capital's largest and most representative business organisation with 2,500 member companies from across Greater London. LCCI membership ranges from small- and medium-sized enterprises through to multi-national corporates. LCCI member companies operate within a mix of sectors, across the Greater London area, genuinely reflecting the broad spectrum of London business.

As the voice of London business we seek to promote and enhance the interests of the capital's business community through representations to the Mayor and the GLA, central Government, Parliament and the media as well as relevant international audiences. Through member surveys and commissioning research, LCCI seeks to inform and shape the debate on key business issues.

Transport connectivity continually ranks within the top two main issues for our membership in regular LCCI surveys. LCCI believes adequately resourced, resilient transport infrastructure is a central requirement to guarantee sustainable economic growth in London. The Government must ensure they have an aviation policy in place that creates the conditions for the London and UK to thrive; having the right connectivity, capacity and cost structures.

Existing Capacity

In our view, existing London airport infrastructure is not being used as fully and as efficiently as it could be to gain additional, essential capacity in the short term. Swift action to improve the utilisation of existing capacity is required, especially as long-term deliberations continue.

Surface Access

Airlines cite quality surface access as one of the top four reasons why they choose to locate at a given airport. In order to attract new airlines to London's airports with the potential to open new routes to unserved markets, and LCCI. LCCI has supported calls for upgrades to surface access links to London's airports.

Stansted Express – A Faster, More Reliable Service

Excluding Heathrow and Gatwick, London Stansted ("Stansted") would benefit significantly with an upgrade of the rail link serving the airport from Liverpool Street. The journey time of the Stansted Express is both longer than comparable services to competitor airports like Heathrow and Gatwick, and more variable. The service's off-peak journey time is 47 minutes (to Liverpool Street) and the peak journey time is 51 minutes, with some peak services timetable to take as long as 56 minutes. Moreover, one in ten Stansted Express services is delayed by at least five minutes.

The objective must be to reduce journey times to and from Stansted from up to an hour to around 30 minutes and improve punctuality. An improvement of the airport's rail services would make Stansted more accessible to the competitive London market, engender economic growth along the London-Stansted-Cambridge growth corridor and make better use of latent runway capacity at the airport.

The only long-term solution to deliver world class rail services to Stansted is four tracking the line between Copper Mill Junction and Broxbourne. We welcome the Airports Commission's acknowledgement that "the case for investing [in this project] merits urgent consideration".¹

LCCI welcome's the Government's commitment to carry out a study on improving rail links to Stansted; however, we have concerns that the urgency advocated by the Airports Commission in its interim report could be lost. In our view, the Commission should urge the Government to fund as soon as possible preparatory/enabling works (a £10m package to close level crossings and improve journey times has already been identified by Network Rail) which would enable the full-four tracking scheme to be delivered quickly in Network Rail's Control Period 6 (2019 – 2024).

City – Linking to Crossrail

Similarly, surface access could be improved to London City ("City"), especially with a new Crossrail station. This station would provide greater access to and from the airport for passengers. It was unfortunate that a City Crossrail station was not part of the original Crossrail project, but we believe there is a case for Transport for London (TfL) and Crossrail Ltd to consider a City station.

The connection of City to Crossrail, combined with other infrastructure developments to the airport (described below), would allow City to fill its permitted capacity, benefiting London businesses and the capital's economy and making best use of the existing capacity in the short term.

In addition, a City Airport Crossrail station would enable a better use of the London airports system as a whole by providing connections between City and Gatwick and Luton Airports via the Farringdon interchange, and with Heathrow directly.

Maximising Existing Runway Use

Stansted and City both have spare runway capacity that could be more efficiently used to grow the number of routes serving the London market with application of some measures that would not require expansion of existing runways.

Stansted – Removing the Arbitrary Planning Cap

Stansted can maximise its potential within the current land boundaries and its existing infrastructure asset. Unfortunately, Stansted is subject to an arbitrary planning cap applied by their planning authority that is holding back traffic growth. The airport could grow on its single runway beyond its planning cap (35 million passengers per annum (mppa)) making more efficient use of existing infrastructure. Indeed, Stansted predict that their single runway could accommodate up to 45 mppa on their single runway.²

The removal of that planning cap in the short term would enable the airport to grow routes that would meet London business demand, and help make London and the broader south east more attractive as a place to

¹ Airports Commission Surface Access Letter to the Chancellor (Nov 2013)
(https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/263208/surface-access-letter.pdf)

² MAG (2013) Capacity for Growth

[http://www.magworld.co.uk/magweb.nsf/AttachmentsByTitle/LongTermCapacity/\\$file/Long+Term+Capacity+Options.pdf](http://www.magworld.co.uk/magweb.nsf/AttachmentsByTitle/LongTermCapacity/$file/Long+Term+Capacity+Options.pdf)

do business. Equally, the airport could develop short haul routes with new schedules to meet business passenger needs wanting to reach continental Europe.

The Airports Commission should strongly recommend removing the planning cap at Stansted to allow the airport to further contribute to the economic growth of London and the south east.

City – Enhancing Airport Infrastructure

City have plans for new infrastructure that would allow the airport to accommodate its permitted 120,000 flight movements each year by the London Borough of Newham, and without an extension to its existing one runway or any plans for a new runway.³

The plans include new parking stands (to host larger aircraft), a parallel taxi lane to optimise runway capacity during peak times and an extension of City's terminal building to improve the passenger experience.

Through these infrastructure improvements submitted to the London Borough of Newham, City could grow its number of flights from 70,000 annual movements currently, which would provide greater domestic connections and European routes. City would also be able to help relieve pressure on other capacity-constrained airports by taking some of their shorter-haul traffic and liberating valuable slots for essential long-haul routes to unserved markets.

In our view, the Airports Commission should recommend the urgent approval of these plans so as not to delay, or even stop, the implementation of this vital development programme.

Yours faithfully



Colin Stanbridge
Chief Executive

³ City Airport Development Programme <http://www.londoncityairport.com/aboutandcorporate/page/cadp>