



**Airports Commission Discussion Paper No 6: *Utilisation of the UK's Existing Airport Capacity***

**Consultation submission**

**from**

**Belfast City Airport Watch**



**July 2014**

We would like to address the issues raised in paras 2.26 (What is the right strategy), 3.18 (Should there be state aid for smaller airports), and Chapter 6 (the planning process).

## 1. What is the right strategy?

We believe that the Commission must examine the issue of the use of existing airport capacity within the context of the current and potential noise pollution created by each airport. The current situation in Northern Ireland provides a prime case study of what can happen when an airport with a considerable noise impact is permitted to grow in an ad hoc manner and with negative consequences for the efficient utilisation of existing airport capacity.

We understand that the paper is aimed primarily at addressing the airport capacity issue in the South East of England. Equally most of the analysis relates to regional airports in England, Scotland and Wales where there are large regional markets/ catchment areas and overspill into neighbouring areas which means that the catchment area of many airports is less well defined.

In common with other parts of the UK, Northern Ireland has suffered from the adverse impact of the situation which the European Commission has stated should be avoided i.e. “a proliferation of regional airports” leading to “the duplication of unused or not efficiently used airport infrastructure.” (cited at 2.24 in the Commission’s discussion paper). As the Commission will be aware, there are now **three regional airports in Northern Ireland, serving a population of only 1.8m**. As an example, this compares to the **7.5m population size of the area which Bristol Airport considers to lie within its catchment area** – i.e. all those who live within a 2-hour drive of the terminal.<sup>1</sup> **This area**, which includes the Bristol and Cardiff areas, Devon, Cornwall, Somerset, Wiltshire and Gloucestershire, **is served** – to our knowledge – **by five airports**.

However, Northern Ireland differs from most of the rest of the UK in that the catchments of its airports cannot extend much beyond the population which lives in the territory. Although the catchments of Belfast International Airport (BIA) and City of Derry airports can include people living in the border areas of the Republic of Ireland, those areas are sparsely populated and are unlikely, therefore, to greatly extend the overall catchment populations.

Northern Ireland has two main airports – BIA and George Best Belfast City Airport (GBBCA). These lie just 20 miles and 30 minutes’ drive from each other. Neither has been able to sustain a throughput of 5 million passengers

One of these airports, GBBCA, recently made a loss on a fully accounted basis<sup>2</sup>, and the other, BIA, is almost totally dependent on easyJet. BIA is also struggling to sustain its sole long haul route, even though it is the only Northern Ireland airport with the capacity and infrastructure to accommodate long haul routes. Table 2.2 in the Commission’s discussion paper shows that the total passenger throughput of these two airports combined in 2013 was 6.5m – down from 7.4m in 2007. However, while BIA has lost 1.2m passengers over that period, GBBCA has gained 0.3m. Since 2008, GBBCA has taken passengers from BIA, leaving BIA with very substantial unused capacity.

The winner in this situation is Dublin Airport, in the Republic of Ireland. It achieved passenger throughput of more than 20m in 2013. Moreover, it has seen strong growth in passengers from Northern Ireland; in 2013, 570,000 of its passengers came from Northern Ireland which was an 11% increase on the previous year.<sup>3</sup> It is clear that Dublin Airport is benefitting significantly from the fact that the market for services in greater Belfast and in much of Northern Ireland is split between BIA and GBBCA, meaning that both are in a vulnerable position with regard to their current and future viability.

The correct strategy for the situation in Northern Ireland, where there is a small, isolated population, has to be to minimise the conditions which currently impede one airport from attaining a sufficiently large passenger throughput to compete effectively with Dublin Airport, and to provide a wider selection of routes, including long haul routes, which are likely to boost the economy in Northern Ireland and enhance tourism. Moreover, such a strategy would help to relieve pressure on London airports by making a wider range of direct international services available from Northern Ireland; while many Northern Ireland passengers choose to fly from Dublin, many others still opt for one of the London airports when flying internationally.

The next question is which of Northern Ireland's two largest airports – BIA or GBBCA – should be given strategic priority in this regard? We believe that BIA must be given priority. Our prime concern is the significant scale of noise pollution from aircraft operating at GBBCA; in 2013, **more than 8,000 people (8,247) people were impacted by noise at 57 dB LAeq 16 h and above from planes operating at GBBCA**, according to the airport's own consultants' report.<sup>4</sup> As the Commission well knows, this is the level at which the UK government believes that serious community annoyance is likely to occur. **By contrast, the latest figures available for Stansted Airport show just 1,250 people impacted at the same level, while 3,650 are affected at that level around Gatwick Airport.**<sup>5</sup>

Moreover, the latest available figures for BIA show that **just 269 people are impacted at the lower threshold of 55 dB LAeq 16h or above around BIA.**<sup>6</sup> This is hardly surprising as BIA is situated on a greenfield site, well away from any built-up areas. Its location stands in complete contrast to that of GBBCA which is one of only three airports in the whole of Europe classified as a 'city' airport due to its location in a large, densely-populated urban area.

For this reason, we are completely opposed to any further expansion of GBBCA's operations. GBBCA has submitted proposals for amending its current Planning Agreement which, by its own calculations, could mean as many as 26,000 people being impacted at the 57 dB LAeq 16 h level or above. Moreover, the comparatively large size of its current and recent noise impact is due to the fact that the noise control measures (regarding a noise control contour and late flights) in its current Planning Agreement are not being fully implemented.

Therefore, if the proper environmental controls were being implemented, the Northern Ireland economy would already be benefitting from a greater concentration of air travel at one airport which has the potential to offer a much wider range of routes, including long haul routes i.e. BIA – an airport which has a tiny noise impact, compared to GBBCA, and which also has significant spare capacity.

On a UK-wide basis, we believe that the Commission must examine the issue of the use of existing airport capacity within the context of the current and potential noise pollution created by each airport. Where two regional airports are relatively close to each other and are duplicating services to a point where neither is able to take full advantage of efficiencies of scale, strategic priority should be given to the airport with the lower noise impact – and future potential noise impact - in population terms.

## **2. Should there be state aid for smaller airports?**

While there may be a limited case for state aid where a small airport serves an otherwise geographically isolated area, we believe there should be no state aid for airports which have a significant noise impact in population terms, and that there should be no state aid for small airports which merely impede the ability of one or more competitor airports to achieve sufficient passenger throughput to offer a wide range of business and inbound tourism routes.

## **3. The planning process**

The planning process in Northern Ireland is currently undergoing change. At present, the Department of the Environment in Northern Ireland is responsible for the planning process. We are completely opposed to the implementation of any measures which might 'improve' the planning process from the point of view of airports and developers, but which would do so to the detriment of the robustness of the process itself.

This is especially important with regard to airports because most airports in the UK, including all three of the airports in Northern Ireland, are governed by a very laissez-faire regime of noise regulation which relies heavily on self-monitoring. Moreover, most airports are permitted to draw up their own noise action plans in order to comply with European legislation on noise. There is an inherent conflict of interest in permitting a commercial entity to self-regulate in this way. This entirely unsatisfactory situation would not be permitted with regard to a factory which emitted air or water pollution, and does not pertain with regard to other forms of noise pollution. As the Commission will be well aware, aircraft noise is excepted from the types of noise pollution upon which local councils have powers to act.

All of this reduces the amount of robust protection afforded to local communities affected by aircraft noise. For this reason, it is extremely important that the process regarding the consideration of any planning application by an airport is as rigorous as possible and cannot be compromised by the wish of the applicant for a speedy process.

We would further point out that it is not always planners, or residents' or environmental interests which hold up planning processes. The failure of GBBCA to submit requested environmental information in good time was responsible for delays in the consideration process regarding both its runway extension application and its current application to amend its planning agreement.

## **4. About Belfast City Airport Watch**

Belfast City Airport Watch is an umbrella group of 20 organisations, including 18 residents' associations and community groups, opposed to further expansion at George Best Belfast City Airport.<sup>7</sup> It also has a further 787 individual associate members.

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<sup>1</sup> Bristol Airport (2012) *Giving wings to airports across the UK*, p. 3.

<sup>2</sup> See *Belfast Telegraph*, 29.10.13: <http://www.belfasttelegraph.co.uk/business/company-profiles/george-best-city-airport-tighter-margins-and-profit-loss-29706919.html>

<sup>3</sup> See Dublin Airport press release: [https://www.dublinairport.com/gns/at-the-airport/latest-news/14-04-16/Dublin\\_Airport\\_Grows\\_Northern\\_Ireland\\_Business\\_By\\_11.aspx](https://www.dublinairport.com/gns/at-the-airport/latest-news/14-04-16/Dublin_Airport_Grows_Northern_Ireland_Business_By_11.aspx)

<sup>4</sup> Bickerdike Allen Partners *GBBCA Airborne Aircraft Noise Contours 2013*, Table 5.

<sup>5</sup> CAA *ERCD Report 1303 Noise Exposure Contours for Stansted Airport 2012*, Fig. 13, and CAA *ERCD Report 1302 Noise Exposure Contours for Gatwick Airport 2012*, Fig. 1.3

<sup>6</sup> BIA *BIA END Noise Action Plan 2013 – 18*, Table 3.3.

<sup>7</sup> The list of BCAW's organisational affiliate members is as follows:

1. Carew II Family and Training Centre
2. Connswater Community Centre/Connswater Community Group
3. Cultra Residents' Association
4. Dee Street Community Centre/The Klub
5. Dee Street Computer Group
6. Dee Street Mums and Tots Group
7. East Belfast Healthy Living Project
8. East Belfast Toddler Group
9. GMB Trade Union Branch 252
10. Hampton Park Residents' Association
11. Holywood Airport Action Group
12. Lagan Valley Group Residents' Association
13. Marlborough Park Residents' Association
14. Newtownards Road Women's Group Ltd.
15. Old Stranmillis Residents' Association
16. Park Road and District Residents' Association
17. Short Strand Community Forum
18. Titanic Schools Project
19. Ulidia Residents' Group
20. Wise Men of the East Network (network of nine affiliated east Belfast mens' groups)