

SUBMISSION TO COMPETITION COMMISSION

1. I write as a former Director of Bristol Airport.
2. Whilst I am aware that your terms of reference focus on Heathrow and Gatwick and BAA – the point of concern I want to raise has I suggest wider application, and I hope you will feel able to address the matter.
3. Essentially it relates to the general failure of Airports to provide equitable access to ALL public transport and parking groups. Typically the airports seek bids for the provision of these services so as to maximise their income. This bidding process is I suggest to the disadvantage of the travelling public – and mitigates against the provision of a competitive and effective service. Effectively the airports seek to offer preferential and exclusive treatment to the successful franchisees (through favourable drop off points; pick up points for bid winner only; exclusion of location for other public transport operators (whether taxis, buses, etc); etc.
4. In a similar vein parking provision is not being delivered through an effective and competitive approach – but is again delivered by the highest bidder (and therefore typically the most expensive provider) – again by using exclusive and non-competitive approaches.
5. At Bristol Airport the basic profit was derived primarily from three sources:
 - i) sale of fuel to aircraft
 - ii) car parking
 - iii) franchises (mainly retail, but also taxis & buses) in terminal building.I cannot speak on the first source – but do consider that the other two sources are (as currently arranged) focussed on maximising the Airport Authority income explicitly by excluding competition – and in a manner that specifically hinders the delivery of efficient good value services.
6. It is my submission that the Airport Access Report requirement (a requirement I understand of Dept of Transport) is not being implemented effectively in the public interest so as to ensure there is a competitive and effective market. All Airports with more than, say 1 million passengers per annum, should be required to agree a Transport Access Plan (on a 3 or 5 year rolling basis, and with local consultation) with their relevant local Council (as part of Transport Planning) setting how they will deliver sustainable public transport access and parking in a competitive and effective manner. This should specifically seek to ensure the competitive provision of services in the broader public interest.

26th April 2007

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