

# **The Future Development of Air Transport in the United Kingdom: A National Consultation**

**A Report on Responses to the Government's  
Consultation: Northern Ireland**



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A Report on Responses to the Government's Consultation: Northern Ireland

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## Table of Contents

<b>Background</b> .....	<b>5</b>
<b>The UK-wide report</b> .....	<b>7</b>
<b>1 Should Additional Airport Capacity be Provided?</b> .....	<b>12</b>
Introduction .....	12
Synopsis of Relevant Part of the Northern Ireland Consultation Document .....	12
Summary of Findings .....	13
Respondents' Views.....	14
<b>2 Where to Provide Any New Airport Capacity</b> .....	<b>21</b>
Introduction .....	21
Synopsis of Relevant Part of the Northern Ireland Consultation Document .....	21
Summary of Findings .....	21
Respondents' Views.....	22
<b>3 Finance and Regulation</b> .....	<b>24</b>
Introduction .....	24
Synopsis of Relevant Part of the Northern Ireland Consultation Document .....	24
Summary of Findings .....	24
Respondents' Views.....	25
<b>4 The Economic Benefits of Air Travel</b> .....	<b>26</b>
Introduction .....	26
Synopsis of Relevant Part of the Northern Ireland Consultation Document .....	26
Summary of Findings .....	26
Respondents' Views.....	27
<b>5 Social Inclusion</b> .....	<b>31</b>
Introduction .....	31
Synopsis of Relevant Part of the Northern Ireland Consultation Document .....	31
Summary of Findings .....	31
Respondents' Views.....	32
<b>6 Environmental Impacts</b> .....	<b>33</b>
Introduction .....	33
Synopsis of Relevant Part of the Northern Ireland Consultation Document .....	33
Summary of Findings .....	33
Respondents' Views.....	34
<b>7 Surface Access</b> .....	<b>37</b>
Introduction .....	37
Synopsis of Relevant Part of the Northern Ireland Consultation Document .....	37
Summary of Findings .....	37
Respondents' Views.....	38
<b>8 Regional Access</b> .....	<b>40</b>
Introduction .....	40
Synopsis of Relevant Part of the Northern Ireland Consultation Document .....	40
Summary of Findings .....	40
Respondents' Views.....	41
<b>9 Draft Strategy</b> .....	<b>44</b>
Introduction .....	44
Synopsis of Relevant Part of the Northern Ireland Consultation Document .....	44
Summary of Findings .....	44
Respondents' Views.....	45
<b>Annex A - Questions for Consultees</b> .....	<b>46</b>
<b>Annex B – Glossary of Abbreviations</b> .....	<b>49</b>

### List of Tables

Table 1 – Which National Policy Scenarios Should Form the Basis of the UK Government's National Airports Strategy to 2030?.....	14
Table 2 – Reasons for National Policy Scenario Choice .....	15
Table 3 – How Much New Capacity Should be Provided in the South East?.....	17
Table 4 – Where in the South East Should New Capacity be Provided? .....	18
Table 5 – Essential Policy Mechanisms for Desired Scenario .....	19
Table 6 – Preferred Location of New Airport Capacity in Northern Ireland .....	22
Table 7 – Is Competition Preferable to Complementary Development? .....	25
Table 8 – How Important is Aviation to the Northern Ireland Economy? .....	27
Table 9 – How and Where can the Benefits be Captured? .....	27
Table 10 – Can Aviation Help Address Deprivation and Social Inclusion? .....	32
Table 11 – Overall Views on Acceptability of Impacts.....	34
Table 12 - Are there any Environmental Impacts that you Regard as Unacceptable, and to What Extent Can These be Mitigated? .....	35
Table 13 – Key Surface Access Schemes .....	38
Table 14 – How to Increase Public Transport Share.....	39
Table 15 – Would it be Desirable to have a Greater Number of Flights from Northern Ireland Airports to London? .....	41
Table 16 – Which Northern Ireland Airport?.....	41
Table 17 – Which London Airport?.....	42

## Background

### A New Deal for Transport

- A1 The Integrated Transport White Paper, *[A New Deal for Transport: Better for Everyone](#)*, published in July 1998, announced the Government's intention to produce a new UK airports policy that would look 30 years ahead. Since that date, the Government has undertaken a number of wide-ranging consultations, discussions with stakeholders, surveys and independent studies to help inform its policy decisions. This report is one component of that process of consultation and investigation. Other principal inputs are set out below.

### The Future of Aviation

- A2 Between December 2000 and April 2001 the Government consulted upon the main issues to be addressed by the White Paper. Around 550 responses were made to that consultation exercise, *[The Future of Aviation](#)*, and a summary of responses was published on the Department for Transport's web site [www.dft.gov.uk](http://www.dft.gov.uk) in November 2001.

### Regional Air Services Studies

- A3 A programme of studies was carried out to look at Regional Air Services between 1998 and 2002. This was carried out in three parts. Part 1 comprised six Regional Air Service (RAS) studies covering:
- Midlands;
  - Northern Ireland;
  - North of England;
  - Scotland;
  - South West; and
  - Wales.
- A4 These studies gathered up-to-date information on aviation, assessed future needs and highlighted the major issues that needed to be addressed.
- A5 Part 2 involved the co-ordination of the RAS studies and audited them for consistency and also looked at a range of cross regional issues. This work was known as RASCO (Regional Air Services Co-ordination) and identified where there might be constraints, what they might be and what would be necessary to address them for example, runway extensions, new terminals, new runways.
- A6 RASCO identified that additional runways might be required in the Scottish Central Belt and in the Midlands. Additional work (Part 3 Runway Studies) was carried out for Glasgow and Edinburgh, and Birmingham and East Midlands.

### South East and East of England Regional Air Services Study (SERAS)

- A7 The SERAS study, which began in 2001, examined a wide range of options for the South East, ranging from no development other than that already permitted or under consideration in the planning system, to additional runway and terminal capacity to meet demand in full.
- A8 The Department for Transport considered some of the more technical or detailed issues in separate studies. A list of supporting documents can be found in the annexes to the consultation documents.

<b>A REPORT ON RESPONSES TO THE GOVERNMENT'S CONSULTATION</b>	<b>Report 4 Northern Ireland</b>
<b>Background</b>	

## The Future Development of Air Transport in the United Kingdom

A9 The results of the regional air services studies informed the seven consultation documents published collectively as [The Future Development of Air Transport in the United Kingdom](#) in July-August 2002

### NOP Questionnaires

A10 Alongside the seven consultation documents, the Government commissioned NOP to publish seven questionnaires which asked for views on issues covered in the consultation documents. Over 66,000 completed questionnaires were received and analysed by NOP and the results can be seen on DfT's web site [www.dft.gov.uk](http://www.dft.gov.uk).

### Consultation Events

A11 Consultation events and exhibitions were held across the UK to enable a wide range of stakeholders and members of the general public to meet with Government Officials and their consultants, to discuss the issues raised and seek additional information.

### Subsequent Developments

A12 Since the publication of the consultation documents in July 2002, there have been a number of developments which respondents believe affect particular development options, the UK air transport industry or the global economic or environmental context. These developments are additional considerations for the Government in determining its policy for air transport in the UK and, to the extent that they are reflected in the responses to the consultation documents, they have been addressed in AviaSolutions' analysis. They include (the list is not exhaustive) -

- the war in Iraq and, in combination with the events of 11 September 2001, its effect on the global demand for air travel;
- the publication by Birmingham International Airport Limited of an alternative runway option for Birmingham airport;
- the publication by London Luton Airport Operations Limited of alternative runway options for Luton airport;
- the publication by BAA plc of alternative runway options for Heathrow and Gatwick airports and British Airways' alternative runway option for Heathrow airport;
- the results of the study into the feasibility of rail links to Glasgow and Edinburgh airports;
- the decision by Office of the Deputy Prime Minister to approve the development of Finningley airport near Doncaster;
- the outcome of the Department for Transport's multi-modal studies; and
- the results of the study undertaken on the future of air transport in the far South West of England.

A13 In addition, the Government announced in its 2002 Pre-Budget Report that it would discuss with stakeholders the most effective economic instruments for ensuring that the aviation industry is encouraged to take account of and, where appropriate, reduce its contribution to global warming and local air and noise pollution.

A14 Its report, [Aviation and the Environment: Using Economic Instruments](#), published in March 2003, provided a platform for discussions with stakeholders. It set out estimates of aviation's external costs and outlined the Government's approach to using economic instruments. It also asked questions about the effectiveness and desirability of economic instruments for this sector.

A15 In addition to the views that were expressed during the stakeholder discussions, a number of stakeholders provided the Department for Transport and HM Treasury with a written response to the issues and questions raised in the report. Those submissions are not included in this report, but where respondents to the consultation documents did raise points relating to the use of economic instruments, they have been noted in this analysis.

## The UK-wide report

### The Consultation Exercise

- B1 In July 2002, the Government published seven consultation documents on [The Future Development of Air Transport in the United Kingdom](#). The Scottish and Welsh documents were published jointly with the Scottish Executive and the Welsh Assembly Government respectively.



**Figure 1 – Regional Consultation Document Areas**

- B2 The Government published revised versions of the South East main and summary consultation documents at the end of February 2003, following the decision of the High Court in November 2002 that options for runway development at Gatwick should be included. The Government also issued revised NOP questionnaires to take into account the Gatwick option. Respondents were invited to replace or supplement their original responses if they wished to do so, and the consultation period was extended to 30 June 2003 to allow time for this.
- B3 The Department for Transport (DfT) received over 400,000 responses to the consultation exercise. Some were detailed submissions; a large number of people across the UK completed NOP's questionnaire; and there were many thousands of individual letters. Some respondents addressed a large number of the issues raised by the consultation documents, while others concentrated their responses on a particular area of the UK, a specific issue, or a single option for development.

### The Process of Analysis

- B4 A team of consultants was appointed to analyse responses from those organisations and individuals that submitted detailed and often technical submissions to the consultation documents.
- B5 It was expected that there would be a large number of responses to the consultation and that these would cover a range of complex issues. A database was therefore created to assist with the logging and analysis of responses.

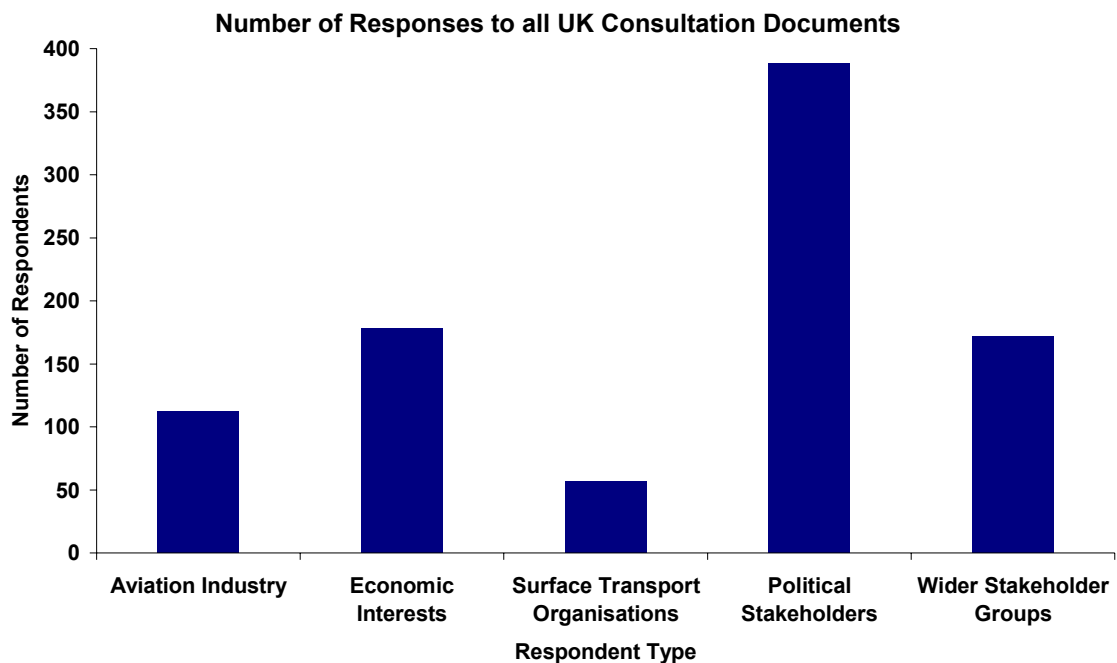
### Analysis

- B6 The key objectives of the analysis undertaken were to -
- capture respondents' submissions accurately and consistently;
  - provide the DfT with a clear understanding of the issues, concerns and wishes of stakeholders;
  - demonstrate a clear audit trail; and
  - make the process transparent.

- B7 Each response was allocated to a 'home region' for the purpose of entry onto the database. In most cases the postal address of the respondent determined the home region. However, those respondents with interests across the UK, for example British Airways, and those respondents from outside the UK, for example Delta Airlines, were designated as 'national' and 'international' respectively.
- B8 It should be noted that the home region of a respondent did not restrict their ability to comment on development proposals for other regions. Respondents were able to respond to as few or as many of the proposals in the consultation documents as they wished. For example a respondent from Northern Ireland was able to respond to proposals in the South East and / or the Midlands.

### The Grouping of Respondents

- B9 The views of respondents have been grouped, and presented throughout the report, in 5 categories:
- **Wider Stakeholders** – which includes both national and local environmental groups, consultative committees, airport development opposition groups;
  - **Surface Transport Organisations** – which includes bus, coach and rail operators and other organisations representing surface transport interests;
  - **Political Stakeholders** – which includes county, borough and district councils, members of parliament (national, devolved and European), devolved administrations, and regional assemblies;
  - **Economic Interests** – which includes regional development agencies, enterprise agencies, chambers of commerce, business interests and trades unions;
  - **Aviation Industry** – which includes airlines, airports, aircraft manufacturers, aircraft maintenance providers and direct suppliers to the aviation such as ground handling and aircraft catering.
- B10 A total of 907 responses were analysed, which were distributed between the 5 respondent categories as follows –



- B11 Numerically Political Stakeholders dominate and Surface Transport Organisations have the smallest representation, although there are regional variations.

### The Quantitative Nature of the Analysis

- B12 When reading the results of responses to individual questions, it should be borne in mind that at times the respondent sample size for a question may be small, and the conclusions that may be drawn from the analysis, may be limited in consequence.
- B13 The analysis is predominantly represented in tabular or graphic form together with explanatory text. Where appropriate, the text draws on individual responses to illustrate a commonly held view, to articulate dissenting views, or to highlight an important perspective or insight.

### The Organisation of the Report

- B14 This report can be read in its totality to provide a UK wide perspective for all parts of the UK. Alternatively there are individual documents available for each part of the UK and also for National and Cross Regional Issues (as set out in the table below) for those whose interest is limited to a particular region of England, or to Scotland, Wales or Northern Ireland.
- B15 The report is structured as follows:

Report	Title
1	National and Cross Regional Issues
2	Midlands
3	North of England
4	Northern Ireland
5	Scotland
6	South East
7	South West
8	Wales

- B16 Report 1 brings together a range of issues that respondents have raised and which are of relevance to either the whole of the UK or to more than one geographical area of the UK.

## The Northern Ireland Report

### Synopsis

- B17 In the Northern Ireland consultation document the UK Government set out the context for their consultation on the future of aviation. The UK Government aims to define a long-term sustainable aviation policy up to 2030 which will maximise the benefits of airports and air services to Northern Ireland whilst minimising the negative impact and allow those concerned to plan with greater certainty.
- B18 For Northern Ireland:
- air services are the only realistic means of reaching many international destinations and are also the only means of travelling to other parts of the UK quickly and conveniently. Business and leisure passengers in Northern Ireland therefore make substantial use of air travel for domestic as well as international leisure journeys;
  - air services have a vital role in reducing travel times, increasing accessibility and therefore improving economic efficiency and productivity;
  - air services serve an important role in attracting inward investment, particularly from overseas, help to stimulate and sustain the growth of local businesses by opening up new markets and supply chains;
  - aviation makes a significant contribution to the economy and to social welfare, directly supporting 3,500 jobs with a further 6,400 indirectly or in other parts of Northern Ireland's economy;
  - airports are also frequently the focus of clusters of businesses serving the aviation industry directly or requiring easy and frequent access to air services, with many businesses dependent on air travel and good access to principal export markets in the USA, Western Europe and Asia Pacific;and
  - aviation accounts for 1.3% of the Northern Ireland's GDP.

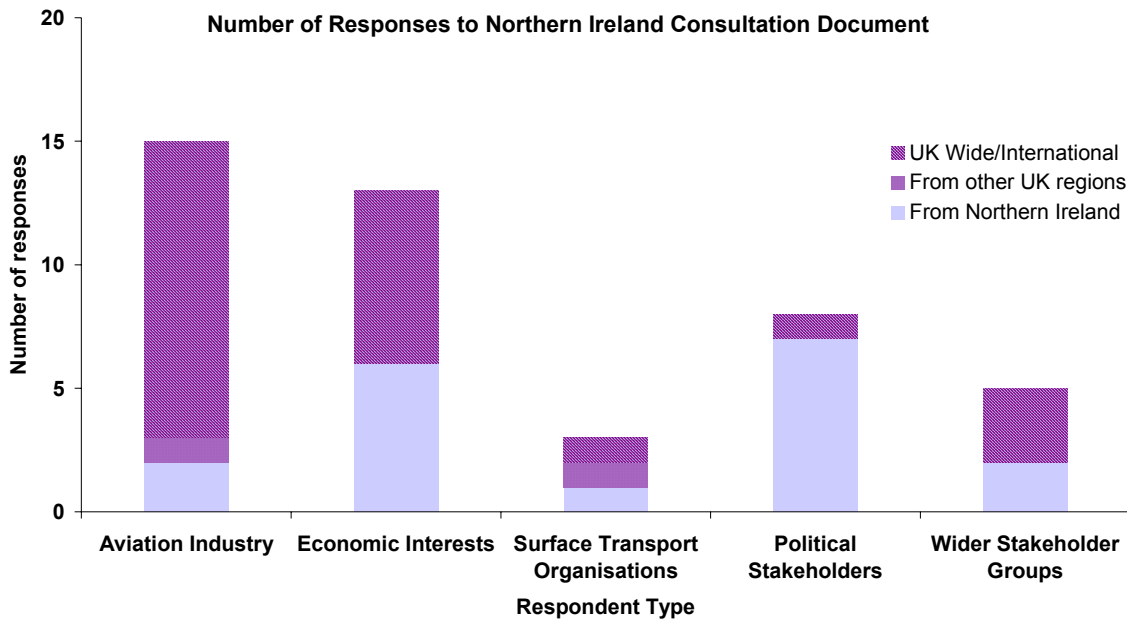
- B19 A sustainable long-term strategy for Northern Ireland means finding the right balance between benefits and impacts, and determining how impacts on people living close to airports, the built and natural environment and surface access infrastructure and services might be mitigated and managed.
- B20 The questions contained in the Northern Ireland consultation document (which are set out in Annex A of this report) aim to gather respondents’ views on the issues that are key to the development of that long-term sustainable aviation policy.

**Organisation of this Report**

- B21 To assist way-finding through this report, at the head of each section is a graphic, like the one below, which indicates the issue under consideration and the order in which issues are being looked at.

<b>Should Additional Airport Capacity be Provided?</b>
Where to Provide Any New Airport Capacity
Finance and Regulation
The Economic Benefits of Air Travel
Social Inclusion
Environmental Impacts
Surface Access
Regional Access
Draft Strategy

- B22 Each section of this report begins with a brief introduction setting out the principal issues to be explored in that section, and a synopsis of the relevant part of the Northern Ireland Consultation Document to provide context for the analysis. The introduction concludes with a summary of respondents’ views.
- B23 Following the section introduction is the detailed analysis of respondents’ views.
- B24 AviaSolutions received 44 responses to the Northern Ireland consultation document which were distributed across the 5 respondent categories as follows –



B25 Numerically, Aviation Industry stakeholders dominate and Surface Transport Organisations have the smallest representation. However, of those based in Northern Ireland, the largest number of responses came from Political Stakeholders. The varying numbers of respondents within each category should be borne in mind when reading the report, as no mechanism has been employed by AviaSolutions to weight responses or otherwise counteract the effects of a purely numerical analysis.

## Should Additional Airport Capacity be Provided?

<b>Should Additional Airport Capacity be Provided?</b>
Where to Provide Any New Airport Capacity
Finance and Regulation
The Economic Benefits of Air Travel
Social Inclusion
Environmental Impacts
Surface Access
Regional Access
Draft Strategy

### Introduction

- 1.1 This section is about the principal issue of whether or not the Government's policy to 2030 should support additional capacity at the UK's airports. It looks at the degree of support to be found for policy scenarios, which range from constraint to growth; the social, environmental or economic reasons why respondents favour one scenario over another; and the policy mechanisms that would help to deliver those scenarios. It explores the relationship between providing airport capacity in Northern Ireland and in the South East of England.
- 1.2 The section draws on respondents' commentary on the matters contained in Questions A1 to A5 of the Northern Ireland consultation document.

### Synopsis of Relevant Part of the Northern Ireland Consultation Document

- 1.3 The UK Government utilised three illustrative national policy scenarios to forecast the potential volume and distribution of passengers under a range of circumstances, ranging from constraint to growth. They were:
  - *UK-Wide Unconstrained (UKU)*, where growth in the South East of England is effectively unconstrained, with provision for at least 300 million passengers per annum (mppa). Air services are encouraged at all airports across the UK, including Northern Ireland, to maximise economic benefits. This is similar to the *RASCO Reference Case (RRC)*, used in other parts of the UK. For the UKU scenario in Northern Ireland, development is permitted at Belfast International and City of Derry to meet demand but the current planning constraints remain in place at Belfast City.
  - *South East Constrained (SEC)*, which would limit capacity at the London airports to the level already permitted (pre the Terminal 5 approval at Heathrow), but would not constrain the growth of airports outside the South East. In Northern Ireland the same provisions apply as in the UKU case.
  - *UK Wide Constrained (UKC)*, in which growth would be severely constrained in all parts of the UK, and reinforced by measures to limit environmental impacts.
- 1.4 This range of scenarios was somewhat different from those that have been considered in other UK regions, and reflected the unique circumstances that exist in Northern Ireland.
- 1.5 The Government suggested some policy levers that might be available to help deliver one or more of the scenarios. These were:
  - use of the land use planning system;
  - encouraging air services at airports outside the South East of England;
  - slots policy at South East of England airports;
  - financial levers;
  - regulatory or voluntary frameworks;
  - competitive or complementary development of airports;

- surface access schemes and charges; and
- availability of airspace.

## Summary of Findings

- 1.6 This section had the highest response rate, with 37 out of the 44 respondents answering at least one question.
- 1.7 UK-Wide Unconstrained (UKU) was the most popular Northern Ireland scenario, supported by a quarter of all respondents. Many of the national respondents selected the RRC scenario which, although not put forward in the Northern Ireland consultation document, had some similarities with the UKU scenario in that it assumed a continuation of past policies. Economic reasons in general and inward investment and inbound tourism in particular were the most popular reasons for the preferred scenario.
- 1.8 For the UK as a whole, 17% of respondents commented that the forecasts were too high and there were also many comments about the use of unconstrained demand forecasts. However, for Northern Ireland, only 2 out of 44 respondents took this view.
- 1.9 Most respondents said that capacity should be provided in the South East in line with demand, with Heathrow, followed by Gatwick, then Stansted as the location for additional capacity. There was a very limited response to the questions on how much and where capacity should be provided in the South East from Political and Wider Stakeholders.
- 1.10 The most popular mechanism was using the planning system to facilitate or constrain airport development in Northern Ireland, followed by slot policy at South East airports. Some respondents referred to 'leakage' to Dublin Airport, and mechanisms to address this issue.

## Respondents' Views

**Question A1: Which, if any, of the National Policy Scenarios do you think should form the basis of the UK Government's national airports strategy to 2030 and why? Considerations might include:**

- enhancing consumer choice and accessibility to air services;
- fostering a strong and competitive airline industry;
- facilitating existing businesses to compete effectively in global markets;
- attracting inward investment and inbound tourism;
- ensuring aviation develops sustainably and minimises environmental impacts of growth;
- minimising distance people have to travel;
- reducing congestion; and
- encouraging the use of public transport.

**Table 1 – Which National Policy Scenarios Should Form the Basis of the UK Government's National Airports Strategy to 2030?**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
UK Wide Constrained (UKC)					1	1
South East Constrained (SEC)				1		1
UK-Wide Unconstrained (UKU)	5	4		2		11
Other (including RRC)	4	3		1	3	11
<b>Total Responses</b>	<b>9</b>	<b>7</b>		<b>4</b>	<b>4</b>	<b>24</b>
No Response	6	6	3	4	1	20
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

- 1.11 Table 1 shows respondents' answers to Question A1 on growth scenarios. There was most support for the UKU scenario which was specific to Northern Ireland. Many of the national respondents selected the RRC scenario which, although not put forward in the Northern Ireland consultation document, had some similarities with the UKU scenario in that it assumed a continuation of past policies. These are recorded as 'Other'.
- 1.12 Belfast International Airport supported the UKU scenario because of the crucial need to connect to international flights, as well as for origin and destination traffic to London. The General Consumers Council also supported UKU as Northern Ireland consumers were exceptionally dependent on adequate air transport. Belfast City Airport noted that, in all three scenarios, the planning cap at the airport was assumed to remain in place which was inequitable and unrealistic as other airports were assumed to grow beyond their current planning limits. Omagh District Council supported the SEC scenario because it would bring more employment and more tourism to Northern Ireland and reduce reliance on London by having more flights to a greater range of destinations. The Wildlife Trust supported the UKC scenario. Examples of supporters of the RRC scenario included ABTA, Thomas Cook Airlines and the CBI.
- 1.13 Having established levels of support for the various scenarios, respondents were asked to explain the reasons for their choices.

**Table 2 – Reasons for National Policy Scenario Choice**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
<b>Economy sub-total</b>	<b>3</b>	<b>6</b>		<b>5</b>	<b>1</b>	<b>15</b>
Good for economy	3	5		5	1	14
Helping UK businesses compete in global markets	3	6		2		11
Attracting inward investment	3	6		4		13
Attracting inbound tourism	3	5		4		12
<b>Aviation Competitiveness sub-total</b>	<b>3</b>	<b>4</b>		<b>4</b>	<b>1</b>	<b>12</b>
Fostering strong and competitive airline industry	2	1		1		4
Enhancing consumer choice	2	4		4		10
Minimise distances people need to travel		2			1	3
<b>Environment etc. sub-total</b>	<b>3</b>	<b>2</b>		<b>2</b>	<b>4</b>	<b>11</b>
Ensuring aviation develops sustainably	3	2		1	4	10
Minimising environmental impacts of growth		1			3	4
Reducing congestion		1			1	2
Rail/Air substitution					3	3
Encourage use of public transport		1		1	2	4
Forecasts too high					2	2
Other		1		1	1	3
<b>Total Answers</b>	<b>19</b>	<b>35</b>		<b>23</b>	<b>18</b>	<b>95</b>
<b>Total Responses</b>	<b>5</b>	<b>6</b>		<b>5</b>	<b>4</b>	<b>20</b>
No Response	10	7	3	3	1	24
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

The sub-totals represent the number of respondents that have given at least one answer in that subgroup

- 1.14 Table 2 shows respondents' views on that part of Question A1 relating to the reasons for the choice of scenario. There were 20 respondents to this multiple choice question which gave 95 answers, and many included reasons that were not suggested in the original question. Answers were grouped into four main issues: Economy, Aviation Competitiveness, Environment and Others. Economic issues were selected most frequently, and the three most selected individual reasons were 'being good for the economy' (14), 'attracting inward investment' (13) and 'attracting inbound tourism' (12).
- 1.15 Derry City Council, although not supporting a particular scenario, selected mainly economic reasons and considered that the development of the regional economy depended crucially on attracting inward investment and on increasing tourism, and progress in these two areas would rely increasingly on the existence of frequent local air services, particularly to London. The Rev. Martin Smyth, MP for South Belfast, supported the UKU scenario because it would allow the market to operate freely, it would enable Northern Ireland to operate as a business hub and it would allow tourism to be exploited.
- 1.16 The GMB Union put its reasons in an 'order of merit' with environmental issues at the top, followed by airline competitiveness. Environmental reasons were chosen by the Northern Ireland RSPB and the Wildlife Trust. Environmental reasons (as well as others) were also behind the choices of some respondents from the Aviation Industry and Economic Interests, for example, Thomas Cook Airlines and the CBI. More views on environmental issues are covered in a later section of this report.

### National Air Traffic Forecasts

- 1.17 Although no questions were specifically asked about the forecasts set out in the consultation documents, respondents did comment on this area both nationally and regionally. This section sets out some of the views that were recorded for Northern Ireland forecasts. Comments on the national forecasts are set out in the National and Cross Regional report.
- 1.18 Respondents views, both regionally and nationally, varied and covered forecasting methodology, comments on whether the forecasts were realistic, too low or too high, and whether the forecasts should be reviewed or not. Where respondents had commented on the forecasts, they had normally done so in the context of how they related to the consultation document for the region they were in.
- 1.19 The Civil Aviation Authority's view, whilst accepting the inevitable uncertainties in looking forward over such a long period, was that the long-term forecasts were reasonably robust and experience suggested that long-term trend growth was resilient to shocks such as those faced by the aviation industry in recent years.
- 1.20 Northern Ireland respondents included a number of comments on the forecasts proposed for their region. Most respondents from Northern Ireland saw the development of air services as being critical to the social and economic welfare of the region. Because of its remoteness and relative inaccessibility from the United Kingdom, Northern Ireland was more dependent on air services, especially to airports in the South East, than any other region.
- 1.21 Belfast International Airport Ltd accepted that the forecasts for Northern Ireland could prove to be realistic but they took no account of the fact that the political environment in Northern Ireland was different to that in any other part of the UK. The forecasts did not recognise that the political environment in the area could change for the better in the period to 2030. Their own forecasts produced higher figures and in an optimistic scenario implied demand of over 22 mppa in 2030 as against the Government's forecast of 12.9 mppa. They accepted that the achievement of their optimistic forecasts may be an unlikely outcome but urged the Government to look beyond their own forecasts when defining aviation policy for Northern Ireland.
- 1.22 The North West Chambers of Commerce Initiative represented a number of Chambers in the region and commented that the forecasts appeared to be unreasonably low, particularly in respect of Derry. The forecasts contained apparent anomalies and implied policy decisions which were inappropriate, for example the effect of the improved promotion of tourism had not been taken into account nor had the development of new routes by 'no frills' airlines. The forecasts needed to be revisited.
- 1.23 Belfast City Airport believed that they had been singled out for unfair treatment in respect of how demand was allocated to individual airports in the region. It was inequitable and unrealistic to leave the planning cap in place at the airport, and restrict demand to that level, whilst allowing growth at other airports, which exceeded the planning permissions currently in force.
- 1.24 The general views were echoed, to one degree or another, by most other respondents in the region – air links in terms of the future economic development of the Northern Ireland were deemed to be critical.
- 1.25 Many respondents across the UK felt that the forecasts were too high and commented on the difficulties of predicting demand so far into the future. Across the UK as a whole, 149 respondents believed that the forecasts were too high, about 17% of the UK total sample of 907 responses. However, only 2 of the 149 responses were from Northern Ireland, a much smaller percentage of the 44 total sample. They were the National Trust - Northern Ireland and the Wildlife Trust, the latter being part of a national response.
- 1.26 Given the Government's commitment to an integrated public transport system, some respondents in the UK felt that not enough attention, if any, had been given in the forecasts to the development of alternative forms of transport especially high-speed rail links. Several respondents clearly felt that the forecasts did not acknowledge the possibilities for the substitution between short-haul air and high-speed rail travel. Whilst high-speed rail travel had no direct impact on Northern Ireland, the slots that might become available at SE airports as a result of any substitution could be utilised by flights to and from Northern Ireland.
- 1.27 Question A2 addresses the issue of capacity in the South East, an important consideration due to the high frequency of operations into the London system from Northern Ireland.

**Should Additional Airport Capacity be Provided?**

**Question A2: If you think additional capacity should be provided in the South East to meet the needs of regional air passengers interlining or accessing services from London airports via surface modes:**

- **how much capacity do you think should be provided; and**
- **where in the South East should it be located?**

1.28 Question A2 has two important components, and the responses are therefore reported in separate tables. The first part, how much capacity should be provided in the South East, shows opinions on the amount of additional capacity that respondents feel may be necessary in the South East; while the second shows where they feel any additional capacity should be provided. Both were answered by less than half of respondents.

**Table 3 – How Much New Capacity Should be Provided in the South East?**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
No additional capacity					1	1
Limited extra capacity						
Significant extra increase, but less than market demand		1				1
Capacity in line with demand	9	6				15
Excess capacity (above commercial demand)						
Other				1		1
<b>Total Responses</b>	<b>9</b>	<b>7</b>		<b>1</b>	<b>1</b>	<b>18</b>
No Response	6	6	3	7	4	26
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

1.29 Table 3 shows the respondents to the first part of Question A2. Most of the respondents were from the Aviation Industry and Economic Interests and favoured capacity increases in line with demand, for example Belfast City Airport and the Northern Ireland Institute of Directors. The only dissenting voice was from the Northern Ireland RSPB which proposed that demand should be reduced by fiscal measures and new capacity only provided after all means of using existing capacity have been achieved. The only Political Stakeholder to respond to this specific question was the Rev. Martin Smyth, MP for South Belfast, who asked that consideration should be given to increasing capacity, but did not specify by how much.

**Table 4 – Where in the South East Should New Capacity be Provided?**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Heathrow	8	6		2		16
Gatwick	6	4		1		11
Stansted	4	5				9
Luton	1	4				5
London City		1				1
Cliffe / New Site only						
Other smaller airport(s)		2				2
Where meets consumer need	1	1				2
Other	1	2				3
<b>Total Answers</b>	<b>21</b>	<b>25</b>		<b>3</b>		<b>49</b>
<b>Total Responses</b>	<b>10</b>	<b>7</b>		<b>2</b>		<b>19</b>
No Response	5	6	3	6	5	25
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

1.30 Table 4 shows respondents' answers to the second part of Question A2. The 19 respondents, again mostly Aviation Industry and Economic Interests, made 49 selections for this multiple choice question. Heathrow was most frequently cited, followed by Gatwick and then Stansted. All 5 that mentioned Luton also selected Heathrow, Gatwick and Stansted, all 9 that mentioned Stansted also selected Heathrow and Gatwick and all 11 that mentioned Gatwick also chose Heathrow.

1.31 Belfast International Airport called for additional capacity at more than one South East location, primarily Heathrow but including Luton. Belfast City Airport supported additional runways at Heathrow and Gatwick. The General Consumers Council supported a short runway at Heathrow. The TUC supported additional capacity at Heathrow, Gatwick, Stansted and Luton.

1.32 This issue is raised again in a later section of this report on Regional Access.

**Question A3: Which of the scenarios will most enhance consumer choice and accessibility to services in:**

- Northern Ireland; and
- the UK as a whole?

1.33 Respondents' views on this question were similar to those for Question A1 above and are therefore not repeated here.

**Question A4: Are there any other policy scenarios, including any combination of those set out in the document, which would better meet your aspirations for the development of regional air services and airports in Northern Ireland?**

1.34 Ten respondents to this question put forward a range of suggestions, some being amended versions of the scenarios put forward in the consultation document, although no single alternative was mentioned more than once.

1.35 Belfast International Airport believed that in Northern Ireland the focus should be on developing more direct air services. The market was small and air service development should be more focused on one airport to enable development of services, although this did not preclude development at other airports that could offer complementary services. British Airways believed there would be merit in combining elements of the FG and RRC scenarios, although these particular scenarios apply to other parts of the UK.

- 1.36 Derry City Council, the owner of City of Derry Airport, suggested that, should the Government find it necessary to constrain growth, then steps should be taken to exempt services to and from City of Derry Airport from whatever restrictions were imposed, given that shipping provides the only alternative means of transport to other parts of the UK. This view was supported by John Tierney and Mark Durkan, Members of the Northern Ireland Assembly. Strabane District Council, located close to City of Derry Airport, proposed that the relative deprivation of the North West should be a factor in the Government's consideration of the need to constrain air traffic growth.
- 1.37 Lisburn City Council thought there was a need for a national strategy on airports throughout the UK and, in Northern Ireland, airports should complement each other and actively encourage more European and international flights from Belfast International Airport.
- 1.38 The Royal Commission on Environmental Pollution called for no growth over current levels. The National Trust - Northern Ireland was of the view that making effective use of existing capacity whilst ensuring that all costs and benefits of the aviation sector were included in assessing future demand would be key and that elements of RRC, SEC and UKC were required to integrate social, economic and environmental considerations, although again these scenarios were related to other parts of the UK. The Environmental Law Foundation maintained that the starting point for assessment should be a sustainable level, with the burden being on showing how growth may be achieved without incurring adverse environmental effects. The Wildlife Trust proposed that development should be restricted, growth in demand reduced and air transport should become more efficient.
- 1.39 Finally, within the section on whether airport capacity should be provided is the question of delivery mechanisms for the chosen policies.

**Question A5: Which of the policy mechanisms set out in Chapter 3 do you think are essential to delivering your preferred scenario? Are there any that you consider might assist in doing so but you do not consider essential? Are there any policy mechanisms not covered in Chapter 3 that you think should be considered?**

**Table 5 – Essential Policy Mechanisms for Desired Scenario**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Use Planning System to constrain or facilitate development	7	4			2	13
Prioritise Surface Access Improvements	4	2		4	1	11
Encourage air services to use regional airports	2	4		4		10
Slot Policy	1	3	1	4	1	10
Fiscal measures to limit demand	2	1		1	4	8
Encourage airport competition / complimentary development	1	4		1		6
Emissions Trading	2	1				3
Restrictive regulatory or voluntary frameworks	1					1
Other	4	4		4		12
<b>Total Answers</b>	<b>24</b>	<b>23</b>	<b>1</b>	<b>18</b>	<b>8</b>	<b>74</b>
<b>Total Responses</b>	<b>8</b>	<b>7</b>	<b>1</b>	<b>8</b>	<b>4</b>	<b>28</b>
No Response	7	6	2		1	16
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

- 1.40 Table 5 shows respondents' answers to Question A5. The most mentioned mechanism was use of the planning system. The Northern Ireland Institute of Directors suggested that a review of the current planning constraints on Belfast City Airport might usefully be undertaken, taking into account the views of local residents and environmental groups. Belfast City Airport also called for the removal of artificial constraints on growth. Using the planning system was supported by the Wildlife Trust but was not referred to by any local authorities.
- 1.41 Supporters of prioritising surface access improvements included Forfás and the Development Agency of Ireland, Belfast City Airport, Belfast International Airport and Lisburn City Council. Surface access is discussed in detail in a later section of this report.

<b>A REPORT ON RESPONSES TO THE GOVERNMENT'S CONSULTATION</b>	<b>Report 4 Northern Ireland</b>
<b>Should Additional Airport Capacity be Provided?</b>	

- 1.42 Encouraging air services to use regional airports was a mechanism suggested by, among others, the General Consumer Council and the TUC. The Northern Ireland Office advised that it was examining ways in which financing might be provided to encourage airlines to retain a particular service or develop new routes, but also noted that helping an airline to improve commercial performance if it was considering pulling off a route was impractical and would distort competition. Slot policy at South East of England airports as a mechanism was supported by Belfast City Council and ABTA and this issue is also covered in the section on Regional Access later in this report.
- 1.43 A number of respondents from across the stakeholder groups made specific comments in relation to the use of fiscal measures as potential policy levers. These are explained in the paragraphs below, which have additionally been considered in the separate report entitled 'National and Cross Regional Issues', which formulates a national view on the matter.
- 1.44 Fiscal measures such as Air Passenger Duty were supported by 4 Wider Stakeholder groups and also by others, provided the revenues were used for mitigation. 2 made specific comments in relation to the use of fiscal measures as potential policy levers. The National Trust suggested that leading options for discussion included an aviation fuel tax, a Europe-wide emissions charge, slot auctions and an international emissions trading system. RSPB Northern Ireland made a substantive response on this issue, calling for a basket of fiscal measures including fuel duty, landing charges, slot allocation and removal of cross subsidy from retail activities which would increase airfares, and significantly reduce demand, obviating the need for new runway capacity in the South East of England.
- 1.45 Other views on fiscal measures came from Belfast City Airport, which noted that the absence of a departure tax in the Republic of Ireland could be an encouragement for passengers to use Dublin. The issue of 'leakage' to Dublin was also addressed by the Department for Regional Development and Belfast International Airport which noted the need to manage activity so that it was complementary rather than divisive and could provide effective competition with Dublin. Belfast City Council believed that research needed to be undertaken to address the price of travel in Northern Ireland compared to other parts of the UK, as air travel on long haul flights was already more expensive. Belfast International Airport called for the funding of necessary security provisions at Northern Ireland airports so that existing costs borne by the airports could be used to directly support air services development. It also called for government intervention to ensure that Belfast was not unduly undermined with regard to Transatlantic Bilateral Agreements due to the unique geographic circumstances within Ireland.
- 1.46 In the next section respondents' views on the location of airport capacity in Northern Ireland are described.

## Where to Provide Any New Airport Capacity

Should Additional Airport Capacity be Provided?
<b>Where to Provide Any New Airport Capacity</b>
Finance and Regulation
The Economic Benefits of Air Travel
Social Inclusion
Environmental Impacts
Surface Access
Regional Access
Draft Strategy

### Introduction

- 2.1 The Northern Ireland consultation document invited views on whether there was a need for new infrastructure in the Northern Ireland and if existing sites could be developed to accommodate growth. It draws out respondents' preferred locations for growth or constraint, reflecting any proposals over and above, or as alternatives to those options or packages suggested in the consultation document. It reflects respondents' views on the importance of Northern Ireland accommodating its own demand, rather than relying on connecting at hubs elsewhere.
- 2.2 This section elicits opinion about the principle of providing new airport infrastructure in Northern Ireland, and about the specific suggestions for new infrastructure described in the Northern Ireland consultation document. It draws out respondents' preferred locations for growth or constraint, reflecting any proposals for growth over and above, or as alternatives, to those options suggested by the Northern Ireland consultation document.
- 2.3 The section draws on respondents' commentary on the matters contained in Questions B1 to B3 of the Northern Ireland consultation document.

### Synopsis of Relevant Part of the Northern Ireland Consultation Document

- 2.4 The consultation document noted that planning constraints limit Belfast City Airport to 45,000 Air Transport Movements per annum and passenger numbers to 3mppa with limited runway/taxiway improvements and terminal expansion needed to attain these volumes. At Belfast International Airport, some taxiway improvements may be needed and the new terminal may need expansion, together with an increase in apron and stand capacity. At City of Derry Airport, runway improvements may be necessary, plus terminal expansion and an increase in apron/stand capacity.

### Summary of Findings

- 2.5 This section had a high response rate, with 36 out of the 44 respondents answering at least one question.
- 2.6 All three of Northern Ireland's main airports received support, with Belfast International just ahead of Belfast City and City of Derry. On infrastructure questions, most respondents said that best use should be made of existing facilities, but there was support for a runway extension at City of Derry. There were calls for the planning cap at Belfast City to be lifted, or at least reviewed. There were no respondents suggesting that any of the airports were not needed.

## Respondents' Views

Our forecasts show that the prospects for air travel to and from Northern Ireland are heavily dependent on the degree to which airport capacity is provided in the South East.

**Question B1:** Given its impacts for Northern Ireland, should additional capacity be provided in the region? This document has described how airports in the region might develop, if policy is to meet demand. Do you have any comments on these suggestions for new infrastructure?

**Question B2:** If your preferred strategy for Northern Ireland involves accommodating growth in air services, where would the projected levels of growth best be accommodated and what form of airport development should be supported in order to achieve this?

**Question B3:** If it does not, does Northern Ireland need all of its current complement of airports, and are there particular airports whose development should be constrained and why?

2.7 These three questions were taken together.

**Table 6 – Preferred Location of New Airport Capacity in Northern Ireland**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Belfast City	4	5		3		12
Belfast International	4	5		4	1	14
City of Derry	3	5		4		12
Other	2	1				3
<b>Total Answers</b>	13	16		11	1	41
<b>Total Responses</b>	7	9		7	1	24
No Response	8	4	3	1	4	20
<b>Total Sample</b>	15	13	3	8	5	44

2.8 Table 6 shows respondents' answers to that part of Question B2 asking where growth should be accommodated. Support was broadly similar for all three airports from the responding groups of Aviation Industry, Economic Interests and Political Stakeholders. There was only 1 response from Wider Stakeholder Groups and none from Surface Transport Organisations.

2.9 Omagh District Council, Thomas Cook Airlines and the General Consumers Council supported growth at all three airports. The Rev. Martin Smyth, MP for Belfast South, commented that Belfast City Airport should be used to the maximum capacity allowed by the planners and that Belfast International Airport should be expanded only if passenger numbers grew. Lisburn City Council thought that Belfast International Airport offered the best opportunity for development.

2.10 The 'Other' category included the CBI which gave unspecified support and Royal Mail which made a particular point about night operations at Belfast International Airport. All 20 respondents to Question B3 said that Northern Ireland needed all of its airports

### Belfast International

2.11 For Belfast International, 7 respondents commented specifically on the existing terminal, 4 of which supported expansion and 3 called for its better use. 14 respondents answered that part of Question B2 on the form of development at Belfast International Airport of which 8 supported the best use of existing runways, which included expanding other airport infrastructure. Thomas Cook Airlines supported a terminal extension and the TUC supported this and expansion of the aprons and taxiways. 6 respondents made various other comments, including suggestions for surface access infrastructure, which are covered in more detail in a later section of this report.

### Belfast City

2.12 There was a similar pattern of support for Belfast City Airport, with best use of the existing runway supported by 7 out of 12 respondents, and the rest referring to various other suggestions including improved surface access.

<b>A REPORT ON RESPONSES TO THE GOVERNMENT'S CONSULTATION</b>	<b>Report 4 Northern Ireland</b>
<b>Where to Provide Any New Airport Capacity</b>	

- 2.13 The issue of the planning cap at Belfast City Airport was addressed by a number of respondents. The scenarios and forecasts in the consultation document had assumed it would be retained although the potential capacity of the site was higher. Belfast City Airport called for its removal and a review was supported by the Institute of Directors. The Northern Ireland Office noted that any renegotiation of the planning agreement would be advantageous in terms of route development but was likely to have a detrimental effect on the environment and be opposed by local residents. Belfast City Council did not express a view on the cap except to note that it was given and that this, in part, had determined the way the airport had developed (see also Question C2 in the next section of this report). Belfast International Airport believed that there was a convincing case for retaining the current planning and operational constraints at Belfast City Airport.

### **City of Derry**

- 2.14 Four respondents supported a runway extension at City of Derry Airport and 5 preferred the best use of the existing runway. Derry City Council, the airport's owner, noted the imbalance in services from the Belfast airports compared with the catchment populations and also said that it was planning to extend the runway and was committed to expanding the terminal and stands. Derry City Council's submission was endorsed by John Tierney and Mark Durkan, both of whom were Members of the Northern Ireland Assembly.
- 2.15 Strabane District Council considered the view of the consultation document to be pessimistic and dismissive of the potential of City of Derry airport. Expansion at City of Derry Airport was also supported by Forfás and the Investment and Development Agency of Ireland and the Londonderry Chamber of Commerce. Best use of existing airport infrastructure at City of Derry Airport was supported by Strabane District Council and the CBI. Concerns about the environmental impact of expansion at City of Derry Airport are covered in a later section of this report.
- 2.16 In the next section respondents' views on the finance and regulation of airports in Northern Ireland are described.

## Finance and Regulation

Should Additional Airport Capacity be Provided?
Where to Provide Any New Airport Capacity
<b>Finance and Regulation</b>
The Economic Benefits of Air Travel
Social Inclusion
Environmental Impacts
Surface Access
Regional Access
Draft Strategy

### Introduction

- 3.1 This section considers if there is a role for the complementary development of Northern Ireland's airports or if a competitive environment is better for the development of Northern Ireland's air services. It reflects respondents' thinking on opportunities for greater partnership between the aviation industry and the public sector.
- 3.2 The section draws on respondents' commentary on the matters contained in Questions C1 and C2 of the Northern Ireland consultation document.

### Synopsis of Relevant Part of the Northern Ireland Consultation Document

- 3.3 The Government needs to consider how the best interests of a region or country within the UK should be served by the airports within it or adjacent to it.
- 3.4 Both competition and complementary development may have a role; and there may be opportunities for partnership between the aviation industry and the public sector to encourage access to air services.
- 3.5 The consultation document notes that the relationship between the two Belfast airports is partially determined by the cap imposed on Belfast City Airport and by the fact that they are each owned by independent private organisations.

### Summary of Findings

- 3.6 This section had one of the lowest response rates, with only 19 out of the 44 respondents answering at least one question. All agreed that there were opportunities for partnerships but competition was preferred to complementary development. The two Belfast airports were seen as having developed complementary services because of their locations, constraints and ownership.

## Respondents' Views

**Question C1: Are there opportunities for greater partnerships between airports, airlines and the public sector stakeholders to foster the wider economic interests of Northern Ireland?**

- 3.7 All of those that responded (18) to this question agreed that there were opportunities for airports, airlines and the public sector to develop partnerships that would provide wider benefits for Northern Ireland. Lisburn City Council recognised the need for an agreed strategic approach to the development of air transport in Northern Ireland. The Londonderry Chamber of Commerce believed that the way could be opened for closer consultation, co-operation and joint action in the north west region.

**Question C2: Is competition always preferable to complementary development? Do you think there are any circumstances in which the latter approach would bring wider economic or other benefits?**

**Table 7 – Is Competition Preferable to Complementary Development?**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Yes	2			2		4
Usually	1					1
Sometimes (not always)		3		2		5
No	1	1				2
<b>Total Responses</b>	<b>4</b>	<b>4</b>		<b>4</b>		<b>12</b>
No Response	11	9	3	4	5	32
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

- 3.8 Table 7 shows respondents' views on Question C2. Including those noted as 'Usually' and 'Sometimes', most respondents preferred competition.
- 3.9 Thomas Cook Airlines commented that the very nature of airports predicated the likelihood of a geographic monopoly but that every effort should be made to avoid a concentration of ownership such as existed in the South East and Scotland. The General Consumers Council believed that competition between the two Belfast airports had led to them becoming complementary and they would advocate them remaining in separate ownership. Belfast International Airport suggested that the region was in need of a more cohesive, co-ordinated approach.
- 3.10 Belfast City Council noted that, to a large extent, the two airports had developed complementary services but that the relationship ensured that there was competitiveness for regional flights and international flights via London. It also noted that a further scenario to ensure critical mass and complementary growth was to actively link more closely with Dublin Airport. Belfast City Airport believed that the current limitations should be applied to all airports in an equitable manner in order to prevent a situation where business at one of the three Northern Ireland airports is unfairly restrained.
- 3.11 In the next section respondents' views on the economic benefits of air travel are described.

## The Economic Benefits of Air Travel

Should Additional Airport Capacity be Provided?
Where to Provide Any New Airport Capacity
Finance and Regulation
<b>The Economic Benefits of Air Travel</b>
Social Inclusion
Environmental Impacts
Surface Access
Regional Access
Draft Strategy

### Introduction

- 4.1 This section examines the degree to which Northern Ireland's economic well-being is assisted by the aviation industry and the importance or otherwise that respondents attach to the development of more direct services. It considers which aspects of the economy are most affected by aviation, with a particular look at the possible negative effects on the domestic tourism market, and identifies opportunities to encourage certain sectors of the aviation industry. It reflects on the implications of a relaxation of 5th Freedoms on direct services from Northern Ireland's airports.
- 4.2 This section draws on respondents' commentary on the matters contained in Questions D1 to D10 of the Northern Ireland consultation document.

### Synopsis of Relevant Part of the Northern Ireland Consultation Document

- 4.3 The consultation document noted the importance of aviation to Northern Ireland in terms of nearly 10,000 jobs, particularly important because of the high unemployment rate. It also noted aviation's importance for inward investment and importers and exporters as prime users of air services, and the emergence of economic clusters near the airports.

### Summary of Findings

- 4.4 This section had a relatively high response rate with 33 out of the 44 respondents answering at least one question, reflecting the importance of economic issues to Northern Ireland.
- 4.5 Most of these respondents said that aviation was important to the economy. There was no dissent on the relationship of air links to inbound tourism but not everyone agreed that reliance on London would be reduced. Most thought that airports could be the sites of economic clusters and also agreed that air cargo was important to the economy.

## Respondents' Views

4.6 The opening question sought to establish whether respondents believed aviation to be of importance to the economic prosperity of Northern Ireland. Almost all of the respondents indicated that it was. Two respondents among the Wider Stakeholder Groups did not share this view.

**Question D1: How important is the contribution of aviation to Northern Ireland's economy? How and where can the benefits be captured?**

**Table 8 – How Important is Aviation to the Northern Ireland Economy?**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Important	9	10		7		26
Not important					1	1
Importance exaggerated					1	1
<b>Total Responses</b>	<b>9</b>	<b>10</b>		<b>7</b>	<b>2</b>	<b>28</b>
No Response	6	3	3	1	3	16
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

**Table 9 – How and Where can the Benefits be Captured?**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Facilitating trade/clusters	3	5		3		11
Employment creation	4	3		1		8
Facilitation of inbound tourism				1		1
Safeguard / improve Northern Ireland's competitive position				1		1
Other		2		1		3
<b>Total Responses</b>	<b>7</b>	<b>10</b>		<b>7</b>		<b>24</b>
No Response	8	3	3	1	5	20
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

4.7 Tables 8 and 9 show respondents' views on Question D1. A significant number of respondents believed that the benefits of aviation would apply to more than one area, but, for clarity of analysis, only the main area from each was extracted and recorded here. Most of the questions in this section were answered primarily by the Aviation Industry, Economic Interests and Political Stakeholders groups. The following views provide some illustrations:

- Belfast City Council described aviation as crucial to the development of the business base;
- Belfast City Airport agreed that aviation was of key importance to the economy of Northern Ireland and stimulated economic activity;
- the Rev. Martin Smyth, MP for Belfast South, described aviation as a key ingredient in the economic recipe of Northern Ireland;
- the Institute of Directors confirmed that, based on surveys, all of its members felt that aviation was very important;
- the Northern Ireland Office noted that air transport was a significant employer;

## The Economic Benefits of Air Travel

- the CBI noted that aviation provides UK business access to compete in international markets and many businesses regard air travel as increasingly central to their activities.
- 4.8 Conversely the RSPB was noted as indicating that aviation was not important to the economy and the National Trust considered that its value was outstripped by the importance of a high quality environment but they also recognised that, unlike other areas of the UK, many journeys to and from Northern Ireland cannot be undertaken by alternative means.

**Question D2: What barriers need to be addressed if the jobless on benefit, in particularly low employment areas, are to take advantage of the employment opportunities that arise from growth in aviation and airport services? Are there any solutions?**

- 4.9 There were 8 respondents to the first part of Question D2 on barriers, of which 5 referred to travel time and cost of getting to jobs. 6 out of 9 respondents to the second part on solutions suggested improved or more affordable public transport. Belfast International Airport noted that provision of access options for both workers and travellers could occur in parallel. Thomas Cook Airlines noted that much airport employment was shift working and surface access provision needed to address this adequately otherwise the benefits would be lost to those most in need of employment.

**Question D3: What systems or processes will help improve links between aviation industry employers and intermediaries assisting the jobless and why?**

- 4.10 There were only 4 respondents to this question. The GMB Union proposed that the Department of Enterprise should be used as the main economic development agency, as it should be in a good position to develop links between the aviation industry, employers, intermediaries and education bodies.

**Question D4: Would improved air links help to:**

- increase inbound tourism to Northern Ireland?
- reduce reliance upon London as the primary point of interest for airborne inbound tourists?

**Question D5: If you think it would, what measures could Government, regional tourism interests and the aviation industry take to facilitate this?**

- 4.11 There were 24 respondents to the first part of Question D4 relating to tourism, all of which agreed that improved air links would help to increase inbound tourism. In Table 9, only 1 respondent had been noted as having selected the facilitation of inbound tourism as their main way in which benefits could be captured, but many other respondents noted tourism as a subsidiary issue and are thus recorded here.
- 4.12 Derry City Council thought that the airport was crucial to attracting inward investment and inbound tourism, particularly in the context of the spatial strategies on both sides of the border, a point echoed by Forfás and the Investment and Development Agency of Ireland. Strabane District Council believed that the City of Derry Airport was vitally important to tourism development of the north west and Lisburn City Council believed that improved air links were essential to develop tourism. Belfast City Airport believed that air travel had benefited Northern Ireland by encouraging foreign visitors.
- 4.13 In response to the second part of Question D4, 8 out of 13 respondents agreed that improved air links would reduce reliance on London. The Institute of Directors advised that its members valued the connectivity offered by routes to Heathrow but were concerned that an insufficient range of destinations outside the UK, in fact only one, was available. On the other hand, Belfast City Council thought that the extension of flights to other UK airports would not achieve an adequate solution as they would not provide the choice and availability as at London.
- 4.14 In addition to the potential for air services to facilitate tourism, airports can also act as catalysts for economic activity within a region. Question D6 sought to establish whether respondents believed airports within Northern Ireland could act as a focus for economic clusters.

**Question D6: Is there a role for airports in Northern Ireland as a focus for economic clusters and should such clusters be encouraged?**

- 4.15 There were 10 respondents to this question, from the Aviation Industry, Economic Interests and Political Stakeholders, 9 of which agreed that airports could be a focus for economic clusters. Belfast City Council noted that growth at Belfast City Airport would support the developing business clusters close to the airport and that the airport was also strategically located in relation to Northern Ireland's two top universities. Omagh District Council did not support the concept of economic clusters, preferring the benefits to be spread to less economically successful areas.

## The Economic Benefits of Air Travel

- 4.16 There are also specific elements of the aviation industry that could make a contribution to Northern Ireland's economic aims. The first of these is air cargo.

**Question D7: How important are air cargo services for the economic objectives of Northern Ireland? What measures are needed to give airfreight and mail operators confidence to plan their long-term investment in airport facilities? Should night-time slots be guaranteed for airfreight and mail? Should such guarantees be contingent upon noise/emissions standards of the aircraft being operated?**

- 4.17 There were 14 respondents that answered this question, 13 of which (from the Aviation Industry, Economic Interests and Political Stakeholders) thought that air cargo was important. The British Cargo Airline Alliance believed that it was essential that airports from which overnight freight flights operated were protected as 24 hour facilities, but did not wish to tie guarantees to noise or emissions standards. Lisburn City Council thought that, if there was a need for night-time slots, then these should be investigated further with regard to the noise and emission standards that may need to be set. Royal Mail stressed the importance of night-time slots for their activity. Belfast International Airport understood that 24 hour operation was critical and that they would be amenable to negotiating improvements in standards with operators as a trade off.
- 4.18 One Wider Stakeholder Group, the Environmental Law Foundation, suggested that air cargo was not important because the importation of cheap food has an adverse effect on UK agriculture.
- 4.19 Other sectors that could contribute include maintenance, ground and cabin crew training.

**Question D8: Are aircraft maintenance and ground/cabin crew training sectors of the industry that the Northern Ireland should foster? What would be the advantages and disadvantages of encouraging growth of this sector?**

- 4.20 There were only 4 respondents to this question. Belfast International Airport, Rev. Martin Smyth, MP for Belfast South, and Omagh District Council and all agreed that these sectors should be fostered. Omagh District Council proposed that, given the excellent educational and training establishments which Northern Ireland already possessed, training schemes which would generate a local trained workforce in the areas of aircraft maintenance and ground/cabin crew should be set up. The GMB noted that a limited amount of local maintenance had to be undertaken at each airport.
- 4.21 Another sector of the industry that may bring wider benefits to Northern Ireland is business aviation.

**Question D9: How important is business aviation for inward investment and other economic objectives of Northern Ireland? If business aviation cannot be accommodated at the major airports, how should the needs of this sector be met?**

- 4.22 There were only 6 respondents to this question, 3 each saying that business aviation was either very or quite important. Respondents felt either that accommodating business aviation at Northern Ireland's airports was not a problem or commented on a UK-wide basis that where there was a problem it should be accommodated at secondary airports. Belfast International Airport saw no great difficulty in providing adequate capacity for this type of development.
- 4.23 International air service agreements can shape the development of aviation within a country, and this issue may have relevance to Northern Ireland. Stakeholders were asked to consider this.

**Question D10: Would the relaxation of the UK's current policy in relation to international air service agreements to allow unlimited 5th Freedoms from regional airports materially affect the ability of Northern Ireland's airports to capture new services?**

- 4.24 Of the 8 respondents which answered this question, 2 were in favour of relaxation, 2 said maybe and 3 were against. Examples of views expressed were:
- Rev. Martin Smyth, MP for Belfast South, believed that it would be good to see more freedom but incentives to operate new routes would be almost essential;
  - Forfás and the Investment and Development Agency of Ireland were in favour of relaxation;
  - Belfast International Airport thought that relaxation was unlikely to have much impact, unless Government intervened and engineered the removal of protective clauses in the Irish-US bilateral which had caused operators to disregard the market potential from Belfast;

- the General Consumer Council for Northern Ireland thought that the possibility of bmi's involvement in a new transatlantic bi-lateral could pose a further threat to Northern Ireland's Heathrow slots;
- Thomas Cook Airlines and the Thomas Cook Group believed that the current policy was a proper balance between the needs of consumers and the legitimate interests of UK airlines; and
- British Airways were of the view that 5th Freedom rights give little UK benefit.

4.25 In the next section respondents' views on social inclusion are described.

## Social Inclusion

Should Additional Airport Capacity be Provided?
Where to Provide Any New Airport Capacity
Finance and Regulation
The Economic Benefits of Air Travel
<b>Social Inclusion</b>
Environmental Impacts
Surface Access
Regional Access
Draft Strategy

### Introduction

- 5.1 This section captures respondents' views about the extent to which the development of aviation could help to address deprivation and social exclusion within Northern Ireland. It looks, in particular, at the ways in which the jobless and less economically buoyant parts of Northern Ireland might benefit from the creation of employment opportunity. It asks if it would be a useful to identify and assist those remote parts of Northern Ireland dependent on lifeline services, and on what basis support might be made available.
- 5.2 The section draws on respondents' commentary on the matters contained in Questions E1 to E3 of the Northern Ireland consultation document.

### Synopsis of Relevant Part of the Northern Ireland Consultation Document

- 5.3 The consultation document noted the greater levels of deprivation in Northern Ireland than in many other UK regions or countries, and the wide disparities within Northern Ireland.

### Summary of Findings

- 5.4 Twenty three out of the total of 44 respondents answered at least one question on this issue with most agreeing that aviation could help to address social deprivation. Only the Aviation Industry, Economic Interests and Political Stakeholders answered questions in this section. The most frequently suggested measure was improved public transport to make the airports more accessible to the workforce.

**Respondents’ Views**

5.5 Question E1 seeks to establish whether respondents felt growth in aviation can promote social inclusion and help overcome deprivation.

**Question E1: Can the development of aviation within Northern Ireland help to address deprivation and social exclusion?**

**Table 10 – Can Aviation Help Address Deprivation and Social Inclusion?**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Yes	7	5		6		18
Under some circumstances		2		1		3
No						
<b>Total Responses</b>	<b>7</b>	<b>7</b>		<b>7</b>		<b>21</b>
No Response	8	6	3	1	5	23
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

5.6 Eighteen respondents agreed that aviation could help address social deprivation, and 3 more said it could under some circumstances. Among the supporters was Lisburn City Council which believed that the development of air transport would help because the region suffers because of its peripheral location. Amicus AEEU noted that air travel had opened up opportunities for almost everyone in the UK. Strabane District Council believed that airports played a catalyst role in continued regeneration.

5.7 If aviation is to help address these issues, barriers need to be overcome for the jobless to take advantage of new opportunities.

**Question E2: What measures are needed to ensure the benefits of growth in the air transport industry are transmitted to less economically successful areas of Northern Ireland?**

5.8 Seven respondents suggested measures, of which 5 suggested that improved public transport would make the airports more accessible for employees. The Rev. Martin Smyth, MP for Belfast South, suggested a number of potential measures which might help spread the benefits of aviation to the wider community, including tourist and sporting packages to remote parts of Northern Ireland and attracting American visitors.

**Question E3: Should the Government identify remote communities that require access to air services as a social need and directly, or indirectly, provide support to ensure that the social need is met? What might be the criteria for defining a remote community in need of assistance?**

5.9 All 7 respondents to this question agreed that remote communities requiring access to air services should be identified, but only 4 respondents suggested particular criteria, most of which related to there being no viable alternative surface route because of the sea crossing. Belfast International Airport suggested that the criteria should include travelling time, the availability of alternative means, the degree of dependence on air services and the degree of disadvantage relative to other regions.

5.10 In the next section respondents’ views on environmental impacts are described.

## Environmental Impacts

Should Additional Airport Capacity be Provided?
Where to Provide Any New Airport Capacity
Finance and Regulation
The Economic Benefits of Air Travel
Social Inclusion
<b>Environmental Impacts</b>
Surface Access
Regional Access
Draft Strategy

### Introduction

- 6.1 This section is about the environmental implications of growth in aviation across the UK in general, and for Northern Ireland in particular, resulting from the various national policy scenarios and the development options at Northern Ireland's airports. It identifies any environmental impacts of growth which are thought to be both unacceptable and incapable of amelioration, as well as those for which mitigation and control is possible. It looks at the issue of enforceable environmental targets as a corollary of growth.
- 6.2 The section draws on respondents' commentary on the matters contained in Questions F1 to F3 of the Northern Ireland consultation document.

### Synopsis of Relevant Part of the Northern Ireland Consultation Document

- 6.3 The consultation document reviewed impacts on people and the natural and built environment, looking specifically at noise, air quality, greenhouse gases and climate change, water, biodiversity, landscape and heritage. Limited quantification was provided for each airport but details of the effects at each site were listed. Specific emphasis was given to the conservation designations and designated sites in Northern Ireland near to each airport.

### Summary of Findings

- 6.4 Twenty four out of 44 respondents answered at least one question on this issue. Noise and air quality were identified as the two most unacceptable impacts, but most agreed that impacts could be controlled or mitigated, and supported enforceable targets. At Belfast City Airport, noise was identified as an issue, while at Belfast International Airport concern was expressed about nearby Scheduled Ancient Monuments. At City of Derry Airport, the impact of expanding the airport on Lough Foyle was identified.

## Respondents' Views

6.5 This section begins by analysing respondents' views on the environmental impacts of the National Policy Scenarios, particularly where it may be felt that these are unacceptable. In order to provide a logical and clear presentation of the responses received, questions F1 and F2 are analysed together.

**Question F1: Are there any environmental impacts from the National Policy Scenarios or potential infrastructure nationally/regionally important projects appraised in this document which you regard as unacceptable?**

**Question F2: Could these environmental dis-benefits be controlled or mitigated to reduce them to acceptable levels? Do you have particular views on this in respect of:**

- noise (day-time and night-time);
- air quality (air traffic and surface access impacts);
- land and property take (residential, agricultural, landscape);
- biodiversity;
- climate change; or
- other environmental impacts;

**either in general, or at particular Northern Ireland airports.**

6.6 The number of respondents that said that the impacts from the National Policy Scenarios were 'unacceptable', in those precise terms, was small. The bulk of respondents identified specific environmental impacts, described the extent to which they were concerned or otherwise by those impacts and then, depending on that level of concern, whether or not those impacts might be mitigated or controlled and how. In order to accommodate the terminology used in Question F1, and to ensure that the seriousness of respondents' concerns were captured, those respondents that expressed great concern about a particular impact or impacts were described as finding those impacts 'unacceptable'.

6.7 Respondents' answers to Questions F1 and F2 have been taken together; firstly, to get an overall view of whether respondents felt environmental impacts were of concern per se; second, to establish a ranking of impacts of concern; and third, to identify for each individual impact respondents' views on the extent to which they would be capable of effective mitigation.

**Table 11 – Overall Views on Acceptability of Impacts**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Unacceptable impacts - cannot be mitigated					1	1
Unacceptable impacts - mitigation maybe possible					3	3
Unacceptable impacts - no comment on mitigation		1	1		1	3
Unacceptable impacts - can be mitigated	1	1				2
No unacceptable impacts highlighted - can be mitigated	9	2		1		12
<b>Total Responses</b>	<b>10</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>5</b>	<b>21</b>
No Response	5	9	2	7		23
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

6.8 Table 11 shows respondents' overall views on the acceptability of environmental impacts and whether their effects can be controlled or mitigated. A clear pattern emerged with Wider Stakeholder Groups tending to find environmental impacts unacceptable and Aviation Industry and Economic Interests either not highlighting unacceptable impacts or maintaining that they could be controlled or mitigated.

6.9 Nine respondents indicated concern about impacts, of which only the Environmental Law Foundation believed that the effects could not be controlled or mitigated. Others expressing concern included the National Trust Northern Ireland, the Wildlife Trust and the UK Noise

Association. Those expressing concern but not indicating a view on mitigation included the Northern Ireland RSPB and the CBI. Those that supported the view that impacts could be controlled or mitigated included Belfast International Airport and the GMB. The 12 remaining respondents which did not highlight any unacceptable impacts included the Northern Ireland Office, Belfast City Airport and Omagh District Council.

**Table 12 - Are there any Environmental Impacts that you Regard as Unacceptable, and to What Extent Can These be Mitigated?**

	Impacts can be mitigated	Impacts identified - no substantive comment on mitigation	Impacts cannot be mitigated	Sub-Total
Noise	16	2		<b>18</b>
Air Quality	15	1		<b>16</b>
Land and Property Take	8	3		<b>11</b>
Biodiversity	6	1	2	<b>9</b>
Climate Change	7	3		<b>10</b>
Other Environmental Impacts	4	6		<b>10</b>
<b>Total Answers</b>	<b>56</b>	<b>16</b>	<b>2</b>	<b>74</b>
Total Respondents				<b>22</b>
No Response				22
<b>Total Sample</b>				<b>44</b>

- 6.10 Table 12 shows respondents' views on specific impacts. Noise and air quality were the issues of greatest concern, followed by land and property take, climate change and biodiversity. The vast majority said that these impacts could be mitigated. The only specific impact identified as not able to be controlled or mitigated was biodiversity, by the National Trust and the Wildlife Trust.
- 6.11 There were also concerns about particular impacts at each airport. The Transport Advisory Committee indicated concerns about the development of Belfast City Airport, as it was located in a largely urban environment. On the other hand, Belfast City Airport strongly supported the need for continued action to reduce aircraft noise at source as well as the concept of local solutions in relation to noise within a national framework. The Northern Ireland Office noted that the number of people affected by noise at Belfast City Airport could rise but that the rise was relatively modest and effective noise management would be the key to sustainable growth.
- 6.12 The National Trust Northern Ireland advised that the setting of Scheduled Ancient Monuments was undermined by being close to Belfast International Airport.
- 6.13 The Northern Ireland RSPB noted the main ecological impacts at City of Derry Airport which included impacts on the Lough Foyle Special Protection Area, Ramsar site and RSPB reserve. The Northern Ireland National Trust suggested that the internationally designated Lough Foyle should be monitored.
- 6.14 Having established the views of respondents with regard to areas of potential environmental impact, and where these could be mitigated, the following question addresses the more specific issue of whether there would be support for policy scenarios that allow increases in capacity providing they are accompanied by targets for environmental improvement.

**Question F3: Would you support the scenarios to keep pace with consumer demand if they carried with them enforceable targets for environmental improvement (eg air quality, noise, public transport mode split, energy savings, and waste reduction)?**

- 6.15 There were 13 respondents to this question, 11 of which supported enforceable environmental targets. Omagh District Council asserted that some impacts would be unacceptable, so actions to mitigate them would be needed. Belfast City Airport supported the development of a national strategy for the mitigation of negative environmental impacts underscored by local solutions for local issues. The Rev. Martin Smyth, MP for Belfast South, believed that the consultation document did not seek to propose changes that would damage Ulster's wonderful wildlife and landscape. The National Trust suggested that the quality of the natural and historic environment was one of the prize assets of Northern Ireland and should not be compromised by airport development.
- 6.16 In the next section respondents' views on surface access are described.

## Surface Access

Should Additional Airport Capacity be Provided?
Where to Provide Any New Airport Capacity
Finance and Regulation
The Economic Benefits of Air Travel
Social Inclusion
Environmental Impacts
<b>Surface Access</b>
Regional Access
Draft Strategy

### Introduction

- 7.1 This section identifies the surface access schemes and other measures which would be needed to support any proposals to expand Northern Ireland's airports. It considers whether or not such schemes and measures ought to be a pre-condition of growth. It looks at priorities for, and sources of, funding.
- 7.2 The section draws on respondents' commentary on the matters contained in Questions G1 to G5 of the Northern Ireland consultation document.

### Synopsis of Relevant Part of the Northern Ireland Consultation Document

- 7.3 The consultation document considered each airport in terms of its existing road, rail, bus/coach and car parking provision. For the future scenarios, indications were given of the roads which might be congested, car parking demand, and potential public transport options.

### Summary of Findings

- 7.4 Twenty eight out of the 44 total respondents answered at least one question on this issue. All agreed that constraints should be addressed and there was support for road and public transport schemes. Improving quality in terms of better frequencies, connections and reliability of bus services was seen as the best way of improving public transport share.

## Respondents' Views

Under many of our National Policy Scenarios there will be a large increase in the number of passengers using Northern Ireland's airports over our forecasting period. Our analysis indicates this might place strain on surface access provision, particularly key road links in a number of places:

### Question G1: Should these surface access constraints be addressed?

7.5 There were 14 respondents to this question, 13 of which agreed that these constraints should be addressed, with the 1 other agreeing under certain circumstances. The Londonderry Chamber of Commerce noted that the Republic of Ireland's National Spatial Strategy included the strengthening of the Letterkenny-Derry axis as a transportation and development corridor. The General Consumer Council believed that real efforts to get people to use public transport would have to concentrate on bus services.

Question G2: Which schemes outlined in the document do you consider are the key ones for improving access to the region's airports and what priority should they be given relative to other projects. Which do you think should not be taken forward?

Question G3: Are there any surface access schemes identified in the analysis that you support or oppose? Please give your reasons.

Question G4: Are there any surface access improvements which should be regarded as pre-conditions before new capacity can take place at airports within the study area? How should these surface access improvements be funded?

Table 13 – Key Surface Access Schemes

GENERAL							
	Key Schemes						Preconditions
	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total	
New or improved heavy rail access to airports	3	5		2	1	11	2
New or improved light rail access to airports	1	2	1	1	1	6	
New or improved road access to airports	3	4		1		8	2
New or improved bus/coach access to airports	2	3	1	2		8	2
Total Answers	9	14	2	6	2	33	6
<b>Total Responses</b>	<b>4</b>	<b>7</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>15</b>	
No Response	11	6	2	6	4	29	
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>	

7.6 Table 13 shows respondents' answers to Questions G2 and G4. The last column at the right indicates schemes which should be pre-conditions to any development. There was support across all groups for all types of improvement.

7.7 The Confederation of Passenger Transport called for new institutions to promote and fund bus and coach improvements. Belfast City Airport called for government funding to improve public transport access. The Rev. Martin Smyth, MP for Belfast South, called for better use of Sydenham Station to access Belfast City Airport and a range of schemes to improve access generally, including consideration of trams as part of a Belfast city network. Lisburn City Council called for a rail link to Belfast International Airport. The Londonderry Chamber of Commerce noted that access to City of Derry Airport would be related to a range of proposals to upgrade road and rail routes into the city. The Transport Advisory Committee noted a number of current issues related to the accessibility of Northern Ireland airports for people with disabilities.

7.8 In relation to funding, there were 7 respondents to the last part of Question G4. 2 said that surface access improvements should be publicly funded and 4 suggested a mix of public and private funding. 3 respondents suggested the use of Air Passenger Duty proceeds, either in sole public funding or a mix of public and private funding.

**Question G5: How might the share of public transport access to airports be increased?**

**Table 14 – How to Increase Public Transport Share**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Improving public transport quality/reducing fares	1	3	2	3	1	10
Enforceable % targets for public transport use		1			2	3
Public funding - public transport operation	1					1
Discouraging use of private car	1					1
Other	3	2		1		6
<b>Total Answers</b>	<b>6</b>	<b>6</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>21</b>
<b>Total Responses</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>15</b>
No Response	11	9	1	5	3	29
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

7.9 Table 14 shows respondents' answers to Question G5. Improving quality, in terms of better frequencies, connections and reliability, was seen as the best way of increasing public transport share. The Confederation of Passenger Transport called for more bus and coach options which were particularly suitable for smaller airports. The General Consumer Council recognised that rail links were unlikely and urged a partnership approach concentrating on bus services.

7.10 In the next section respondents' views on regional access are described.

## Regional Access

Should Additional Airport Capacity be Provided?
Where to Provide Any New Airport Capacity
Finance and Regulation
The Economic Benefits of Air Travel
Social Inclusion
Environmental Impacts
Surface Access
<b>Regional Access</b>
Draft Strategy

### Introduction

- 8.1 This section reflects the importance, or otherwise, that respondents attach to developing direct air services from Northern Ireland, and the extent to which they envisage Northern Ireland continuing to rely upon airports in the South East of England for global connectivity and access to the London market. Should moves be made to guarantee Northern Ireland's access to the UK's principal South East airports?
- 8.2 The section draws on respondents' commentary on the matters contained in Questions H1 to H3 of the Northern Ireland consultation document.

### Synopsis of Relevant Part of the Northern Ireland Consultation Document

- 8.3 The consultation document notes that access to London is perhaps the most important national aviation issue which affects Northern Ireland. It notes the possibility of protecting air services through Public Service Obligation regulations (PSOs) or slot ring-fencing. It also discusses the options for additional runway capacity in the South East.

### Summary of Findings

- 8.4 Twenty three out of the total of 44 respondents answered at least one question on this issue. Most thought that there should be more flights to London from all three main airports in Northern Ireland. Heathrow was most selected as the London airport, and as the location for additional capacity, provided that access was available for Northern Ireland services. PSOs or slot ring-fencing were supported by some respondents.

## Respondents' Views

Question H1: Would it be desirable to have a greater number of flights from Northern Ireland airports to London; from which airports in the region to which London airports? Would these services be beneficial mainly for:

- access to London itself; or
- access to onward flights.

**Table 15 – Would it be Desirable to have a Greater Number of Flights from Northern Ireland Airports to London?**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Yes	8	4		5		17
Maybe	1	1	1	1		4
No						
<b>Total Responses</b>	<b>9</b>	<b>5</b>	<b>1</b>	<b>6</b>		<b>21</b>
No Response	6	8	2	2	5	23
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

8.5 Table 15 shows respondents' answers to the first part of Question H1. The clear view was that there should be more flights to London. The Rev. Martin Smyth, MP for Belfast South, called for more flights to mainland Europe and for flights to London airports for interlining and no frills carriers. The Institute of Directors also considered that there was an insufficient range of direct European destinations from Northern Ireland.

**Table 16 – Which Northern Ireland Airport?**

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Belfast International	3	5		3		11
Belfast City	3	5		3		11
City of Derry	2	3		4		9
Total Answers	8	13	0	10	0	31
<b>Total Responses</b>	<b>4</b>	<b>5</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>15</b>
No Response	11	8	3	2	5	29
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

Table 17 – Which London Airport?

	Aviation Industry	Economic Interests	Surface Transport Organisations	Political Stakeholders	Wider Stakeholder Groups	Total
Heathrow	6	5	1	2		14
Gatwick	3	3		1		7
Stansted	1	2				3
Luton		2				2
London City		2				2
Total Answers	10	14	1	3		28
<b>Total Responses</b>	<b>6</b>	<b>5</b>	<b>1</b>	<b>2</b>		<b>14</b>
No Response	9	8	2	6	5	30
<b>Total Sample</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>8</b>	<b>5</b>	<b>44</b>

8.6 Tables 16 and 17 show respondents' answers to the second part of Question H1. Similar numbers of respondents supported additional flights from each of the three Northern Ireland airports. Apart from the airports themselves, most respondents supported more flights from two or three Northern Ireland airports.

8.7 Heathrow was by far the most popular London airport. All respondents that said there should be more flights to other London airports had also said there should be more flights to Heathrow. Support for the respective London airport was dependent upon there being access to it for Northern Ireland services.

**Question H2: In view of the evidence presented in the document is retention of the existing services to South East airports essential? Should this be subject to slot ring-fencing and if necessary a PSO if loss of the service is threatened?**

8.8 The responses to the first part of Question H2 were virtually identical to the first part of Question H1, and 14 out of 16 supported PSOs or slot ring-fencing. Examples included:

- the General Consumer Council which called for the maintenance of a Heathrow-Belfast link and noted that there was scope for reserving slots under EU regulations;
- Belfast City Council which supported intervention in slots at South East airports because Northern Ireland relies on them for access to the UK;
- Belfast City Airport which called for the protection of economically crucial links to Heathrow and Gatwick;
- the Transport Advisory Committee which expressed concern about the over reliance on no frills operators, with poorer service levels for people with disabilities;
- Belfast International Airport which indicated that slots at Heathrow and Gatwick should be protected, otherwise travellers will become dependent on Dublin;
- Lisburn City Council which believed that PSOs may be necessary if government targets of sustainable development were to be progressed;
- the Institute of Directors - Northern Ireland which suggested that Belfast to London services should be protected as was currently the case with the Derry to Dublin service;
- the Northern Ireland Office which noted that Northern Ireland was largely dependent on Europe's most congested airport - Heathrow - and its international connections, and also expressed concern about exposure to the commercial strategies of airlines;
- Thomas Cook Airlines which noted that slot ring-fencing would be at the cost of other existing services to and from London; and
- The Rev. Martin Smyth, MP for South Belfast, who believed that there was no need for PSOs while no frills and scheduled carriers operate a portfolio of viable services.

**Question H3: Should additional capacity be provided at any of the London airports (please specify) to facilitate interline connections to destinations where there is either unlikely to be a direct service or one which provides only limited frequencies?**

- 8.9 Fifteen respondents answered this question, mostly from the Aviation Industry and Economic Interests, all of which identified Heathrow as the location for additional airport capacity. This was a multiple choice question and, of the 15 respondents, 9 also selected Gatwick and 6 selected Stansted.
- 8.10 The Northern Ireland Office believed that Northern Ireland's air access to the South East of England would be best protected by the provision of a third runway at Heathrow and additional runway capacity at Stansted. Belfast City Airport thought that the greatest benefits for Northern Ireland and the UK as a whole would be derived by adding runway capacity at Heathrow and Gatwick as the interline potential was greatest at those airports.
- 8.11 In the final section of this report respondents' views on a draft aviation strategy for Northern Ireland are described.

## Draft Strategy

Should Additional Airport Capacity be Provided?
Where to Provide Any New Airport Capacity
Finance and Regulation
The Economic Benefits of Air Travel
Social Inclusion
Environmental Impacts
Surface Access
Regional Access
<b>Draft Strategy</b>

### Introduction

- 9.1 In this section respondents were asked to consider if their objectives for developing Northern Ireland's air services would be served by ascribing different roles or functions to Northern Ireland's airports, or is the better solution to rely on market forces to govern the distribution of traffic across Northern Ireland.
- 9.2 The section draws on respondents' commentary on the matters contained in Question I1 of the Northern Ireland consultation document.

### Synopsis of Relevant Part of the Northern Ireland Consultation Document

- 9.3 The consultation document suggests that a regional strategy for aviation could be developed, covering services (route development, use of PSOs, reducing leakage to Dublin, improving regional supply chains), infrastructure (existing/new airport infrastructure, improvements to surface access ie. road/rail/public transport) and general issues (planning framework, mitigation and sustainability).

### Summary of Findings

- 9.4 There were only 9 respondents on this issue, but all agreed that a strategy would be beneficial, and various suggestions were made for issues to be covered.

## Respondents' Views

**Question I1: If DRD were to develop an aviation strategy for Northern Ireland, what issues do you think it should cover? Section 8.2 (of the consultation document) outlines the possible issues to be addressed by an Aviation Strategy for Northern Ireland. Do you think that this would be beneficial?**

- 9.5 Of the 9 respondents to the last part of Question I1, all agreed that an aviation strategy for Northern Ireland would be beneficial. Most broadly agreed with the issues as set out in the consultation document but a number of suggestions for issues to be included were made, as follows:
- Belfast International Airport proposed that it should include aviation as an economic catalyst, a long-term vision of sustainable roles, maximising attractiveness of Northern Ireland routes to airlines, how Belfast International and Belfast City Airports should grow (complement etc), development of mechanisms to reduce leakage, provision of start up funds for new routes, marketing funds, protected access to key routes and slots, enhancement of airport surface access, creation of level playing field in terms of bilaterals and integration with other plans (economic, transport, environment etc);
  - Rev. Martin Smyth, MP for South Belfast, suggested that it should cover route development of direct services to Europe, leakage to Dublin Airport, integration of air services, airport and surface access development, recognition of the needs of deprived areas and communication between different stakeholders;
  - the General Consumer Council for Northern Ireland believed that the Northern Ireland Office should consult further to promote informed debate on how Northern Ireland airports could facilitate growth; and
  - Omagh District Council suggested that the strategy should include developing the contribution of the aviation industry to the local economy, improving accessibility to airport facilities, cross-border issues relating to aviation development, environmental issues and how such concerns could be positively addressed and how to address the level of imbalance between the level of services operated from the two Belfast airports and those operated from the City of Derry Airport.

## Annex A - Questions for Consultees

It is important that you complete the accompanying questionnaire, but you are also invited to expand your response by addressing the questions set out below. It would be helpful if you could structure that response to reflect the way the key questions have been set out; this will help significantly with the analysis and reporting of responses. Clearly if there are issues of importance to you which the questions do not address, or which you feel have not been covered adequately by the consultation document, you should also clearly set these out. In doing so you should bear in mind that any comments made on broader national issues set out in the National Consultation Document “The Future of Aviation” have been analysed and are being used to help prepare those aspects of the White Paper.

### A: National Policy Scenarios

- A.1** Which, if any, of the National Policy Scenarios do you think should form the basis of the UK Government's national airports strategy to 2030 and why? Considerations might include:
- enhancing consumer choice and accessibility to air services;
  - fostering a strong and competitive airline industry;
  - facilitating existing businesses to compete effectively in global markets;
  - attracting inward investment and inbound tourism;
  - ensuring aviation develops sustainably and minimises environmental impacts of growth;
  - minimising distance people have to travel;
  - reducing congestion; and
  - encouraging the use of public transport.
- A.2** If you think additional capacity should be provided in the South East to meet the needs of regional air passengers interlining or accessing services from London airports via surface modes:
- how much capacity do you think should be provided; and
  - where in the South East should it be located?
- A.3** Which of the scenarios will most enhance consumer choice and accessibility to services in:
- Northern Ireland; and
  - the UK as a whole?
- A.4** Are there any other policy scenarios, including any combination of those set out in the document, which would better meet your aspirations for the development of regional air services and airports in Northern Ireland?
- A.5** Which of the policy mechanisms set out in Chapter 3 do you think are essential to delivering your preferred scenario? Are there any that you consider might assist in doing so but you do not consider essential? Are there any policy mechanisms not covered in Chapter 3 that you think should be considered?

### B: Location of Airport Capacity

Our forecasts show that the prospects for air travel to and from Northern Ireland are heavily dependent on the degree to which airport capacity is provided in the South East.

- B.1** Given its impacts for Northern Ireland should additional capacity be provided in the region? This document has described how airports in the region might develop, if policy is to meet demand. Do you have any comments on these suggestions for new infrastructure?
- B.2** If your preferred strategy for Northern Ireland involves accommodating growth in air services, where would the projected levels of growth best be accommodated and what form of airport development should be supported in order to achieve this?
- B.3** If it does not, does Northern Ireland need all of its current complement of airports, and are there particular airports whose development should be constrained and why?

### C: Finance and Regulation

- C.1** Are there opportunities for greater partnerships between airports, airlines and the public sector stakeholders to foster the wider economic interests of Northern Ireland?
- C.2** Is competition always preferable to complementary development? Do you think there are any circumstances in which the latter approach would bring wider economic or other benefits?

## Annex A – Questions for Consultees

**D: Economy**

- D.1** How important is the contribution of aviation to the Northern Ireland's economy? How and where can the benefits be captured?
- D.2** What barriers need to be addressed if the jobless on benefit, in particularly low employment areas, are to take advantage of the employment opportunities that arise from growth in aviation and airport services? Are there any solutions?
- D.3** What systems or processes will help improve links between aviation industry employers and intermediaries assisting the jobless and why?
- D.4** Would improved air links help to:
- increase inbound tourism to Northern Ireland?
  - reduce reliance upon London as the primary point of interest for airborne inbound - tourists?
- D.5** If you think it would, what measures could Government, regional tourism interests and the aviation industry take to facilitate this?
- D.6** Is there a role for airports in Northern Ireland as a focus for economic clusters and should such clusters be encouraged?
- D.7** How important are air cargo services for the economic objectives of Northern Ireland? What measures are needed to give air freight and mail operators confidence to plan their longterm investment in airport facilities? Should night-time slots be guaranteed for airfreight and mail? Should such guarantees be contingent upon noise/emissions standards of the aircraft being operated?
- D.8** Are aircraft maintenance and ground/cabin crew training sectors of the industry that the Northern Ireland should foster? What would be the advantages and disadvantages of encouraging growth of this sector?
- D.9** How important is business aviation for inward investment and other economic objectives of Northern Ireland? If business aviation cannot be accommodated at the major airports, how should the needs of this sector be met?
- D.10** Would the relaxation of the UK's current policy in relation to international air service agreements to allow unlimited 5th Freedoms from regional airports, materially affect the ability of Northern Ireland's airports to capture new services?

**E: Social Inclusion**

- E.1** Can the development of aviation within Northern Ireland help to address deprivation and social exclusion?
- E.2** What measures are needed to ensure the benefits of growth in the air transport industry are transmitted to less economically successful areas of Northern Ireland?
- E.3** Should the Government identify remote communities that require access to air services as a social need and directly, or indirectly, provide support to ensure that the social need is met? What might be the criteria for defining a remote community in need of assistance?

**F: Environmental Impacts**

- F.1** Are there any environmental impacts from the National Policy Scenarios or potential infrastructure nationally/regionally important projects appraised in this document which you regard as unacceptable?
- F.2** Could these environmental dis-benefits be controlled or mitigated to reduce them to acceptable levels? Do you have particular views on this in respect of:
- noise (day-time and night-time);
  - air quality (air traffic and surface access impacts);
  - land and property take (residential, agricultural, landscape);
  - biodiversity;
  - climate change; or
  - other environmental impacts;
- either in general, or at particular Northern Ireland airports.

## Annex A – Questions for Consultees

- F.3** Would you support the scenarios to keep pace with consumer demand if they carried with them enforceable targets for environmental improvement (eg air quality, noise, public transport mode split, energy savings, and waste reduction)?

**G: Surface Access**

Under many of our National Policy Scenarios there will be a large increase in the number of passengers using Northern Ireland's airports over our forecasting period. Our analysis indicates this might place strain on surface access provision, particularly key road links in a number of places:

- G.1** Should these surface access constraints be addressed?
- G.2** Which schemes outlined in the document do you consider are the key ones for improving access to the region's airports and what priority should they be given relative to other projects. Which do you think should not be taken forward?
- G.3** Are there any surface access schemes identified in the analysis that you support or oppose? Please give your reasons.
- G.4** Are there any surface access improvements, which should be regarded as pre-conditions before new capacity can take place at airports within the study area? How should these surface access improvements be funded?
- G.5** How might the share of public transport access to airports be increased?

**H: Regional Access**

- H.1** Would it be desirable to have a greater number of flights from Northern Ireland airports to London; from which airports in the region to which London airports? Would these services be beneficial mainly for:
- access to London itself; or
  - access to onward flights.
- H.2** In view of the evidence presented in the document is retention of the existing services to South East airports essential? Should this be subject to slot ring-fencing and if necessary a PSO if loss of the service is threatened?
- H.3** Should additional capacity be provided at any of the London airports (please specify) to facilitate interline connections to destinations where there is either unlikely to be a direct service or one which provides only limited frequencies?

**I: Draft Strategy**

- I.1** If DRD were to develop an aviation strategy for Northern Ireland, what issues do you think it should cover? Section 8.2 outlines the possible issues to be addressed by an Aviation Strategy for Northern Ireland. Do you think that this would be beneficial?

## Annex B – Glossary of Abbreviations

AONB	Areas of Outstanding Natural Beauty
ASSI	Area of Special Scientific Interest
ATM	Air Transport Movements
BA	British Airways
BE	British European
BFS	Belfast International Airport
BHD	Belfast City Airport
bmi	bmi british midland
CAA	Civil Aviation Authority
CAEP	Committee of Aviation Environmental Protection
CoD	City of Derry Airport
dBA LEQ	Local Equivalent Noise Index in Decibels (A-weighted)
DETR	Department of the Environment, Transport and the Regions
DfT	Department for Transport
DoE(NI)	Department of the Environment (Northern Ireland)
DRD(NI)	Department for Regional Development (Northern Ireland)
DTLR	Department for Transport, Local Government and the Regions
EC	European Commission
ERCD	Environmental Research and Consultancy Department (of the CAA)
EPNdB	Effective Perceived Noise in Decibels
EU	European Union
GA	General Aviation
GDP	Gross Domestic Product
IATA	International Air Transport Association
ICAO	International Civil Aviation Organisation
ILO	International Labour Organisation
LPA	Local Planning Authority
MPPA	Million passengers per annum
MtC	Million Tonnes of Carbon
NATS	National Air Traffic Services
NIPAM	Northern Ireland Passenger Allocation Model
OEF	Oxford Economic Forecasting
PAX	Passengers
PPG	Planning Policy Guidance (Note)
PSO	Public Service Obligation
PSZ	Public Safety Zones
PTF	Propensity to Fly
RAS	Regional Air Services
RASCO	Regional Air Services Co-ordination Study
RCD	Regional Consultation Document
RESA	Runway End Safety Area
RET	Rapid Exit Taxiways
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SERAS	South East and East of England Regional Air Services Study
SPAM	Second Passenger Allocation Model

**Annex B – Glossary of Abbreviations**

SEC	South East Constrained Scenario
SPA	Special Protection Area
UKC	UK-Wide Constrained Scenario
UKU	UK-Wide Constrained Scenario

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