

Airport Capacity, Efficiency and Safety in Europe

A response from the British Air Transport Association

BATA (British Air Transport Association) welcomes the opportunity to respond to the EU Commission's consultation on "Airport Capacity, Efficiency and Safety in Europe". BATA represents UK-registered airlines, covering the scheduled, charter and freight sectors. Our members produce 90% of UK airline output.

The paper addresses the issue of the shortages in airport capacity. In doing so, it also touches on air/rail integration, surface access, ATFM (Air Traffic Flow Management) capacity, land use planning, financing infrastructure projects, safety, cross subsidisation and state funding. The Commission points out that it is seeking comments only and the paper does not prejudice any decision that might be taken by the Commission. Nevertheless, the impression given by the paper is that the Commission believes that more regulation and central control is needed. Many of the ideas floated are incompatible with the free market policies prevailing in the UK.

The UK's approach to airport capacity is to make optimum use of the existing capacity at major airports, such as Heathrow and Gatwick, and to encourage growth at regional airports. Regional airports are run as commercial enterprises and there are few if any traffic restrictions.

Responses to specific questions:

Airports' Relationship with Other Modes

Promoting combined air/rail transport

Q1) Given the recommendations in the Rail Air Intermodality Facilitation Forum (RAIFF) report, in which areas and in which order of priority should the Commission focus its actions to improve integration between the two modes?

We agree with the Commission that, in certain cases, there may be capacity gains to be had by transforming competition between HSR (High Speed Rail) and air into complementarities. However, the Commission should leave it to the privatised rail and air industries to develop schemes that might be commercially viable.

Q2) What is the level of interest of airlines, airports and rail companies to tackle the operational integration of the modes? What is the market potential for intermodal services?

The market potential is low – at least in the UK – and the costs and difficulties of integration high. The level of interest of airlines is therefore low.

Encouraging the shift towards rail alternatives

Q3) Do stakeholders believe that, where High Speed Trains (HST) are alternatives to short-haul air-services or some such services (e.g. feeder services), their use should be promoted by Community legislative means?

We would be strongly opposed to any legislation to restrict or surcharge short haul flights on routes where there is an efficient HST service. HST already receives favoured treatment in that it can receive public or even community financing whilst there can be no aid to airports or airlines departing from regional airports where there is an efficient HST service.

Q4) Would stakeholders welcome it if Art. 4 on the Public Service Obligations (PSOs) were made more explicit to state that PSOs would not be granted in the presence of a rail connection, which is adequate in terms of price, speed and comfort.

We are opposed to PSOs in principle, except for “lifeline” services, and therefore regard such a change to Art. 4 as irrelevant.

Q5) Would stakeholders encourage the Commission to identify further policies to shift traffic from air to rail, particularly HST?

Rail already receives favoured treatment in policy terms and in subsidies which distort the travel market. We are opposed to any further policies that favour rail.

Improving ground access to airports and passenger intermodality

Q6) Which are, in the view of the industry, the main obstacles to obtaining a better modal split in airport access: financial, regulatory, political, travellers' habits and inertia?

We find it curious that the obstacles listed do not include those most frequently cited by passengers, i.e. low frequency, short operating hours and the price of public transport.

The Individual Airport

Increasing consistency between ATFM and airport slots.

Q7) What potential does the reduction of inconsistencies bear in terms of capacity in relation to the efforts required to improve real-time data exchange between the actors?

We are not able to comment on this matter.

Airport capacity assessment and planning

Q8) Should a common methodology for the assessment of the capacity of an airport be developed and a capacity assessment programme be devised? If yes, for which time period should the capacity be estimated (e.g. a rolling 5 year period)?

Q9) Should information on existing and future projected airport capacity be collected on a mandatory basis at the EU level in order to better plan the network capacity? If yes, who should be in charge of this process and who should be the repository of this information? What minimum size of airport should be included in this exercise in terms of passengers, movements and cargo?

Q10) Should the Commission propose Community legislation for the use of sensitive airport operation data? How can data protection be assured?

These are matters for airports and ATFM providers to deal with and they should not need EU regulatory measures. The European airports trade association, ACI, would seem the best forum through which action could be coordinated

Environment and land-use management

Q11) Do stakeholders believe that the Community has a role to play in land-use management around Community airports? If so, how do they envisage that role; where would it begin and end?

The Community has no role to play in land-use management around airports. This is clearly an area where the principle of subsidiarity should apply. Land use planning and management should remain the responsibility of the local designated planning authority.

Q12) What are the experiences of airports and authorities in the application of the “balanced approach” set out in Directive 2002/30? What are the environmental noise control measures planned or under preparation by airports and authorities in compliance with the environmental noise Directive 2002/49/EC?

We are not able to comment on this matter.

Q13) Which role can airlines play in easing the environmental effects around airports beyond improving their fleets’ noise and exhaust emissions? What concrete responsibilities are airlines willing to assume?

Airline signatories to Sustainable Aviation, the UK aviation industry’s sustainability strategy have committed to the following goals:

Noise

Develop and promote low-noise flight procedures through evaluation of future operational methods and implementation of best practice, for example:

- evaluate implementation of steeper and curved approaches for noise abatement at relevant airports
- complete a Continuous Descent Approach (CDA) outreach programme at all main UK airports by end 2006
- procedures, balancing both noise and local air quality requirements, by end 2006.

Air Quality

Contribute to air quality measurement programmes and aid research to improve the assessment of aircraft and airport emissions to enable a better understanding, by 2007, of their actual contribution to local air quality close to airports.

Deliver continued improvements in airport ground vehicles, supply of ground power services, operational practice and the availability of cleaner fuels, in order to reduce NOx emissions. Report on progress by end 2006.

Sources of funding of airport infrastructure

Q14) Do airport operators believe that the revenues from charges enable them to finance their future capacity projects sufficiently? Is there a lack of funding for the sector or in specific countries? Is there a need to rely more extensively on pre-funding, perhaps under conditions to be set out in an EU directive on airport charges?

Funding capital projects is rarely a problem, at least in the UK. Local planning issues are usually the biggest obstacle to development. We are opposed to pre-funding through user charges under any circumstances. The discipline of having to fund capital projects through normal commercial financial channels helps ensure that projects are viable and have a sound business case.

Q15) How can the funding problems of peripheral airports and the specific situation of national airport networks be addressed?

We firmly believe that airports should be individually accountable for their commercial performance. There should be no cross-subsidisation from other airports since, in effect, the airlines at one airport would be subsidising the airlines at the other.

Benchmarking and dissemination of best practice

Q16) Do stakeholders support the adoption of common benchmarking techniques to better assess and address airport capacity problems?

Q17) What form could an institutionalised information exchange forum take? What are the concerns regarding data protection? Are airports willing to bear the cost of the activities?

We believe it would be much better to let the airports themselves exchange ideas than to set up another EU bureaucracy.

The Relationship Between Airports

Ground Operations.

Q18) The success of the research activities into Advanced Surface Movement Guidance and Control Systems (A-SMGCS) led to the point that most large and medium size European airports have been installing systems to support the concept. Is it time to have a common understanding of the rules, the operations and the responsibilities that govern ground movements?

Q19) Should common operational specifications, operating standards for tested, new tools be established on a pan-European basis? If established, should these form the basis of rule making? Could this be a task for the European Aviation Security Agency (EASA), provided that its remit gets extended?

We support the concept of harmonising the rules, procedures and responsibilities for ground movements throughout Europe.

Q20) How could the implementation of research results be accelerated?

We are not able to comment on this matter.

ATM Safety at airports

Q21) Should the EU move towards safety certification of airports? Could EASA be given a role in this certification process and the collection of data on ground movement surveillance?

We support the idea of EASA taking on the safety certification of airports. However this should not be done until EASA has comfortably absorbed its current portfolio of responsibilities and it has the resources to deal with airports.

Q22) Arrival and departure coordination tools are implemented at many European airports: should the Commission support the harmonisation of procedures through a binding regulation on surveillance and control systems implementation?

Yes. Harmonisation will help in producing a consistent system performance but this should not be done through a binding regulation. A recommendation would be preferable.

Traffic Distribution.

Q23) Is it necessary to continue to allow the creation of airport systems and the application of traffic distribution rules? If so, what criteria for granting airport system status should be applied? Do stakeholders believe that guidance or rules aiming at facilitating traffic distribution on the basis of non-discriminatory criteria are called for?

The right to regulate the distribution of flights within an airport system, i.e. within a recognised group of airports serving the same city, should be discontinued. This is the case in the UK and it has not caused any serious problems.

Secondary Airports.

Q24) What further regulatory or non-regulatory means can be defined to reap the potential of secondary airports in particular in relation to point-to-point traffic and the use of spare capacity at non-hub airports?

This is not a problem in the UK where regional airports are growing at a much faster rate than the majors. The answer appears to be to privatise airports and to allow them to offer attractive terms to any airline.

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