The Future Development of Air Transport in the United Kingdom

SERAS - South East Consultation: Second Edition

A response from the British Air Transport Association

BATA welcomes the opportunity to comment on SERAS, the South East and East of England Regional Air Services Study (second edition). BATA represents UK-registered airlines, both scheduled and charter. Our members produce over 90% of UK airline output.

We made a submission on 28th November 2002 to the first edition just after the Secretary of State announced that, following a judgement in the High Court, a new consultation document would be issued. At the time we reserved the right to submit a revised response. Although our views on many issues have not changed we have decided to submit a full response rather than to have to refer back to our earlier one. We have also taken note of the BAA's submission "Responsible Growth" (May 2003) and of the British Airways' submission "The Future Development of Air Transport in South East England" (May 2003).

Introduction

We welcome the Government's initiative to formulate its aviation policy for the next 30 years. This consultation exercise, together with the Regional Air Services Co-ordination Studies (RASCO), is a most important step in the process. The Government's policy decisions will not only profoundly affect the viability of the UK's aviation industry but will also have a substantial influence on the UK's economy as a whole.

Aviation is one the UK's most successful industries – punching far above its weight internationally. The UK has the world's third largest aviation industry (behind the USA and Japan) and the second largest in terms of international passengers carried. UK consumers have access to a huge range of high quality services from the most competitive and innovative aviation market in Europe. London is one of the world's best-connected cities with direct flights to more than 260 destinations. The real cost of flying has reduced dramatically through innovation, competition and investment in new technology by all airlines. Charter and "no frills" scheduled airlines have pioneered low cost fares bringing the opportunity of travel, with all its social and cultural benefits, within the reach of most of the population.

The range of international services is a key factor supporting many of the UK's growth industries and in promoting inward investment in the UK. London's pre-eminence as an international finance centre, for example, depends on aviation.

Inbound tourism is the UK's biggest invisible export, accounting for 4-5% of GDP and 7% of all jobs. Some two thirds of overseas visitors arrive by air, spending £10 billion per year (80% of all spending by overseas visitors)[1].

The UK's active engagement in Europe relies on good air transport links to a far greater extent than continental states simply because we are an island.

However in recent years the industry has been increasingly constrained by a shortage of infrastructure capacity - especially runways in the South East. No new full-length runway has been built in the South East for more than 40 years.

We agree with the Government that doing nothing is not an option. The need for action is urgent. The Government must give clear guidance to planning authorities for increasing aviation capacity. The Government must also reform the planning system so that the approval process for major infrastructure developments is much quicker. The long-winded process, as exemplified by the Terminal 5 Inquiry, is against the interests of promoters and protestors alike.

SECTION 1 – HOW MUCH CAPACITY SHOULD BE PROVIDED?

Q1 Should new airport capacity be provided in the South East over the next 30 years and, if so, how much? What are the main reasons for your answer and how does it measure against the environmental, economic and social objectives of the Government's strategy for sustainable development?

We believe it is possible to provide enough capacity to meet all consumer demand in a sustainable way. The Government's forecast show that demand will more than double over the next 30 years which means that **at least 3 new runways will be needed in the south east in the same period**.

Sustainable development means striking a balance between the economic and social benefits of aviation and the environmental effects of any developments. The Government's own analysis shows that the economic and social benefits far outweigh the costs of the environmental impacts. The south east alone will gain at least £12 billion (net present value) through the addition of 3 runways[2]. At least 70,000 jobs will be created (but with no development jobs will decline). The tourism "trade gap" will be closed[3]. The RASCO studies have also shown that capacity in the south east is vital for the economic health of the regions, not least to provide links to London, the south east and access to international services at Heathrow. Heathrow is the UK's premier gateway and is of national importance but it is full and urgently needs more capacity.

Q2 Should the Government aim to maintain at least one large hub airport in the South East? Is a second hub plausible, and if so, should Government seek to promote one, and what would it need to do to achieve this?

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[1] The contribution of the Aviation Industry to the UK Economy. Oxford Economic Forecasting. November 1999.
[2] SERAS 2 Consultation Document paragraph 14.23.
[3] SERAS 2 Consultation Document paragraph 14.37

In the UK, the most important characteristic of a hub is to provide connections between short and long haul services (unlike hubs in the USA where they are primarily used to provide links between short haul domestic services). A thriving and successful hub airport in the south east is essential to maintain the international connections which sustain London as a world city and support international businesses throughout the UK. Heathrow is the only realistic option for a hub in the south east in the short and medium term. An alternative could not be developed in the required time and it would be far more costly requiring 3 or 4 new runways instead of one at Heathrow.

A second hub in the south east is not plausible in the foreseeable future. The effectiveness of a hub depends on the range of destinations served. For two hubs to be successful each would have to have services to a large range of destinations. To a large extent they would have to duplicate each other and this could only be achieved if demand on each route was high enough to support duplicate services. Even so it is doubtful that 'thin' long haul routes would be available at both. British Airways' attempt to set up a second hub at Gatwick in the 1990s failed because there was insufficient demand to provide the critical mass for a successful operation.

The continental hubs at Amsterdam, Paris and Frankfurt also have to be taken into account. It would be far more attractive for an airline or an airline alliance to move from Heathrow to a continental hub than to risk moving to an untested new hub in the UK.

A second hub elsewhere in the UK may become feasible eventually if regional demand continues to grow. We do not foresee any potential for this to happen until towards the end of the 30-year policy horizon.

Q3 Are there any benefits of aviation to passengers, the aviation industry or the wider economy that the Government should aim in particular to secure through its airports policy? Are there any drawbacks it should aim to avoid?

Aviation policy must be consistent with policies for the consumer, business and tourism. It must be aimed at satisfying the legitimate demand for air travel for the benefit not just of the aviation industry, important though that is, but for the social, cultural and economic health of the UK as a whole. Aviation is one of the UK's most successful industries – the five London airports serve a higher volume of traffic than any other city airport system in the world[4]. However the current constraints - especially runways in the South East and airspace capacity over Europe - restrict consumer access and choice. Passengers are subjected to delays and service quality is reduced. Constraints undermine efforts to reduce unemployment, increase exports and to promote the UK tourism industry.

A number of business sectors, including IT, pharmaceuticals, biotechnology and financial services, depend on the availability of a large range of international air services in order to compete in the global marketplace. The availability of international services is a key factor in creating a favourable business environment for inward investment.

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[4] New South East England Airport – Airline Development Strategy. Booz Allen Hamilton 28th October 2001.

Congestion adds to the environmental impact and increases the costs to airlines of operating from the busiest airports. The unsatisfied demand is being ‘exported’ and other European airports and airlines are prospering at the UK’s expense.

Q4 Should the Government seek to ensure that the potential employment benefits of aviation growth are spread to those people and localities which are most in need of such benefits? If so, what should it do to achieve this?

Yes, but locating capacity as close as possible to demand and minimising local environmental impacts should take precedence. See our answer to the next question.

New capacity **in itself** should not be provided in an area to promote regeneration. A local airport with a good range of direct services or indirect services via a hub is a valuable enabler in regenerating an area but the demand, or the reasonable likelihood of demand, must be there to justify the investment.

The best way of “spreading” aviation jobs to areas of unemployment is to provide cheap, fast and frequent public transport which operates at times which are compatible with the opening hours of the airport.

SECTION 2 – WHERE TO PROVIDE ANY NEW AIRPORT CAPACITY?

Q5 To which criteria should the Government attach the most and the least weight in reaching decisions about the location of any new capacity, and why?

The most important considerations in the location of new capacity are the proximity of demand, the catchment area and the ability to deliver within the required timescales. The next most important considerations are environmental impacts, development costs, the ability to fund the development and hub policy. Unlike many industries, the location of airports is the prime factor in their commercial and operational success and also has the biggest influence on local environmental impacts. It is, generally speaking, far less costly both in economic and environmental terms, to expand existing airports than it is to build a new airport.

Developing new infrastructure is a lengthy and expensive process. The Government has made it clear that it does not intend to develop airports itself so it is essential that a sound commercial business case can be made for each development. This is much more likely at existing airports where there is an established market. Furthermore, each development must stand on its own merits. We oppose the concept of cross-subsidisation amongst airports as suggested by BAA. This will lead to market distortion with aeronautical charges at one airport, in effect, subsidising charges at another.

The wider social and economic benefits of aviation are also dependent on location. Business and leisure passengers will incur extra costs if suitable air services are not locally available. Eventually businesses will move out of an area with inadequate air services.

Q6 What are the relative merits of these alternative combinations of possible airport development as set out in Chapter 14?

See our answer to the next question.

Q7 Giving reasons for your answer, which combinations do you prefer and which do you not favour?

In our view the best package, in order of development, is:

1. A new runway at Heathrow
2. A new runway at Gatwick
3. Safeguarding for another runway at Gatwick or Stansted

This package, together with making maximum use of Luton, London City and Southampton airports, meets about 90% of the Government's forecast 2030 demand. However, there are many uncertainties in forecasting and planning over a 30-year period and we suggest that the position should be reviewed after 10 years and the package modified accordingly. Options for a second runway at Stansted or a third runway at Gatwick should be safeguarded.

Heathrow

A new runway at Heathrow is the first priority because:

- Heathrow is already full and has the largest excess of demand over supply.
- It has a very large catchment area.
- It is closest to London and its passengers have to travel less distance to the start or end their journey[5].
- It's surface access modal split for public transport is the highest out of all the major airports in the UK and has the potential for significant improvement through the provision of more rail links.
- It will provide temporary relief at Gatwick by enabling some services to move to Heathrow.
- It is capable of being funded. One possible way is through airport charges. According to BAA, charges would have to rise in line with the cap proposed by CAA of RPI+6.5% up to 2012. (Note that this does not mean that BATA supports the continuing increase in charges at Heathrow in order to pre-fund the runway. We are opposed to the principle of pre-funding. Users of new infrastructure should pay when the infrastructure is available, not in advance.)

We agree with BAA that in order to get the best use out of the new runway, a passenger facility will be needed between the new runway and the existing northern runway.

In order to provide some extra capacity whilst the new runway is being built, mixed mode operation should be introduced on the two existing runways as soon as possible.

Gatwick

Gatwick is a priority because it has the next largest excess of demand over supply. The Government's own analysis[6] shows that adding runways at Gatwick generates large economic benefits. It demonstrates that Gatwick has an excellent catchment

[5] SERAS 2 Consultation Document paragraph 14.22

[6] SERAS 2 table 14.6

area. We believe an additional runway, south of the existing one, will be needed by about 2020 if not before. This assumes that a runway is built first at Heathrow. Further analysis is needed to determine the optimum timing and location. Analyses by the Government and BAA show that there is a trade off between environmental impact, capacity and economic benefits. The more widely spaced options provide more capacity and economic benefits but have greater environmental impacts.

The current legal agreement means that building a new runway cannot start until 2019 which may be too late to meet demand in an optimum manner. The longer the delay in providing a second runway the greater the congestion and the greater the economic pressure and benefits – and the wider the spacing that will be economically justified. Amending the legal agreement should not be ruled out at this stage. The Government should be prepared to re-negotiate with the local authority and BAA if necessary.

The Government should state clearly in the White Paper that a new runway should be built at Gatwick and ensure that the necessary analysis is carried out to determine the optimum balance between timing, environmental impacts and economic benefits.

Stansted

Stansted has been growing at an average of 25% per year[7] and is already slot constrained at peak times. However, the case for early development at Stansted is far less compelling than it is at Heathrow or Gatwick. Stansted does at least have some spare capacity whereas Heathrow and Gatwick are essentially full. Furthermore, most of the operators at Stansted are or “no frills” airlines and it is unlikely that they would be prepared to pay the increased charges that the early development of a Stansted runway would require.

Based on the Government’s current traffic forecasts, a third runway will be needed in the south east before 2030 and our preference is that it should be at Gatwick or Stansted. It is not necessary to decide where to build the third runway for some time and the opportunity to develop either option, including a close parallel or a wide spaced runway at Stansted, should be safeguarded. The situation should be reviewed every five years from 2010 onwards so that the best sustainable option is chosen at the appropriate time.

Luton

With additional runways at Heathrow, Gatwick and Stansted, the demand at Luton is insufficient to justify a replacement runway except possibly towards the end of the 30-year policy horizon[8].

In the meantime, Luton should be allowed to expand to meet demand up to the maximum possible capacity with its current runway alignment, enhanced if necessary by a parallel taxiway. Luton is one the few airports near London that can be expanded in the short term and therefore has a key role to play in bridging the capacity gap until a new runway is built at Heathrow.

[7] SERAS 2 Consultation Document table 5.2
[8] SERAS 2 Consultation Document table 13.3

Any expansion should be subject to a review of the implications for ATC to ensure there is no conflict with the expansion of operations at Stansted.

Cliffe

We see little merit in developing a new airport at Cliffe for the following reasons:

- It is the most costly of all the options.
- It has the highest financial risk because its success depends on it becoming a hub which we believe is unlikely to happen – see our answers to questions 2 and 8.
- It has the largest land take and habitat loss of all the options.
- It has a relatively poor catchment area.
- It would require major surface access infrastructure developments.
- There are major Air Traffic Control problems. The Chief Executive of NATS has said "the complex airspace structure in the south-east is simply not able to support the introduction of arrival and departure routes for a major new airport without serious implications for others. If the decision is for a new major airport at Cliffe – the stark reality we then face is either to close or to severely limit capacity at one of the other London airports. Cliffe … is therefore a non-starter."[9]
- It would take the longest to deliver out of all the options and the delivery of more capacity is already overdue.

Q8 If you think either Gatwick, Cliffe or Stansted should be developed as a hub airport, should the Government take action to ensure such development can be financed and subsequently fully utilised and if so what form should any action take?

A new, purpose-designed hub airport at Cliffe, and to a lesser extent a hub at Gatwick or Stansted, might appear on the surface, to be a tempting prospect for airlines. However the problems of "seeding" services from other airports, the environmental impact and funding difficulties render this option impractical. It is an idea built on sand (or is it mud?).

The proposals for Cliffe assume that 40% of Heathrow services, 23% of Gatwick services and 11% of Stansted services will be moved to seed Cliffe but there is no indication of how this might be done. The possible options are financial incentives or statutory instruments. Neither is realistic.

A financial inducement, for example, would be reducing charges at Cliffe but this would not be enough to cause a major shift from Heathrow. 40% of Heathrow means that one of the major alliances would have to move together with some other airlines. This would be extremely risky commercially for the airlines that move, not only because of developing the market at a new airport, but also because the spare capacity at Heathrow would be back-filled by competitors. In practice, Heathrow would remain a rival hub and the viability of both would be compromised. Furthermore, reducing charges at Cliffe would reduce the rate of return to the investors and make funding much more difficult and expensive. We can find no evidence that this, nor the airline relocation costs, have been taken into account in the economic evaluation of the packages.

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[9] Richard Everitt, Chief Executive NATS. Speech to the Aviation Club 19th September 2002.

Any attempt by the Government to force airlines to move would be resisted and would be open to legal challenge. Even if the Government succeeded, foreign base airlines would be more inclined to move to established continental hub airports.

The only feasible way Cliffe could be kick started as a viable hub would be to close Heathrow. This would leave West London and South West England without a convenient airport for most destinations and would have a massive negative economic impact.

The same arguments apply, albeit with slightly less force, to developing Gatwick or Stansted as a hubs. They are at least an established airports and require less seeding. Even so, it is postulated that 40% of Heathrow's long haul services would have to move. In reality, one of the Heathrow alliances would have to move and it would move its short haul services as well. The seeding problem at Gatwick or Stansted is similar to that at Cliffe. For the reasons stated previously, this is unlikely to happen unless Heathrow is closed.

Other South East airports (Chapter 12)

Q9 Should the Government encourage the development of smaller airports to meet as much of the demand as they can attract?

Yes – airports such as London City, Southampton and Norwich fulfil a valuable role in meeting local demand efficiently. There are customer and environmental benefits in reducing access times and distances to airports. However the developments should be environmentally sustainable overall.

Q10 Should support be given for a specialised low cost/freight and maintenance facility at Alconbury?

No. The airport has a poor catchment area and only develops significant amounts of traffic if the rest of the south east is constrained. It seems to be a poor business proposition. It would be better to develop freight and maintenance facilities at Stansted.

Q11 If so, what conditions, in broad terms, should be attached to this support?

Not relevant.

Q12 What views do you have about the six sites identified in the SERAS study as having the potential to cater for the demand for Business and other General Aviation?

We have no comments to make about the individual sites. We support the policy of providing facilities at secondary airports for Business and General Aviation so that capacity at the primary airports is available for commercial aviation.

Freight (Chapter 13)

Q13 How far should the Government make specific provision for the air freight sector in its decisions about future airport capacity in the South East? What might this involve in practice?

Provided three more runways are provided in the south east to meet the passenger demand, there is no need for the Government to make specific capacity provision for the air freight sector except in regard to night flights. The express parcels sector needs to be able to operate at night and any night quota limits should be set accordingly. We believe such flights should be allowed at Stansted, Gatwick, Luton and East Midlands.

SECTION 3 MANAGING THE IMPACTS OF AIRPORT GROWTH

The environmental impacts of aviation should first be tackled by reducing the scale of impacts at source, next by taking mitigation measures against the remaining impacts and lastly by providing compensation for impacts remaining after mitigation measures.

Environmental policy needs to distinguish carefully between global and local effects. At the global level the UK should not 'go it alone'. Aviation is an international business and UK airlines and airports should not be burdened more than their foreign competitors. Progress has to be made through the sensible development and reform of international agreements, standards and regulations.

Aviation is unique as regards possible measures to reduce its environmental impact. There is no competitive alternative mode of transport for journeys over about 500kms, or for most journeys over water, and there is no alternative fuel for the foreseeable future. We therefore believe that for global impacts, such as greenhouse gas emissions, open international emissions trading is the best way to deliver targeted improvements. This will not be without costs to airlines and consumers. However, according to the DTLR's research, aviation already meets a substantial proportion of its known external environmental costs through APD (Air Passenger Duty). We believe that APD should be replaced by systems (such as emissions trading) or charges that are more directly related to the environmental burdens generated. Any proceeds should be used to pay for mitigation.

At the local level there should be a national framework for environmental agreements. A wide variation in standards for emissions or noise will create operational difficulties and add to costs.

Q14 Are there any specific conditions that you feel should be attached to any or all of the airport options described in Chapters 7-11?

We accept the principle that conditions should be attached to any airport developments. There is a large range of possible conditions but we prefer those which address the impacts directly, such as limits on noise and emissions, rather than proxy measures such as limits on movements or passengers. The latter measures do not provide any incentives to airlines, airports or manufacturers to improve technology or develop best practice. Nor do they necessarily address the impacts of most concern. However it is too early to be able to be specific about what should be attached to any of the options and we would expect such conditions to be considered during the planning process.

Q15 Are there any impacts reported in the chapters on individual airport options that you consider unacceptable?

The consultation document highlights a potential air quality problem at Heathrow which, should the predicted impact actually occur, would be unacceptable. However, recent work has shown that, for various reasons, the contribution to the inventory from aircraft has been grossly overestimated[10].

While road transport is the major contributor to NOx emissions, the aviation industry is working hard to develop technology to reduce NOx levels. Engine modifications on Boeing 747-400s have already resulted in a significant decrease in NOx emission levels at Heathrow and, along with manufacturers, we are confident that these levels can be reduced further.

We also believe that the local air quality statistics on which the Government is basing their figures are misleading. The methodology for assessing local air quality impacts is set out in section 6.10 of the SERAS Stage Two Appraisal Findings Report. For NOx the key assumptions are:

- *New engines just meet CAEP/4 limits for NOx and there is no change to existing engines*. In practice, existing engines can be improved. BA for example has fitted 30 out of 57 747-400s with low emission combustors.
- *All aircraft use 100% thrust on take-off*. In practice, nearly all take-offs are at reduced thrust but the proportion varies by aircraft type, load and route. For example, for British Airways' Boeing 747-400s, the mean thrust at take-off is around 80-85%. It should be noted that at 80% thrust NOx emissions are about half those at 100% thrust.[11]
- *Pre-conditioned air (PCA) is not available and aircraft use auxiliary power units (APUs) whilst on the ground*. In practice, PCA should be available at T5 and probably on most stands at other terminals. APU use could be reduced by about 80% with PCA.

More recent modelling work carried out by British Airways and BAA incorporating recent measurements of NO_2 concentrations suggests that the local air quality impacts will be significantly less than those published in SERAS. We think it unlikely that any residential area outside the airport boundary would be exposed to levels of NO_2 concentrations above the statutory limits coming into force in 2005.[12]

[10] "Responsible Growth" paragraph 5.51 et seq and appendix 2. BAA May 2003

[11] "The Future Development of Air Transport in South East England" appendix 4 fig 5. British Airways May 2003.

[12] "The Future Development of Air Transport in South East England" paragraph 330 et seq and appendix 4. British Airways May 2003.

Q16 How can local noise and air quality impacts in particular, best be reduced, controlled and mitigated?

Local noise and air quality impacts are best tackled by employing technology to reduce the outputs at source and by land-use planning to reduce the population exposed.

Noise

The aviation industry has a good record over many years in reducing noise from aircraft and will continue to press ahead with improvements. Government policy should be focussed on securing internationally agreed standards through ICAO.

Air Quality

Some of the measures, which the industry is taking, are described in our response to the previous question. Other steps that could be taken are:

- Switching to low emission fuels or electric propulsion for all airport ground vehicles.
- Improving public transport links to reduce the use of cars and taxis.
- Encouraging the remaining taxis to use low emission fuels such as LPG.

Noise controls (Chapter 16)

Q17 What are your views on the following points on the control of noise impacts:

Do you think that caps on the size of noise contours are the best way to determine a noise limit for an airport? If not, what other limits might you suggest?

Caps on the size of noise contours are the best way of controlling the impact of noise at airports, such as Heathrow, where there are built-up areas close by in most directions. At other airports, it is probably more effective to address the noise impacts directly by, for example, capping the number of houses affected.

If you agree with the concept of contour caps, what size of noise contours might be desirable and feasible for each option?

We accept that the size of cap at Heathrow for the 57Leq daytime contour should be 145 sq. km as recommended by the Terminal 5 Inquiry Inspector.

How do you think a contour cap might be regulated and enforced?

Compliance with contour caps is best ensured by taking noise into account during the regular airport schedules planning process. A noise model can be used to predict the contour area for the season being planned. If this shows that the cap will be exceeded then schedules would have to be changed until the cap is met. Actual noise contours should then be produced for each season to verify compliance with the cap and to help refine the noise model.

Individual air traffic movements should be monitored for type of aircraft used, track keeping and compliance with noise abatement procedures. Offenders could be fined or, in extremis, have their slot withdrawn.

Noise mitigation and compensation (Chapter 16)

Q18 What views do you have on the following possible measures:

Should any residential property which suffers an increase in noise of 3dBA or more as a result of any of these options, and which would be exposed to a noise level of 63dBA daytime or more, be eligible for acoustic insulation?

Yes.

Should acoustic insulation for households be extended to other noise-sensitive buildings not normally eligible, such as schools and hospitals, depending on detailed circumstances?

Yes.

Should those eligible for insulation be given the choice of either having the insulation work done or accepting a cash payment of an equivalent amount?

There should not be a cash alternative. This could cause problems when dwellings change hands. An exception would be in the situation where a house becomes eligible for insulation because of an increase in noise but the householder has already paid for noise insulation to be fitted.

Should assistance with relocation expenses be offered to households subject to very high levels of noise (such as 69dBA or more)?

In principle, yes.

Should offers be made to purchase those properties which would be subject to both a very high level of noise and a large increase in noise?

In principle, yes.

Should cash compensation be offered to those households suffering a significant increase in noise to a level greater than 57dBA but less than 63dBA – and therefore not qualifying for insulation?

No. This would be seen as being inequitable by those already in the 57-63dBA area and would cause problems if the shape of the noise contour changed. Would those benefiting from a reduction in noise return the cash?

Night noise (Chapter 16)

Q19 Do you think that a five-yearly review cycle for the night restrictions regime for Heathrow, Gatwick and Stansted is appropriate or should some other review cycle be considered and, if so, what would you suggest? Are specific night noise restrictions needed at any other airport, and if so how should these be determined?

Night flights at Heathrow, Gatwick and Stansted are tightly regulated. We note that the Government intends to review the night flight restrictions in 2003[13] and we will take an active and constructive part in the consultations.

[13] SERAS 2 Consultation Document paragraph 16.47

We consider a 5-year review cycle is reasonable.

Access to airports by rail and road (Chapter 17)

Q20 Are there specific surface access improvements that should be made a condition of any airport option and any that should *not* be included?

BATA supports the case for surface access improvements to airports especially improvements to public transport. Experience at airports in the UK and abroad has shown that passengers prefer rail and this should be the priority for development whenever the potential demand can justify it. Dedicated coach services are the next most preferred option.

It is too early to be able to be specific about which surface access improvements should be made to any of the options. These should be considered during the planning process.

Q21 How should any surface access schemes that are required for a particular airport development option be funded?

The airport developer should fund those elements that are exclusively required for airport access. Other improvements to the transport infrastructure, where non-airport users also benefit, should be funded by the developer in proportion to the expected use of the new capacity that will be made by airport users. The balance of the funding should come from the appropriate highway or rail authority.

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