



The Consumer Council for Northern Ireland response to Heathrow airport's consultation on Heathrow airport expansion.

The Consumer Council

1. The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.
2. The Consumer Council has been designated to handle passenger complaints made under Regulation (EC) No 1107/2010 (the Access to Air Travel Regulation) relating to an airport in Northern Ireland or a flight departing from an airport in Northern Ireland by the Civil Aviation (Access to Air Travel for Disabled Persons and Persons with Reduced Mobility) Regulations 2007 (SI 2007/1895). The Consumer Council also handles complaints made under Regulation (EC) No 261/2004 concerning flight delays, cancellations and instances of denied boarding.
3. The Consumer Council welcomes the opportunity to respond to Heathrow airport's consultation on Heathrow airport expansion.

Summary

4. As the consultation makes clear the expansion of Heathrow airport, by moving from two to three runways, will result in an increase in capacity at the airport. The Consumer Council see this as an opportunity to increase the domestic connectivity of Northern Ireland to the Heathrow hub. This is a significant regional issue for Northern Ireland which is uniquely dependent within the UK on aviation to keep it connected to the rest of the UK and the rest of the World. In our view with increased capacity, slots should be ring fenced for UK regional routes. Even prior to the expansion of Heathrow a Public Service obligation (PSO) should be used to ring fence slots at Heathrow for Northern Ireland routes.

Consultation response

5. Having no road or rail links with the rest of the UK, Northern Ireland is uniquely dependent both economically and socially on air travel, to connect to the rest of the world and also to allow access for social and business purposes to the UK. The high level of dependence of Northern Ireland on air travel has been recognised by the Northern Ireland Affairs Committee which, in its report Air Passenger Duty: implications for Northern Ireland, stated 'that for many people in Northern Ireland travelling by air is not a luxury, but is an essential element of family and economic life'.

Regarding the economic benefits to northern Ireland of aviation connectivity, a recent report by Oxford Economics¹ said:

Inbound air travel is important for Northern Ireland's economy. In 2017, there were nearly 2.7 million visitors to the country- about 80 per cent of whom arrived by air.'

and

Visitors to Northern Ireland in 2017 spent £656 million in the domestic economy providing a particularly important source of demand for the transport, hospitality and retail sectors.

6. This connectivity relies on the access that Northern Ireland has to connections into other UK airports, but most importantly of all is access to Heathrow.
7. The importance of regional connectivity has recently been highlighted in the 'Aviation 2050'² consultation by the Department for Transport and in the Airport Commission's Final Report³. Both documents note that increasing regional connectivity boosts the economy and improves access and choice to air travel in regions where consumers struggle to realise the full benefits of modern air travel.
8. Furthermore, both documents note that due to a lack of capacity there has been a fall in regional domestic connectivity in recent years. We have seen this in Northern Ireland. For example, in 2017 British Airways (BA), reduced its winter schedule from Belfast to Heathrow from six daily flights to four. Currently BA is offering four or five flights daily to Heathrow, depending on the day of the week. Furthermore, in March and September 2019, Ryanair announced reductions to its winter schedule on its routes from Belfast.
9. The Aviation 2050 consultation demonstrates clearly that the Government views an expanded Heathrow as an opportunity to strengthen and develop the connectivity of the regions. If Northern Ireland consumers are to benefit from these connections, it is of utmost importance that they have access to frequently operated services between Northern Ireland and Heathrow. To ensure the continued operation of services between Northern Ireland and Heathrow the Consumer Council believes slots should be ring-fenced for these routes.
10. With the expansion of capacity at Heathrow Airport, Brexit provides one opportunity for the Government to ring-fence slots for domestic connectivity by creating new rules outside of the EU Slot Regulation. Another opportunity, is to expand the use of Public Service Obligations (PSO) on domestic routes. In its Final Report, the Airport Commission described a PSO as 'a proportionate and effective measure for protecting regional air services that has safeguarded valuable connectivity to the regions in question'.

¹ Improving Northern Ireland's Aviation Connectivity- Oxford Economics/Department for the Economy. July 2019

² 'Aviation 2050 – the future of UK aviation'

³ Airport Commission's Final Report-July 2015.

11. We welcome the Governments 'commitment in the 'Aviation 2050' consultation to the combined use of ring-fencing slots and the use of a PSO if necessary to support an increase in domestic connectivity. With its unique dependence on air travel such a move must include ring fencing slots for Northern Ireland at an expanded Heathrow. The consultation invites views on the 'early growth' in capacity that Heathrow is planning to deliver even prior to the expansion of the airport. We believe the Government should consider using a PSO to ring fence slots at Heathrow for Northern Ireland routes prior to the expansion of Heathrow. This will improve the aviation connectivity to Northern Ireland at the earliest opportunity.

Conclusion

12. Northern Ireland is unique in the UK in its dependence on aviation for economic and social connectivity to the rest of the UK and beyond. The expansion of Heathrow airport is an opportunity to increase the domestic connectivity of Northern Ireland to the Heathrow hub. The Government should consider the use of a PSO to ring fence slots to facilitate this.

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