

APP/L2250/V/10/2131934 & APP/L2250/V/10/2131936

SECTION 77 TOWN AND COUNTRY PLANNING ACT 1990 – REFERENCE OF APPLICATIONS TO THE SECRETARY OF STATE FOR COMMUNITIES AND LOCAL GOVERNMENT

TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000

**SUPPLEMENTARY PROOF OF EVIDENCE OF LOUISE  
CONGDON  
BA (Soc Sci), MTD**

**SOCIO-ECONOMIC CASE**

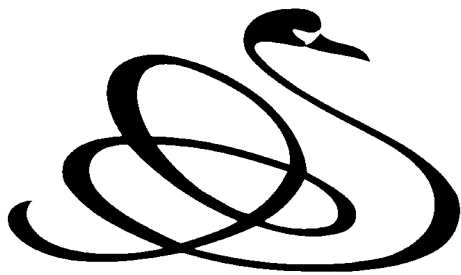
In respect of:

Planning Application Reference: Y06/1647/SH (New Terminal Building)

Planning Application Reference: Y06/1648/SH (Runway Extension)

relating to land at London Ashford Airport, Lydd, Romney Marsh, Kent, TN29 9QL





**York Aviation**

**Originated by: Louise Congdon**

**Dated: 13<sup>th</sup> March 2011**

**Reviewed by: Richard Kaberry**

**Dated: 14<sup>th</sup> March 2011**

**DEVELOPMENT OF A PASSENGER TERMINAL, A RUNWAY  
EXTENSION AND IMPROVED ACCESS ARRANGEMENTS AT  
LYDD AIRPORT, ROMNEY MARSH, KENT**

**SOCIO-ECONOMIC CASE**

**Contents**

	<u>Page</u>
<b>1 BACKGROUND .....</b>	<b>1</b>
<b>2 THE FALLBACK POSITION .....</b>	<b>3</b>
<b>3 DAILY SCHEDULE.....</b>	<b>18</b>
<b>4 AIRPORT SOLUTIONS REPORT .....</b>	<b>22</b>



## 1 BACKGROUND

- 1.1 This Supplementary Proof has been prepared in response to new points now raised by both Natural England and the RSPB regarding the fallback position in Addenda to their Statements of Case dated 8<sup>th</sup> March 2011 and to deal with other matters relevant to my evidence which arose during cross examination of witnesses under the Ornithology topic, including reference that was made to my evidence in the report of Airport Solutions, attached as Appendix 6 to the evidence from Dr John Allan (NE/1/E). I set out below by way of assisting the Inquiry some points in writing, but this is not intended to be exhaustive and I only deal with selected points where it is considered necessary to respond in writing. Where a specific point has not been dealt with, this does not mean that these points are accepted and these other points will be addressed as necessary or appropriate at the Inquiry.
- 1.2 Specifically, Natural England has now stated that it wishes to examine the fallback position by reference to:
- *“the existing and previous pattern of aircraft using the airport;*
  - *the improvements to and marketing of airport facilities to date;*
  - *the airport’s current services and facilities;*
  - *further infrastructure or facilities required in the fallback scenario;*
  - *the assumptions underlying the fallback scenario as to the gaps in the market;*
  - *the constraints on the airport including as to surface access.”*
- 1.3 Similar issues are also now raised by the RSPB, including the allegations that:
- given the physical infrastructure is already in place, the level of activity seen today represents *“the best evidence of the level of demand for the facility”*, and
  - there is no lack of capacity to serve Kent or South East London’s business and general aviation requirements given the more conveniently and centrally located Manston and/or Biggin Hill.

1.4 This note is prepared to address these specific points. I deal with:

- the fallback position
  - the overall market for general and business aviation;
  - capacity to serve London and Kent;
  - marketing of LAA to date;
- likely daily profile of commercial scheduled and charter services; and
- response to points made by Airport Solutions raised at the inquiry.

## 2 THE FALLBACK POSITION

### Projections of movements by larger aircraft

- 2.1 I understand that witnesses and counsel for Natural England and RSPB agreed and have stated expressly at the inquiry on a number of occasions that the number of and types of daily movements that the LAA would be expected to be handling with the development in place at 500,000 passengers per annum would be as set out at Page 18 of the Statement of Common Ground between LAA and Shepway District Council based on the original Environmental Statement. Indeed NE and RSPB have cross-examined the Airport’s witnesses on this basis already, including specifically in respect of ornithological matters. I reproduce that table below.

Aircraft	300,000ppa with Runway Extension (Annual Average)	300,000ppa with Runway Extension (summer average)	500,000ppa with Runway Extension (Annual Average)	500,000ppa with Runway Extension (summer average)
B737	2	4	4	6
A319	2	4	4	6
BAe146	2	2	2	2
Dash 8	2	2	2	2
ATR42-500	0	0	4	4
Saab				
340/SF340B	4	4	2	2
Learjet 35A	3	3	4	4
Citation II	3	3	3	3
CNA750				
Citation X	17	17	18	18
Cessna 152	25	25	25	25
Cessna 172	20	20	20	20
Piper PA28				
Cherokee	15	15	15	15
Piper PA-34				
Seneca	20	20	20	20

- 2.2 Adding up the number of movements by large aircraft under each scenario, it can be seen that:

- at 300,000 passengers with runway extension annual average, there would be 35 movements by larger/jet aircraft;

- at 300,000 passengers with runway extension summer average, there would be 39 movements by larger/jet aircraft;
- at 500,000 passengers with runway extension annual average, there would be 43 movements by larger/jet aircraft;
- at 500,000 passengers with runway extension summer average, there would be 47 movements by larger/jet aircraft.

2.3 Of these, 23 movements at the level of 300,000 passengers per annum would be by business jet type aircraft represented indicatively by the types Learjet 35A, Citation II or Citation X, and there would be 25 such movements at 500,000 passengers per annum. Such movements are, by common agreement with all parties and in particular NE and RSPB, accepted as being able to operate to and from LAA today with its present infrastructure and facilities. The development proposals do not involve or propose any additional development for those movements. Such movements would not use the new passenger terminal nor require the runway extension.

2.4 In my revised demand forecasts, as set out in my original Proof of Evidence, I reduced the number of projected movements by larger aircraft within the limits capped by the passenger terminal facilities due to my expectation that there would be a higher proportion of the commercial air transport movements by relatively larger Code C<sup>1</sup> type aircraft rather than regional jets. I also constrained the overall number of movements across all types consistent with the proposed 40,000 movement limit condition. The revised movement breakdown was given in Table 5.7 of my original Proof of Evidence (LAA/4/A). For ease of reference, I repeat this table overleaf.

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<sup>1</sup> This is a grouping of aircraft defined by maximum wingspan. The categorisation is commonly used to define the physical dimensions of airport infrastructure. Code C refers to a group of aircraft up to and including Boeing 737 and A320 aircraft.



Table 5.7: York Aviation Aircraft Movements by Scenario

Aircraft Type	Fallback			Lower Growth			Higher Growth								
	Summer	Winter	Total	Runway Extension 300K ppa		Terminal 500K ppa	Runway Extension 300K ppa		Terminal 500K ppa						
				Summer	Winter		Summer	Winter		Summer	Winter				
B737/A320	-	-	-	796	220	1,016	1,620	560	2,180	856	492	1,348	1,576	776	2,352
Bae146	360	264	624	-	-	-	-	-	-	-	-	-	-	-	-
Dash 8 (Q400)	-	-	-	1,380	1,096	2,476	1,620	1,100	2,720	1,140	856	1,996	1,200	836	2,036
ATR 42	134	98	232	-	-	-	-	-	-	-	-	-	-	-	-
Learjet 35	734	361	1,095	712	351	1,063	896	441	1,337	715	352	1,068	909	448	1,357
Citation II	734	361	1,095	712	351	1,063	672	331	1,003	715	352	1,068	682	336	1,017
Citation X	4,157	2,048	6,205	4,037	1,988	6,026	4,031	1,986	6,017	4,054	1,997	6,050	4,090	2,015	6,105
Cessna 152	6,114	3,011	9,125	5,937	2,924	8,861	5,599	2,758	8,357	5,961	2,936	8,897	5,681	2,798	8,479
Cessna 172	4,891	2,409	7,300	4,750	2,339	7,089	4,479	2,206	6,686	4,769	2,349	7,118	4,545	2,238	6,783
PA28	3,668	1,807	5,475	3,562	1,755	5,317	3,360	1,655	5,014	3,577	1,762	5,338	3,409	1,679	5,087
PA34	4,891	2,409	7,300	4,750	2,339	7,089	4,479	2,206	6,686	4,769	2,349	7,118	4,545	2,238	6,783
	25,683	12,768	38,451	26,636	13,364	40,000	26,757	13,243	40,000	26,556	13,444	40,000	26,636	13,364	40,000

Source: York Aviation

2.5 I have set, out in **Table 2.1** overleaf, the equivalent daily profile of movements by indicative aircraft type. On the basis of the revised forecasts in my original proof of evidence there, would be a slight reduction in the number of daily movement to the following:

- at 300,000 passengers with runway extension annual average, 33 movements by larger/jet aircraft;
- at 300,000 passengers with runway extension summer average, 39 movements by larger/jet aircraft;
- at 500,000 passengers with runway extension annual average, 37/38 movements by larger/jet aircraft;
- at 500,000 passengers with runway extension summer average, 43/45 movements by larger/jet aircraft.

2.6 Within these projections, the number of larger business jet movements forecast to be operating are:

- 22 a day on average year round and 26 on an average summer day at 300,000 passengers per annum; and
- 23 a day on average year round and 27 on an average summer day at 500,000 passengers per annum.

2.7 Significantly, in the fallback case if the development proposals were not to proceed, as set out in Table 2.1, the number of business jet movements expected is the same as in the 500,000 passengers per annum case. This is not surprising. The 23 movements a day on average that I have forecast will be attracted to use LAA are less than the number of 25 business aviation jet movements a day on average which Natural England and RSPB have already accepted the LAA would attract in the with development case. I point out that I expect a slightly higher number to operate in summer and a slightly lower number in winter on average. It should be noted that my projections conservatively assume that this level of demand would be reached over the period up to 2030, whereas the ES assumed a much faster build up of both commercial and general aviation movements in the with development and fallback cases.

Table 2.1: York Aviation Daily Aircraft Movements by Scenario

Aircraft Type	Fallback			Runway Extension 300K ppa			Terminal 500K ppa			Runway Extension 300K ppa			Terminal 500K ppa			Higher Growth		
	Summer	Winter	Total	Summer	Winter	Total	Summer	Winter	Total	Summer	Winter	Total	Summer	Winter	Total	Summer	Winter	Total
B737/A320	-	-	-	4	2	3	8	4	4	6	5	4	4	4	8	6	7	
Bae146	2	2	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Dash 8 (Q400)	-	-	-	7	7	7	8	8	8	8	6	6	6	6	6	6	6	
ATR 42	1	1	1	0	0	-	-	-	-	-	-	-	-	-	-	-	-	
Learjet 35	4	3	3	4	3	3	5	3	4	4	4	3	3	5	3	4		
Citation II	4	3	3	4	3	3	4	3	3	3	4	3	3	4	3	3		
Citation X	20	14	17	20	13	17	20	13	17	17	20	13	17	20	14	17		
Cessna 152	30	20	25	29	19	25	27	18	23	23	29	20	25	27	19	24		
Cessna 172	24	16	20	23	16	20	22	15	19	19	23	16	20	22	15	19		
PA28	18	12	15	17	12	15	16	11	14	14	17	12	15	17	11	14		
PA34	24	16	20	23	16	20	22	15	19	19	23	16	20	22	15	19		
	127	87	106	131	91	113	132	90	113	113	131	93	113	131	92	113		

Source: York Aviation

- 2.8 In the fallback case, if the development were not to proceed, 3 additional larger aircraft movements should in fact be added to the business aviation total to reflect the anticipated night freighter operations and additional movements associated with aircraft maintenance activities, giving a total of 26 larger aircraft movements a day on average in the fallback case. This is also shown in Table 2.1.
- 2.9 Given that all of the facilities to attract such other operations are already in place, there is no reason why such a level of activity would not result in natural growth over the period between now and 2030. The ability to attract such operations is not dependent on any aspect of the developments which are the subject of the current applications, particularly given that the FAL Aviation fixed base operation (FBO) facilities for business aviation are already in place at LAA.
- 2.10 I now go on to examine the market conditions under which the build up of business aviation activity at LAA is expected to occur, but which Natural England and RSPB have already implicitly accepted in agreeing the activity in the with development scenario which is necessarily predicated on that growth.

### **The Overall Market for General and Business Aviation**

- 2.11 In its study into Business Aviation in Europe 2009<sup>2</sup>, Eurocontrol identified that business aviation activity fell by 14% in 2009<sup>3</sup> across Europe as a whole. This reflects the global economic recession that has recently been experienced. However, as Europe's economies recover, business aviation activity is expected to grow at a faster rate than that of commercial aviation in general, resulting in business aviation making up a higher proportion of flights in European airspace<sup>4</sup>.

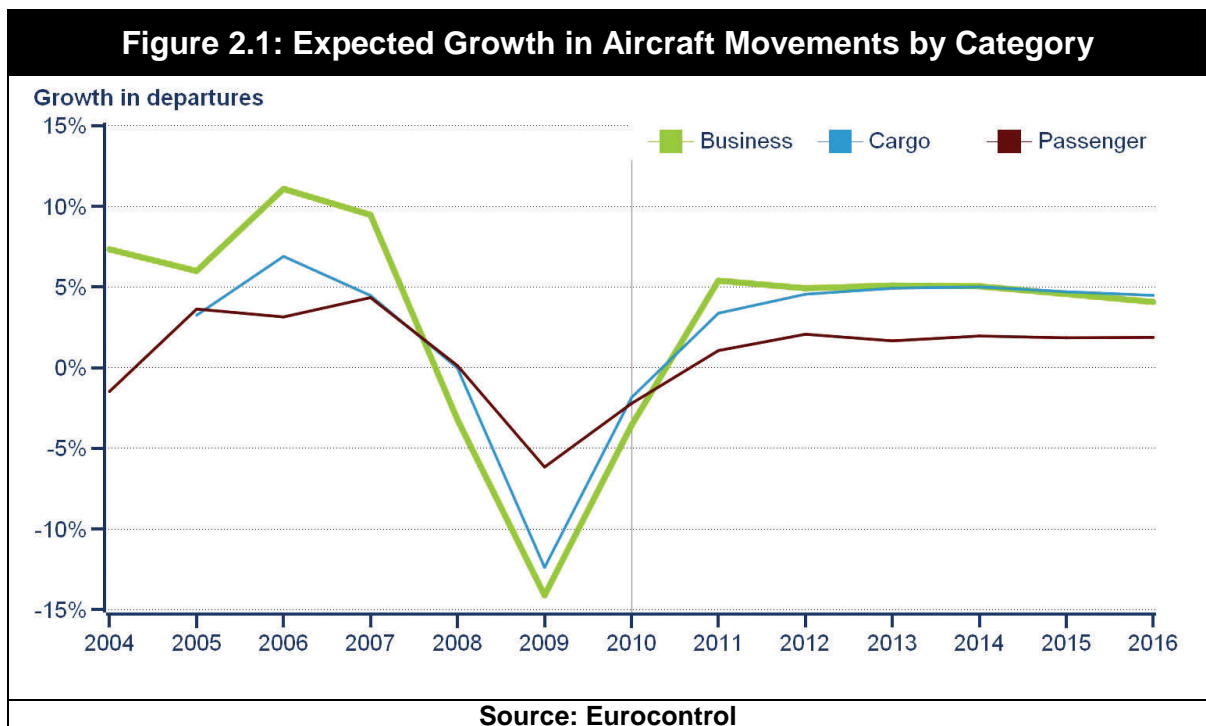
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<sup>2</sup> CD8.23.

<sup>3</sup> Ibid, page 2.

<sup>4</sup> Ibid, page 12.

2.12 I illustrate in **Figure 2.1** below the consequences of Eurocontrol’s expectation for growth rates in different categories of aircraft movements. The expected initial recovery in the business aviation market from 2011 is evident. At a European level, growth is expected to reach around 5% per annum over the medium term. In the longer term, growth is expected to track economic growth by some multiple.



2.13 It should be noted that in terms of business aviation movements as recorded in CAA statistics<sup>5</sup>, LAA in fact saw growth from 168 to 195 such movements in 2010 (business aviation and air taxi movements only<sup>6</sup>). This represents a growth of 16%. For the rest of the UK reporting airports, the number of such movements fell from 133,512 to 129,392; a fall of 3%. This demonstrates what should be obvious from the nature of the airport, namely that LAA is able to attract such movements now, even in a recession, albeit the growth is starting from a low base.

<sup>5</sup> CD16.15 and CD16.16.

<sup>6</sup> A number of business aviation movements are coded by the CAA as private flights where it is a private individual using his or her own aircraft for a business related journey.

- 2.14 The most recent complete study of business aviation in the South East of England is now quite old and was undertaken by the Halcrow Group Ltd between 1998 and 2002 for the then Department of the Environment, Transport and the Regions (DETR). It is very difficult to obtain up-to-date and accurate figures for business aviation movements in the South East as a whole, partly because some business related movements are classified as private flights if the aircraft is privately owned and operated and because the the CAA has historically only published data for airports offering some form of scheduled services.
- 2.15 With these caveats, I set out, in **Table 2.2**, the available CAA statistics for business aviation and air taxi movements at those London airports for which the CAA have published data, over the period from 2005 to 2010. I have also included total business aviation movements at Farnborough based on the airport's own data. It is evident from this data that the market at the main airports serving the London business aviation market also recorded a decline in such movements in 2010 over 2009, the decline in the market overall having commenced in 2008. This information again only serves to highlight the relatively strong performance of LAA in 2010 in the current economic conditions.
- 2.16 Assuming 5% per annum growth generally, as projected by Eurocontrol as a whole, the number of business aviation flights would be expected to double over a period of approximately 14 years. Even with some slowing of growth in the long term, such doubling of the number of flights by 2030 would be a realistic estimate. This would result in a total demand for business aviation in the London area of at least 140,000 movements, representing an increase of at least 70,000 movements. The actual increase in the number of such movements will, in fact, be greater than this when account is taken of such movements classified as private or using other non-reporting airports.
- 2.17 Of this projected growth, my growth predictions only assume LAA capturing or attracting approximately 8,400 of such movements over the period to 2030, which amounts to no more than 12% of the total market growth in the London area. I consider this to be conservative in the circumstances which I explain further below.

**Table 2.2: Business Aviation and Air Taxi Movements at London Airports 2005 to 2010**

	<i>CAA Category 'Business Aviation'</i>						
	2005	2006	2007	2008	2009	2010	% Growth
Gatwick	894	614	475	541	361	1,542	72.5%
London Heathrow	1,386	1,523	1,634	1,935	2,407	1,829	32.0%
London City	984	555	337	283	248	268	-72.8%
Luton	17,175	20,898	24,346	20,856	15,284	15,180	-11.6%
Southend	1,333	1,328	1,928	1,477	1,244	1,022	-23.3%
Stansted	6,485	7,017	7,269	7,060	4,819	1,949	-69.9%
Biggin Hill	4,721	5,247	6,080	5,459	4,134	4,176	-11.5%
	<i>CAA Category 'Air Taxi'</i>						
	2005	2006	2007	2008	2009	2010	
Gatwick	1,318	1,688	1,499	1,482	1,313	458	-65.3%
London Heathrow	1,488	1,642	1,309	973	918	745	-49.9%
London City	5,483	7,685	8,301	6,192	6,770	7,108	29.6%
Luton	3,608	4,367	4,688	4,274	3,075	4,077	13.0%
Southend	452	930	1,234	1,338	1,058	1,038	129.6%
Stansted	1,833	1,881	1,994	1,712	1,480	1,610	-12.2%
Biggin Hill	3,858	5,654	8,197	8,511	6,014	5,826	51.0%
	<i>Combined Total</i>						
	2005	2006	2007	2008	2009	2010	
Gatwick	2,212	2,302	1,974	2,023	1,674	2,000	-9.6%
London Heathrow	2,874	3,165	2,943	2,908	3,325	2,574	-10.4%
London City	6,467	8,240	8,638	6,475	7,018	7,376	14.1%
Luton	20,783	25,265	29,034	25,130	18,359	19,257	-7.3%
Southend	1,785	2,258	3,162	2,815	2,302	2,060	15.4%
Stansted	8,318	8,898	9,263	8,772	6,299	3,559	-57.2%
Biggin Hill	8,579	10,901	14,277	13,970	10,148	10,002	16.6%
Farnborough (Total)	18,469	21,365	26,507	25,504	22,779	23,511	27.3%
<b>Total</b>	<b>69,487</b>	<b>82,394</b>	<b>95,798</b>	<b>87,597</b>	<b>71,904</b>	<b>70,339</b>	

Source: CAA Statistics & TAG Farnborough

## Capacity to serve London and Kent

- 2.18 In considering the scope to accommodate increased business aviation activity in the London area, it is important to bear in mind the capacity constraints facing the main London airports as commercial passenger and aircraft movement demand growth resumes, particularly in circumstances where there will be no additional runways for at least the medium term.
- 2.19 No material growth in such movements would be expected at Heathrow or Gatwick and there would in fact be expected to be increasing pressure on existing slots used by business aviation aircraft at these airports leading to an absolute decline in the number of such movements.
- 2.20 Although approval to increase movements to 120,000 per annum at London City has recently been confirmed, it is to be expected that growth in commercial passenger carrying flights will eventually begin to displace business aviation activity over the longer term. Use of the airport peaked at close to 95,000 aircraft movements in 2008. I would not expect significant increases in the number of business aviation movements at London City, with a reduction seeming more likely over the medium term.
- 2.21 Luton Airport operates within a constrained site. It is to be expected that, over time, commercial passenger carrying aircraft will also begin to displace business aviation activity at this airport as the principal constraint at this airport is apron parking space.
- 2.22 Scope for growth of business aviation movements at Stansted will also be limited once growth in commercial passenger movements resumes. Over the longer term, I would expect business aviation activity to be displaced from this airport as well.
- 2.23 Farnborough was recently granted planning approval to increase to 50,000 movements per annum, giving substantial scope for growth. Even so, it will at best be able to absorb no more than 38% of projected growth for the London area as a whole and it will predominantly serve an area to the west of London.



2.24 Biggin Hill Airport currently handles around 50,000 aircraft movements each year, of which around 10,000 are business aviation movements. It has a cap on movements of 125,000 within the airport lease. It does, however, operate with some restrictions on its opening hours (see **Appendix I**) which prevents arrivals prior to 07.30 in the morning and with further limitations at weekends. Such limits present some constraints on the airport's ability to attract business aviation activity, such as early morning arrivals from the USA or Europe. So, whilst I would expect Biggin Hill to handle some of the growth in business aviation, there are some limitations which mean that it will not be able to attract all types of service. This means that airports like LAA (without such restrictions) will continue to be attractive to operators.

2.25 Manston Airport also has the capability to handle business aviation operations, particularly those destined for East Kent, but it is not centrally located in the market which can be served from LAA.

2.26 There are other non-reporting airports that will also take up some part of the growth, particularly where they are located in close proximity to the business destination. These would include Northolt, whose civil enclave operates with a strict movement limit of 7,000 per annum and is already operating close to capacity, and smaller airports such as Blackbushe or Dunsfold which have limited facilities.

2.27 As with commercial passenger operations, business aircraft operators are particularly influenced by the specific location to which their passengers wish to fly. The benefit of business aviation activity is that it is not constrained to the major airports and it allows business travellers to get closer to their true origin and destination. European business aviation flew 103,000 airport pairs in 2009, compared to 32,000 for scheduled traffic<sup>7</sup>. One of the principal benefits of business aviation is the value of time saved, particularly by key decision makers.

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<sup>7</sup> CD8.23, page 5.

2.28 Just as I would expect LAA to be able to attract back commercial passenger demand from the congested London airports over time in proportion to demand in the local market, these same demand drivers apply to business aviation. LAA will be better able to attract business aviation activity from south London and the Kent Sussex border than either Biggin Hill or Manston airports. This coupled with its lack of restriction on operating hours and its ability to serve a wide range of business jets, means that a projection that LAA might attract around 12% of business aviation growth over the period to 2030 seems entirely reasonable.

### **Marketing of LAA to date**

2.29 It has been suggested at the Inquiry that LAA's apparent failure to attract significant commercial and business aviation activity since the ILS was installed in 2006 demonstrates a lack of potential for the Airport. I do not agree with this contention.

2.30 First, I understand that the Airport has never employed a dedicated marketing team.

2.31 Reference has been made at the Inquiry to the glossy Marketing Brochure<sup>8</sup> published in 2006. Whilst airports do produce such brochures, they are not of themselves sufficient to attract airlines to operate. Airlines would expect detailed market assessments for individual routes, including passenger demand levels from within the catchment area, an assessment of competitors, a demonstration of how the proposed route would fit into the airline's route network, and specific relevant local economic information, including the prospects for attracting business or leisure travellers on to a service. Such specific information is absent from the brochure, yet is what I would expect to be provided if any proper marketing of the Airport were to take place. There is simply no data on specific markets. It is important to remember that airlines fly where it is commercially viable not simply where it is physically possible.

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<sup>8</sup> CD11.10.

2.32 Rather, the brochure contains is a list of routes and airlines with equipment able to serve these routes from LAA's existing runway. The text describes these airlines and their current operations but does not relate this to the market potential within LAA's catchment area. Rather, there is a general reference on page 16 to the routes served from Southampton, an airport serving a larger and more densely populated catchment area so not representative of the routes which are potentially viable from LAA's catchment area.

2.33 Although a list of routes and potential airlines is given at page 15, this is not supported by any analysis as to whether the market exists for such services. Of the routes and airlines listed at page 15:

- *Manchester* – Flybe and bmi regional might be potential operators of such services but I do not believe that such a service is likely to be viable given competition from high quality rail service to Manchester. There has been substantial erosion of domestic air services in England except where they provide connections at Heathrow and Gatwick. Jet 2 could not, in any event, operate with the existing runway length as they operate B737 aircraft.
- *Newcastle* - Flybe could operate the Newcastle route but, in my analysis, there is insufficient demand to make such a route viable.
- *Plymouth* – Air Southwest has been purchased by Eastern Airways and is loss making. It has recently withdrawn its Gatwick service. The Plymouth market is a small niche market and service from LAA seems highly unlikely.
- *Edinburgh* – this is a route where I do see potential, once LAA has demonstrated that it can attract passengers to a range of charter services. Scot Airways is not a likely operator of such services as its scheduled service activity is confined to wet lease<sup>9</sup> services on behalf of City Jet feeding the airline's main base at London City Airport. Scot Airways no longer operates scheduled services on its own account.
- *Glasgow* – this is a route where I do see potential, once LAA has demonstrated that it can attract passengers to a range of charter services. Flybe is a candidate airline.

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<sup>9</sup> Aircraft provided with full crew and operated on behalf of another operator.

- *Channel Islands* – I expect such services to be viably operated on a seasonal basis, as evidenced by the interest in starting such a service by the local travel trade, once passenger terminal facilities are in place (the existing terminal is currently being refurbished in a way that would make this possible). As indicated in Appendix D to my first proof of evidence, the volume of passengers on such a service would be small. The airlines listed are candidate airlines.
- *Dublin* – this is another route where there is potential demand. Aer Arann could operate the route but is now an Aer Lingus franchise carrier serving larger regional airports. The planned services to Southend from Spring 2011 are a result of Stobart taking a shareholding in the airline, for which a commitment to start services was obtained, and are effectively a relocation of services from Luton Airport. The commercial viability of these services is as yet unknown.
- *Brussels* – Brussels Airlines has no track record in flying to smaller regional airports. In my assessment, there is insufficient demand for a service to Brussels from the local catchment area. Such a route is highly unlikely, not least given competition from Eurostar services.
- *Amsterdam* – there is insufficient demand for a regular scheduled service to Amsterdam (see table 5.2 of my first Proof of Evidence LAA/4/A), other than as a basis for providing onward flight connections. Hence, the only candidate airline would be KLM but KLM would be unlikely to operate until the Airport had proven its commercial viability through attracting other commercial services, such as charters.
- *Rotterdam* – there is insufficient demand to sustain a service to Rotterdam. VLM Airlines is now part of CityJet (in turn part of the Air France Group), whose operations are centred on London City Airport and also feed Air France's Paris hub making operations by VLM from LAA unlikely.
- *Lyon and Nice* – there is insufficient demand to sustain regular services to these destinations, other than part season charter services for the ski season. Britair operates principally for Air France within France and on selected routes to major cities outside France. City Airline is a Scandinavian Airline operating to a number of points from Sweden with no routes not based in Stockholm. Régional is part of the Air France group and operates a number of routes from Paris. It would be unlikely to open up a regional route not serving the Paris hub. Hence, these airlines would be highly unlikely to operate such routes.

- *Barcelona* – I anticipate that services to this destination might be developed in the longer term as demand levels build up. Air Nostrum might be a candidate airline.

2.34 Accordingly, whilst some of these routes and airlines listed in the brochure could operate from LAA, in many cases the routes would not be commercially viable and the airlines not realistic candidate operators. I consider that the 2006 Marketing Brochure was a theoretical exercise not underpinned by adequate market research to provide an appropriate platform for marketing the Airport. This is contrast to an appropriate, targeted marketing exercise focused on the real market that LAA can properly serve which I have identified in my own analysis. I am unaware of any such exercise yet having been undertaken.

2.35 Equally, in the absence of a marketing department, I do not believe that LAA has yet marketed the Airport's capability to business jet operators. To the extent that LAA has demonstrated growth, despite the recession related downturn in the market more generally, serves to indicate the attractions of using the Airport, which if properly marketed would generate accelerated growth of business aviation activity.

### 3 DAILY SCHEDULE

- 3.1 I understand that queries have been raised regarding the expected timing of commercial flights at LAA, particularly in terms of the number of movements expected at more critical times of day for birds around dawn and dusk at certain times of years.
- 3.2 As indicated in my first Proof of Evidence at paragraph 5.44, I consider it unlikely that LAA will attract based airline operations at a throughput of either 300,000 or 500,000 passengers per annum. As such, flight movements will be by aircraft based away from LAA. This, in fact, minimises the need or likelihood for early morning or late evening flights from such operations (in contrast to existing and future business aviation activity). This is a particular consideration given that the Airport will be closed at night (i.e. after 2300) if the development were approved.
- 3.3 In **Tables 3.1 to 3.4** overleaf, I set out typical busy day schedules which indicate the profile of flights we would expect at LAA for the destinations shown in Appendix D to my first Proof of Evidence (LAA/4/C).
- 3.4 I have based these schedules on the profiles of flights to such destinations at other small UK regional airports, such as Humberside currently handling 283,000 passengers a year, City of Derry Airport currently handling 346,000 passengers a year and at Manston Airport. I set out the flight timetables for illustrative days for these airports for summer 2011. This demonstrates the basis upon which I have assessed the expected timings of flights at LAA where the destinations are the same or similar.

<b>Table 3.1: Typical Busy Day Schedule for LAA Lower Growth Summer</b>		
<b>300,000</b>		
<b>Destination</b>	<b>Arrive</b>	<b>Depart</b>
Dublin	10.00	10.30
Glasgow	12.10	12.40
Malaga	12.30	13.30
Edinburgh	14.25	14.55
Faro	15.00	16.00
<b>500,000</b>		
<b>Destination</b>	<b>Arrive</b>	<b>Depart</b>
Dublin	10.00	10.30
Glasgow	12.10	12.40
Malaga	12.30	13.30
Belfast	13.40	14.10
Edinburgh	14.25	14.55
Faro	15.00	16.00
Alicante	15.30	16.30
Tenerife	17.00	18.00
<b>Source: York Aviation</b>		

<b>Table 3.2: Typical Busy Day Schedule for LAA Lower Growth Winter</b>		
<b>300,000</b>		
<b>Destination</b>	<b>Arrive</b>	<b>Depart</b>
Dublin	10.00	10.30
Glasgow	12.10	12.40
Malaga	12.30	13.30
Edinburgh	14.25	14.55
Tenerife	17.00	18.00
<b>500,000</b>		
<b>Destination</b>	<b>Arrive</b>	<b>Depart</b>
Dublin	10.00	10.30
Glasgow	12.10	12.40
Malaga	12.30	13.30
Belfast	13.40	14.10
Edinburgh	14.25	14.55
Alicante	15.30	16.30
Tenerife	17.00	18.00
<b>Source: York Aviation</b>		

<b>Table 3.3: Typical Busy Day Schedule for LAA Higher Growth Summer</b>		
<b>300,000</b>		
<b>Destination</b>	<b>Arrive</b>	<b>Depart</b>
Dublin	11.00	11.30
Glasgow	12.10	12.40
Malaga	12.30	13.30
Edinburgh	14.25	14.55
Faro	15.00	16.00
<b>500,000</b>		
<b>Destination</b>	<b>Arrive</b>	<b>Depart</b>
Glasgow	12.10	12.40
Malaga	12.30	13.30
Belfast	13.40	14.10
Edinburgh	14.25	14.55
Faro	15.00	16.00
Alicante	15.30	16.30
Tenerife	17.00	18.00
<b>Source: York Aviation</b>		

<b>Table 3.4: Typical Busy Day Schedule for LAA Higher Growth Winter</b>		
<b>300,000</b>		
<b>Destination</b>	<b>Arrive</b>	<b>Depart</b>
Dublin	11.00	11.30
Glasgow	12.10	12.40
Malaga	12.30	13.30
Edinburgh	14.25	14.55
Tenerife	17.00	18.00
<b>500,000</b>		
<b>Destination</b>	<b>Arrive</b>	<b>Depart</b>
Glasgow	12.10	12.40
Malaga	12.30	13.30
Belfast	13.40	14.10
Edinburgh	14.25	14.55
Alicante	15.30	16.30
Tenerife	17.00	18.00
<b>Source: York Aviation</b>		



<b>Table 3.5: Peak Summer Days for Selected Comparator Airport</b>								
<b>Humberside</b>								
<b>Destination</b>	<b>Saturday - July</b>			<b>Airline</b>	<b>Destination</b>	<b>Thursday - July</b>		<b>Airline</b>
	<b>Arrive</b>	<b>Depart</b>	<b>Depart</b>			<b>Arrive</b>	<b>Depart</b>	
Amsterdam	-	6.10		KLM	Amsterdam	-	6.10	KLM
Amsterdam	9.30	10.10		KLM	Amsterdam	9.30	10.10	KLM
Alicante	10.10	10.35		Ryanair	Palma	11.24	14.10	Air Europa
Palma	12.55	13.55		Thomas Cook	Amsterdam	16.40	17.20	KLM
Jersey	15.10	15.35		Flybe	Dalaman	20.00	21.00	Onur Air
Amsterdam	16.40	17.20		KLM	Amsterdam	21.20	-	KLM
Amsterdam	21.20	-		KLM				
<b>City of Derry</b>								
<b>Destination</b>	<b>Tuesday - July</b>			<b>Airline</b>	<b>Destination</b>	<b>Friday - July</b>		<b>Airline</b>
	<b>Arrive</b>	<b>Depart</b>	<b>Depart</b>			<b>Arrive</b>	<b>Depart</b>	
Dublin	9.15	9.35		Aer Arann	London Stansted	8.25	8.50	Ryanair
Tenerife	10.45	11.10		Ryanair	Dublin	9.15	9.35	Aer Arann
Palma	12.50	14.10		Thomson Airways	Manchester	12.25	12.50	Flybe
London Stansted	14.30	14.55		Ryanair	Liverpool	13.50	14.15	Ryanair
Dublin	19.20	19.45		Aer Arann	Birmingham	13.55	14.20	Ryanair
					Glasgow Prestwick	15.35	16.00	Ryanair
					London Stansted	16.20	16.45	Ryanair
					Reus	17.20	18.05	Air Europa
					Dublin	19.20	19.45	Aer Arann
<b>Manston</b>								
<b>Destination</b>	<b>Friday - July</b>			<b>Airline</b>	<b>Destination</b>	<b>Saturday - July</b>		<b>Airline</b>
	<b>Arrive</b>	<b>Depart</b>	<b>Depart</b>			<b>Arrive</b>	<b>Depart</b>	
Manchester	13.40	14.05		Flybe	Edinburgh	11.15	11.40	Flybe
Edinburgh	12.10	12.35		Flybe	Jersey	14.50	16.30	Air Southwest

## 4 AIRPORT SOLUTIONS REPORT

- 4.1 It has come to my attention in light of the cross-examination to date that reliance is being placed on the Second Review of Proposed Bird Control Management at LAA by Airport Solutions (NE/1/E Appendix 6) by way of alleged rebuttal of my evidence. I deal with this document here.

### **Boeing B737 aircraft**

- 4.2 At Section 3 of this Report, Airport Solutions raised queries about the aircraft types which we expect to operate from LAA. Whilst I do not name specific airlines which are expected to operate from LAA, this is only because it is unrealistic to expect specific commitments from airlines until such time as the time of completion of the proposed development is confirmed. I do, however, refer to the likelihood of operations being by charter airlines such as Thomsonfly or Thomas Cook Airlines or foreign charter airlines (LAA/4/A, paragraph 5.36). I also comment on the likelihood of operations by low fare airlines and regional airlines.
- 4.3 At Table 5.6 of my first Proof of Evidence (LAA/4/A), I make clear that we are expecting operations by B737/A320 sized aircraft, otherwise known as Code C aircraft. I have not been specific to the precise variant which might be used. For the purpose of assessing terminal capacity, I adopted the benchmark of a B737-800 of 189 seats at Appendix C (LAA/4/C) as having the highest seating capacity of those Code C aircraft which might reasonably be expected to use LAA having regard to the expected airline operators and the aircraft within their fleets. This was for the purpose of assessing the capability of the terminal to process the maximum number of passengers from a Code C aircraft and certainly does not indicate that such aircraft will be the sole aircraft which might operate on relevant routes.

- 4.4 In terms of the B737-300 aircraft, singled out by Airport Solutions at paragraph 3.6 of their report, I do not believe that there will be significant operations by B737-300 type aircraft. Such aircraft make up a very small proportion of the fleets of airlines which are expected to operate many of the routes that I have identified as likely to be operated from LAA and these aircraft are generally being phased out. Thomsonfly operates both B737-300 and B737-800 aircraft as well A320 and A321 aircraft, although the B737-300 makes up only 22% of its fleet of Code C aircraft and are older types of aircraft being phased out. I am unclear of the relevance of JAT of Serbia or Lufthansa identified by Airport Solutions, neither of which have been indicated in my evidence as likely to operate at LAA nor do they serve destinations for which I have identified a market.
- 4.5 Other regional routes that develop over time are likely to use smaller aircraft types.

### **Aerodrome Licensing**

- 4.6 At paragraph 5.3, it is stated that LAA will need to change from having an Ordinary Use Licence from the CAA to a Public Use Licence as it increases the number of commercial aircraft operations. This is not correct. A number of airports operate substantial number of commercial passenger services under Ordinary Use Licences, including Coventry, City of Derry, Farnborough, Manston, Newquay and Southend Airports<sup>10</sup>. In particular, Coventry, City of Derry and Newquay Airports have handled 500,000 to 1 million passengers per annum whilst operating under Ordinary Use Licences.
- 4.7 It is clear that airlines are happy to operate from a licensed airport, whether with an Ordinary or Public Use Licence. I agree with Airport Solutions at paragraph 5.5 that airlines would also have their own specific requirements before considering whether to operate from an airport, first and foremost of which being whether there is sufficient demand to make services viable.

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<sup>10</sup> [http://www.caa.co.uk/docs/375/srg\\_as\\_ordinarylicencesandmaps.pdf](http://www.caa.co.uk/docs/375/srg_as_ordinarylicencesandmaps.pdf)

## Delays

- 4.8 Airport Solutions goes on to refer to delays to aircraft which would be a consequence of a “*warn and hold*” approach to managing the risks associated with birds in the vicinity of the Airport. My understanding is that this is not a significant element of the Airport’s Bird Hazard Management Plan and I have discussed the risk of delay with Mr Deacon from such process. As a consequence, I consider that Airport Solutions has substantially overstated the risk of delays to airline operations at paragraph 5.6.
- 4.9 Hence, I do not accept that there would be any material or regular “*departure delays arising from repeated and extended hold times*” sufficient to “*counter the commercial benefits of reduced passenger transit times to and from the airport and cost*” as I refer to in paragraphs 6.33 and 6.51 of my first Proof of Evidence (LAA/4/A). Nor do I consider this would in any way undermine the merits of reduced flying times from the Airport to key destinations to the South. The discussion of IATA delay codes, in paragraphs 6.7 and 6.8 does not seem relevant.
- 4.10 Airport Solutions, in its discussion of peak period slots in paragraph 6.9, has clearly not considered the nature and frequency of operations to points such as Belfast, Dublin, Edinburgh and Glasgow. From Table 5.7 of my first Proof of Evidence, it is clear that regional aircraft operations are expected to account for no more than 2,720 movements a year. This amounts to less than 8 flights per day on average (4 arrivals and 4 departures). We have assumed the pattern of such operations to be similar to that currently operated to Manchester and Edinburgh by Flybe at Manston, with operations largely in the middle part of the day. Similarly, it is clear from Appendix D (LAA/4/C) that we do not anticipate the main destinations which LAA will serve to be major European cities where slot delays are a major concern. Hence, Airport Solutions’ assessment of the potential concerns of airlines appears based on a number of false premises and their conclusions at paragraph 9.2 are unfounded.

## **APPENDIX I: BIGGIN HILL OPERATIONAL LIMITS**





You are here: [Welcome](#) > [Community](#) > [Biggin Hill and the Olympics](#) > **The Proposals**

## The Proposals

### Temporary Increasing of Opening Hours

**At present, the airport has restricted and strictly enforced opening hours. During the Olympics, the timing of many events go on until late evening and programme highlights will frequently be at weekends, which is why the airport is proposing to amend the opening hours for this time.**

The Games will also attract a lot of day visitors. Although the actual dates of the Olympics and Paralympics are 27th July to 9th September 2012, the proposals are for Friday 13th July 2012 to Sunday 23rd September 2012, allowing for a build up and a shut down period at either end. It is expected that during the Olympics there will be an extra 21 business flights per day in addition to the average 32 per day at present. This level is well within the authorised numbers of flights permitted and well below the maximum daily rate at peak times of the year.

#### Current

- Weekday opening hours 0630 to 2200 hrs (10pm)
- Weekend opening hours 0900 to 2000 hrs (8pm)
- 0630-0730 Unlimited number of departures, no arrivals
- Passenger tax - £0
- Passenger limit - no limit but no fare paying passengers
- Annual flight allowance - 125,000
- No flying outside of operating hours

#### Proposed for the Olympics

- Weekday opening hours 0630 to 2300hrs (11pm)
- Weekend opening hours 0630 to 2300hrs (11pm)
- 0630-0700 - maximum of three flights in or out
- Passenger tax - £3 per departing commercial passenger
- Passenger limit - 75 per flight, incl. some who may have paid a fare
- Annual flight allowance - 125,000
- No flying outside of operating hours

#### Temporary Allowance of Air taxi Services

**The airport does not accept scheduled passenger services. The airport is not looking to change this under these proposals.**

Air taxi services are not scheduled passenger services and are operated by companies where seats can be 'pooled' on an on-demand basis, or the whole plane paid for by one person or organisation. These aircraft services already operate at the airport but they would normally be turned away if they are carrying passengers who have paid for their seat.

The airport proposes that to discriminate against these visitors would be unfair. However, they would be subject to the community tax noted above that will be paid to the Council. Aircraft types would be limited to 75 seats and would be the same as those already using the airport and nothing like the big passenger aircraft that use Gatwick and Heathrow.

#### How are these proposals being reviewed?

There is a lease of the airport which has been agreed with the Council, which sets the guidelines and terms within which the airport is operated and run for 125 years. Within the lease is a section called the Operating Criteria that is designed to be changed from time-to-time during such a long lease.

The airport's Operating Criteria section controls the noise levels allowed of aircraft which can use the airport opening hours and other such matters, i.e. things that are bound to need changing over time.

The London Borough of Bromley is the landlord and any changes to the Operating Criteria have to be made in agreement with the Council, even temporary changes. London Biggin Hill Airport has been keeping the landlord advised of Olympic matters and has now submitted the final proposals outlined here to the Council in order to agree the terms so that the airport can ensure the transportation authorities can plan the capacity of the airport to handle the expected traffic.