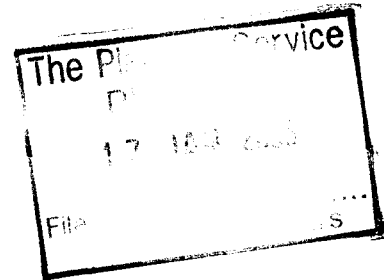


# bmi

14 January, 2005

C H Baird  
The Planning Service  
Millennium House  
17-25 Great Victoria Street  
Belfast  
BT2 7BN



*Dear Mr Baird*

## REVIEW OF PLANNING AGREEMENT WITH BELFAST CITY AIRPORT

I refer to your letter of 19 November to bmi's Chief Executive, Nigel Turner, about the review of the planning agreement between the Department of the Environment (Northern Ireland) and Belfast City Airport.

I am pleased to enclose bmi's formal response. I confirm that bmi is content for this to form part of the public record.

Please do not hesitate to contact me if you require further clarification.

*Yours sincerely*

**Peter McClymont**  
Manager, Industry and Government Affairs  
Industry and Government Relations

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A STAR ALLIANCE MEMBER

## REVIEW OF THE PLANNING AGREEMENT BETWEEN THE DEPARTMENT OF THE ENVIRONMENT (NORTHERN IRELAND) AND BELFAST CITY AIRPORT

### COMMENTS FROM bmi

#### introduction

1. bmi welcomes the opportunity to comment on the review of the planning agreement between the Department of the Environment (Northern Ireland) and Belfast City Airport.

#### bmi

2. bmi is the UK's second largest full service airline and has its base at London Heathrow airport. bmibaby – a "low cost" unit – and bmi regional are wholly-owned subsidiaries of bmi. The bmi group operates over 3000 flights a week to over 90 destinations on domestic, European and transatlantic routes. The group has a fleet of 56 jet aircraft. In 2004 the bmi group carried over 10 million passengers.
3. bmi has been operating services to Ireland for nearly 50 years. This is a record of commitment and dedication which is hard to match.

#### background

4. As has been noted, the Government's White Paper on Aviation, published in December 2003, set out a strategy for providing the appropriate infrastructure to meet forecast demand by passengers and other airport users. The Government took a balanced approach to this issue, recognising both the vital benefits which aviation brings to the UK economy – in the local airport community as well as further afield – and the environmental impact.
5. Northern Ireland is dependent upon aviation links to the rest of the UK and Europe. There are no surface transport alternatives without a sea crossing.
6. As a group, bmi refocused its efforts on serving the Belfast community in early 2003. bmi now offers a 8 times a day service between Belfast City and London Heathrow. bmibaby flies to other UK and European destinations from Belfast International Airport. In simplistic terms, Belfast City primarily serves the business market and Belfast International primarily serves the leisure sector.
7. bmi has no current plans to alter its pattern of service at Belfast City though, of course, the company will respond to commercial and other pressures as and when these arise. We are committed to serving the Northern Ireland community as we have done with success for many years.
8. Our 8 times daily service helps form the vital link between Northern Ireland and London. The community sees that link as important to the economic development of Northern Ireland. In addition, the service provides a link to Europe and beyond through interlining and codeshare services. bmi is a member of the Star Alliance, the world's largest airline alliance. Our links with other Star carriers at our Heathrow hub allow for convenient

connections to the four corners of the globe. This helps foster inward investment and inward tourism, both essential for the Northern Ireland economy.

## **operating hours**

9. However, the current planning agreement restricts opening hours. The 2130 closing restricts our ability to provide a late evening service from London to Belfast. Our last daily flight departs Heathrow at 1940, arriving at Belfast City at 2100. This restriction, we know from customer feedback, restricts the ability to do a full day's work in London or Europe.
10. Prior to moving our Heathrow services to Belfast City in 2001 we provided a late arrival into Belfast International Airport in order to serve the business community. It was always our intention when moving to Belfast City to be able to offer a similar service at this airport: i.e a later Heathrow departure affording better European connections.
11. bmi's position remains that the opening hours restriction limits our ability to provide the service demanded by the public. We fully appreciate community concerns about increased operating hours. bmi supports the need for a balanced approach to the public policy framework for the airport. bmi fully supports a programme of sustainable development at Belfast City Airport, as we do at other airports within the UK. Yet, bmi believes that the opening hours restriction hinders economic development in the region. The restriction hampers bmi's ability to grow business into and out of Belfast City in the face of unhindered competition from other carriers operating from other airports in the region, most critically, Dublin.
12. That being the case, bmi supports a reasonable extension of the opening hours at Belfast City Airport.

## **air transport movements (atm) cap**

13. As regards the other conditions to the planning agreement, we are concerned that the ATM cap may become a potentially critical issue in the future if, for example, the airport attracted new operators or we wished to expand the range and/or frequency of our services. Whilst there is existing headroom within the current ATM cap for minor operational changes (such as accommodating an additional evening rotation), the existence of a cap does limit future potential operations and reduces the marketability of Belfast City Airport for customers.
14. bmi operates single aisle, chapter 3 compliant aircraft – Airbus A319, A320 and A321. Belfast City Airport can currently accommodate these aircraft and other single aisle narrow body aircraft in our fleet. bmi has no plans to alter the usage of aircraft into and out of BCA.

## **seat sales cap**

15. The cap on seat sales – currently 1.5 million per year – is of more immediate concern to bmi. We can see little reason for retaining this cap, which appears to be based on terminal operational issues rather than air traffic, runway operational or environmental grounds. The cap is likely to have an impact on airport users in the near future. Data provided in BCA's evidence indicates that the current cap is in danger of being breached.

This will become a critical issue if one or other of the current operators wishes to increase aircraft size or if a new operator wishes to enter the market.

16. bmi supports the removal of the seat sale cap.

## **other planning conditions**

17. Regarding the other conditions of the planning agreement between DOE and BCA – noise monitoring and preferential routeings over Belfast Lough – bmi supports retention of these subject to continued review based on experience and operational requirements.

## **conclusion**

18. In conclusion,

- bmi supports a reasonable extension of the opening hours at Belfast City Airport;
- we are concerned that the ATM cap may become a potentially critical issue in the future;
- bmi supports the removal of the seat sale cap; and,
- bmi supports retention of the noise monitoring and preferential routeing conditions

19. Belfast City and bmi provide an essential service to the community. We recognise our responsibilities as a good corporate citizen. bmi will continue to work with interested parties – both airport users and neighbours - to deliver the best air transport package to Belfast and Northern Ireland community. However, the failure at this time to address the option to extend flexibility will have all impact on the economy and therefore creation of jobs within Northern Ireland where transport links to the outside world are vital in creating the inward investment the province so obviously requires.