

## 1. Summary

Flybe. strongly supports Belfast City Airports request for an alteration to the planning order, which limits the airport to not offering more than 1.5m seats on scheduled flights in any 12-month period.

The limitation on seat sales is a legacy commitment borne out of a time when regional aircraft were smaller than the 85 seat average plane that flybe (Belfast City's largest operator) operate today. Belfast City Airport are not seeking any change in the other key areas of operating activity – opening hours and air transport movements – which have the potential for more impact upon the local environment.

Flybe. does believe that a gradual relaxation in operating hours would be desirable in the medium term with the permitted opening hours being extended to 10.30pm for regional aircraft below 115 seats. Flybe. believes that the noise profile of its fleet can ensure that any relaxation will have limited impact on the local environment.

Flybe. believes that Northern Ireland has benefited greatly from having two strong airports and that its operations fulfil exactly Belfast City Airports original planning criteria which was to deliver regional services to the UK and Ireland.

## 2. Flybe. in Northern Ireland

Flybe. expects to carry more than one million passengers in and out of Belfast in 2005, to and from 10 direct UK destinations (London Gatwick, Birmingham, Bristol, Leeds, Newcastle, Southampton, Exeter, Glasgow, Edinburgh, Norwich, Aberdeen, Liverpool and Jersey), and 20 international destinations via our UK hubs.

## 3. Flybe's Future in Northern Ireland

Given flybe.'s recognition of the importance of regional hubs, we see Belfast City Airport as an integral part of our overall region-based European route network. We are constantly looking at ways in which we can improve and develop our services from Belfast City Airport, in order to fully meet consumers' preferences and demands. With no surface infrastructure connecting Northern Ireland to the rest of the UK and Europe, flybe. recognises the value of accessible air travel to the economy, local enterprise development, and the cultural life of the region. We are keenly aware of the need to establish and maintain a comprehensive route network, with the maximum number of connections to key destinations, which serves the business community and Northern Ireland's rapidly growing tourism industry. The economic development of Northern Ireland rightly remains a key

Government priority and flybe. welcomes the opportunity to make our contribution to this objective.

Our recent expansion in Southampton and Exeter in the South of England demonstrates the tangible benefits which regular and affordable air connections bring, not solely business travellers and the leisure industry, but also in terms of the indirect impact of investment flowing into regions.

Flybe.'s aim is to connect Northern Ireland with every key business and leisure destination in the United Kingdom. Aberdeen, Liverpool & Norwich are just the latest cities we have added to the route portfolio available to passengers from Belfast. However, although flybe. is willing to commit to providing such a service, a number of impediments need to be addressed if the full potential of improved transport connections is to be realised. Flybe. believes that recognising and addressing these constraints should be a central objective of any planning reviews.

#### 4. Passenger Seat Sale Restrictions

Belfast City Airport is a successful airport, which through its facilitation of flybe.'s flying programme is delivering upon its planning remit of providing regional services to the UK & Ireland. The growth in demand for these services means that the airport has now reached the ceiling under this out dated planning restriction.

The 1.5m seat sale ceiling was introduced at a time when the average regional aircraft has a seat capacity of 33. Today's regional aircraft flown by flybe. have an average seat capacity of 85. This change can be witnessed by the fact that the ATM capacity has not been breached nor is any change in the capacity figures being requested.

If the seat sale cap is not changed, then we will in the near term have to either:

- a) End introduction of new routes to new regional UK and Ireland destinations.
- b) Cannibalise existing routes and seek to close the least profitable ones.
- c) Reduce frequency on routes and reduce consumer service.

#### 5. Operating Hour Restrictions

Flybe. would like to see a gradual movement in operating hours with the opportunity to extend the permitted operating hours to 10.30pm. This would enable flybe. to:

- a) Deliver more service
- b) Deliver potentially European City services

- c) Ensure that operating time over-runs are minimised

We believe this would bring us into line with most heart of the city airports e.g. Glasgow etc.

Conclusion

Having two airports in Northern Ireland has been of great benefit to the Northern Ireland economy. A CBI survey shows that every 1 million passengers creates 1000 jobs in the local economy. As air travel is so critical to Northern Irelands economy, the 2-airport strategy has also driven down air prices and thus regional inflation thereby benefiting the economy. Any artificial block on the further development of this strategy would severely impact the local economy.