



Our Ref: AL/KS

RECEIVED

31 January 2005

PLANNING ADMIN

Ms Gemma Friel  
BCA Planning Agreement Consultation  
Planning Service HQ Admin Section  
2<sup>nd</sup> Floor, Millennium House  
17-25 Great Victoria Street  
BELFAST  
BT2 7BN

Dear Ms Friel

**BCA Planning Agreement Consultation**

Further to the above matter, please find enclosed a copy of Antrim Borough Council's response paper, as approved in committee on 27 January 2004, for your information.

It is hoped that the paper will contribute to the consideration of this regionally important issue, and if there are any queries relating to the response, please do not hesitate to contact us at your earliest convenience.

Through the response, Council has sought to highlight the importance of evaluating the matter at a regional level, and whilst the International Airport is clearly of prime importance to the Borough, its regional significance should not be detrimentally affected by this application.

Council acknowledges the need for market competition, but would also reiterate the need to ensure that the regional market is not jeopardised to the benefit of one individual facility, and hope that Planning Service will consider the issue carefully.

Council would also like to extend thanks to Planning Service for granting an extension to the deadline in order to accommodate committee schedules. We are very much obliged for your assistance.

Antrim Borough Council, Corporate Services, The Steeple, Antrim BT41 1BJ  
T. 028 9446 3113 F. 028 9446 4469 E. corporate@antrim.gov.uk W. www.antrim.gov.uk

Finally, Council would be grateful if Planning Service could keep them informed of the progress of this application.

Thank you for your assistance.

Yours faithfully

A handwritten signature in black ink that reads "Alastair Law". The signature is written in a cursive style with a horizontal line underneath it.

~~ALASTAIR LAW~~  
*Planning Officer*

Enc

# **PUBLIC CONSULTATION EXERCISE – REVIEW OF CURRENT BELFAST CITY AIRPORT PLANNING AGREEMENT**

Antrim Borough Council welcomes the opportunity to comment on the proposed review, and in particular, is keen to ensure that any proposed changes to the existing agreement do not discriminate unfairly against Belfast International Airport, given its importance to the Borough and the region as a whole. As such, Planning Service is correct to open this debate up to wider regional scrutiny.

The comments (below) briefly outline Council's stance on the matter.

- *Significant changes to the existing 'Seats for Sale' restriction will have serious ramifications for Belfast International Airport, particularly in terms of employment. The tangible impact of the proposal must be assessed in terms of the benefit to the region, and not in terms of an individual operator or facility. Such an approach is justifiable in light of the Regional Development Strategy and in the need for a cohesive, regional aviation strategy.*
- *The net result of the proposal will not serve the region's best interests in the medium- or long-term. There is concern that this approach will undermine the credibility of the local market in the face of international competition; it is intended, purely and simply, to serve the operational targets of Belfast City Airport alone.*
- *The current physical constraints facing Belfast City Airport will prevent the accommodation of growth forecasted by a commensurate increase in the 'Seats for Sale'.*
- *The removal of the restriction will permit operators to expand services to the detriment of other regional facilities, most notably Belfast International, which is acknowledged as the region's chief gateway facility.*
- *Clarification as to how the proposal will affect operating hours (and thereby, local communities) is needed in environmental terms.*

These points are expanded in the following statements.

## **1. Strategic and Regional Implications:**

The status of the International Airport is reiterated in the Department's own Regional Development Strategy. It offers, "a unique regional opportunity because of its

extensive modern facilities, its available development land and its strategic geographical location, especially in relation to Belfast, Antrim, Craigavon and Lisburn, as well as to the main transport corridors.”

The RDS notes that, “the International Airport area has the potential to attract major inward investment to the region which might not otherwise occur. Successful new investment on a large scale would have consequential implications for improvements to local transport linkages, both road and rail, and maintaining airport accessibility.”

A strictly controlled increase, based on actual passengers handled per annum, rather than one based on the spurious ‘*Seats for Sale*’ concept, may be a more equitable approach for the authorities to adopt.

### **2. Employment & Investment Implications**

In terms of investment and future growth, the *Genesis Business Park* at Belfast International will provide up to 600,000 sq ft for airport, distribution and freight-related services, and will have a significant impact upon the local and regional economies. It is felt that the proposed amendment may jeopardise this, and it is the responsibility of Planning Service to review this matter strategically to ensure that the amendment does not outweigh the net costs at a regional level.

It is clear that Belfast International is best equipped to handle the bulk of the anticipated growth in air passenger traffic, be that international or domestic markets, given its location and its physical capacity to accommodate growth, and the fact that it is unencumbered by restrictive operating hours. The future of this facility should not be sacrificed for short-term gain.

In 2004, Belfast International had about 4,000 airport pass-holders and carried approximately 4 million passengers. In contrast, Belfast City employed 800 persons and a throughput of nearly 2 million passengers. The accepted industry norm is 1,000 direct jobs for every 1 million annual air passengers, and the wider impact in terms of catalytic employment within the general economy can reach 3,500 jobs per million passengers. Put simply, this indicates that Belfast International is a more efficient generator of employment, and this needs to be safeguarded.

### **3. Competitiveness & The Impact on New and Existing Routes:**

The National Consultation Paper (July 2002) noted that, “a small, dispersed population of only 1.7 million means that Northern Ireland airports have a limited catchment...this in turn limits the range and frequency of services the airports can support, especially to international destinations.” Council believes that it is imperative that any decision reached should note this cautionary statement.

In the Consultation Paper, the Department for Transport stated that Belfast International is the “fifth largest regional airport (8<sup>th</sup> largest in the UK) and Belfast City is the 13<sup>th</sup> largest (18<sup>th</sup> in the UK)”. It also recognised an important trend that cannot be supported by Belfast City, that “growth has been faster in international services than in domestic services”.

Whilst regional air traffic has increased since September 11<sup>th</sup>, Council is concerned that ‘leakage’ to airports in neighbouring regions receiving favourable tax breaks may

occur, with the likely result that the local market will be structurally weakened. Belfast International identified this in response to the White Paper, amid legitimate concerns in respect of the viability of remaining routes, and further market dilution. The review will clearly have serious economic implications for the entire Northern Ireland market, in business, employment and tourism terms.

The opportunity afforded by the White Paper to review the ‘*Seats for Sale*’ restriction has not been lost upon the City Airport’s operators. Council contends that this tactic is out of order for a facility of such obvious limitations (physical capacity, operating hours etc) and is certainly not in keeping with the regional objectives as espoused by the RDS, nor the economic arguments above.

Council believes that there is an urgent need for clarity and public transparency in respect of the implications of removing the ‘*Seats for Sale*’ restriction, and in terms of the practicalities of the proposal. This needs to be highlighted by Planning Service. Failure to implement the stipulations of the capping agreement when that predetermined point is reached will only serve to fuel desire for further, future expansion. However, if no alternative can be agreed, Council would suggest that a very limited revision be proposed, rather than a more damaging, wholesale modification of the passenger cap.

**Summary:**

In conclusion, there is an urgent need for a regional aviation strategy characterised by complementarity, sustainability and transparency. Council is convinced that, in light of the RDS, the Department would support such a vision. Unfortunately, it is clear that the application fails to recognise such principles.

Competition is necessary in any market. However, the bigger picture to consider is of a market struggling to establish itself in the wake of a decade of airline withdrawals, and facing the threat, in particular, of Dublin Airport, which hints at future market erosion.

Planning Service must appreciate that any review must not jeopardise the long-term security of the regional market at the behest of an individual operator or facility. Wholesale changes to the restrictions will have serious repercussions, but if it arises, Council feels that any new, re-worked agreement should remain capped, given the physical and environmental constraints caused primarily by the juxtaposition of the airport and nearby residential areas.

The White Paper spoke of the need to evaluate airport capacity provision throughout the UK on the existing basis of too little available capacity in respect of handling anticipated air traffic growth until 2030. Frankly, Belfast International is more than capable of accommodating all of this anticipated growth, and with considerably less environmental impact – a key consideration – than opting to expand Belfast City. This is ostensibly acknowledged within the White Paper.

Council trusts that the above comments are helpful in this matter.

ALASTAIR LAW

Planning Officer - 12 January 2005 [*Endorsed at PSL Committee 27 Jan 04*]