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### **Consumer Council response to CAA consultations on Economic Regulation at Gatwick, Heathrow, and Stansted Airports**

The Consumer Council welcomes the opportunity to respond to the CAA's consultations on Economic Regulation at Gatwick, Heathrow and Stansted airports from April 2014. This response focuses on the need to ensure the economic regulation of Gatwick, Heathrow, and Stansted airports promotes the principles of fairness, value and choice for the Northern Ireland passengers that travel via the three airports.

The Consumer Council have reviewed the CAA 'In Focus' briefing on making London's airports better for passengers. The Consumer Council is not in a position to be able to comment on the specific caps on airport charges being proposed. However, the purpose of this response is to ask CAA to ensure that the economic regulation of Heathrow, Gatwick and Stansted does not have any disproportionate impact on Northern Ireland passengers.

The consultation on CAP 1027 stresses "users' interests are generally best served where they have genuine choice among airports that are competing and innovating vigorously for their custom". Northern Ireland currently is well served by connections to the three airports in question, however, the majority of interlining opportunities operate via Heathrow, giving the airport significant control in terms of the provision of global connections for Northern Ireland passengers. It is essential that the regulation of Heathrow recognises the airport's substantial market power in respect to this matter and prevents the airport's charges from unfairly disadvantaging the Northern Ireland consumers who use Heathrow.



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In its response to the Airports Commission discussion paper on aviation connectivity the CAA recognises capacity constraints at Heathrow will increasingly shape network configuration by reinforcing the trend towards focusing on the most profitable, high-yield routes which is likely to lead to further specialisation on long-haul routes. In this document the CAA also acknowledges capacity constraints will reinforce the trend towards focusing on the most profitable high-yield routes and while a short haul network will be needed to provide feeder traffic for long-haul routes, it is essential that Northern Ireland's Heathrow services are not sacrificed to increase long-haul capacity. To prevent steps to this effect being taken, the Consumer Council believes it is essential that the CAA ensures charges for airlines operating domestic services do not increase in a manner which makes it unprofitable to operate short-haul services. A reduction in Northern Ireland's Heathrow services would disadvantage the region's consumers who have no alternative means to access Heathrow, unlike their GB counterparts who can travel to the airport by road or rail.

The Consumer Council welcomes the CAA's decision to use Gatwick's, Heathrow's and Stansted's licences to strengthen the airports' approaches to planning for service disruption and their responses to passengers in the event of service disruption. While the capacity constraints at Heathrow deem the need for service disruption planning at the airport to be particularly acute, the severe negative impacts borne by passengers who experience travel disruption requires the development of robust service disruption planning at Gatwick and Stansted also.

It is essential that the airlines operating from the airports are fully involved in the development of service disruption plans as it is the airlines that are required to provide passengers with assistance and accommodation in accordance with the requirements of Regulation (EC) No 261/2004 in instances of flight disruption.

If you would like to discuss the issues raised in this response please contact me on 028 90674818 or [skennerley@consumercouncil.org.uk](mailto:skennerley@consumercouncil.org.uk).

Yours sincerely

A handwritten signature in black ink, appearing to read 'SK', with a long, sweeping horizontal line extending to the right.

**SCOTT KENNERLEY**  
**Head of Policy (Transport)**