

[REDACTED]

[REDACTED]

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Thank you for asking us to contribute to this consultation. Unfortunately we were only made aware of the consultation very late in the process and so there has been no time for your documents to be considered by the full Council and a suitable response prepared.

However, air connectivity is an important issue for Belfast and so we would like to draw your attention to some documents that show the Council's current position.

Firstly, we are currently developing a tourism strategy, a draft of which can be downloaded from this web address:

<http://www.belfastcity.gov.uk/tourism-venues/tourism/tourismstrategy.aspx>

See page 17 and the actions overview from page 25 in particular.

Additionally, in August 2013, the Council responded to a consultation about the London Hub Airport. We also responded to a planning change from our City Airport in March 2014. Many of the points we raised in those responses are relevant to your consultation. Therefore I have included a copy of the two responses below.

I hope these are useful to you. If you would like to discuss this issue in any further detail, initially please contact our Tourism Manager. [REDACTED]

[REDACTED]



Thank you.



Business Research & Development
Development Dept.
Belfast City Council
The Cecil Ward Building
4-10 Linenhall Street
Belfast
BT2 8BP



Belfast City Council Response to proposed London Hub Airport

Development Committee 20 August 2013

Approved by Council on Monday, 2nd September, 2013

Belfast City Council

Report to: Development Committee

Subject: Response to proposed London Hub Airport

Date: 20 August 2013

Reporting Officer: [REDACTED], Director of Development, [REDACTED]

Contact Officer: [REDACTED], Urban Development Manager, [REDACTED]

| 1 | Relevant Background Information |
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| 1.1 | The Airports Commission was launched in 2012 with the remit of examining the need for additional UK airport capacity and providing recommendations to government on how this can be achieved in the short, medium and long term. |
| 1.2 | The Airports Commission has issued a number of papers for discussion on various aspects of aviation including connectivity and the economy, climate change, airport operation models, and noise. |
| 1.3 | The Airports Commission invited proposals which explore short and medium term options for making the best use of existing airport capacity. In addition, long term capacity proposals were also requested and led to the submission of 38 proposals from various private and public sector interest. |

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| 1.4 | Many of the plans support the development of hub airport in London, whereby passengers transfer between flights to reach a broader network of destinations. |
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| 2 | Key Issues |
| 2.1 | From a direct connectivity perspective Belfast occupies what could be considered a relatively isolated and peripheral location from both the rest of the UK and Europe. Consequently, Belfast city and the wider region rely heavily on the two regional airports to connect to the UK and other European and International destinations. |
| 2.2 | Belfast also differs from other regional cities with airports in Great Britain by virtue of the fact that neighbouring airports, especially Dublin, are subject to different terms, targets and taxation. The challenges of competition from Dublin, operating under a lower tax regime, is compounded by the absence of direct high speed land links (rail and road) to gateway airports within Great Britain. |
| 2.3 | The development of a new hub airport could offer longer term benefits to Belfast by way of convenient and integrated access to NI with smoother transfer through UK gateways, the development of stable connection services and potentially quicker transfer arrangements. |
| 2.4 | Reliable and frequent air connections are vital to the development of the tourism sector and to attract broader investment into the Belfast and regional economies. The total value of direct tourism spend in Belfast by GB and overseas visitors was £418 million in 2012, representing an increase of 3% from 2011. By December 2012, it was estimated that tourism and leisure industries accounted for 54,270 employee jobs in Northern Ireland. The total number of GB and overseas visitors staying at least one night in NI was estimated at 1.55 million for the 2012. |
| 2.5 | In Belfast's the tourism growth targets is set at a 40% increase in overnight visitors over the next 5 years. The ability to achieve this level of growth will be dependent on the continued development of air connection access alongside the activity to support the local tourism product. |
| 2.6 | The continued development of Belfast's connectivity needs will be linked to the future economic potential arising from the changing global conditions such as the growth of new and emerging markets. A significant element of the future growth potential has been linked to the emerging economies which are only accessible through long haul flights. To maximise accessibility and reduce the adverse impacts of our peripheral location any primary UK hub needs to have the capacity to offer guaranteed preferential regional connection to service these long haul destinations. |
| 2.7 | The current capacity constraints at the main London hubs have resulted in increasing pressure on fixed landing slot allocations and competition between regional and long-haul services. This competition and the longer term uncertainty in relation to the availability of sufficient access to support regional access from Belfast to a full range of long haul connections could limit the potential for future economic growth. |
| 2.8 | <u>Planning</u> The Regional Development Strategy recognises the need for Northern Ireland to be well connected in order to compete globally. Within the RDS, gateways are identified as strategically important transport interchanges which are important for economic development, freight distribution activities and additional employment generation. |
| 2.9 | Spatial Framework Guidance (SFG) 15 seeks to 'strengthen the Gateways for Regional competitiveness' and considers gateways as an asset by potential investors and seeks to provide high quality connections to and from the airports. |

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| 3 | Equality and Good Relations Considerations |
| 3.1 | No considerations. |

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| 4 | Recommendations |
| 4.1 | Members are requested to consider the appended draft response and agree for submission to the Airports Commission in respect of the recent London's Hub Airport capacity publications |

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| 5 | Decision Tracking |
| Submission of an agreed response following consideration and agreement of the Committee. | |

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| 6 | Key to Abbreviations |
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| 7 | Documents attached |
| Appendix 1 - Proposed response on how best London's Hub Airport capacity meets the needs of Belfast and the wider region | |

Appendix 1 Proposed response on how best London's Hub Airport capacity meets the needs of Belfast and the wider region: Response on how best London's Hub Airport capacity meets the needs of Belfast and the wider region

Belfast City Council understand that a number of plans have been submitted which explore the development of a new airport capacity in London. The Council wishes to comment in relation to the longer term proposals as these are considered to offer the greatest potential to resolve the long standing issues around the guaranteed connectivity for the Belfast and the wider region.

The Northern Ireland Context

In a geographical context, the city of Belfast occupies an isolated and peripheral location from the rest of the UK and the wider European region. With no options for direct surface travel between Belfast and cities/ markets in Great Britain, Belfast city and the wider region are more heavily reliant on the two regional airports (George Best Belfast City Airport and Belfast International Airport) for connectivity to within the UK, Europe and other International destinations.

Air travel remains the most common means of entry into Northern Ireland, with almost three quarters (74%) of overnight visitors and a third (34%) of day trippers arriving by plane (PWC, 2011). Belfast also differs from other regional cities, across Great Britain, in that largest neighbouring airport at Dublin is operated within a separate tax regime with different operating targets linked to the development of its own national economy.

Whilst the proximity of Dublin can offer access to a broader long haul market this provides a greater direct competitive advantage to businesses operating in the airports own local economy.

The development of a new UK hub airport could offer longer term benefits to Belfast by way of convenient and integrated access to Northern Ireland with smoother transfer through a common UK gateway, the development of stable inter-connection services and potentially quicker transfer arrangements.

The current capacity constraints at the main London hubs have resulted in increasing pressure on fixed landing slot allocations and competition between regional and long-haul services. This competition and the longer term uncertainty in relation to the availability of sufficient access to support regional access from Belfast to a full range of long haul connections could limit the potential for future economic growth.

The Council would welcome the introduction of short and medium term measures to maximise capacity as an interim to the adoption of a longer term solution that would provide the potential for growth that meets the needs for the expansion of secure regional connectivity alongside the increased capacity for long haul routes. This balanced approach to the development of future capacity is critical for Belfast and local region to be able to compete and secure the potential for recovery and longer term growth.

Economic Growth

The continued enhancement and refinement of Belfast's potential for connectivity must be linked to the future economic opportunities arising from the changing global conditions such as the growth of new and emerging markets. A significant element of the future growth potential for the local economy has been linked to the emerging economies, many of which are only accessible through long haul flight connections.

To maximise accessibility and reduce the adverse impacts of our peripheral location any primary UK hub needs to have the capacity to offer guaranteed preferential regional connection from Northern Ireland to service these long haul destinations. The Council along with other agencies continue to address the need for the enhanced economic competitiveness and the capacity to respond to the challenges of the changing world economy.

In September 2011, Frontier Economics published a report on 'Connecting for growth: the role of Britain's hub airport in economic recovery'. As the UK's current hub airport, Heathrow connects Britain to the global economy and is recognised as playing a vital role in the economic success of the country as a whole. The report highlights that successful hub airports play a special role in an economy by underpinning a country's connectivity to long haul destinations around the world.

UK trade with the rest of the world has increased significantly over the last 10 years. Trade with Emerging Market Countries has been a major contributor to the increase. The 'Connecting for growth' report notes that UK businesses have the opportunity to grow their revenues by trading with businesses in these countries. However, the regional markets are not always well connected to these destinations and this lack of connectivity makes it more difficult for the UK as a whole to do future business with Emerging Market Countries.

While Heathrow could serve far more destinations, it is constrained by a limit on air transport movements per year. It is estimated that the value of UK trade could be increased by approximately £1.2 billion a year, if there were capacity to accommodate viable Emerging Market routes. With no available connections available through London, other European hubs have become more attractive. The report notes that there are 21 Emerging Market destinations with daily flights from other European hubs that are not served from London.

Passengers flying to and from hubs, as destinations in their own right, also benefit from better connectivity as many routes would not be viable without the transfer traffic generated

through the long haul routes. Consequently passengers can not only benefit from a wider range of routes but also lower fares.

Tourism in many ways exemplifies the challenges and opportunities faced by the broader economy as Belfast and the wider region seeks to achieve a degree of rebalancing both in terms of the general competitiveness and the unique local circumstances. The importance of tourism to the city is highlighted in the Integrated Strategic Framework for Belfast Tourism 2010-2014. Developed in partnership with the Northern Ireland Tourist Board and in consultation with local stakeholders, the Framework recognises that improved access to the city is essential if it is to attract more international visitors and if Belfast is to realise its local Gateway potential. The Council regard the framework as crucial to the city's development as a globally competitive sustainable tourism destination.

Reliable and frequent air connections are vital to the development of the tourism sector and to attract broader investment into Belfast and the regional economy. The total value of direct tourism spend in Belfast by GB and overseas visitors was £418 million in 2012, representing an increase of 3% from 2011. At December 2012, it was estimated that tourism and leisure industries accounted for 54,270 employee jobs in Northern Ireland. In 2012, the total number of GB and overseas visitors staying at least one night in NI was estimated at 1.55 million.

In Belfast's the tourism growth targets is set at a 40% increase in overnight visitors over the next 5 years. The ability to achieve this level of growth will be dependent on the enhancement of air connections and integrated access, alongside continued activity to support the development of local tourism infrastructure. Belfast City Council is committed to developing tourism exemplified by the contribution to the £97 million development of Titanic Belfast, a world class visitor attraction. This facility alone attracted 807,340 between April 2012 and March 2013. In total, 471,702 visitors to Titanic Belfast came from outside Northern Ireland highlighting the dependence on international accessibility.

Northern Ireland's tourism GDP is approximately 4.9% whereas ROI is 6%. The regional routes and the ability to secure integrated long-haul connections are critical to the continued development of the tourism sector and the achievement of growth targets over the medium to long term. Tourism is forecast to be the 4th fastest growth area in the UK over the next 10 years. NI tourism demand in terms of revenue, is forecast to increase by 2.8% per annum, in real terms over the next 10 years (Deloitte 2010). To meet and exceed these longer term targets Belfast and NI needs to secure additional international links through both direct short haul connections and integrated service via a long haul London hub airport with the capacity to offer guaranteed regional accessibility.

George Best Belfast City Airport – Planning Agreement Modification

- . [Meeting of Town Planning Committee, Thursday, 6th March, 2014 4.30 pm \(Item 4.\)](#)
- . Approved by Council on Tuesday, 1st April, 2014.

Minutes:

([REDACTED] Director of Health and Environmental Services, and [REDACTED] Head of Environmental Health, attended in connection with this item.)

The Director of Health and Environmental Services submitted, for the Committee's consideration, the undernoted report:

"1 Relevant Background Information.

- 1.1 George Best Belfast City Airport (GBBCA) is located on the southern shore of Belfast Lough adjacent to the A2 Sydenham By-Pass and is a key strategic gateway to the province. The 121 hectare site is situated on reclaimed lands within the Harbour Estate. The site is owned by the Belfast Harbour Commissioners and is leased to GBBCA.
- 1.2 GBBCA is an asset owned by the EISER Infrastructure Fund. It is a regional airport serving a range of destinations, mainly in Great Britain and Ireland with some European destinations. In 2013, it catered for around 2.54 million passengers, representing approximately 30% of the air traffic to and from Northern Ireland.
- 1.3 The Airport is a significant local employer and it is estimated that there are around 1,250 full time equivalent staff working across a range of services and facilities, with over a third of these resident within Belfast itself.
- 1.4 In March 2012, GBBCA submitted a request to the Department of the Environment (DoE) to vary the terms of its 1997 Planning Agreement established under Article 40(A) of the Planning (NI) Order 1991 and modified in 2008. The Airport requested that the seats for sale restriction be removed and replaced with a noise control contour and noise control measures. Members considered this application and a previous response was forwarded to the Department in June 2012.
- 1.5 Following completion of a public consultation exercise, the Department requested additional information in relation to noise, habitats and traffic. A revised proposal has now been received. This report summarises the key aspects of the revised proposal and officers have prepared a draft response for Members to consider. This is attached as Appendix 1 to this report. The revised proposal from the Airport updates and supersedes previous documents.
- 1.6 GBBCA is the only airport in UK with a departing 'seats for sale' restriction employed as a means of regulating noise.
- 1.7 Noise contours are like geographic contour lines on a map, however, instead of height, they indicate areas that are exposed to specified noise levels over a given time period. In the case of airports, noise contours are typically denoted by the Equivalent Continuous Level (Leq) over the 16-hour daytime period from 07:00 until 23:00. An equivalent continuous level (Leq) of 57dB(A) over the 16-hour daytime period has been identified by the Department for Transport, as the level at which the onset of significant community annoyance is likely; 2003 White Paper 'The Future of Air Transport', chapter 3 – Environmental Impacts.
- 1.8 Increasingly, Planning Authorities across the United Kingdom are moving towards conditions that relate directly to noise exposure, such as noise contour limits, combined with sophisticated ways of monitoring compliance with these limits. Contours can incentivise airports to improve noise management practices so as to allow more passengers to use an airport without increasing the noise burden upon the local community, but only if they are set at an appropriate size.
- 1.9 A local Public Inquiry (PI) is scheduled to take place in order to consider consultation responses. The council will be given an opportunity to participate in this process. Following the PI, a report will be produced for the Minister who will then determine the application, taking account of the information presented by the different parties.

- 1.10 The Minister's stated objective for this process is 'the introduction of an effective noise management system at the Airport which achieves the correct balance between the socio-economic benefits of airport expansion with the need to protect the environment and quality of life for the surrounding community'.
- 1.11 The Council's previous consultation response to the 2012 request highlighted concerns over the size of the proposed noise contour and the potential number of residents that would be affected under the various growth scenarios suggested at that time. The council's response concluded that a smaller contour would better deliver the balance that the Minister is seeking. However, this response is now superseded by the new proposals.
- 1.12 The Minister (DOE) will make the final decision on this application following consideration of the findings of the PI, however as this is a planning agreement between the two parties, the applicant if they do not agree with the Minister's decision, could continue to operate within the provisions of the current agreement with the existing 2 million departing 'seats for sale' cap remaining in place.

2 Key Issues.

- 2.1 The previous information submitted by the applicant included growth forecasts for the Airport up until 2020, together with scenarios for low, medium and high growth. By way of response, the Council stated that more information was needed on how these three forecast scenarios were developed and which scenario was most likely to prevail. This information has now been supplied thought the Planning Service.
- 2.2 The current submission presents a growth scenario based on the potential for the Airport with the 2 million departing 'seats for sale' restriction removed. It is a forecast of demand that takes account of GBBCA's ambition, targets and assessment of the market but, as with any business looking ahead; it cannot be regarded as either inevitable or definitive. The applicant however considers it to be reasonable in the context of perceived growth at other airports and a strategy for 'clawing back' additional business from Dublin Airport.
- 2.3 The submission also presents a 'fall back' growth scenario calculated on the basis that the planning agreement is not modified as requested and that the existing 'seats for sale' restriction remains in place.
- 2.4 Air Traffic Forecasts.

The applicant has projected that air passenger traffic will grow by 2.94% over the period 2013 – 2025 with the 'seats for sale' restriction removed. This assessment is comprised of an accepted projection for annualised growth in air passenger traffic for Northern Ireland of 2.1% with the remaining 0.84% (above the projected rate) arising from a combination of: increased flight frequencies to existing destinations; the introduction of new routes to Amsterdam, Frankfurt, Barcelona; increases in flights to leisure destinations and provision for the anticipated 'claw back' of passengers from Dublin Airport.

- 2.5 The applicant forecasts that this will equate to annual passengers numbers of around 3.72 million by 2025 with a corresponding 47,904 air traffic movements per annum. By way of comparison, the applicant has predicted that should the 'seats for sale' cap remain in place, then the cap will be reached in 2022, with some 2.05 million departing seats for sale and an associated 38,436 air traffic movements. This latter forecast is based on the 'Seats for Sale' restriction having an immediate impact on growth and investment decision reducing the overall annualised rate to 1.43% for 2013 to 2022, with no further growth thereafter.
- 2.6 Economic Impacts

If GBBCA is successful in having the 'seats for sale' restriction removed, and achieves the target growth rate of 2.94% per annum between 2013 and 2025, the Airport estimates that it will have created around 270 additional jobs by 2025.

GBBCA estimates the Gross Value Added (GVA) per job to be around £38,760 per full time equivalent employee and therefore the total additional value to the economy by 2025, should the variation to the planning agreement be granted, to be around £13.2 million. This estimate includes both direct and induced factors. The Council's consultant has confirmed that the applicant has followed a standard approach to estimating the economic impact of the proposed changes to the planning conditions.

2.7 Noise contour data.

The following table summarises data published by GBBCA and indicates the size of the noise contour and the likely population affected based on the Airport Annual Reports for 2013 and the growth forecast scenarios. It should also be noted that the revised noise contour sizes are improvements to the previous forecasts submitted in 2012.

| Year of assessment | 57dBLa _{eq} , 16h Contour area (Km ²) | Population |
|--------------------|--|------------|
| 2010 | 6.1 | 12,500 |
| 2013 | 4.4 | 7, 200 |
| 2025 with SFS | 6.5 | 14,600 |
| 2025 No SFS | 7.5 | 18,100 |

2.8 The draft response states that the Council is supportive of the Airport's ambition for growth and recognises the benefits that expansion will bring to both the city and the region. It is considered that the size of the noise control contour and the conditions contained in any new Article 40 agreement are crucial to ensuring that these benefits are realised whilst providing protection to local communities that will be impacted upon by the Airport's operations. The Council also recognises that GBBCA wishes to achieve this balance. The data provided indicates however, that the removal of the 'seats for sale restriction' will increase the number of people exposed to aviation noise.

2.9 It is important that airports are incentivised to implement continuous improvement in noise management practices required in order to achieve balance between growth and the need to protect the environment and quality of life for the surrounding community. The noise contour size needs to be considered alongside best practice noise management systems and the ambitions to support sustainable economic growth

1.10 The draft response therefore reflects support for the Airport's growth aspirations. In addition, it recommends that the PI should examine the Airport's expansion proposals giving consideration to the noise management proposals submitted by the Airport, including the control contour size and any other appropriate measures that may achieve the right balance between the socio-economic benefits of airport expansion with the need to provide reasonable protection to the surrounding community (an outcome that both the applicant and Minister have stated they are seeking).

2.11 The consultation period closes on Monday the 3rd March, the Council has therefore advised the Planning Department that our response will be late and forwarded after committee has considered the response but will be subject to full council approval following the April Council meeting.

- 3 **Resource Implications.**
- 3.1 **The services of an Aviation Acoustic Consultant and Aviation Economist continue to provide additional advice. The cost has been included within revenue estimates.**
- 4 **Equality and Good Relations Considerations**
- 4.1 **None.**
- 5 **Recommendations**
- 5.1 **Members are invited to**
 - **Consider the content of this report and to endorse the attached draft consultation response and agree to forward to the Department of the Environment following committee, advising that it will be subject to full Council approval in April.**
 - **Agree that the council continues to seek specialist advice.”**

Appendix 1 – Draft council response for consideration by Committee

Strategic Planning Division (Headquarters)

Department of the Environment

Millennium House

17 – 25 Great Victoria Street

Belfast.

BT2 7BN

Re: George Best Belfast City Airport Planning Agreement Modification Process.

Dear Sir

As a consultee, Belfast City Council has reviewed the content of the George Best Belfast City Airport ‘Request and Related Documents’ in support of the Airport’s request to vary the terms of its Planning Agreement with the Department of the Environment of 22 January 1997, as modified in 2008, pursuant to Article 40A(1)(a) of the Planning (Northern Ireland) Order 1991 and would submit the following comments by way of representation response.

Belfast City Council is supportive of George Best Belfast City Airport’s aspirations for passenger growth and is cognisant of the benefits that such an expansion will bring in terms of both local employment and added value to the local economy.

The Council also appreciates the need to ensure effective noise management arrangements are in place to ensure that noise levels experienced by exposed communities are kept to lowest levels that can reasonably be managed.

Therefore the Council considers that the size of the noise control contour and the management conditions contained in any new Article 40 agreement are crucial to ensuring that the abovementioned benefits are realised whilst providing reasonable protection to local residents impacted by the Airport’s operations. The council also recognises that George

Best Belfast City Airport wishes to achieve this balance. The council also welcomes that the airport will continue to commission independent annual reports, through the Department for Regional Development (Air and Sea Ports branch) on its performance against set noise management criteria.

It is important that airports are incentivised to implement continuous improvement in noise management practices required in order to achieve the desired balance. This is the case with some United Kingdom airports which continue to achieve sustainable economic growth whilst at the same time have been able to reduce their noise contours as aircraft become quieter and good noise management practices enhance operations.

For these reasons, Belfast City Council requests that the forthcoming inquiry should examine the Airport's expansion proposals giving consideration to the noise management proposals submitted, including the control contour size and any other appropriate measures that may achieve the right balance between the socio-economic benefits of airport expansion with the need to provide reasonable protection to the surrounding community (an outcome that both the applicant and Minister have stated they are seeking).

Should you have any queries regarding these comments, in the first instance please contact Stephen Leonard, Environmental Health Manager (Environmental Protection and Public Health & Housing Unit) on 028 9032 0202 ext 3312.

Yours sincerely

[Redacted signature]

[Redacted name]

Town Planning Committee

The Committee endorsed the aforementioned response to the Department of the Environment.

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