Bristol Airport
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Civil Aviation Authority
Aviation House
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Dear Sirs,

Response to consultation on issues affecting passengers access to UK airports.

Thank you for the opportunity to respond in writing to the Consultation on issues affecting passengers' access to UK aiports. Representatives from Bristol Airport (BRS) also attended the workshop held on 5th February 2016 and found this very informative and helpful.

UK regional airports operate in a highly competitive aviation market. Consumers in BRS' catchment area depart from airports at Heathrow, Birmingham, Cardiff, Exeter, Newquay and Bournemouth, as well as many others. BRS is therefore highly focussed on improving surface access and has a huge incentive to do so. The success of BRS in a very competitive market place relies in very large part to excellent surface access options.

BRS works extremely closely with the Local Enterprise Partnership and the major local authorities of the South West (Bristol City Council, North Somerset Council, South Gloucestershire Council and Bath and North East Somerset Council) to play a major part in improving surface access to the airport. In the past 2 years, via its section 106 obligations, BRS has spent circa £6.5m on transport and road schemes to enhance surface access to the airport and more widely across the city of Bristol.

There is already a strong focus on customer service in all aspects of the airport operation, including the provision of surface access options. The BRS website is a key communication tool which provides information on a range of surface access options. There are also additional forms of communication e.g. twitter and facebook, that can be accessed by consumers from mobile devices whilst they are at the airport. Customer service staff, employed by BRS in the terminal and in its car parks, are on hand to assist arriving passengers and there is a taxi office and staff to advise on bus and coach services. The airport website was updated and upgraded in 2015 and there is ongoing and significant investment in further improving the provision of information to BRS consumers.

BRS' consumers expect it to demonstrate a duty of care towards them and for that reason BRS believes it must take an active interest in managing aspects of surface access very closely. Whilst BRS allows access to all public car parks and other public areas to everyone (including business operators) it cannot police the activity of all taxi, offsite car park, bus, coach or car rental operators where it has no commercial relationship with them. BRS believes it is in the best interests of its consumers for it to play an active part in trying to enhance the quality of service and products available. Where it is not possible to establish a commercial relationship with an operator and have some level of input into the service provided (particular in relation to security and safety) BRS cannot be expected to promote or endorse that service via its website or in any other way.

In summary and recognising the need to act within the law, BRS believes an airport is more likely to achieve the objective of providing a balanced surface access solution with more flexibility, rather than more regulation.

As requested the specific questions asked in the document published in January 2016 are answered below.

a) Which surface access facilities from the airport's portfolio of assets are made available and their attitude to the development of facilities outside the airport perimeter.

Bristol Airport's (BRS) surface access facilities consist of private roads, car parks (including drop-off and pick-up areas), facilities for car rental operations and the forecourt in front of the main terminal building. With the exception of the forecourt which is governed by a variety of security restrictions, the airports facilities are made available to both public and private commercial operators e.g. car rental operators, taxi operators, bus and coach operators, and off-site car park operators.

BRS does not own any land outside the airport perimeter and therefore has no direct influence on how facilities beyond the airport perimeter are developed. BRS' attitude is therefore governed by the appropriateness of each proposal and the relevant planning laws in each case. Facilities developed beyond the airport boundary must obviously comply with all relevant planning laws and where appropriate mitigate any impacts on noise, traffic congestion etc.

One of the significant challenges for BRS is dealing with the impact of facilities (such as private airport parking) developed outside the airport boundary without planning approval, which are effectively unlawful in planning terms but still continue to operate. More needs to be done by local authorities to stop this unauthorised activity.

b) How they make available facilities that can be used by surface access operators and an explanation of any restrictions to the range of operators or the type of services that can be operated at the airport.

Bus and coach operators are given access to the terminal forecourt subject to the necessary security clearance, compliance with DfT protocols, BRS' surface access policy and airport byelaws.

All car parks, pick-up and drop-off areas are available to the public and private commercial operators. In some cases (car rental, for instance) designated areas are set aside for specific operations.

With the exception of the forecourt no restrictions to date have been applied to any operator or operation related to surface access. As the airport grows it is possible that in future some restrictions may have to be made based on capacity constraints, but that is not currently the case.

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BRS has a responsibility to its consumers to ensure quality services are available from the airport in a safe and secure manner. Some control may need to be exercised to ensure a quality, reliable and safe service is provided to BRS' consumers.

c) How airport operators derive charges for the use of facilities by surface access providers and to explain how these charges relate to costs or any other relevant factors and, in particular, if these lead to differentiation between different providers of surface access products or between segments of consumers. Particular attention should be provided to areas where airport operators themselves compete with independent surface access operators.

The charging mechanism for the use of facilities at BRS is flexible to allow BRS' section 106 planning obligations to be fulfilled (NB. BRS is under an obligation pursuant to a section 106 Agreement to promote public transport). Highly profitable bus and coach services that operate to and from the airport are charged more for access than local community services (which often run on subsidies from local authorities) or start-up services where the risk of commercial failure is high. When considering and setting these charges BRS takes account of these commercial and community factors, and this enables BRS to better meet its section 106 obligations to increase public transport usage.

The relationship with off-site car park operators (where BRS' own services compete with independent operators) is particularly difficult as none of the car parks operated outside the perimeter of BRS have planning approval. It is not appropriate for BRS to establish commercial relationships with operators who do not comply with the planning regulations. They are allowed access to the BRS' public car parks but are not legitimate partners. BRS would take a different view if they operated within the law.

d) How airport operators consult with users on general charging principles and structures of airport services (access to facilities at or near the forecourt) required by surface access operators and how they provide relevant information on the costs of providing such services.

The surface access policy and airport byelaws control the operation of key infrastructure at BRS.

Charges are currently discussed with interested parties where requested and in some cases communicated during commercial tender processes. It is the intention of BRS to introduce a more formal published 'list of tariff's as the airport grows and more requests for this type of information are received.

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e) The extent of any agreements with other surface access operators and with distributors regarding the sharing of pricing information, the provision of information on costs, capacity management or any other practices and how they ensure these do not allow undue coordination among competitors.

Where BRS has information on any of the above through commercial agreements and contracts these are generally covered by confidentiality obligations and cannot be shared.

No pricing information is shared with distributors of car parking other than that which is publically available on BRS' website. Car park pricing is not discussed with distributors. BRS sets its own car park prices.

f) Their efforts to ensure that consumers have access to information about all options to get to and from the airport at the time they need to make informed choices (both on the airport operators' websites and on onward travel kiosks) and, insofar as it is the airport operators' ability to influence, those options are presented in a neutral and transparent way.

Official parking, bus and taxi options are all displayed on BRS' website for consumers to view prior to booking and/or arrival. These options are also emailed to consumers, who have joined BRS' loyalty scheme, on a regular basis.

The information point within the terminal is used to advise onward travel options once the consumer has landed.

Clear wayfinding and real time information screens are then used to direct consumers to their chosen mode.

BRS does not support the idea that it should be obliged to promote rival off-site car parks on its website or elsewhere. The internet and search engines are widely used by consumers and do a very good job of offering consumers flexibility and choice, as do many comparison sites.

Non-regulated airports, such as BRS, come under different pressures, when compared to regulated ones, due to higher commercial expectations from airlines and far less negotiating power.

The ability of BRS to thrive and grow for the benefit of its consumers is heavily reliant on over 60% of its income coming from non-aeronautical revenue. Many regional airports would not today be providing the wide range of services they do if it were not for the ability to grow non-aeronautical revenues. Whilst it is clear that competition law (and other relevant laws) must take precedence it is not likely to be in the best interests of its consumers if BRS is ultimately forced to act as a disinterested (neutral) onlooker in the way many services are procured and provided to its consumers.

g) Details of any surface access options that are available at no charge to consumers that allows for the drop-off and pick-up of passengers.

A free drop-off and pick-up car park was installed at a cost of £250k. Although this was advertised online and on-site, the facility was not used and so was removed after a year.

h) Have we identified the key issues on market structure within the scope of this review?

Having read the consultation document and attended the workshop on 5th February, BRS questions if there is sufficient understanding of the commercial pressures and overall commercial model which regional airports operate within. Where unregulated airports are unable (due to the negotiating power of airlines and highly competitive nature of the UK airport market) to cover their operating costs through airline charges they are loss making unless they can leverage non-aeronautical revenue opportunities. BRS fears that restricting an airport's ability to do this in the name of 'consumer choice' will ultimately have the opposite effect and consumers will be worse off. Providing consumers with more choice is a positive step providing it does not have a negative commercial impact on airports which ultimately reduces the airport's ability to maintain and grow routes and services.

BRS also questions if there is sufficient understanding about how different each airport is (particularly outside London) and how a 'one size fits all' solution may possibly be counterproductive. BRS has no (1) rail access, (2) underground or metro system, (3) close access to a motorway junction, (4) duelled road access to the airport, (5) dedicated bus terminus and has restricted physical capacity on the forecourt where the topography of the land makes extending it very difficult. With a significant reliance on car parking, BRS operates a 24/7 bus transfer from the terminal forecourt to the various car parks. Congestion on the forecourt is a limiting factor in the feasibility of having numerous large buses: 2 of our car park buses on the forecourt is circa 60% of the safe forecourt capacity.

However BRS is committed to increasing the use of public transport in line with BRS' section 106 planning obligations and to maximise its facilities to accommodate transport access. In doing so, BRS cannot exceed the physical capacity of the existing infrastructure.

i) Have you any views and/or evidence on the market position of airport operators in the provision of airport services used to access the airport?

In BRS' experience, regional airports such as BRS have a desire to improve access. The ability to operate in a commercial manner and not be restricted unduly by additional rules and regulations on top of those that already exist is an important factor. Off-site car park operators, car park consolidators/distributors, independent bus and coach operators do not always have the overall best interests of the airport passenger in mind when designing their products and services. They are also unlikely to sacrifice their profitability (as an airport operator may be prepared to do) for a greater long term goal. It is not necessarily a bad thing for airport operators to be involved in the provision of such services. They are more likely to see the broader benefits of providing good value high quality options as it reflects positively on the overall airport user experience.

j) Have you any evidence or views on how well informed consumers are of their airport surface access options and on what is most important to passengers in accessing an airport? Is this an area that merits further research?

Pre-booking across all of the surface access transport options continues to grow, suggesting an increased awareness by consumers in such options. Unfortunately one of the disadvantages of online booking is the ability rogue operators have to misrepresent themselves on websites. There is a good deal of evidence showing this is a problem, for instance, in consumers being able to choose in particular airport parking which meets their needs.

Market research conducted by BRS in 2015 showed that 81% of passengers chose their method of transport based on what is easiest/most convenient.

k) Have we identified the key issues related to the distribution of airport car parking? Do you have any views on what, if anything, would improve outcomes to consumers?

An increased awareness of the risks associated with car parks which operate unlawfully and without planning consent may aid the decision making for consumers.

l) Have you any views and/or evidence on how the information set that passengers have when choosing between airport surface access products could be improved for consumers?

BRS' consumer base is largely UK originating, being outbound passengers travelling on holiday. As such, most journeys start from the consumer's home and therefore transport options are by and large determined by the consumer.

BRS' view is that for consumers who need information on surface access options from the airport the airport website does a very good job.

m) Have you any views on our proposed way forward and, in particular, the development of good practice principles by airport operators?

Based on BRS' own experience and observations, and those of our consumers (through research and direct feedback), BRS questions if there is a problem here that needs fixing.

The development of good practice principles may bring positive benefits but BRS believes that they must have enough flexibility built in to accommodate local conditions, so consumers are not negatively impacted by a policy that benefits some airport users but not others. Worse still would

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be a situation where a perceived 'good practice' resulted in a poorer service for consumers of some airports where the airports unique circumstances had not been fully understood.

Yours sincerely,

Simon Preece
Commercial Director