



London (Heathrow) Airline Consultative Committee (LACC)

LACC Response to the CAA Consultation on Surface Access at UK Airports, 22 April 2016.

The Heathrow Airline Community of 82 airlines, represented by the London (Heathrow) Airline Consultative Committee (LACC) and the Airline Operators Committee (AOC), is grateful for the opportunity to provide comments to the CAA's consultation on issues affecting passengers' access to UK airports.

Aviation, and the Heathrow hub in particular, plays an important role in the UK economy. A recent report by the respected Oxford Economics group has estimated the contribution of the aviation industry to the UK economy at circa £50bn in terms of overall GDP¹.

Maintaining resilient, effective and efficient surface access links to airports is an important part of their operations and sustainable growth, and is very much in UK Plc's interest.

We recognise that the main focus of this consultation is on the market conditions around road and forecourt access. We do not propose to comment in detail on this issue, but support the CAA's position that some form of free pick up and drop off should be available to passengers, and that it's availability should be clearly highlighted to consumers (section 4.30).

In this context the CAA should also note that any proposals to introduce congestion charging around airports would increase costs for passengers.

We also have some comments on the CAA's position on airport market power and airport charges:

- In section 4.3 onwards there is a discussion of Airport market power. In listing the factors that passengers take into account in their choice of airport there is strangely no mention of the flight price.
- Whilst the focus of this consultation is on surface access costs, the CAA needs to recognise that price is the key decision variable for most passengers, the majority of whom are travelling for leisure or VFR (Visit to Friends and Relatives) purposes. Airlines compete fiercely for this

¹ <https://www.iata.org/policy/Documents/Benefits-of-Aviation-UK-2011.pdf>

traffic and rising airport charges have become a very significant cost component.

- Finally, we note that the CAA recognises that lower airport charges, given a competitive and efficient airline sector, 'would result in lower fares and more connectivity being provided to passengers' (section 4.10)

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