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Dear Sir or Madam,

CAA Consultation on issues affecting passengers' access to UK airports: a review of surface access

TfL welcomes the opportunity to comment on this consultation. TfL works with a number of airport operators in and around London, as well as associated surface access operators, in order to enable travel choice and ensure a safe and reliable journey for all its customers.

Whilst the review principally focusses on road access for airports, together with availability of information, TfL would welcome a broader holistic review of all surface access to airports as public transport is the primary way for many people in London to access services (as highlighted within Figure 2). Furthermore, we would welcome further insight into the issues surrounding kiss & fly, and additionally in light of this consultation the link to drop-off fees.

Airports engage with a variety of stakeholders as part of the development of their multi-modal surface access strategies and consultation groups. We support the development of strategies which are inclusive of all needs and promote the use of all modes, including proactively supporting the use of public transport. A key challenge for airports and other stakeholders, including ourselves, is managing and encouraging mode shift in the future.

TfL would also welcome further insight into how regulation could potentially manage car parking (and other) arrangements for airports, including both operations by the airport and third parties, in order to inform how this could be used as a mode shift tool in the future, where it is forecast that highway congestion will worsen. An example of this could be in how airports spend excess revenue, for instance to assist in pump priming bus services or funding other measures which could enable mode shift through the development of specific funds.

The consultation principally asks for comments on questions outlined within the report, based off of the details provided throughout the report.

- **Have we identified the key issues on market structure within the scope of this review?**
- **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 general terms the analysis outlined in the report highlights the various elements of market structure for the industry, however, TfL would welcome a broader view in terms of access to airports via all modes.

Whilst the report clearly highlights that airports use car parking in particular as a key source of revenue, there are other benefits from such actions, including addressing localised air quality, traffic congestion and trying to enable mode shift to other areas.

There is also a case to be made in terms of safety and security for customers/passengers who choose to use guaranteed airports facilities, over third party operations potentially off-site from the airport. Furthermore, TfL agrees that airports can ensure certain standards are met by operating preferred operator style schemes, such as the example highlighted from Gatwick. This style of operation is not limited to car parking and has been rolled out across a number of sectors, including taxis.

We feel the bus and coach sector warrants further analysis to highlight how it is a growing market, as well as the effect it has on driving mode shift from other areas. Arguably, the Stansted rail corridor is particularly susceptible to competition by coach through pricing of services. TfL would welcome further analysis on how coach could compete with the private car sector to enable mode shift.

Further investigation into the bus and coach industry would also be welcomed to understand further challenges around license fees (and to clarify what these are), as well as the importance and success of pump-priming routes (for example through s106) to enable access to new demand corridors, which has and continues to be done for a number of the London airports. Further insight into the relationship between bus/coach infrastructure on site at airports versus the number of services in operation would also be welcomed.

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

TfL agrees this is an area that warrants further research. Providing information, including any hidden costs, across a number of formats and methods, is crucial to enabling travel choice when planning a journey. The further development of technology over the recent years has enabled a greater level of information to be available to people, which is seen to be a very positive thing, however, care must be taken to ensure that everyone can still access the same levels of information regardless of the method.

TfL supports the provision of information at all stages of the customer journey, from booking with an airline through to arriving at the destination. TfL also supports the use of open source information to enable third party applications to be developed to enable passengers and other customers to make effective decisions.

As mentioned within Section 3.57, there are a number of rail options in accessing the various airports across London, and TfL has been working with operators to enable common ticketing systems to be used. A recent example of this is the inclusion of Oyster to Gatwick Airport, via Southern services.

- **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?**

Whilst TfL accepts that the use of private car to access airport facilities could be perceived to be the most appropriate mode of travel, this is not always the case and higher levels of information provision across the various sectors could enable further mode shift to other areas. In some cases, customers are not necessarily aware of their travel choices and will choose what they perceive to be the most convenient option to access airport services.

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

TfL would suggest further analysis is undertaken to look at how people travel and why they choose certain modes, including cost thresholds. This should include how the industry provides information to customers, including to foreign arrivals. TfL supports enabling travel choice by provision of information effectively across all channels.

As previously mentioned, whilst this study has focussed primarily on information provision and car parking, TfL would welcome a broader review of all modes, including the importance of the rail, bus and coach network, as well as principles of good interchange.