

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

Response from the Manchester Airports Group (M.A.G)

Introduction

- Manchester Airports Group (M.A.G) owns and operates four airports in the UK (Manchester, London Stansted, East Midlands and Bournemouth), handling some 50 million passengers per annum. Our airports are nationally significant infrastructure assets, providing essential connectivity for the regions they serve and contributing over £4 billion per annum in GVA to the UK economy.
- 2. Surface access is a key factor in the choices that airlines and air passengers make about which airports they use. As such, the issues outlined in the CAA's consultation document are of great importance to our business both on a day-to-day operational level and strategically in terms of our ability to work with partners to deliver surface access improvements to support the development of our airports.
- 3. MAG airports have capacity to accommodate significant growth and making the most effective use of this spare capacity will be vital to maintaining choice and value for consumers, and developing the best possible connectivity for the UK economy. Surface access improvements have a vital role to play in making the most effective use of existing airport capacity. For that reason MAG has attached a high priority in recent years to securing improvements in public transport to our airports, and to improving the range of options for passengers travelling by other modes of transport, including private car.
- 4. For example, since M.A.G acquired Stansted in 2013, we have sought commitments from Government and Network Rail for an urgent programme of investment on the West Anglia Main Line (WAML), with a particular focus on reducing journey times for air passengers and commuters. In parallel, we have continued to press the case for improvements to Stansted's rail services through the new Anglia franchise to enable the airport to make the fullest possible contribution to meeting demand.
- 5. In the long term, high-speed rail has the potential to intensify competition between airports (and airlines) across the UK. In particular, a high-speed network across the North would radically reduce city-to-city journey times and transform access to Manchester Airport from across the region. Millions of additional passengers every year would stand to benefit from direct and convenient access to the global connectivity provided by the airport, which in turn would enable the airport to attract airlines to offer new services.
- 6. At the same time, we have continued to innovate and offer increased choice to passengers who travel to and from our airports, whether by public or private transport. For example, at Stansted we have recently retendered the coaching operations to provide passengers with an increased range of London services. At Manchester, we recently contributed £50 million to the extension of the Metrolink to the airport. In terms of car parking, passengers have benefited from a wider choice of products over the last five years, providing value for money across a range of options in terms of cost and quality, including value-propositions such as JetParks through to premium Meet&Greet services.

Our response

- 7. We welcome the opportunity to comment on the CAA's initial conclusions from its review of on issues affecting passengers' access to UK airports. Our response is organised as follows:
 - a. general comments on the key issues raised by the consultation document; and
 - b. responses to the CAA's specific questions about surface access at each airport.
- 8. The consultation document also contains a number of general questions for consultees about surface access to airports, and we have endeavoured to answer these as part of our overall response.
- 9. The consultation document contains a number of references to surface access issues at MAG airports. We have not responded in detail to each of these issues because in many cases the CAA does not set out an initial conclusions on the matters discussed. We would be happy to provide further information on these issues if it would assist the CAA during the remainder of the review.

Key issues raised by the consultation document

The CAA's review of surface access should include rail services to airports

- 10. In a competitive market, airports with fast, regular and reliable rail services will have a distinct advantage over airports with slow, irregular and unreliable services. It follows that if passengers and airlines are dissatisfied with the level of rail service at a particular airport, they will tend to express this by switching their custom to a rival airport that offers the services they want. As such, the development and operation of the rail network has a significant impact on the competitiveness of different airports.
- 11. Airports depend exclusively on Network Rail to provide the rail infrastructure they need to compete effectively with other airports to attract passengers and airlines. In this respect, Network Rail is a key supplier to many UK airports. However, unlike the relationships airports have with other key suppliers, they are generally unable to contract directly with Network Rail to procure a particular level of service.
- 12. Instead, Network Rail's funding constraints require it to strike a balance between the needs of different users across the entire network and make difficult trade-offs between the level of service it provides to different customers. This approach has led to some significant gaps between the outputs Network Rail can deliver and the needs of its different customers.
- 13. Over the years, these compromises and trade-offs have had a profound impact on the competitive position of different airports. For example, the service improvements enabled by the Thameslink programme will enhance the competitive positions of Gatwick and Luton by significantly improving their access to central and north London markets. Likewise, Crossrail will further strengthen Heathrow's dominant position by providing improved connections between the airport and central and east London markets.
- 14. At the same time, prolonged underinvestment on the rail networks around Stansted and Manchester, in particular, has been a key factor in the marked decline in the quality of rail

services to those airports in recent decades. For example, journey times to Stansted from central London are now up to 10 minutes slower than they were a decade ago. This deterioration in service has led to the share of Stansted's passengers using rail falling from around 30% in 2005 to around 22% currently. More importantly, the deterioration in the quality of the rail service has had a negative impact on Stansted's competitive position in the London market. Network Rail's current programme of investment around Manchester, known collectively as the Northern Hub project, and the forthcoming electrification of the TransPennine line to Leeds will see some long-overdue improvements in rail services to Manchester Airport over the course of the next few years.

- 15. The CAA's stated purpose (para 1) in reviewing surface access to airports is to better understand how effectively the market is operating and serving the interests of consumers. We note the CAA's view (para 1.4) that the scope of the review focuses on the competitive conditions for road access to UK airports, and that it excludes the majority of issues concerning rail access to airports, except for the provision of information about services to consumers.
- 16. However, in our view any review by the CAA of surface access issues should also consider how well air passengers' interests are served by rail services to airports. The CAA's views on these issues would provide the Government and other stakeholders, including Network Rail, with an independent perspective on the wider economic value of rail services in enhancing competition between airports across the UK and increasing customer choice.
- 17. While we recognise that many of the issues with the rail industry are determined by wider government and regulatory policy, the CAA has an important role to play in setting out how the interests of air passengers are affected by the quality of airport rail services and the actions that should be taken to address these issues. The CAA's views on these issues would be a valuable input for Government as it reviews both its aviation policy and rail investment priorities for the next control period over the course of the next year.
- 18. Furthermore, it will be important for the CAA to take account of rail services in its market definition work and in any subsequent assessment of competition in those markets.

Passenger information

- 19. We acknowledge the concerns of the CAA's Consumer Panel in relation to the possibility that some groups of passengers could be disadvantaged by a lack of information about the range of surface access options available to them, and the cost of those options.
- 20. In particular, we recognise the risk that customer service and product innovations that rely on access to the internet have the potential to disadvantage certain groups of customers. These innovations have brought significant benefits for consumers in recent years, and in many cases the way most passengers use our car parks has changed radically over the last five to ten years in common with other sectors of the economy. The most notable change has been significant increase in the percentage of passengers pre-booking their car parking at airports, and taking advantage of a wide variety of different products and prices.
- 21. As our response to the CAA's specific questions to airports make clear, MAG endeavours to provide passengers with clear and accessible information about their travel options, including

through its website, telephone helplines and at the airport with information kiosks and ticket desks. Passengers without internet access can pre-book car parking a MAG airports over the phone at the same rates as those available on the MAG website and through distributors.

The CAA should set out a clear framework for defining upstream and downstream markets

- 22. The consultation document raises the important issue of how the CAA should approach the task of defining upstream and downstream markets for surface access. These issues will be central to how the CAA or other competition bodies consider the issue of dominance, and the related issues of abuse of dominance and adverse effects on competition.
- 23. The document suggests that one approach to defining the market would be based on a view that passengers will largely choose airports according to the flights available and the relative distances between the different airports. It is further suggested that this might enable airports to raise prices to passengers and surface access providers above competitive levels, even though the airport might not have a dominant position in relation to aeronautical services.
- 24. The document goes on to suggest that an airport's presence in both upstream and downstream markets means that it would be able to have substantial influence on the downstream market by controlling the upstream market. It is further suggested that airports could exert such influence by tendering access to facilities to a limited number of providers, and excluding other providers from the market.
- 25. The document also highlights that certain airports have in the past been deemed to hold a dominant position in the upstream market because of their control of particular facilities that are assessed to be needed to operate services from the airport. The consultation document then goes on to outline an alternative approach to defining markets, based on the extent to which an airport faces competition.
- 26. In setting out the different 'competing' alternatives in this way, the consultation document appears to suggest that the CAA believes it needs to make a fundamental choice between the different approaches to market definition. In our view, the outcome of a market definition exercise should be determined only after a thorough examination of the relevant empirical evidence relating to the competitive environment in which an airport operates.
- 27. One key issue for competition bodies is to define the precise scope of the relevant upstream market in which an airport operates when it provides access to its facilities and infrastructure. The consultation document suggests that in many cases there will be a single upstream market, such as a coach station, in which the airport enjoys a 100% share on account of its supposed control of the facilities and infrastructure. For this to be the case, it would be necessary to show that the airport is not subject to any effective competitive constraints in its operation of these assets.
- 28. If the airport is subject to such constraints then the definition of the upstream market would have to be expanded to include the relevant competitive constraints, and the respective market shares would need to be reassessed and dispersed between the airport and those undertakings providing the constraints.

- 29. The majority of airports in the UK are subject to relevant, effective competitive constraints by virtue of the fact that they operate in commercial environments in which they compete with other airports for the custom of airlines, passengers, surface access operators and providers of other retail and commercial activities. In particular airports are constrained by the countervailing buyer power exercised by airlines and transport operators using airport facilities, as well as the threat of passenger switching between airports.
- 30. As the consultation document identifies, passengers' decisions as to which airport to use include the speed and convenience of travel to the airports in question, the price of surface travel options, previous experience of different airports, the destinations available and the frequency of services. The consultation document suggests that it could be argued that passengers generally take less notice of charges levied by airports on access, and that this might enable airports to raise charges above competitive levels. This view incorrectly ignores the potential response of surface access providers who may either reduce services from the airport altogether.
- 31. As the consultation document sets out, the CAA's recent research shows that passengers generally have a high level of awareness of their options for travelling to airports, with more than 90% of passengers considering these before their day of travel, and around half considering these options before booking their air travel. The research also shows that passengers accumulate knowledge and awareness of their options as they take more flights from particular airports. These informed passengers will provide a strong degree of protection to passengers that are less well informed about their travel options.
- 32. These factors, individually and collectively, act as competitive constraints on airports and are relevant to the decisions airport take about granting access to infrastructure and facilities. As such, the task of defining the relevant upstream market should take into account these competitive constraints. For this reason, there may be many situations where the relevant upstream market is broad enough to include the provision of facilities not only at the airport itself, but also the other airports that are competing with it.
- 33. If that is the case, it follows that the relevant downstream market should also include not only the onward transport services from the airport in question, but also the relevant onward transport services from competing airports that are included in the relevant upstream market.
- 34. Only where an airport has a dominant position in the relevant upstream market could it have the scope to exercise sufficient market power to distort competition in the relevant downstream market or act independently of its customers. However, even then there should be no presumption about whether a position of dominance has an adverse effect on competition given that it may well have no material impact on consumers and, of course, the airport may not behave in an abusive manner notwithstanding that it has enough market power to enable that.
- 35. The conclusions on market structure set out in the consultation document suggest that there is a connection between planning restrictions and the likelihood of an airport holding a dominant position. For the reasons outlined above, conclusions on this issue can only be drawn once the CAA has a clear understanding of the competitive constraints on the airport

and the nature of the upstream market. In many circumstances where there is effective competition, the upstream market will be sufficiently wide to mean that an airport does not a have a dominant position.

Responses to the CAA's specific questions

36. Our responses to the CAA's request for airports to provide specific information on surface access options are set out in Annex 1.

Annex 1

<u>Question 1</u>

• Which surface access facilities from the airport's portfolio of assets are made available?

Manchester Airport (MAN)

MAN provides and makes available the following surface access facilities from its portfolio of assets:

- Heavy and light rail station (Network Rail and Metrolink)
- Bus and coach station
- Hackney and private hire taxi rank at each terminal
- Car Rental Village
- Terminal forecourts for drop-off, pick up, taxis, coach & off-airport transfers
- Short Stay car park for drop-off, pick up, taxis & off-airport transfers
- Long stay car park with free courtesy bus
- Low cost Park & Ride car park (JetParks) with free courtesy bus
- Valet Parking services
- Cycle path network and facilities for locking bikes

London Stansted Airport (STN)

STN provides and makes available the following surface access facilities from its portfolio of assets:

- Heavy rail station
- Bus and coach station
- Private hire taxi rank at terminal
- Car Rental Village with free courtesy bus
- Terminal forecourt for drop-off, pick up, taxis, coach & off-airport transfers
- Short Stay car park for drop-off, pick up, taxis & off-airport transfers
- Long Stay car park with free courtesy bus
- Mid Stay car park with free courtesy bus
- Low cost Park & Ride (JetParks) car park with free courtesy bus
- Valet Parking services
- Cycle path network and facilities for locking bikes

East Midlands Airport (EMA)

EMA provides and makes available the following surface access facilities from its portfolio of assets:

• Bus and coach bus stops

- Private hire taxi rank at terminal
- EMA Parkway rail station (airport concession taxi operator provides transfers)
- Car Rental Village
- Drop-off forecourts for drop-off, pick up, taxis, coach & off-airport transfers
- Short Stay car park for drop-off, pick up, taxis & off-airport transfers
- Long Stay car park with free courtesy bus
- Low cost Park & Ride (JetParks) car park with free courtesy bus
- Valet Parking services
- Cycle path network and facilities for locking bikes

Bournemouth Airport (BOH)

BOH provides and makes available the following surface access facilities from its portfolio of assets:

- Bus & coach bus stops
- Private hire taxi rank at terminal
- Car Rental facilities
- Terminal forecourt accommodating drop-off, pick up, taxis, coach & off-airport transfers
- Short Stay car park accommodating drop-off, pick up, taxis & off-airport transfers
- Long Stay car park (terminal adjacent therefore no bus required)
- Cycle path network and facilities for locking bikes

• What is MAG's attitude to the development of facilities outside the airport perimeter?

MAG recognises that off-airport operators have a role to play in helping to meet the needs of passengers, subject to those operators complying with relevant planning requirements and health and safety regulations.

MAG also recognises that its airports have a responsibility to facilitate the operation of competing operators, and to treat them reasonably and fairly in the way that they are provided with access to airport facilities.

The consultation document makes reference (para 3.26) to the fact there is limited off-airport car parking capacity at Stansted. The CAA will be aware from successive regulatory reviews that this situation is the product of the land-use policies adopted by the local planning authority and successive planning inspectors to control the phased development of the airport over the last 25 years. These planning policies have been expressly designed to help mitigate the impacts of the airport's growth on the predominantly rural surrounding areas.

In this instance, the planning policy has sought to contain the impacts of airport-related parking to the areas immediately adjacent to the airport to prevent wider development in surrounding rural areas. As such, the local planning authority has been concerned to ensure that sufficient land is identified 'on airport' to meet the likely needs of passengers as the airport grows. This approach has allowed the local planning authority, and other surrounding authorities, to refuse planning applications for new airport-related car parks on the basis that they are not consistent with planning policy, and/or there is no demonstrable need for the off-airport development on the grounds that land-use provision has already been made at the airport for these facilities.

Stansted has worked closely with local planning authorities to adhere to this planning policy, mindful of the importance of meeting its legal obligations and complying (and being seen to comply) with relevant planning conditions.

Related to this the independent Stansted Surface Access Forum has supported local planning authorities taking action against unlawful off airport parking operators. This is part of the Forum's approach to an integrated transport strategy for the airport.

Similarly, the airport takes seriously the issue of fly-parking in the villages close to Stansted, and has sought to agree an approach with local stakeholders to addressing this source of nuisance for communities around the airport.

• 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

Where applicable, our airports provide off-airport parking operators and taxi companies with access to terminal forecourts to enable them to drop-off and pick-up passengers, and offer valet parking / meet and greet services. We also provide off-airport operators with access to car parks where this is required to support their operations.

Off-airport valet parking and meet and greet operators can use the airport facilities and enter the terminal building to meet customers provided that they park the vehicles in a short-stay car park.

Where charges apply for the use of these facilities, these are levied at the standard prevailing rate for all users, and no additional restrictions are applied to their usage of these facilities.

In certain cases, such as the express set down area at Stansted, commercial operators are exempted from some of the restrictions imposed on private vehicles and taxis, for example the prohibition on re-entry within 30 minutes of leaving the area. These have been agreed locally to enable off-airport car parking companies to use the forecourt to operate meet and greet services and offer other off-car parking products to passengers.

MAG also cooperates with some off-airport operators to provide a credit facility so that operators can access car parks and drop-off areas without the need to carry cash for individual transactions.

MAG does not use terminal forecourts to operate its own-brand Meet&Greet car parking products.

 How airport operators derive charges for the use of facilities by surface access providers and to explain whether and how these charges relate to costs or any other relevant factors. In particular, airports should explain if these lead to differentiation between 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.

MAN

Facility	Charge		
Heavy and light rail station	• No charge		
Bus and coach station	• No charge		
Hackney cabs and private hire taxi ranks	 Hackney cabs are charged £1.60 per journey. These charges have remained the same for 10 years. The Airport Taxi Association would be consulted on any change. Private hire taxi operator appointed following commercial tender process 		
Car Rental Village	• Operators participate in commercial tender processes for car hire facilities, and pay fees as a proportion of revenues		
Terminal forecourt	• No charge		
Short Stay car park	• Off-airport operators pay standard charges for the use of short stay car parks, and are subject to standard terms and conditions		
Motor-cycle parking	• No charge		

STN

Facility	Charge	
Heavy rail station	• No charge	
Bus and coach station	 Scheduled coach operators appointed following an open commercial tender process Charter coaches and hotel courtesy buses pay £10 per departure. Charges levied to ensure users contribute to infrastructure/facilities costs Dropping off groups of passengers is free of charge for all operators; departure fees only apply when picking up passengers There is no charge for local buses using the bus and coach station 	
Private hire taxi rank	 Private hire taxi operator appointed following a commercial tender process 	
Car Rental Village	• Operators participate in commercial tender processes for car hire facilities, and pay fees as a proportion of revenues	

Terminal forecourt	• Operators pay standard prevailing rate, and no additional restrictions are applied	
Short Stay car park	• Off-airport operators pay standard charges for the use of short stay car parks, and are subject to the same terms and conditions	
Mid Stay car park with free courtesy bus	 Off-airport operators can use mid-stay car park on the same terms as other users and are subject to the same terms and conditions. Use of the coach park is free of charge to bus and coach operators 	

EMA

Facility	Charge		
Bus and coach stops	• No charge		
Private hire taxi rank	Private hire taxi operator appointed following commercial tender process		
Car Rental Village	• Operators participate in commercial tender processes for car hire facilities, and pay fees as a proportion of revenues		
Terminal forecourt	 Operators pay standard prevailing rate, and no additional restrictions are applied 		
Short Stay car park	• Off-airport operators pay standard charges for the use of short stay car parks, and are subject to the same terms and conditions		
Low cost Park & Ride car park with free courtesy bus	 Off-airport operators can use car park on the same terms as other users and are subject to the same terms and conditions. Coach park is free of charge to bus and coach operators 		

BOH

Facility	Charge		
Bus and coach stops	• No charge		
Private hire taxi rank	Private hire taxi operator appointed following commercial tender process		
Car Rental Village	• Operators participate in commercial tender processes for car hire facilities, and pay fees as a proportion of revenues		
Terminal forecourt	• Operators pay standard prevailing rate, and no additional restrictions are applied		
Short Stay car park	• Off-airport operators pay standard charges for the use of short stay car parks, and are subject to the same terms and conditions		
Low cost Park & Ride car park with free courtesy bus	 • Off-airport operators can use car park on the same terms as other users and are subject to the same terms and conditions. • Coach park is free of charge to bus and coach operators 		

• 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.

Many of the surface access facilities at MAG airports are provided free of charge, as shown above. A number of the other services, including private taxis and coach services, are commercially tendered.

Where charges apply, commercial users pay standard tariffs for the use of forecourt facilities. As such, the relevant airports do not tend to consult users specifically on general charging principles and structures as these do not differ from those applied to individual users.

Any proposal to increase the per-journey fee paid to Manchester Airport by Hackney cabs would be consulted on with the Airport Taxi Association. Note the current fee has not been changed for ten years.

Prior to the commercial tender process for coach operators at Stansted, the airport consulted coach operators on any changes to coach station charges. The airport continues to charge charter coaches and hotel courtesy buses for the use of the bus and coach station. These charges have been the subject of consultation in the past, and any proposed changes to these charges in the future will be consulted on prior to implementation.

• 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

MAG engages with a range of partners to support the distribution of its car parking products. These distribution partners include:

- online parking specialists;
- airlines;
- tour operators;
- corporate companies; and
- affiliate networks.

These enterprises are engaged in an agent capacity on Sales Agency contracts with MAG. Because they are acting purely as agents to sell MAG car parking products, there is no transfer of commercial responsibility or liability to the enterprises. All of them operate as true agencies enabling the access of MAG's products to market and have no opportunity to influence MAG's cost management, pricing, capacity provision or product specification.

In particular, there is no discussion or coordination between MAG and agents on issues such as pricing and capacity utilisation. For those agents who use their own booking platform, commercial interaction is limited to MAG providing a pricing file every hour which is automatically uploaded to their systems to support their selling of the product at the relevant price. This ensures that these agents sell car parking at prices that correspond with MAG's own booking platform, and they only sell capacity when it is available to be sold.

A number of other distributors use MAG's booking platform to transact with customers. Any transactions carried out in this way use the prices on MAG's booking platform, and no capacity information is made available.

• 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

MAG websites

MAG airports make extensive use of their respective websites to provide passengers with information about the options for getting to and from the airport.

As an example, Appendix 1 reproduces screenshots from the internet to demonstrate what a passenger would see if they entered the phrase 'getting to Manchester Airport' in a Google search enquiry, and then followed the links to explore the different options.

The results demonstrate that passengers looking for information on the internet are presented with a clear and neutral picture of their different options for getting to and from the airport. Similar search results would be generated for other MAG airports.

Google search page

The initial Google search presents passengers with their travel options in a neutral way, and does not give a greater prominence to car parking options or other products where the airport would earn commercial revenue. In addition the search results do not place advertising for airport car parking above the information about the different travel options.

Manchester Airport web page

Clicking through the from the Google link to the Manchester Airport website presents a comprehensive and neutral list of travel options. The structured menu can then be used by passengers to explore the costs and other information about each of the options. There are also banner messages about traffic information and travel disruption to assist passengers with their journey planning.

Car parking options

Clicking through on the car parking button takes passengers through to menu page where they can enter their travel dates, before seeing a range of car parking options, prices and other information about their choices. The list of options is sorted by price, from low to high, so that passengers see their cheapest options first. The car parking page also highlights that savings are available to passengers who pre-book their car parking.

Other travel options

The Manchester Airport website also contains extensive information on the different travel options, including pages on coach, train, taxi and transfer, bus services, Metrolink, chauffeurs and cycling. Many of these travel options are bookable directly through the airport websites.

Other sources of information

The airports also offer provide support to passengers through telephone helpdesks to assist with travel enquiries. In addition, car parking at MAG airports can be booked using on the telephone booking service which offers the same range of products and prices as the website.

At the airport

Onward travel options are provided with a strong terminal presence at all sites, with information boards and kiosks available to find our more information about all available options. For example, the majority of space in landside Arrivals Hall at Stansted is dedicated to the sale and promotion of onward travel options including bus, coach, rail, taxi and car hire.

• Details of surface access options that are available at no charge to consumers that allow for the drop-off and pick-up of passengers.

MAN

The terminal forecourts can be used by private vehicles and taxis free of charge for the drop-off and pick-up of passengers. Similarly, shuttle buses can access the airport without charge and buses and coaches are not charged for using the coach park. As such, all these modes of transport have access to the airport free of charge.

STN

The mid-stay car park can be used by private vehicles and taxis to drop-off and pick-up passengers free of charge. The car park is a five-minute courtesy bus ride away from the terminal forecourt (buses run every 10 minutes). The first hour in the mid-stay car park is free of charge, with a £1 charge for up to two hours. Daily rates for the mid-stay car park apply after two hours.

Alternatively, the Express Set Down facility provides passengers with the ability to be dropped off on the terminal forecourt for a fee of £3 per vehicle for up to 10 minutes.

Shuttle buses can also use the mid-stay car park without charge, and buses and coaches are not charged for using the coach park, which is co-located next to the mid-stay car park.

EMA

The JetParks car park can be used by private vehicles and taxis to drop-off and pick-up passengers free of charge. The car park is a five-minute courtesy bus ride away from the terminal forecourt. The first hour in the JetParks car park is free of charge.

Alternatively the Express Set Down facility provides passengers with the ability to be dropped off on the terminal forecourt for a fee of $\pounds 1$ per vehicle for up to 10 minutes.

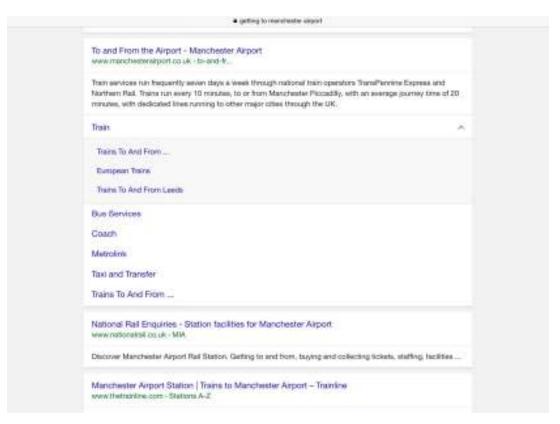
As at Stansted, shuttle buses can access the airport without charge by using the drop-off facilities in the JetParks car park, and buses and coaches are not charged for using the coach park.

BOH

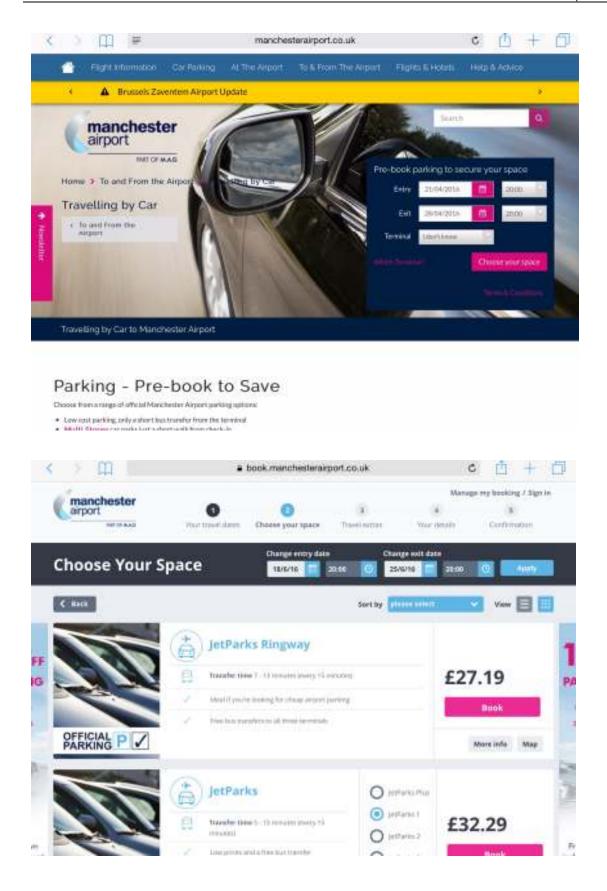
The airport does not offer a 'free of charge' drop-off and pick option for passengers. The free parking period of 10 minutes was withdrawn to help support MAG's £50 million redevelopment of the airport facilities in 2007.

We note the CAA's initial views on provision of a free option for passenger drop-off/pick-up. However, this view does not take into account the specific commercial and operational context for smaller airports, particularly where the scale of the airport does not practically support the parallel provision of free and chargeable options in close proximity to one another.

Appendix 1 – Manchester Airport website

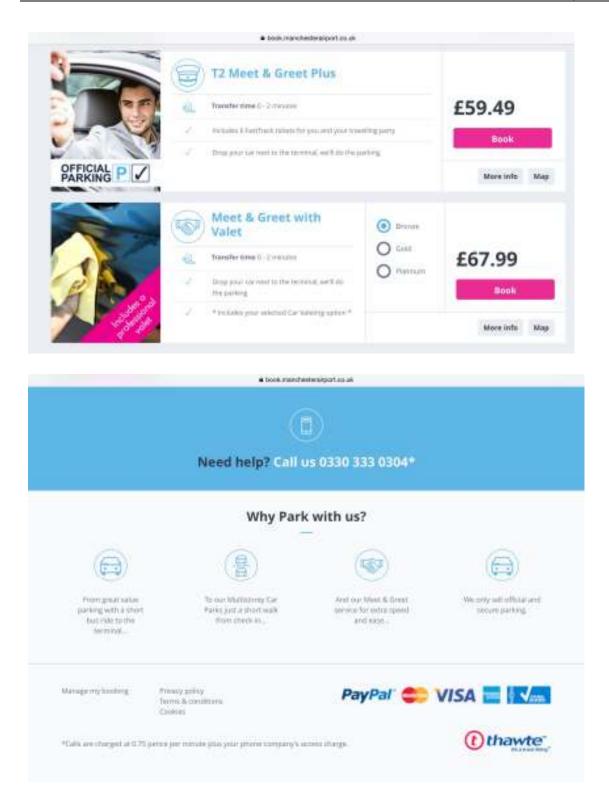






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