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**RESPONSE FROM CULTRA RESIDENTS' ASSOCIATION
TO THE NORTHERN IRELAND AFFAIRS COMMITTEE INQUIRY INTO
AIR TRANSPORT SERVICES IN NORTHERN IRELAND**

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RE: BELFAST CITY AIRPORT AND BELFAST INTERNATIONAL AIRPORT

Cultra Residents' Association welcomes the Committee's inquiry into Air Transport Services in Northern Ireland as there has been a need for some considerable time for a searching independent review of air services in Northern Ireland to achieve the maximum economic benefit for the region.

Cultra Residents' Association represents over 200 families in the Cultra area of North Down. The Association is also working closely with residents in Kinnegar Sydenham and East Belfast. The latter groups represent many thousands of residents living in the areas of high density housing in close proximity to Belfast City Airport.

All the residents groups are gravely concerned with the intensification of use of Belfast City Airport which is having a significant detrimental effect on their environment. Noise pollution is already widespread throughout the area (which incidentally contains approximately 39 schools) and the introduction of larger aeroplanes at the City Airport since British Midland moved its scheduled flights to Heathrow has noticeably intensified the pollution. Noise experts instructed by our Association inform us that noise levels being experienced at Kinnegar and East Belfast are already double and in some cases quadruple the levels of noise as shown in the indicative contours being published by Belfast City Airport and accepted by the Department of the Environment for Northern Ireland.

It is clear that any growth at the City Airport will be a risk to public health and noise levels will be experienced which will be in excess of the World Health Organisations guidelines. It is not difficult therefore to anticipate situations where there will be grounds for legal proceedings claiming compensation for injury to health and clearly thousands of householders will be justified in seeking grants for double glazing.

As a result of our Associations concern about the City Airport's detrimental impact on its environment we have been in lengthy correspondence with the Planning Department and the Department of Regional Development for Northern Ireland since 13th September 2001, and a number of matters have been revealed in this correspondence which cause us to look closely at the future of air transport in Northern Ireland and its relationship to the well being of the Northern Ireland economy.

Why are there two civil airports within a few miles of each other and in keen competition with each other but dependent for their trade on a small catchment area with a population of approximately 1.7 million? In a small region like Northern Ireland, it is not rational to have two substantial airports in close proximity, bearing in mind the high cost of airport

infrastructure and the relatively limited resources available. It just does not make economic sense. Geographically, there is really only one site in Northern Ireland for an “international airport”. This is Aldergrove. The site was first selected in 1917 as a military airport by Major (later Marshall of the Royal Air Force) Sholto Douglas. At the same time, Sholto Douglas selected the site at Collinstown which is now Dublin Airport for an airport serving Dublin so that his judgment of sites for airports in 1917 seems to have been very farsighted.

In 1958/59 it became necessary to decide on a site for an international airport for Northern Ireland and careful consideration was given by the UK Government of sites at Aldergrove, Belfast Harbour Airport, and wartime airfields at Ballyhalbert, Bishops Court, Millisle, Long Kesh, and Langford Lodge. On the 29th July 1959 an announcement was made at Westminster that Aldergrove had been selected and the decision was favourably received in Northern Ireland. Since 1959 Aldergrove has grown extensively and some 50 million pounds in Government and EEC grants have gone into its development. It is an airport situate in open countryside and almost unique to the United Kingdom it does not create any environmental problems whatsoever. It is the only airport in Northern Ireland that can possibly rival Dublin for international destinations and it is clearly suitable for further extensive development. If Aldergrove is not developed to its full potential it is very obvious that many Northern Ireland citizens will be obliged to use Dublin Airport which is already successfully increasing its international connections and is now benefiting from the recent improvement in the road infrastructure between Belfast and Dublin.

Why is Belfast City Airport in competition with Belfast International at Aldergrove and is this competition detrimental to the economic growth of Northern Ireland? These are two questions which have to be looked at in an historical context so that it can be appreciated how the situation developed, largely by default and by the lack of strategic thought and firm control at Government level.

Prior to 1983 the City Airport was only used by Short Brothers for test flights and for air taxis. However, in 1983 Short Brothers, then one of Northern Ireland’s largest employers obtained permission to fly passenger services from the City Airport. On the 5th January 1983 their spokesman made the following statement:-

“We are not at all interested in competing with Aldergrove which with something like 1.5 million passengers per year throughput is clearly the Province’s major gateway airport. Rather our primary objective is to exploit sales of our commuter aircraft and thus help safeguard thousands of jobs at Queen’s Island which are so vital to the Province, by stimulating our customers’ growth opportunities”.

This alleged principle of safeguarding jobs was clearly a powerful and persuasive weapon and was effectively exploited by Short Brothers. As the poet declaims: “Tall oaks from little acorns grow”.

However, with the continuing growth of the City Airport there was growing public concern about the Airport which is situate only 2.5 miles from the centre of the City and is surrounded by well established residential areas. It is not surprising that the City Airport is

now one of only four airports in Europe designated as a “City Airport” therefore allowing the imposition of more stringent noise-related operating restrictions.

Faced with the growing public concern about the unexpected development of the City Airport and at the same time pressured by Short Brothers to obtain more flights the Department of the Environment included the issue of the future of the City Airport as one of the relevant issues in a major Public Inquiry which opened on the 23rd October 1990 and closed on 14th January 1991.

The Report on the Public Inquiry by Mr F.J.Warke, the Principal Professional Commissioner, was accepted by the Planning Appeals Commission on the 24th June 1991 and the conclusions of the Commissioner were adopted by the Department of the Environment in an Adoption Statement 1991. Policy AP1 in the Adoption Statement states:-

“The Department will establish indicative noise contours against which reasonable growth of airport operations will be assessed”.

Policy AP3 in the Adoption Statement states:-

“The Department will seek to maintain the airport’s present role and character as a regional airport”.

In clarification of Policy AP3, the Adoption Statement also provided as follows:-

“Since the introduction of passenger services in 1983 Belfast City Airport has fulfilled an important role alongside Belfast International Airport (Aldergrove). Aldergrove is Northern Ireland’s major airport – the trunk route and international gateway. Belfast City Airport operates mainly as a regional airport serving other regional centres in the United Kingdom with short haul aircraft. The Department considers that airport operations within the framework of indicative noise contours will not alter the character of the airport so long as the operators adhere to the following environmental and operational constraints:-

- the use of quiet aircraft (to be defined by reference to current practice and standards)
- operating services between 6.30am and 9.30pm
- the maintenance of the present bias in favour of the main flight path over Belfast Lough.

The Department will seek to establish a basis for local consultation and monitoring can be regularly and reliably assessed against the environmental and operational constraints”.

One would have thought that Policies AP1 and AP3 set out so lucidly in the Adoption Statement 1991 issued by the Department of the Environment were not open for

misconstruction or misunderstanding. It was therefore with shock and surprise that the Association learnt from correspondence between its solicitors and the Planning Department and the Department for Regional Development that the Departments had never implemented Policy AP1 and that the planners had watered down the provisions of AP3 by entering into private agreements with Belfast City Airport Limited and Short Brothers plc whereby (inter alia) the airport was permitted to allow flights to arrive between the hours of 9.30pm and 11.59pm if aircraft were delayed by “exceptional circumstances”. Not surprisingly this concession has been exploited and the Association has now learnt that on average more than 50 flights per month are arriving after the 9.30pm deadline. This is now a major issue between the Residents’ Associations and the City Airport.

In 1993, Maurice Buckby the City Airport’s spokesman told the first meeting of the Belfast City Airport Forum – “We won’t be bringing in noisy jet aircraft and we won’t be operating at night, for instance”. He also said – “We don’t have a lot of extra space to do much more development on this site so our priority is to keep standards of service up with the growth”.

Despite the 1993 Statements by the City Airport’s spokesman, growth has continued at the City Airport to the detriment of its environment and it appears to the Residents’ Associations that the Department of the Environment has failed to honour its obligations to the public as envisaged by the provisions of the Adoption Statement 1991.

It is interesting to note that when it was established by our solicitors that the Departments had in fact failed to establish “indicative noise contours” as promulgated by Policy AP1, the Department of Regional Development engaged Professor Callum Thomas of Manchester Metropolitan University to review “Noise Monitoring at Northern Ireland Airports”, and although Professor Thomas duly produced two lengthy documents which he entitled “A Good Practice Guide to the Assessment and Management of Aircraft Noise Disturbance around Northern Ireland Airports” he did little to advance the operation of Policy AP1. The thread running through his discourse was that it was necessary in the present age to trade off damage to the environment against economic benefit for the community. This conclusion may be true for the majority of airports in the United Kingdom, but it is certainly not appropriate to the situation at the City Airport which will always be limited in its growth by the adjoining housing while 25 minutes away by motor vehicle there is another larger airport with no environmental problems whatsoever.

It would appear to the Association that in Northern Ireland in recent years Civil Servants have decided for their own reasons that it is in the public interest to have two competitive airports and in stressing the benefits of competition for the public to the exclusion of all other considerations they have overlooked the major fact that it is wholly impracticable to have two substantial airports within a short distance of each other serving a catchment area of only 1.7 million people. It does not make commercial sense.

It is also ironical to note that a recent parliamentary question has revealed that Civil Servants themselves travelling between Northern Ireland and the rest of the United Kingdom have spent the following amounts on air travel at the City Airport and Aldergrove as follows:-

2002/3	Belfast City	Belfast International
	£3,983,798.00	£239,348.00
2003/4	£3,154,379.00	£210,216.00

It should be recorded that tickets from Belfast City would cost two or three times the cost of tickets from Belfast International.

The actions of the Civil Servants in their daily activities do not appear to support their proposition that competition between the two airports is of major benefit to the travelling public.

It also has to be noted that in the recent purchase of the City Airport the price must have reflected the existing planning constraints on the airport and that any purchaser in its due diligence enquiries would have been fully acquainted with the limitations on its purchase.

Finally, the Cultra Residents Association would wish the Sub-Committee to conclude that because of its situation, with no possibility of further major development, the City Airport must accept that it can only have very limited growth (if any) and that in the interests of the Northern Ireland economy the development of a truly international airport can only proceed at Aldergrove.

Cultra Residents' Association also confirms that if the Northern Ireland Affairs Committee deemed it desirable its representatives would be willing to provide oral testimony.

Dated the 23rd day of September 2004.

Signed:..... *Cultra Residents Association*
Cultra Residents' Association

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