

The Inquiry Secretary (Airports)
Competition Commission
Victoria House
Southampton Row
London WC1B 4AD

May 4, 2007

Dear Sir or Madam

Competition Commission Airport Investigations

I write as someone who is a professional engaged in aviation and a frequent flyer for business and leisure for the past 40 years.

At present I am an aviation consultant in the fields of airline business, aircraft appraisal and flight safety. This necessitates travel to all areas of the World during which I often have the misfortune to use Heathrow and Gatwick and, occasionally, Stansted Airports - all three BAA airports. I sometimes am able to use Luton Airport, which by contrast is a delight, but is still extremely limited in terms of the range of business destinations available.

There is little doubt that there is an effective monopoly in airport runway and terminal capacity as far as the London and SouthEast of England is concerned. In 2006 the three BAA-owned London Area airports handled a total of 125 million passengers, compared with only 9.4 million at Luton and 2.4 million at London City Airport; giving the BAA London airports a 91% passenger share.

This monopoly works strongly against the public interest; leading to a lack of genuine choice in selecting airports and the same indifferent quality at service at all three of them. It is not a question of whether this is restrictive or distorts the competition; there simply isn't any competition to any significant degree.

Having the benefit of being designed and built quite recently Stansted Airport is still reasonably well-organised, but conditions at Heathrow and Gatwick can only be described as a complete shambles from the point of view of passengers.

- At both airports the public transport system works intermittently with frequent disruptions.
- The Heathrow central zone road traffic system is totally chaotic, badly designed and poorly managed.
- Most of the passenger terminals are badly-designed, poorly maintained and quite squalid in places.
- The departure lounges have become rambling unpleasant shopping malls that obstruct the flow of passengers through the necessary processes and to and from the aircraft.

- The shops that are in the departure lounges are in the main over-priced and many of them are quite inappropriate, since all that is required in an airport are basic shopping facilities dealing with simple traveller needs. The delays that these obstacles cause, unnecessarily extend the time spent getting through the airport.
- Access to and from the departure gates is slow and tedious; a situation not helped by the all-to-frequently out-of-order moving pavements. Terminal 3 at Heathrow is probably the worst of all in in this regard.
- Baggage handling systems are old and decrepit, with failures causing delays and losses; while the crime rate from passenger baggage is legendary as Hounslow Heath's reputation for highwaymen lives on among the baggage handlers.
- The situation on Heathrow airside is managed no better with constant attention having to be paid to the decaying concrete runways and ramps causing congestion with aircraft parked higgledy-piggledy, ramp equipment in every nook and cranny and one of the highest road traffic accident and aircraft ground damage known worldwide.

The focus on shopping as the main source of BAA revenue means that attention is taken away from providing efficient passenger processing, well-managed security, and adequate basic facilities including decent catering and clean toilets in favour of excessive profits from luxury goods and duty-free sales of explosive alcoholic liquids, mainly stored in glass bottles that constitute a safety hazard on aircraft and add to the weight carried and carbon emissions. Also the security procedures that are in operation, though necessary for everyone's peace of mind, are badly-managed and grossly under-resourced, with insufficient equipment and trained staff to deal with the passenger flow most of the time.

The BAA airports also compare unfavourably with other airports worldwide - I can vouch for this having visited over 200 of them - particular in respect of their appearance and condition. The squalor at Heathrow Terminals 1, 2 and 3 and at Gatwick South Terminal is greater than at some developing world countries in Africa and Asia. What is needed is an urgent shake-up of the ownership of the BAA Airports and the complacency in the way these airports are managed. Only then will the lot of their unfortunate passengers be improved.

I therefore urge the Competition Commission to find that the BAA operates in an anti-competitive manner and against the public interest and to force it to divest itself of two of its three London Area Airports. I do not have direct knowledge of the Scottish Airports, using them relatively infrequently but I suspect that the situation is somewhat similar and require comparable action.

This of necessity a short and mainly anecdotal letter as I am travelling again this weekend, but I would be happy to provide more detailed submission if it were required.

Yours faithfully

John Trevett