

# Night Flying Restrictions at Heathrow, Gatwick and Stansted

Response from British Air Transport Association

The British Air Transport Association (BATA) welcomes the opportunity to respond to the Department for Transport's consultation on Night Flying Restrictions at Heathrow, Gatwick and Stansted. BATA represents UK-registered airlines, both scheduled and charter. Our members produce over 90% of UK airline output.

We recognise that night flights are unpopular with those who live close to airports but we are committed to minimising their impact. However, without a small number of night flights there would be severe operational and commercial penalties. These arise through the requirements of:

- Certain long haul flights, especially from the far east, where the effect of time differences at the other end of the route constrain arrival times to a narrow band.
- Some charter airlines and low cost operators where three aircraft rotations per day are needed to maintain an acceptable level of aircraft utilisation.
- Some cargo flights where overnight delivery is the essential feature of the service.

*(Paragraph references in the questions are to the consultation document)*

## **(a) Questions about 2004-05**

*Q1 Do you agree that it is sensible to extend the present night restrictions regime for a further year, to 30 October 2005? (see paragraph 3.11)*

We agree that it is sensible to extend the present regime to 30<sup>th</sup> October 2005 for the reasons set out in the consultation document.

*Q2 Do you agree that the movements limits and noise quotas at each airport for winter 2004-05 and summer 2005 should be the same as those for winter 2003-04 and summer 2004 respectively? (see paragraph 3.15)*

We agree. In reviewing the permitted levels against demand, it should be borne in mind that the last two years have not been typical. The industry has faced unprecedented trading conditions and much reduced demand.

## **(b) Preliminary questions about the night restrictions to apply from 30 October 2005**

*Q3 What are your preliminary views on whether we should continue the present policy of having common arrangements at all three airports, and on the broad issues relating to possible extension of the night quota period? (see paragraph 4.1)*

We support the policy of having a quota count system at all three airports. Beyond that however, we believe that each airport should be considered independently - both in terms of the actual allocation of the quota and movements and with any other conditions.

We would not support an extension of the night quota period.

*Q4 Do you accept the general principle that having the same rules at the three airports is fair to all the people living round those airports and to the airlines? (see paragraph 4.2)*

Yes, we accept the general principle that having the same rules at all three airports is fair to local residents and airlines but it may be better in the future to have different arrangements at each airport to ensure an optimum balance between benefits and impacts.

*Q5 In the context of night restrictions, do you think efficient and economic administration and transparency are important considerations? (see paragraph 4.3)*

Yes, these are vital considerations.

*Q6 What are your views on the possibility of retaining some aspects of common arrangements but not necessarily having the same night quota period at each airport? (see paragraph 4.4)*

We believe that the night quota period should not be increased and therefore it would remain the same at all three airports. This is fair to local residents and airlines. However, should it be agreed that a change be made at one airport, this should **not** be used as reason to make similar changes at other airports. The arrangements and limits at each airport should be considered independently.

*Q7 What are your preliminary views on*

*(a) when should the night quota period start and finish?*

The night quota period should start and finish as now (1130pm to 0600am)

*(b) what is the appropriate size of the movements limits and noise quotas that should apply during the night quota period?*

The movements limits and noise quotas should be no less than they are now.

*(c) which types of aircraft should be restricted in the night quota period?*

The voluntary restriction on scheduling QC/4 aircraft in the night quota period could be formalised in exchange for an increase in the quota and movement limits.

*(d) if the night quota period were extended, would any consequential adjustments be required to other elements of the night restrictions regime? (see paragraphs 4.13 and 4.14).*

We do not think that the night quota period should be extended, but if it were, the movements limits and noise quotas would have to be increased. To prevent bunching, in the middle of the night for example, some other form of restriction would have to be imposed. This would add another layer of complexity which would make system unmanageable.

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