

Night Flying Restrictions at Heathrow, Gatwick and Stansted

Stage 1 of Consultation on Restrictions to Apply from 30th October 2005

Response from British Air Transport Association

BATA welcomes the opportunity to comment on the Department for Transport's consultation paper on Night Flying Restrictions. BATA represents UK-registered airlines, both scheduled and charter. Our members produce over 90% of UK airline output.

Introduction

We are unable to supply the detailed economic information requested for reasons of commercial confidentiality. Individual airlines will submit their own information. In general terms however, the ability to operate at night is valuable to airlines, airports, passengers and shippers for the following reasons:

- **Utilisation of assets and airport capacity.** Night flights provide the operating flexibility to maintain the utilisation of aircraft and airports which reduces costs. Heathrow and Gatwick are at capacity during the day and night flights cannot be moved into the day because there are no daytime slots available.
- **Multi-rotational operations.** The economics of charter operations and much of the growing no-frills sector depend being able to achieve multiple aircraft rotations to various short haul destinations. These operations inevitably include very early departures and late arrivals which require Night Quota Period capacity at Gatwick and Stansted. They also need to make full use of the critical 0600-0700 shoulder period at each airport. Any reduction in NQP capacity or further restrictions in the 0600-0700 hour will undermine the economics of these sectors and lead to a reduction in passenger choice.
- **Long haul flights.** Because of the effect of local time differences and the need to provide competitive timings which are attractive to passengers, some long haul flights, especially those from the east, have narrow operating windows which fall within the night period. Furthermore, such flights carry many passengers whose strong preference is to travel overnight. We anticipate that long haul flights from the east will increase, especially from China and India.
- **Express parcels.** The prime customer demand is for overnight deliveries which requires night flying.

Responses to Specific Questions

Our responses to the questions and requests for information are set out below.

1) Are there any other matters that you think we should cover in this consultation in addition to those set out in paragraph 2.4 of this paper?

The operational effect of the existing commitments should be taken into account such as the runway alternation trial at Heathrow introduced in 1999.

We support the DfT's intention to set the next regime for 6 years.

2) *Do you have any comments on the assessments described in Annex B of the consultation document? (see paragraph 4.1)*

No comment.

3) *Do you have any comments on the presentation of the noise contours and other information in Annex C? (see paragraphs 4.2-4.13)*

The noise contours are unrealistic in that they assume 100% of the quotas are used which in practice is impossible to achieve. The scope for expansion under the existing regime is therefore overstated.

4) (a) *Do you have any comments or suggestions for environmental objectives and specific noise abatement objectives for each airport? (see paragraph 6.6)*

A reasonable long term objective could be to reduce the number of people affected by night noise by a combination of quieter aircraft, night flying restrictions, insulation and planning controls. However this cannot be applied everywhere. Allowances would have to be made around airports where major expansion takes place.

(b) If so, please state for each objective the base case indicator against which it should be assessed.

Number of households within the Lnight (6.5 hour) 54 dBA contour in 2004.

5) *Are you content that we should retain the QC system for classifying aircraft? (see paragraph 7.4)*

Yes. This is a well-established internationally recognised system. Any change would undermine the long-term fleet planning decisions made by airlines and the aircraft manufacturers' recent aircraft design decisions.

6) *Do have any comments on the proposals to:*

(a) remove the weight limit for jet aircraft able to qualify as exempt but, at the same time, extend the QC system downwards by a further band to QC/0.25 (84-86.9 EPNdB)?

In general we support this proposal since it provides incentives for the use of quieter aircraft. However the movement and QC limits must be reviewed and adjusted to take into account the increased number of aircraft types and movements which will become subject to the restrictions. If this is not done, it could result in an indirect tightening of the restrictions.

(b) retain the minus 9EPNdB adjustment for arrivals?

It should be retained.

(c) prohibit QC/4 aircraft from operating between 2330 hours and 0600 hours? (see paragraphs 7.10-7.23)

We support the prohibition of scheduling movements of QC/4 aircraft in the NQP, which would formalise the current voluntary ban. However we do not support a total ban. A prohibition on actual operations would have a disproportionate effect. If no delayed departures were allowed it would lead to cancellations or long delays at great inconvenience to passengers and cost to airlines. It could trigger compensation claims from passengers under the new EU Denied Boarding regulations. If early arrivals were banned, aircraft would have to be diverted to another airport or placed in holding

patterns. This would inconvenience passengers, increase emissions and increase airline costs.

We need detailed information from airlines and other users now, in response to this stage one consultation, as to the number of flights they want to operate each season in each of these half hour time periods (2300-2330, 0600-0630 and 0630-0700), the value of these flights to their business and the likely operational and financial consequences if they are restricted. We also need similar information in relation to the present NQP.

As explained in the introduction, we are unable to supply the detailed information requested for reasons of commercial confidentiality. In general terms however, the ability to operate in the NQP and shoulder periods is critically important for the following types of operation:

- **Long Haul** (mainly at Heathrow but some at Gatwick). Because of restrictions at the other end of the route and the strong passenger preference for overnight travel, long haul flights often have narrow operating windows which fall within the night period. Furthermore, such flights carry significant numbers of passengers who transfer at Heathrow or Gatwick and wish to do this early in the day to avoid a night stop.
- **Charter and other Low Cost Operations** (mainly at Gatwick and Stansted). The viability of such operations depends on high aircraft utilisation. Any reduction in the operating day would reduce the number of aircraft rotations from three to two and put the viability of many such operations at risk. Some aircraft fleets would be moved and become based at airports without night restrictions. Gatwick and Stansted would then be served on some routes by one rotation per day at best, severely reducing passenger choice.
- **Express Freight** (mainly Stansted but some at Heathrow and Gatwick). The business model for this sector is predicated on overnight deliveries which cannot be achieved without some night flying.

7) *Do you have any comments on:*

(a) the value of there being common arrangements at the three airports?

It is very important to retain a common aircraft classification system. It is also valuable, operationally, that other arrangements are common. Nevertheless we recognise that it may be better in the future to have different arrangements at each airport to ensure an optimum balance between benefits and impacts. However, if a change is made at one airport it should not be used as a reason to make a similar change at any other airport.

(b) retaining the same night quota period at the three airports? (see paragraphs 8.1-8.11)

There should be no extension in the night quota period at any airport for the reasons given earlier. Since significant new capacity, i.e. new runways, will not be delivered until after the end of the next night restriction regime, and since the DfT is forecasting an increase in traffic, it would be perverse to further reduce capacity by extending the NQP now. Although not all of the current quotas have been used in recent years, this is a transient effect due to the difficult recent trading conditions. We anticipate that during the period of the next regime, the demand for night movements will increase significantly.

8) *(a) Points relating to density of population and ambient noise seem more germane to issues concerning the size of the night quotas and the number of movements permitted, rather than to the length of the night quota period: do you disagree?*

No – i.e. we agree with the proposition.

(c) Are you aware of any reason why we should not take account of the comment in the WHO Guidelines that responses to aircraft noise are less likely to be influenced by ambient noise than are some other types of noise? (see paragraphs 8.12-8.13)

We are not aware of any reason why the WHO Guidelines should not be taken into account.

9) *Do you have any suggestions for further controls on movements during the night quota period if it is extended? (see paragraphs 8.14-8.17)*

The night quota period should not be extended. If it were to be extended, there should not be any further controls. The existing regime is already difficult to operate and complex to administer. We believe there would be a significant risk of perverse effects and further controls could undermine incentives to use quieter aircraft.

Rather than increase controls, we propose that annual limits should be set rather than seasonal ones as now.

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