

Night Flying Restrictions at Heathrow, Gatwick and Stansted

Stage 2 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, covering the scheduled, charter and freight sectors. Our members produce over 90% of UK airline output.

Summer Season 2006

We support the DfT's decision to extend the current regime until October 2006 in order to give sufficient time for the responses to be considered properly. We agree that the movement limits and noise quotas at the three airports for summer 2006 should be the same as those for summer 2005.

Responses to Specific Questions

- 1) *Do you have any comments on the proposals for environmental and noise abatement objectives set out in section 4?*

In general we agree with the objectives of encouraging the use of quieter aircraft and minimising sleep disturbance resulting from the overflight of the noisiest aircraft. However the objectives must be consistent with the 2003 Aviation White Paper and allow airports to grow. In particular, the proposal to reduce the Gatwick 6.5 hour 48 dBA Leq contour by 3% from the outturn quota usage in 2003 will restrict growth. (See our response to question 8 for more detail.) The contour area for Gatwick should be greater than that proposed.

In the same way, the proposal to impose a 10% reduction at Heathrow (paragraph 4.19) would also further restrict growth and would be inconsistent with the policy for growth in the Aviation White Paper.

- 2) *Do you agree that the QC/4 scheduling ban should continue to apply only between 2330 and 0600 as set out in paragraphs 5.32-5.37?*

Yes. Any extension of the QC/4 scheduling ban would have disproportionate negative economic and operational effects.

- 3) *Do you have any views on the definition of the night period and night quota period? (paragraphs 6.1-6.7)*

The definitions of the night period and night quota period should remain unchanged. Extending the night quota period would reduce scheduling flexibility particularly in the morning period when there are few if any slots available after the end of the night period. It would also increase the likelihood of flights being moved from operating in the shoulder periods to the middle of the night which could be viewed as creating more sleep disturbance.

The number of flights and airlines affected by an extension of the night quota period would be significantly greater which would increase the complexity of managing the quota system.

- 4) *Are you in favour of extending the night quota period if the movement limits and noise quotas were set precisely to accommodate current levels of night flying described in paragraph 6.11?*

No. The “current levels” are those for 2003 which was a low point for passenger numbers in recent years. The proposed limits would be a cut from more recent levels.

Extending the night quota period would stifle growth in other ways. The peak morning period from 0700 is very busy and slot constrained. Extending the night quota period up to 0700 would prevent any further growth in the early morning and so, in effect, prevent any new services until after the morning peak.

Extending the night quota period from 2230 to 2200 would restrict opportunities for long haul services which need to depart late at night to meet operational and time zone restrictions down route.

- 5) *Are you content to continue with the arrangements for disregarding movements? (paragraph 6.12)*

Yes. The circumstances that give rise to such “disregards” are exceptional and impossible to predict. Any reduction in flexibility could result in further inconvenience for passengers and airlines.

- 6) *Do you agree with proposals to remove the rule on movements scheduled after 0630 but arriving before 0600? (paragraphs 6.14-6.15)*

On balance, we agree with the removal of this rule even though it may mean that early arrivals could be forced to hold until after 0630. This will result in extra fuel consumption and emissions as well as a lengthier flight for passengers.

- 7) *Are you content with the carry and overrun arrangements proposed? (paragraphs 7.8-7.18)*

Yes we support the move to 10% flexibility in each season. This will help deal with the imbalance between summer and winter seasons.

- 8) *Do you have any comments on the proposed movements limits and noise quotas for Heathrow, Gatwick and Stansted? (paragraphs 7.19-7.52)*

The proposed limits will constrain operations at all three airports.

Heathrow

Although there is a small but welcome increase in the movement limit, the reduction in the noise quota will, in effect, further restrict long haul operations. Long haul aircraft are bigger, heavier and relatively noisier than short haul aircraft. Long haul flights are the most valuable but are often constrained by narrow operating windows and therefore least able to move. In particular, flights from south east Asia are constrained to arriving in the early morning and it is on these routes where there is the most demand for increased frequencies. For

example, bilateral agreements with China and India have recently been revised and the allowable number services has more than doubled.

The small increase proposed in the movements limit over the six year period can only be realised through the introduction of quieter aircraft. While it will contribute to the additional runway capacity needed to meet the demand for more services, we also recognise that the vast majority of this additional demand will need to be satisfied through extra daytime capacity, initially through the introduction of mixed mode operations.

We believe the noise quota should be no lower than it is now for the whole of the next noise control regime i.e. 4140 in the winter seasons and 5610 in summer seasons.

It follows that the proposal to reduce the noise contour area by 10% (paragraph 4.19) would be even more damaging to operators. We do not have the detailed economic information requested. For reasons of commercial confidentiality, it will have to be supplied by individual airlines.

Gatwick

The deep cuts in the movement and noise quota limits will severely constrain growth at Gatwick. Traffic at Gatwick declined after 2000 and has only recently recovered largely through a growth in no-frills operations.

The proposed limits for 2006/07 are just above the actual levels used in 2002/03 which was a low point in Gatwick's passenger numbers and reflected changes in demand following the events of September 11th 2001. See table below. By 2011/12 the QC limit will be lower than the actual level used in 2002/03. We believe that any proposals to reduce movements or QC limits should be based on the actual activity in 2000 or 2004 and not the artificial low point of 2002.

Table: Gatwick Passengers

Year	Millions of passengers per year
2000	31.9
2001	31.1
2002	29.5
2003	29.9
2004	32.0

The QC per movement declines in winter seasons from 1.26 in 2002/03 to 0.60 by 2011/12 and in summer seasons from 0.80 to 0.59. These are very low ratios and in effect will probably mean that it will be impossible to use all the available movements. The viability of charter and low cost operations at Gatwick depends on high aircraft utilisation which can only be achieved by having some flights in the night period. A reduction in the operating day would reduce the number of aircraft rotations typically from three to two for charter operators and from four to three for no-frills operators. Airlines will choose to operate elsewhere, perhaps in Europe, rather than be inefficient at Gatwick.

We are very concerned that the proposed limits will severely constrain the development of further 3 or 4 sector operations by charter or no-frills airlines and hence will constrain the airport's ability to grow in line with expectations.

The policy of setting the new limits with reference to actual usage sends a message of "use it or lose it" which could lead to more night flights operating than might otherwise be the case. Airlines should not have to face the threat of further reductions in noise quotas just because existing quotas have not been used.

Stansted

The reduction in the noise quota will affect most operators at Stansted. Charter, no-frills, cargo and express parcels operators all rely to some extent on night flying for economic or operational reasons. This applies particularly to the express parcels sector. Stansted has grown rapidly in recent years due in part to the congestion at Heathrow and Gatwick. By bearing down on night flying at Stansted, the potential for meeting the demand in London and the South East will be restricted.

9) *In relation to the noise insulation scheme, do you have any comments on:*

9a) Whether or not policy should be implemented through statutory regulations?

The policy should be implemented through voluntary agreements. Such agreements have worked satisfactorily up to now.

9b) Whether to use a noise footprint or other criterion?

9c) If a noise footprint criterion is used, how to define it for each airport?

In principle we do not oppose the use of noise footprints as criteria for noise insulation schemes. However, as proposed, the footprints are too large. At Heathrow for example, the noisiest aircraft are only about 20% of movements in the night quota period and, at any one time, only one of the four footprint areas will be under an operational flight path. This means that, on average, within any one area, 95% of all movements will be less than the noisiest aircraft.

The footprint areas should be adjusted to take into account the frequency of operations. That is to say, criteria should be set that combine footprints and noise contours.

9d) Whether the scheme should relate to the whole night or the current night quota period? (paragraphs 8.8-8.21)

The scheme should apply to the current night quota period only.

Insulation Scheme: General Comments

We question whether any sleep benefit will, in practice, be achieved. Many people sleep with a bedroom window open which would negate any benefits from installing sound insulation

The estimated cost of the scheme at £50M is disproportionate. The Government's own estimate for the external cost of noise at all UK airports is £25M¹. The cost should be reduced by:

- Reducing the footprint areas as explained above.
- Applying insulation to bedrooms only.
- Limiting the scheme to those suffering a significant increase in noise since they bought their house.

Building regulations and controls should be changed to ensure noise insulation is incorporated in all new developments. New owners should be advised that they are buying a property under an established flight path.

September 2005

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¹ Aviation and the Environment – Using Economic Instruments. DfT 2003.