

Night Flying Restrictions at Heathrow, Gatwick and Stansted Stage 1 Consultation

A consultation by the Department for Transport

Response from the British Air Transport Association (BATA) April 2013

Introduction

The British Air Transport Association (BATA) welcomes the opportunity to submit a response to the Stage 1 consultation being undertaken by the Department for Transport on 'Night Flying Restrictions at Heathrow, Gatwick and Stansted'.

BATA is the trade body for UK-registered airlines, with members representing all sectors of the industry. In 2011, BATA members employed 73,000 people, operated four-fifths of the UK commercial aircraft fleet and were responsible for some 96% of UK airline output, carrying 129 million passengers and 1.1 million tonnes of cargo. The eleven BATA member airlines are: British Airways, DHL, easyJet, Flybe, Jet2.com, Monarch, RVL Group, Titan Airways, Thomas Cook, Thomson Airways and Virgin Atlantic.

We will restrict ourselves to submitting a short response to this consultation, based up on the outputs of the BATA Night Flights Summit held on 23rd January 2013.

Night flights are crucial to both the UK economy and to the transport network. At the BATA Night Flights Summit on 23rd January 2013, presenters repeatedly illustrated the constraints and demands they work to and the integral role of night flights in their operations.

We agree that the objectives of the current regime have been met and this is good news for both the aviation industry and also for people residing near airports. We recognise that the QC system has given the sector long term stability, allowing aerospace manufacturers to develop even quieter aircraft. It should also be noted that in most instances airlines have introduced and are highly incentivised to introduce quieter aircraft as part of the normal cycle of replacing older, noisier and less fuel efficient aircraft, rather than being forced through regulation.

Given the current fragile financial environment of the airline industry, it is essential that burdensome regulations do not force operators to renew their fleets before the operating economics naturally take them in that direction.

Charter Operations

Charter carriers have specific needs and requirements, reflecting their high load factors, high utilisation (of two or three rotations per day) to maximise efficiency and their function of supporting tour operator programmes. This is especially so during the high summer peak season, when an additional rotation is often added – usually at night. Any restriction on the ability to operate that

extra rotation will result in some holidaymakers being unable to travel or paying more for their holiday.

In addition to the reduced flying programme, further restrictions would mean reduced operational resilience for carriers and therefore a need to have additional 'standby' aircraft available in order to try and maintain operational robustness and resilience. Such impacts would add costs which would inevitably have to be passed through to the consumer.

It is best practice that airports are able to operate the longest appropriate hours, taking into account "good neighbour" policies. The loss of opening hours at the margins can have big impacts and would significantly affect the viability of certain routes. This would be detrimental to the UK's international competitiveness, connectivity and consumer choice.

Both charter and scheduled operators are continuing to invest in newer and quieter aircraft in their fleet modernisation programmes as well as adopting operating procedures to minimise noise.

Cargo & Freight Operations

Cargo and freight operations by their nature require the use of overnight flights, whether they be express operators and integrators providing international services, or the UK Royal Mail who rely on air travel to ensure next day First Class mail delivery. Services at night ensure delivery in time with business requirements and enable connecting road transportation to deliver to the end user at non-peak road usage times, thereby reducing congestion and improving efficiency.

Air is the only realistic mode of transport for Royal Mail to use in its operations, offering significantly faster times than road and rail as it works "against the clock". Of the three airports covered by this consultation, Royal Mail only operates from Stansted – its London Gateway - but across the UK utilises 17 airports with up to 60 separate flights a night, with a daily average payload of 250 tonnes or 5 million items per night.

Royal Mail flights at Stansted operate from 20:50 to 02:25, carrying first class post and packets, special delivery and other items. Without the ability to fulfil this service, not only would Royal Mail suffer, but so would its customers (such as Amazon, e-Bay and the financial services industry), the wider economy and the general public, with a likely loss of at least 1000 jobs.

Similarly, in the express industry, demand for night flights is driven by customer needs. Night flights allow for the latest possible collection time whilst guaranteeing next day delivery – which is important when the majority of goods are high value added and/or have to reach market quickly, for instance electrical components required for replacement parts in a factory's machinery or pharmaceuticals for clinical trials. Night flights are vital for supporting export-led growth in key Government target sectors and we note that the Government acknowledges both the economic importance of air freight and the role night flights play in supporting the operations of the express freight industry. Night flights are used because there is no suitable alternative.

The air cargo industry exerts much effort to minimise environmental impacts of night flights, including investing heavily in new, cleaner, quieter and more efficient aircraft as well as operational procedures both in the air and on the ground. The analysis of fleet and operation trends contained within the consultation document does not mention freight-only aircraft (particularly those used for short-haul operations) which have different economics to passenger aircraft. Such aircraft may only

operate for 2 hours per day and this low utilisation rate dictates that older, lower value aircraft are used.

We understand that the 'classic' 737 variants, which form the core of the night mail and cargo business at Stansted, will remain in overnight mail and cargo use at night for at least another 10 years and fleet modernisation for these types of services will always occur at a slower pace than for high utilisation passenger services.

Hindering night flights is a risk to exports and UK growth, threatening the ability of companies to reach target markets competitively. The UK must retain sufficient night flight capability to remain economically competitive on the world stage, while maintaining a balance between operators of night flights and the communities local to the airports in question.

Night flying is required for cargo operations simply because of the specific nature of the market and the demands of the clients and end users. It is not something dictated by airlines or freight operators to suit their own purposes. It is essential such services operate to their scheduled times as the flights are just one part of a very complex and large air and ground network, designed around specific, fixed, collection and delivery times.

It is important that this review of Night Flying Restrictions should take full account of the specific attributes of the air cargo industry and the important part it plays in ensuring economic growth and prosperity in the UK.

The ability to maintain the existing level of night flights for cargo operations to the heart of the UK economy needs to be a key consideration when completing the recommendations from this consultation.

Scheduled Operations at Heathrow

At Heathrow, night flights allow the operation of routes and frequencies that local demand alone could not support, by providing transfer passengers who supplement local demand. This enhances and boosts the UK's international connectivity and attractiveness as a place to visit and to do business. 66% of passengers on early arrivals at Heathrow are connecting at either end and 37% connect at the Heathrow end. Night flights into Heathrow are generally scheduled to depart at the outstation in the late PM, in order to arrive early in the morning. They provide high feed volume onto early short-haul departing flights and without them, there would be a reduction in the route viability for both short-haul and long-haul routes as the feed of passengers onto the first wave of morning departures is reduced.

Heathrow is constrained, unlike competing large EU hubs, and for later morning arrivals – such as between 7 and 9am, both existing runways are already full. If it were to be practical, moving early arrivals to later in the morning would result in weakened passenger numbers for the first wave morning departures, therefore making routes unviable and uncompetitive and having serious implications for the UK's connectivity.

Night flights are a key component of the hub model and cannot be viewed in isolation from the rest of the hub operation. Alternatives to night flights would only undermine service viability and serve to strain inadequate infrastructure

The unintended, but serious knock-on effects from tightening restrictions on night operations can be seen clearly at Frankfurt airport. Carriers operating from there have reported that they now have to keep extra spare aircraft on hand, in order to provide back up and resilience for services if technical problems threaten their ability to abide with the new more restrictive night flying rules. There have also been instances of an aircraft taxiing out and getting to the point of take-off, but having to return to the terminal as it had hit the strictly enforced night flight deadline. Both of these real life examples result in extra cost for carriers and more expensive flights and holidays for the travelling public.

It is also worth noting, that unlike Heathrow, Frankfurt is an airport with spare capacity, helping it to maintain resilience of operations and absorb problems, such as adverse weather conditions.

60% of the UK's air freight moves through Heathrow, primarily in the belly-hold of passenger aircraft, a significant proportion on flights at the start and end of the day. The revenue generated from this service helps support the viability of passenger routes, making travel cheaper for passengers and contributing to the connectivity of the airport. Like Frankfurt, imposing further restrictions on night flights at Heathrow would result in a larger trucking operation for cargo to and from other UK airports, resulting in more noise and CO2 emissions from road transport while at the same time atrophying Heathrow connectivity and route diversity.

Cargo operations at Frankfurt are also under threat due to the night flight restrictions there, with other German airports picking up the slack, resulting in some cargo instead being shipped by road from Frankfurt and flown out of Cologne and Dusseldorf. The main cargo operator at Frankfurt, Lufthansa, although retaining Frankfurt as its HQ, has indicated it will now focus on growing business at Munich instead. This decision will have a significant impact on both the airline's network and the local economy and employment market near the airport.

Transporting air cargo by road in order to accommodate night flight restrictions increases road transport emissions and is an unsustainable model for the just in time market and meeting the demands of the customer and public.

The demand for just in time and next day deliveries isn't extinguished by restrictions such as these; it is simply moved to another location.

Airports in the Middle East and Asia, where there is already unfilled demand for services to Europe, are facing unsociable departure times for services, driven by night flight restrictions within the EU. Indeed, it has been reported that Indian Government believes the EU is effectively "exporting the night noise problem" to airports and communities on the sub-Continent, in order to minimise night landings at EU airports.

Conclusion

Night flight operations at Gatwick, Stansted and Heathrow airports are necessary and important. The air transport industry is aware of its responsibilities to communities near these airports, and is already doing much to minimise its noise impact.

We believe that there should be no material change to the current regime as the risk to UK connectivity, jobs and economic growth from further restrictions is simply too big and serious to countenance.

In particular:

UK airlines would favour, at least, a five year regime period. Anything shorter than this will introduce a high degree of uncertainty with regards to the commercial planning arrangements for airlines. Implementing a second rollover of the current regime should be seriously considered, as this could create alignment of the noise regime with the timetable and schedule of the Airports Commission.

We support the QC system in its current form. It provides airlines and their suppliers a clear basis to plan aircraft investment over time, giving a high degree of certainty of what aircraft noise standards must be met in the future.

We would oppose an operational ban on QC/4 aircraft as this would have a significant impact on movements and resilience at all three airports under consultation.

Likewise, we would oppose the introduction of an operating ban during the night quota period. This would have a significant impact on airport operations and also have further implications on resilience.

According to the ICAO 'Balanced Approach', any operating restrictions should be considered a measure of last resort. Noise management should prioritise the other aspects of the 'Balanced Approach' which focuses on quieter aircraft, quieter operating procedures and land-use planning.

Furthermore, fines should only be used as last resort and if absolutely necessary. We would not be able to support any increases in fines during the period being consulted upon and also oppose any increase in associated charges.

It is also essential to take into account that there is freewill in the decision by rational individuals as to whether or not to reside near an airport or any other source of noise. There is also little evidence of property blight except in extreme circumstances.

Most residents have seen a reduction in aircraft noise since buying their houses. Reaction to noise is not always logical, and aircraft are often blamed when other sources are the cause.

It is important to note that many individuals who choose to live near airports do so because they gain employment from the airport or the airlines that operate from them. It is erroneous to assume therefore that all local residents oppose night flights and there is no evidence that localised noise action groups are representative of the majority.

British Air Transport Association
April 2013