



ABTA Response to the Department for Transport Night Flight Restrictions at Heathrow, Gatwick and Stansted

Introduction

ABTA – The Travel Association - was founded in 1950 and is the largest travel trade association in the UK, with around 1,200 members and over 4,500 retail outlets and offices. In Scotland, ABTA has 42 members and 284 outlets and offices. Our Members range from small, specialist tour operators and independent travel agencies specialising in business and leisure travel, through to publicly listed companies and household names, from call centres to internet booking services to high street shops. ABTA's focus is ensuring that Members can operate their businesses in a sustainable and successful manner, enabling their customers to travel with confidence.

The success of ABTA Members' businesses is directly reliant on the UK's aviation infrastructure; several of ABTA's larger Members are themselves part of groups that own airlines. ABTA Members provide 90% of the package holidays sold in the UK, with Members also selling millions of independent travel arrangements. Annually, ABTA Members' turnover is in excess of £33 billion. The business of our Members is the provision of quality, efficient and competitively priced passenger travel.

Importance of Nights Flights

ABTA has consistently supported the ability of airlines to operate night flights. We acknowledge aviation's environmental impact and accept it is vitally important that aviation plays its part in making every effort to reduce noise and other local impacts. However, it is necessary to strike a balance between the economic benefits of meeting demand and the needs of the industry, with the impact this has on local communities and the environment.

The Department itself points out that noise quota limits should be based on what it is expected can realistically be achieved in the next regime without placing too large a constraint on the airport's operations. The same is also true of airlines' operations.

Noise from individual aircraft has greatly decreased over the years due to the work of Sustainable Aviation, airlines, airports and the aerospace industry to introduce quieter aircraft and more sustainable operating procedures. Noise is expected to continue to fall as new quieter aircraft replace older designs. UK airlines' fleet modernisation programmes demonstrate their commitment to reducing carbon emissions, noise reduction and improving local air quality. Airlines should be further encouraged in continuing to make this investment in sustainable aircraft.

Night flights are important to airlines, and hence to ABTA Members who sell flights/holidays. Flights at anti-social hours aren't necessarily popular with passengers, therefore airlines will try to avoid them where possible.

- Many of the night flights particularly at Heathrow and, to a lesser extent, Gatwick are early morning arrivals of long-haul aircraft operating across several time zones. The arrival time

of the flight depends on its departure time from the origin airport, some of which have night time restrictions meaning it is not possible for the aircraft to depart any later. An early morning long-haul arrival allows passengers to transit to short-haul flights to reach their final destination in the UK or Europe thus highlighting the importance of international hubs and UK connectivity. Airlines need the possibility of these early transfer flights to be able to compete with airlines with international hubs in their home countries.

- UK based airlines operating short and mid haul flights from Gatwick and Stansted, in order to make best use of their aircraft and crew, need to commence their first flight of the day in the early morning (in the night period) and operate a maximum number of rotations completing their last flight late in the evening (also in the night period). If flights can't operate at night, this could result in losing a rotation thus prices will increase for passengers.

Airlines are not able to put together a viable flight programme at the London airports without having some operations within the night period. Airlines have invested heavily in quieter new generation aircraft and it would be wrong to penalise them for making those investment decisions with the proposal that those new aircraft be included in the Quota Count and movement limits. Flexibility is necessary both in terms of destinations and aircraft. It's not unusual for an airline to substitute one aircraft for another to meet demand, for example from an Airbus 321 to a larger (and noisier) Boeing 757-300, Boeing 767 or Airbus 330-200 aircraft.

ABTA believes that there is a continued need to allow late running aircraft to depart in the night period where operationally necessary so that passengers get to their destinations a few hours late rather than many hours late due to having to wait until the following morning.

Night flights bring benefits to the UK economy increasing the number of flights that can be operated, particularly at capacity constrained airports, leading to additional jobs at airports and surrounding areas.

ABTA believes that restricting flights during the night period would undermine the UK's attractiveness as a place to do business. With the EU Referendum, it is more important than ever before to show that the UK is open for business.

Executive Summary

- ABTA agrees that the next regime should be for five years from October 2017 to October 2022.
- ABTA believes that the proposals to introduce a new QC/0.125 category and to count all aircraft towards the movement limit act as a disincentive to airlines already having invested in quieter new generation aircraft.
- Not only must the number of movements be adjusted upwards at Stansted to allow for the current operations, but also to allow for future growth.
- It's important that airlines are properly incentivised to operate quieter new generation aircraft. ABTA does not agree with the proposed reduction of the noise quota by 20% over a five year period.
- Airlines are not able to put together a viable flight programme at the London airports without having some operations within the night period.

Consultation Questions

Q1a. How strongly do you agree or disagree with our proposed environmental objective for the next regime?

ABTA agrees with the proposed environmental objective.

Q2a. How strongly do you agree or disagree with our proposal for the length of the next regime?

ABTA agrees that five years is the appropriate length for the next regime. October 2022 is well before any new Heathrow runway could become operational.

ABTA believes that in line with the Government's Balanced Approach thereafter the Department should continue to set controls, specifically any operating restrictions, at the designated airports. The three airports are working closely with local councils and communities on noise management which we welcome.

Q3a. How strongly do you agree or disagree with our proposal to introduce a new QC/0.125 category for aircraft between 81 and 83.9 EPNdB?

ABTA believes that this proposal acts as a disincentive to airlines investing in quieter new generation aircraft that, at the time the investments were made, would have been exempted from both the Quota Count and movement limits. .

Q3b. How strongly do you agree or disagree with our proposal for all aircraft quieter than this to remain QC/0 but count towards the airports movement limit?

Please see our response to Q3a above.

Q4a. How strongly do you agree or disagree with the proposal for movement limits to remain unchanged at Heathrow?

ABTA agrees with the proposal for movement limits to remain unchanged at Heathrow in the 2017-2022 period. It would be timely to review the limits ahead of the next period to commence in 2022, with the prospect of a third runway becoming operational in that period.

ABTA notes that Heathrow Airport Ltd (HAL) has given an undertaking to introduce a 6½ hour ban on scheduled night flights, in the event of its eventual planning application for a third runway being approved.

Q5a. How strongly do you agree or disagree with the proposal for movement limits to remain unchanged at Gatwick?

ABTA would be very concerned if aircraft currently exempted were to be counted in the movement limit in future and therefore believes that the number of movements should be adjusted upwards at Gatwick to reflect those aircraft currently exempted. Residents in the local communities will still see benefits due to the lower QC limits encouraging airlines to use their quietest aircraft during the night period.

Q6a. How strongly do you agree or disagree with the proposal to raise Stansted's movement limits to reflect the current number of exempt aircraft in operation?

As above, ABTA would be very concerned if aircraft currently exempted were to be counted in the movement limit in future. It is therefore essential to raise Stansted's movement limits to reflect the current number of exempt aircraft in operation.

Further, there would be a need to ensure that the currently exempted General Aviation/business jet movements, many of which operate on an ad hoc basis, do not use up the increased movement quota at the expense of (year-round) operations of commercial airlines, freight and express companies.

Q6b. Do you have any additional comments on our proposal for Stansted's movement limit?

Stansted is the designated airport for diversions resulting from hijacks or major security alerts. ABTA would seek assurance that such movements would not count either to the movement limit or to the Quota Count.

Heathrow is full and Gatwick is full at peak periods. Stansted has spare capacity and is thus the only option for expansion in the South East. We understand that Stansted Airport will make an application to increase their ATM limit. It is vital that this growth is not stifled. As mentioned in the opening paragraphs above, airlines need the ability to commence their first flight of the day in the early morning completing their last flight late in the evening, thus there will be flights in the night period.

Q7a. How strongly do you agree or disagree with our proposals to encourage the use of quieter aircraft at Heathrow?

ABTA believes that airlines should be incentivised to use quieter aircraft.

Through its Blueprint for Noise Reduction, HAL is inter alia incentivising airlines through tiered landing charges and requiring retrofitting of noise reducing technology to some aircraft. HAL has a voluntary scheme fining noisy aircraft with consequential fines funding local community projects. HAL has trialled Noise Preferential Routes to provide residents with respite on a regular basis, Continuous Descent Approaches and recently a steeper angle of descent.

HAL and HACAN have recently jointly supported the introduction of an Independent Aviation Noise Authority (IANA) as originally proposed by the Airports Commission. The IANA's main roles would include providing an impartial source of expert advice on noise, coordinate independent research, adjudicate on noise complaints that can't be managed locally and ensure that communities have access to information about noise and how airports are managing the business.

ABTA believes strongly that encouraging airlines to use quieter aircraft should not be managed through reducing the noise quota by 20% over a five year period. Airlines should not be penalised for being early investors in quieter new generation aircraft.

If the Quota Count is lowered and airlines' plans for quieter aircraft change or are delayed, the Quota Count could be reached before the movement limit.

Q8a. How strongly do you agree or disagree with our proposals to encourage the use of quieter aircraft at Gatwick?

Gatwick Airport Ltd (GAL) also has a voluntary scheme fining noisy aircraft with consequential fines funding local community projects. GAL commissioned an independent review of arrivals and is now following up on recommendations to help alleviate noise problems for local residents. GAL is planning to impose higher charges on noisier aircraft. This includes Airbus 320s which have not been

modified to reduce the high-pitched whine on arrival by end 2017. Other recommendations include continuous descent approach and the establishment of an independent noise management board.

As mentioned above, ABTA believes strongly that encouraging airlines to use quieter aircraft should not be managed through reducing the noise quota by 20% over a five year period. Airlines should not be penalised for being early investors in quieter new generation aircraft.

Also as mentioned above, if the Quota Count is lowered and airlines' plans for quieter aircraft change or are delayed, the Quota Count could be reached before the movement limit. Further, it's not unusual for an airline to substitute one aircraft for another to meet demand, for example from an A321 to a larger (and noisier) B753 or A332.

Q9a. How strongly do you agree or disagree with our proposals to encourage the use of quieter aircraft at Stansted?

Stansted Airport Ltd has its own Noise Strategy also fining noisy aircraft, greater use of Noise Preferential Routes and trialling Continuous Descent Approaches. A new Performance Based Navigation procedure was implemented in 2016 that has taken 4,000 people out of the high noise envelope.

As mentioned above, ABTA believes strongly that encouraging airlines to use quieter aircraft should not be managed through reducing the noise quota by 20% over a five year period. Airlines should not be penalised for being early investors in quieter new generation aircraft.

Q10. Do you have any further views on our proposals, or their potential impact on the Government's ability to fulfil the requirements of the Public Sector Equality Duty?

ABTA has no comment to make.

Impact Assessment

C. what evidence do you have on how airlines and passengers would respond to our proposals, including whether any flights or journeys would be rescheduled to or from the night quota period (sections 6.2.6 and 7.3)

The majority of night flights are early morning arrivals of long-haul aircraft operating across several time zones with the arrival time of the flight depending on its departure time from the origin airport, some of which have night time restrictions meaning it is not possible for the aircraft to depart any later. Moreover, there is no spare capacity at Heathrow to accommodate a night flight displaced to a later time, nor at Gatwick as the period immediately after night period is already at capacity.

In order to make best use of their aircraft, airlines commence their first flight of the day early and operate a maximum number of rotations completing their last flight late in the evening. Airlines are not able to put together a viable flight programme at the London airports without having some operations within the night period. If flights can't operate at night, this could result in losing a rotation thus prices will increase for passengers.

Many airlines operate at a high load factor and may not be able to accommodate passengers displaced off night flights.

Early long-haul arrivals at Heathrow and Gatwick allow passengers to transit to short-haul flights to reach their final destination thus highlighting the importance of international hubs and UK connectivity. Airlines need the possibility of these early transfer flights to be able to compete with airlines with international hubs in their home countries.

Heathrow, Gatwick and Stansted are the local airports for many passengers who thus wish to fly from them. Those passengers should not be forced to travel to another airport meaning a longer journey to the airport. Inbound passengers would likely chose not to visit the UK if they cannot fly to the airport of their choice.

Thank you for taking our comments into consideration. We would welcome the opportunity to discuss any points raised in our response further with the Department.

Further information

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