

ABTA response to the Airports Commission

Discussion Paper 05

Aviation Noise

Introduction

This response is submitted on behalf of the membership of ABTA – The Travel Association. ABTA was founded in 1950 and is the largest travel trade association in the UK, with around 1,200 members and over 5,000 retail 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.

The success of ABTA Members' businesses is directly reliant on the UK's aviation infrastructure; many 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. The provision of quality, efficient and competitively priced passenger air travel is vital to the business interests of Members.

ABTA welcomes the Government's recognition, as expressed in the Aviation Policy Framework of the following:

- The work of Sustainable Aviation on its emissions roadmap in February 2012 and the development of the noise roadmap.
- The continued production of Noise Action Plans, noise exposure maps at Heathrow, Gatwick and Stansted on an annual basis and individual night noise contours.
- The further work to be carried out on noise measures by the CAA, including developing the concept of noise envelopes.
- That local communities are encouraged to work with airports to develop acceptable solutions proportionate to the scale of the noise problem, and that Airport Consultative Committees should be fully involved.

The work of Sustainable Aviation

ABTA supports the work of Sustainable Aviation which is entirely focused on finding collaborative ways of improving the aviation industry's environmental performance and ensuring sustainable growth.

In Spring 2013, Sustainable Aviation launched the industry's first Noise Road-Map¹, demonstrating how noise from UK aviation would not increase despite a near doubling in flights over the next 40 years. This is achieved through the development and introduction of quieter aircraft alongside the implementation of better operating procedures and improved land-use planning. From now on, signatories to Sustainable Aviation will use this Road-Map as a toolkit in refining their own plans to manage noise

Aviation has a demonstrable and well-documented track record in improving its environmental performance and in delivering quieter planes and continues to invest heavily in the future. Aircraft today are 70% more fuel efficient than 40 years ago and the industry will work hard to ensure that this trend continues. Although the perception is that noise around airports has increased substantially with a growing number of aircraft movements, aircraft have in fact become significantly quieter over the past few decades due to increasingly stringent certification and improvements in technology and the noise footprints have shrunk. For example, the number of people within the 57dBA contour around Heathrow has shrunk from 944,000 in 1980 to 228,700 in 2010 despite a substantial increase in movements². Other airports have reported similar reductions in the number of people affected with a continually shrinking noise footprint.

Airlines work continually on replacing their older aircraft with the potential for further reductions of noise and fuel burn. UK airlines' fleet modernisation programmes demonstrate their commitment to reducing carbon emissions, noise reduction and improving local air quality.

This reduction in aircraft noise is not just beneficial for residents insofar as night flights are concerned but also benefits the day time environment which will be of particular interest to local schools and to residents enjoying their outside space and having their windows open during the summer months.

Work of Airports

Individual airports have implemented Noise Action Plans in which they engage stakeholders, local communities, and residents.

ABTA commends the work of Heathrow through the *A quieter Heathrow* report³ that sets out Heathrow's commitments to reducing aircraft noise while safeguarding the UK's connectivity. The report brings together a range of measures to meet the Government's aspiration "to strike a fair balance between the negative impacts of noise and the positive economic impacts of flights". It focuses on five areas: quieter planes, quieter operating procedures, noise mitigation and land-use planning, operating restrictions and working with local communities.

¹ <http://www.sustainableaviation.co.uk/wp-content/uploads/SA-Noise-Roadmap-Publication-version1.pdf>

² Heathrow Airport submission - *Developing a sustainable framework for UK aviation*, October 2011

³ <http://www.heathrowairport.com/noise/what-we-do-about-it/a-quieter-heathrow>

Heathrow has been conducting Early Morning Noise Respite Trials in conjunction with HACAN, British Airways and NATS in response to residents' concerns about disruption caused by early morning arrivals. We understand that the early results are very encouraging and look forward, with interest, to hearing the full outcome.

ABTA understands that Gatwick will be running a 90 day trial for Night Noise Arrivals Respite in the autumn; this would reduce the impact of night noise from arriving flights.

The above examples demonstrate the willingness of airports and airlines to find solutions whilst maintaining a good level of service.

Importance of Nights Flights

The Commission has asked for views on night flight restrictions being detrimental to an airport's operation, limiting capacity, connectivity and efficient operation. ABTA has responded to the Department for Transport's Night Flying Restrictions at Heathrow, Gatwick and Stansted Stage 1 consultation and we repeat the following key points below.

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. It is essential that airports work in partnership with the local communities around them and airlines move towards more sustainable aviation.

We also recognise that noise does not have a uniform impact and different communities react differently to noise. There are many factors affecting this such as level of noise reduction activities in place, insulation, flight patterns, weather conditions and time of day or night. It has to be noted that some people consider themselves annoyed by aircraft noise even though they live some distance from an airport in locations where aircraft are at relatively high altitudes, while other people living closer to an airport seem to be more tolerant of aircraft noise and may choose to live closer to the airport because they work at the airport or in an associated business, fly regularly or benefit from the good public transport links.

Night flights are important to airlines, and hence to ABTA Members who sell flights/holidays:

- Aircraft commence their first flight of the day early and operate a maximum number of rotations during the day completing their last flight late in the evening. A charter airline will usually fly two or even three rotations; a no-frills airline could fly more. Routes to short-haul destinations, for example Spain, are now dominated by the no-frills airlines with the result that the charter airlines are concentrating on more distant destinations. For example, the typical summer day of a charter aircraft could look as follows:

- Gatwick to Palma 0600-0830 (all UK times)
- Palma to Gatwick 0930-1200
- Gatwick to Antalya 1330-1800
- Antalya to Gatwick 1930-2359

A third overnight rotation can be added in peak high season during school summer holidays. Loss of the ability to operate that slot will mean some holidaymakers would not be able to travel and consumers could pay higher prices as the supply is limited.

- It should be noted that charter airlines suffer disproportionately more flight delays as charter programmes can never be cancelled because they are linked to holiday sales and are frequently on 'thin' routes not served by other airlines. Any delay is likely to have a knock-on effect pushing more movements into the night period. The Package Travel Directive, the EU legislation covering package holiday sales, requires operators to ensure the proper completion of the holiday and provides the customer with protection if this does not happen. The Directive is the prime reason why charter airlines (mostly transporting customers who have bought a package holiday) cannot cancel flights.
- Long-haul flights operating across several time zones will typically depart from North America or South East Asia in late evening and will arrive early morning at their UK destination before turning around and returning.
- Long-haul flights feed into short-haul flights departing early which passengers use to fly to other European destinations, thus highlighting the importance of international hubs and UK connectivity. This is true of Heathrow and to a lesser extent, Gatwick. Scheduled airlines need the possibility for these early transfer flights so as to be able to compete with airlines with international hubs in their home countries.
- An aircraft's arrival time at destination will depend on the take-off slot it can obtain at the departure airport and vice versa. The UK airports with night flight restrictions tend to be slot constrained in the peak morning hours. Changes to night flight rules might mean that affected airlines would be unable to obtain slots to operate later as there are no slots available.
- Although ABTA Members are not involved in the express air freight business, we acknowledge the importance to them of being able to operate at night. For example, DHL use Heathrow and Royal Mail use Stansted. Night flights allow the latest possible collection time from customers whilst guaranteeing next day delivery. The majority of goods are high added value (e.g. electric and engineering components, pharmaceuticals, aerospace) and/or have to reach market quickly (e.g. clinical trials, spare parts, contract documents). The preference of air freight operators is to use the belly holds of passenger aircraft wherever possible. Night flights are only used where no suitable alternative is available.

Airlines need to operate at night to maximise the usage of their aircraft. Airlines' ability to operate at night reduces the restrictions on the overall supply of flights particularly at airports which are capacity constrained. If the regime changed and the night period was extended and/or fewer night movements were permitted, this would mean a reduced commercial flying programme as the operating window would be reduced. Reduced operational resilience at Heathrow and Gatwick in terms of delays could push additional

movements into the night period. This would add cost that would be passed on to the passenger. Therefore the current price of air travel is lower than it would be in the absence of night flights greatly benefitting passengers.

Airlines are investing significantly in new quieter aircraft and should not be discouraged from continuing to make this investment in sustainable equipment.

Initiatives adopted in the UK might well be followed by other countries leading to improvements on a global basis.

Contribution to the Economy

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

For example, night flights at Heathrow⁴, in 2011, were assessed as making a significant contribution to the economy by directly contributing £543m, supporting 6,800 jobs and generating £102m in tax revenue. The operation of night flights also provides business for other sectors of the economy through the supply chain to airlines and the airport, bringing additional employment.

Restricting flights during the night period would further undermine the UK's attractiveness as a place to do business.

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

Further information

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⁴ Oxford Economics (2011) for British Airways and the BAA