

Night flights restrictions

CILT Response to the DfT Consultation published 2 December 2020

Introduction

- 1 The Chartered Institute of Logistics and Transport (CILT) is a professional institution embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. Our principal concern is that transport policies and procedures should be effective and efficient, based on objective analysis of the issues and practical experience, and that good practice should be widely disseminated and adopted. The Institute has a number of specialist forums, a nationwide structure of locally based groups and a Public Policies Committee which considers the broad canvass of transport policy. This submission draws on contributions principally by the Aviation Policy Group.
- 2 This is the response of the CILT to the DfT's consultation on Night flight restrictions published on 2 December 2020. Our response is made in this paper rather than through the online form because it is based on principles rather than on the effects of specific proposals.

The regime at designated airports from October 2022 to October 2024

- 3 We support the continuation of the existing regime as proposed. Covid-19 has disrupted air transport to such an extent that any change to the night flights regime could not be based on any real understanding of how air transport might recover over the next few years. Throughout much of 2020 and continuing into 2021, aircraft movement numbers have been well below previous levels, including movements at night, and it is likely that activity will take several years before it returns to previous levels.

Revising the night flight dispensation guidance

- 4 Similarly, given the uncertainties of the current situation, there should not be any change to the current dispensation guidance. The pandemic and the EU transition have demonstrated in particular the need for resilience in supply chains, with flexibility a key aspect.

The structure of the night flight restrictions at the designated airports beyond 2024 and national night flight policy

- 5 We give a combined response to these two sections because we suggest that the same principles should apply to all airports. Those principles are set out in the following paragraphs.
- 6 In line with a balanced approach, any tightening of restrictions which provides benefits to local communities around airports should be accompanied by approvals for expansion of activity. This would align with the policy that the benefits of improved technology should be shared by the industry and the local community. If an airport seeks greater capacity through a planning

application or development consent order, it will have to demonstrate the night noise impact of that expansion and conditions can be attached which require a reduction in night noise impact.

- 7 Also in line with a balanced approach, local plans should ensure that there are restrictions on residential and other development near airports which might be sensitive to night flights.
- 8 Restrictions on night flights should take into account the trend towards increasing night time activity in cities, in particular London.
- 10 Where night flights are essential, respite should be introduced where possible, while mitigation should be focused where respite is not possible (such as on final approaches).
- 11 Night flight restrictions at UK airports should be compatible with restrictions at airports around the world. Compatibility refers to both ensuring that the restrictions at UK airports are similar to others as well as the need to avoid incompatible restrictions in terms of departure and arrival times at both ends of a flight.
- 12 Night flights occur for particular operational reasons. In general terms, passengers would prefer not to start or finish their journeys in the middle of the night and few short haul flights are therefore operated after midnight or before 6am. However, in order to provide the benefit to passengers of low fares, airlines will seek to utilise their aircraft for as long as possible, for example flying three rotations per day between the UK and a Mediterranean destination. For long haul destinations, the combination of world time zones and longer flight times means that departures and arrivals have to be matched. For example, an early evening departure from the East Coast of North America with a flight time of around seven hours and a time difference of five hours behind UK will arrive in the UK 12 hours later, or early morning. From Asia, the flight time might be 12 hours and the time zone might be eight hours ahead of the UK, and an evening departure would arrive in the middle of the night, so some departures are timed to leave as late as possible to arrive in the UK at the end of the night period. In these examples the passenger is flying at night but the aircraft environment enables them to sleep for the journey.
- 13 Night flights are also important for air freight. UK airports handled around 2.5 million tonnes of air freight in 2019 (CAA data), of which 78% was on 'Other International' flights, which are mainly long haul, with the remaining 22% on domestic and EU flights. Air freight is primarily used for high value or time critical items, some of which are for next-day delivery. Around 70% of air freight is carried in the belly holds of passenger aircraft and, because these tend to operate at high frequency (at least daily on many long haul routes), it is then possible to dispatch an item on one day so that it arrives the next day. Some air freight is carried by 'Integrators' such as DHL, Fedex and UPS who, as well as utilising space in the belly holds of passenger flights, also operate their own fleets of aircraft at hubs where flights arrive in the evening, cargo is sorted, and then dispatched on other flights for next day delivery. The UK's main hubs for this type of activity are East Midlands and Stansted, and there are similar operations in continental Europe such as Liege in Belgium, and in the US at Cincinnati and Memphis.
- 14 In addition to the overnight freight operations, freight also operates on day flights, both in the belly holds of passenger aircraft and, where demand is sufficient, on all-cargo aircraft. All-cargo flights are mainly operated to meet demand rather than to a specific schedule and tend therefore to operate at less busy times or less busy airports when and where slots are available. At the busiest airports, in particular at Heathrow, all-cargo aircraft have been squeezed out as

demand for passenger flights has exceeded capacity, but growth in all-cargo flights has been accommodated at East Midlands.

- 15 In the longer term, aircraft design may change significantly to meet the challenge of net zero by 2050. Some of these changes will result in new propulsion systems, new airframe shapes and new operating procedures which may have an impact on the noise environment around airports. It is therefore important that restrictions relating to noise should be kept under review so that the principles noted in paragraphs 6 to 11 above can continue to be applied.

Daniel Parker-Klein
Director of Policy and Communications
The Chartered Institute of Logistics and Transport
Daniel.parker-klein@ciltuk.org.uk
07894 620655

18 February 2021