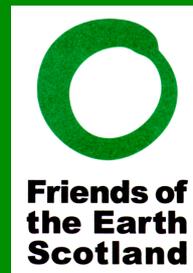


BAA Edinburgh Edinburgh Airport outline Master Plan Draft for Consultation May 2005

Joint consultation response from
Friends of the Earth Scotland
and TRANSform Scotland
31st August 2005



TRANSform Scotland
the campaign for sustainable transport

1. Introductory comments

- 1.1 This is a response is submitted jointly by Friends of the Earth Scotland and TRANSform Scotland.
- 1.2 TRANSform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and more socially-just transport system. Its membership includes local authorities, public transport companies, national environmental groups, local transport and environment interest groups, and individuals.
- 1.3 Friends of the Earth Scotland campaigns for environmental justice and sustainable development. Friends of the Earth Scotland is a member of Friends of the Earth International which campaigns for the environment in over 60 countries worldwide.
- 1.4 Our organisations welcome the opportunity to comment on the consultative draft outline Master Plan. However, we consider that this document fails to present a responsible or sustainable approach to environmental protection, in particular with regard to climate change emissions. We can see no way in which the proposal to accommodate a threefold increase in passenger numbers over the next 25 years can be reconciled with national climate change obligations. Given national targets to cut climate emissions by 60% over the next 45 years, we consider that the proposal to triple passenger numbers over the next 25 years represents an entirely reckless approach with regard to the environment.

2. Passenger demand forecasts (Question 3)

- 2.1 It is our view that the principle explanatory factor behind the growth in passenger demand is the large amounts of effective subsidy that the air transport sector receives from the government.
- 2.2 The introduction of a kerosene tax or an emissions charge, and the introduction of VAT on ticket sales and aircraft purchases would go some way towards removing the tax advantages that lead to the current massive over-supply of aircraft seat capacity. We need to see the early and progressive removal of inappropriate subsidies to the air transport sector.
- 2.3 The best current estimate for the external costs of air transport - the climate change, health, accident, noise, air pollution, landscape, nature loss and so on - presently unaccounted for and unpaid, is about 44 Euros (£28.39) per 1000 passenger kilometres (UK figure, European Environment Agency TERM 2001 report, INFRAS/IWW study). **We recommend that BAA support the urgent introduction of either a kerosene tax or an European-wide emissions charge.**

3. Rail-air substitution (Question 5)

- 3.1 Rail travel is substantially less environmentally damaging than air transport when comparing emissions per passenger kilometre. When considering door-to-door journey times for distances up to 1000 kilometres, rail can also be quicker. We have called upon national government to urgently begin a 10-year programme to transfer all flights of up to 1000 kilometres around the UK, and to our near European neighbours, from air to rail. Eurostar have confirmed that Channel Tunnel Rail Link capacity could shift 40 million passengers from air to rail by 2030. We are confident that by delivering an air to rail shift within the UK that no extra runway capacity would be needed, permanently removing up to 30 million internal UK air passengers from planes to trains.
- 3.2 We welcome BAA Edinburgh's recognition that provision of a high-speed rail link to Scotland would have a significant impact in reducing air traffic movements into and out of Edinburgh Airport (§5.2.6). Given the Airport's dependence on domestic air travel, we consider that the provision of high-speed rail could play an important role in reducing the need for the scale of expansion currently envisaged for the Airport.
- 3.3 We would also agree with BAA Edinburgh that there are "no firm commitments" by the UK Government or Scottish Executive to deliver high-speed rail. We consider that it is unfortunate that national government has failed to provide a lead on this issue. **We recommend that BAA Edinburgh specifically call upon national government to deliver high-speed rail links to Scotland.**

4. Surface access (Questions 10-14)

- 4.1 We welcome the target for increasing public transport modal share into the Airport. However, we note that there is no public transport modal share target for the period after 2007. **We recommend that a target substantially above 25% be set for the period after 2007.**
- 4.2 We are disturbed at the scale of new road-building that BAA Edinburgh advocates. We consider this to be entirely at odds with Scottish Executive commitments to stabilising road traffic levels, and tackling climate change emissions from road transport. **We recommend that BAA Edinburgh significantly scales down its unsustainable demands for road-building around the Airport.**
- 4.3 We are also deeply disappointed that BAA Edinburgh has decided to take such a dismissive attitude towards provision of light rail (tram) and heavy rail surface access (§7.3.4). **We recommend that BAA Edinburgh revises its position with regard to public transport access to the Airport.**
- 4.4 We support the provision of rail access to Edinburgh Airport. However, we consider the current proposal as excessively expensive and poor value in the context of other, more pressing, requirements for investment in the Scottish rail network. The option development process has failed to consider lower-cost, and more swiftly procurable, options for achieving rail access to the Airport. We also consider the likely lengthening of journey times on the flagship Edinburgh-Glasgow rail line as an unacceptable consequence of this project. The project also faces a number of serious technical issues, including (i) steep gradients for the rail line in going underground, (ii) the running of diesel trains underground, (iii) emergency egress, and (iv) tunnelling risk factors associated with river courses and mining. These views are expanded upon in the TRANSform Scotland response to the TIE consultation on the Edinburgh Airport Rail Link, which is available at <http://www.transformscotland.org.uk>

5. Managing external impacts: Climate change (Questions 16 & 17)

- 5.1 Greenhouse gas emissions from aircraft are uniquely damaging and are likely to increase substantially over the next 50 years. By 2050 global emissions from aircraft will contribute to between 4-15% of predicted man-made climate change. Technological and operational improvements will not be sufficient to offset the effects of increasing emissions. The passenger demand forecasts set out on page 19 of the Plan (suggesting a range of 235-325% of growth in passenger numbers until the end of the Plan period in 2030) to be incompatible with a responsible approach to tackling climate change.
- 5.2 The UK Government and the Scottish Executive have set out a range of commitments towards meeting greenhouse gas emissions reduction targets. The table below summarises the UK's international and domestic commitments on reducing emissions of the gases which cause climate change:

Source	UK Target
UN Earth Summit 1992	Cut CO ₂ levels to below 1990 levels by 2000
Labour Party 1997	20% cut in CO ₂ by 2010 on 1990 levels
UN Kyoto Protocol 1997	12.5% cut in all 6 greenhouse gases by average of 2008-2012 on 1990 levels
Tony Blair February 2003	Adopting the Royal Commission on Environmental Pollution 60% cut by 2050.

- 5.3 The UK Government published *Climate Change: The UK Programme* in November 2000.¹ One section was also separately published as the *Scottish Climate Change Programme* (with the addition of a Ministerial Foreword). This Programme presents the Government's plan to reduce climate change emissions from the different sectors of activity within the UK in order to meet our commitment under the 1997 UN Kyoto Protocol and the Labour Party General Election Manifesto pledge of 1997. The Programme deals with emissions from the following sectors: energy supply, business, transport, domestic, agriculture, forestry and land use, and the public sector. A recent analysis by the UK Sustainable Development Commission concluded that further radical measures were required if the UK is to meet the 20% target.²
- 5.4 Chapter 9 of Section 2, "Bringing it all together," states that action in the transport sector should produce 5.6MtC (32%) of the predicted 17.75MtC reduction expected by 2010. It also states that further (unspecified) actions by devolved administrations are expected to lead to additional reductions in total emissions. These additional reductions are needed to meet the 20% CO₂ reduction target for the UK. Scottish Ministers have stated that Scotland will make an equitable contribution to meeting the UK Kyoto commitment.³
- 5.5 There is therefore a need for transport policy to produce further reductions in emissions, so that Scotland can make an 'equitable' contribution to meeting the UK's targets on climate change emissions. We see no attempt by BAA Edinburgh to make its own contribution to meeting these pressing environmental targets. As such, we regard the approach set out in the outline Master Plan to be entirely unacceptable on environmental terms.
- 5.6 We remain deeply sceptical about the ability EU Emissions Trading Scheme to tackle climate change emissions from the air transport sector. [See the written evidence from Green Skies to the Scottish Parliament Environment and Rural Committee inquiry on climate change, February 2005, for details.]

¹ DETR (2000) *Climate Change: The UK Programme*

² <http://www.sd-commission.gov.uk/pubs/ccp/sdc/index.htm>

³ For instance, Written Answer by Rhona Brankin, 14th November 2001.

6. A second runway? (Question 20)

- 6.1 We believe that plans to safeguard land at Edinburgh Airport for future new runway capacity should be ruled out on environmental and sustainability grounds. We accept that there may be a case for the carefully controlled expansion of the airport, within their present physical boundaries and in line with the sustainability criteria we set out in our response.

7. Conclusions

- 7.1 A modern, environmentally-responsible, air transport policy must discard an outdated "predict and provide" approach; manage demand for travel within environmental constraints; use economic instruments to ensure air travel pays fully for the environmental and social impacts it imposes on society; and make urgent investment in the alternatives to short-haul aviation. Without these key ingredients, policy on air transport will provide a recipe for years of conflict between government, industry and communities.

- 7.2 The air transport industry needs to act so that "sustainable" is its watchword not "predict and provide"; and which reflects the guidance set out by the Royal Commission on Environmental Pollution in 1994:

"An unquestioning attitude towards future growth in air travel, and an acceptance that the projected demand for additional facilities and services must be met, are incompatible with the aim of sustainable development..." and that "The demand for air travel might not be growing at the present rate if airlines and their customers had to face the costs of the damage they are causing to the environment."

- 7.3 For over a decade, it has been manifestly clear that action is needed to control the growth of air transport – yet this has not been carried into practice. This outline Master Plan characterised by an outmoded and environmentally-destructive "predict and provide" approach to air transport policy.
- 7.4 Question 20 of the consultation asks whether BAA Edinburgh should seek a balance with the "environmental costs" of its operation. Clearly it should. It is unfortunate that BAA Edinburgh has done no such thing. We regard the BAA Edinburgh attitude to the climate change implications of its actions to be that of passing the buck. This is exemplified by the statement in section 8.10 that BAA Edinburgh sees itself as only having a "local emphasis on tackling climate change." We can only read this as meaning that the company sees itself as having no responsibility for the climate change emissions that are produced by the air traffic movements through the Airport.

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