

BAA Aberdeen Aberdeen Airport outline Master Plan Draft for Consultation November 2005



Joint consultation response from
Friends of the Earth Scotland
and TRANSform Scotland
23rd March 2006

TRANSform Scotland
the campaign for sustainable transport

1. Introductory comments

- 1.1 This 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. Our membership includes bus, rail and shipping operators, local authorities, national environment and conservation groups, consultancies and local transport campaigns.
- 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 doubling 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 double passenger numbers over the next 25 years represents an entirely reckless approach with regard to the environment.
- 1.5 We are also greatly concerned about the noise implications of BAA Aberdeen's proposals, especially given the introduction of night flights to and from the airport in 2005. Any reduction of noise from the predicted decline of helicopter flights will surely be countered by the increase in flights anticipated with the expansion of the airport both within its current boundaries, and the proposed runway extension.
- 1.6 **It is indeed indicative of the UK government's manifestly skewed approach to air transport policy that it has ceded responsibility for the strategic planning of airports to BAA plc, a private company, which has little or no specific responsibility for reducing the strategic environmental impacts of the air transport sector.**

2. The economic disbenefits of aviation (Question 1)

- 2.1 We believe that the claimed economic benefits of airport expansion are entirely questionable. Research by Friends of the Earth, published in August 2005 and based on data from the Office of National Statistics, found that **the net economic impact of aviation was a cost to the Scottish economy of around £1.4bn in 2004.**¹ While over 1.5 million incoming visitors used Scottish airports in 2004, bringing around £866m into the Scottish economy, nearly 4 million trips were made by Scots travelling out of the

country, spending over £2.1bn overseas. For every £1.00 spent by visitors in Scotland, nearly £2.50 was spent overseas - and hence lost to the Scottish economy. These figures suggest that aviation actually damages the Scottish balance of trade.

3. Passenger demand forecasts (Question 3)

- 3.1 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 – around £9 billion per annum.ⁱⁱ
- 3.2 We believe that 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 and unsustainable subsidies to the air transport sector.
- 3.3 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 around 44 Euros (£28.39) per 1000 passenger kilometres.ⁱⁱⁱ
We recommend that BAA support the urgent introduction of either a kerosene tax or an European-wide emissions charge.
- 3.4 Finally, we welcome BAA Aberdeen’s recognition that the decline of North Sea oil and gas production is a major factor in determining the long-term prospects for the airport (§5.2.2). However, we fail to see how this can be reconciled with BAA Aberdeen’s anticipation of greater investment activity in the offshore energy sector (§5.2.4), reflected in passenger demand forecasts.

4. Rail-air substitution (Question 5)

- 4.1 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.
- 4.2 We welcome BAA Aberdeen’s recognition that provision of a high-speed rail link to Aberdeen would have a significant impact in reducing air traffic movements into and out of Aberdeen 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.
- 4.3 We would also agree with BAA 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 Aberdeen specifically call upon national government to deliver high-speed rail links to Scotland, and substantial increases in track capacity and line speeds on the Edinburgh/Glasgow-Aberdeen rail lines.**

5. Surface access (Questions 9-10)

- 5.1 We welcome the target for increasing public transport modal share into the Airport (§7.1.3). However, we note that there is no public transport modal share target for the period after 2007. **We recommend that a target of at least 25% be set for the period after 2007.**

- 5.2 We are disturbed by BAA Aberdeen's support for the construction of the proposed Aberdeen Western Peripheral Route (§7.3.3). 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 Aberdeen withdraw its support for the construction of the unsustainable Aberdeen Western Peripheral Route, and instead focus on demanding better public transport links in the area.**
- 5.3 We support the provision of improved rail access in the Aberdeen area, and to Aberdeen Airport, but are disappointed that BAA Aberdeen has decided to take such a dismissive attitude towards the provision of new rail services and stations, and in particular the Aberdeen Crossrail project (§7.3.5-7). **We recommend that BAA Aberdeen revises its position with regard to public transport access to the Airport.**

6. Managing external impacts: Climate change (Questions 13 & 14)

- 6.1 The passenger demand forecasts set out in §5.2.3 (which suggests a growth of 69-104% in passenger numbers until the end of the Plan period in 2030) to be incompatible with a responsible approach to tackling climate change.
- 6.2 The aviation sector is currently the fastest-growing source of climate change emissions. Aviation emissions have an increased effect on climate change - the UN Intergovernmental Panel on Climate Change has found this to be around 2.5 times the effect of the CO₂ emissions alone.^{iv} This is due to the fact that aircraft emit not only CO₂, but also water vapour and nitrogen oxides into the stratosphere, where the greenhouse effect is magnified. Taking into account this multiplier effect, the aviation sector accounted for approximately 14% of UK CO₂ emissions in 2000; if current trends continue, it will constitute at least 26% of emissions by 2020 and at least 36% by 2030.^v
- 6.3 The UK Government and the Scottish Executive have set out a range of commitments towards meeting greenhouse gas emission reduction targets. The table below summarises the UK's international and domestic commitments on reducing emissions of the gases that 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.

- 6.4 Recent research by the Tyndall Centre for Climate Change Research has found that, if the current expansion in aviation is allowed to continue, the UK government will find it "virtually impossible" to hit its targets for reducing climate change emissions.^{vi} As such, **we can only regard the expansion plan set out for Aberdeen Airport as being incompatible with delivering the 'Scottish Share' of reductions in climate change emissions. We see no attempt by BAA Aberdeen to make its own contribution to meeting these pressing environmental targets.** The approach set out in the outline Master Plan is entirely unacceptable on environmental grounds.
- 6.5 Finally, we remain deeply sceptical about the ability EU Emissions Trading Scheme to tackle climate change emissions from the air transport sector.^{vii}

7. Runway extension proposal (Question 17)

- 7.1 We believe that plans to safeguard land at Aberdeen Airport for future runway extension should be ruled out on environmental and sustainability grounds. We accept that there will, in the short-run, be expansion of the Airport's operations within its present physical boundaries, but we do not accept that the expansion of the footprint of the Airport is compatible with the sustainability criteria we set out in our response.

8. Conclusions

- 8.1 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.
- 8.2 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."*
- 8.3 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.
- 8.4 Question 18 of the consultation asks whether BAA Aberdeen should seek a balance with the “environmental costs” of its operation. Clearly it should. It is unfortunate that BAA Aberdeen has done no such thing. **We regard BAA Aberdeen's 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 Aberdeen 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.

-
- i Friends of the Earth (2005) ‘Why airport expansion is bad for regional economies’ - http://www.foe.co.uk/resource/briefings/regional_tourism_deficit.pdf
- ii Aviation Environment Federation (2003) *The Hidden Cost of Flying*
- iii UK figure, European Environment Agency TERM 2001 report, INFRAS/IWW study
- iv UN Intergovernmental Panel on Climate Change (1999) *Aviation and the Global Atmosphere* - <http://www.grida.no/climate/ipcc/aviation/index.htm>
- v House of Commons Environment Audit Committee (2003) *Ninth Report* - <http://www.parliament.the-stationery-office.co.uk/pa/cm200203/cmselect/cmenvaud/672/67202.htm>
- vi Tyndall Centre (2005) *Growth scenarios for EU and UK aviation* - http://www.foe.co.uk/resource/reports/aviation_tyndall_summary.pdf
- vii See the written evidence from Green Skies to the Scottish Parliament Environment and Rural Committee inquiry on climate change, February 2005, for details

Friends of the Earth Scotland
Lamb's House, Burgess Street,
Edinburgh, EH6 6RD

Tel: 0131 554 9977
Email: info@foe-scotland.org.uk
Web: www.foe-scotland.org.uk

TRANSform Scotland
Lamb's House, Burgess Street,
Edinburgh, EH6 6RD

Tel: 0131 467 7714
Email: info@transformscotland.org.uk
Web: www.transformscotland.org.uk