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Edinburgh Airport Limited

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BAA Edinburgh 

RRHE-GBSA-BJLR
National Planning Framework 2
The Scottish Government Directorate of the Built Environment
Victoria Quay, Leith
Edinburgh
EH6 6QQ

02 May 2008

Dear Sirs,

Draft National Planning Framework 2

Thank you for the opportunity to comment on the above document, our response is attached to this letter.

We support the aims of the strategy and agree that it is very important to provide a national context for development plans and planning decisions if long term sustainable economic growth is to be achieved in Scotland.

We recognise the key role which our three airports play in improving Scotland's international connectivity and thereby contributing to the growth of the economy.

If you have any queries on any aspect of our response or require more detail on the operation of our airports please do not hesitate to contact me.

Your faithfully



Anne Follin
Head of Planning
BAA Scotland

Cc Kevin Lang, Head of Communications, BAA Scotland

BAA Scotland

Response to Consultation on Draft National Planning Framework 2

We have set out our comments in line with the chapter headings used in the consultation document.

Scotland Today

We appreciate the recognition in paragraph 40 that the international connectivity of Edinburgh and Glasgow has improved dramatically over the last decade. During that time period, BAA has invested over £100m in route development across its three Scottish airports, many times that provided by the former Scottish Government Route Development Fund. This package of support and discounts for airlines wishing to start new international services in Scotland has transformed Scotland's international connectivity, as shown in the attached annex. Some 130 destinations in Europe, North America, Asia, Northern Africa and the Middle East can now be reached direct from one of the three Scottish airports owned and operated by BAA and we are committed to increasing that range of destinations yet further in the years ahead.

We believe that international connectivity is essential to creating new opportunities for the key sectors on which the Scottish economy depends, including tourism, financial services, energy and bioscience, all of which require the free movement of goods, people and ideas. In the last decade BAA has invested approximately £400m in its three Scottish airports., and we have committed £500m of investment in Edinburgh, Glasgow and Aberdeen airports over the next 10 years, ensuring the airports we operate are fitting international gateways to the cities they serve.

We would however disagree with the rather simplistic description provided in paragraph 64 of BAA Scotland's three airports, which fails to explain the wider role that each airport plays in serving its local community. Glasgow and Edinburgh airports serve separate and distinct local markets, with many destinations available from both airports.

It is inaccurate to describe Glasgow as a charter airport with some North American flights. In fact, it is the case that barely one fifth of the passengers that fly through Glasgow Airport every year are travelling on charter flights. Glasgow offers a substantial number of domestic flights to the London airports to serve the business community in the west of Scotland and also has scheduled services to Dubai, Pakistan and a range of European destinations. Similarly, Edinburgh now has a number of long haul scheduled services to North America, including three services a day to New York. Aberdeen is not only geared to the needs of the oil and gas industry, but offers scheduled international services and scheduled domestic services to London and other UK airports to serve the business community in the north east, as well as offering a range of leisure flights.

We strongly welcome the recognition within the draft framework that airports require high quality surface access. The Scottish Government has a key role to play in ensuring that new access links are developed if airports are to continue to grow and

we look forward to continuing to engage constructively with the Scottish Government on improving access for passengers.

As recognized in paragraph 67, the air services available from Edinburgh, Glasgow and Aberdeen Airports give these cities important international gateway functions.

Drivers of change

The importance of continuing to grow international services is fully recognized by BAA. We welcome the recognition in paragraph 115 that investment in transport is needed to enhance essential infrastructure, support urban expansions, improve access to facilities and services, facilitate sustainable economic growth and strengthen international gateways for passenger and freight. BAA is fully committed to playing its part in supporting the Scottish Government to achieve this goal.

Paragraph 116 notes that “transport (excluding aviation) accounts for over 20% of Scottish greenhouse gas emissions”. The inclusion of aviation would add very little to this figure as aviation accounts for a small part of overall emissions. The respected Stern report noted that globally, aviation accounts for 1.6% of CO₂ emissions (as opposed to, for example, the 6% that shipping accounts for).

BAA recognises that aviation’s contribution to global carbon emissions is increasing, as mentioned in paragraph 119. However, even taking into the projected growth in air travel, the Stern Report concluded that aviation will still account for only 5% of global emissions by 2050.

We believe there is little evidence to suggest that short and weekend breaks are becoming less popular, as described in paragraph 120. Whilst recent increases in fuel prices has had an impact on the economy, there is currently no evidence showing any discernible impact on people’s propensity to travel.

We also believe that more detailed study is required into the potential environmental benefits of high speed rail links in light of the likely high energy consumption of such services.

Scotland - 2030

We fully support the main elements of the spatial strategy to 2030 outlined in paragraph 150.

Infrastructure

We agree with paragraph 188 that the competitiveness of places depends on adequate investment in infrastructure, particularly in transport infrastructure. As mentioned above, BAA is fully committed to playing its part, through a programme of sustained investment in the development of the three Scottish airports.

We are very pleased to see that both the Edinburgh and Glasgow Airport enhancements have been included in the list of nine nationally important projects. However, we are surprised that no developments in the north-east of Scotland have been earmarked as being of national importance and would suggest that this is something the Scottish Government may wish to review.

The Framework does recognise that Aberdeen is the oil capital of Europe and must focus on strengthening its role as Scotland's northern gateway. We agree that reducing journey times between Aberdeen and the central belt is as matter of strategic importance to the north east. We also appreciate that whilst the future scale of development at Aberdeen airport would not in itself merit designation as a nationally important project, we believe that identifying a core area within the city region, perhaps encompassing the sea ports, airport and key strategic business development locations may well merit such designation.

We agree that a clear long-term vision is vital for transport infrastructure because of the current lengthy delivery times. In preparing Master Plans to 2030 for our three airports, BAA has demonstrated its commitment to the long-term development of its three Scottish airports and is willing to undertake the long term strategic planning required to ensure that new infrastructure is delivered timeously.

We agree that links with North America and the growing economies of Asia need to be strengthened and we remain committed to further enhancing the range of direct international services to these areas from the three Scottish airports in the future. However, despite the success of new international services to and from Scotland, there remain many destinations which are strategically important for Scottish business but to which Scotland could not sustain a regular direct air service. It will therefore remain the case that Scotland will depend on the network of services available from the UK's only hub airport at Heathrow. Heathrow is able to offer long haul direct air routes which are both important for Scottish firms seeking to access new overseas markets and for attracting inward investment. In light of this, it will be vitally important for Scotland to retain effective direct access to Heathrow going forward.

With regard to paragraph 220, we fully support the view that there has to be a shift to public transport services. BAA has been committed to increasing the percentage of passengers that use public transport to travel to and from the Scottish airports. At each airport, we have introduced a public transport levy (PTL), which takes a proportion of short stay car parking revenues for investment in projects which encourage the use of public transport. We have also used monies from the PTL to waive the airport forecourt access fees for some publicly subsidised bus services.

For many communities, bus services will be the only realistic means of increasing public transport provision. In this regard, there has to be recognition by government that many services need considerable financial support in their early years as they develop into commercially viable services. We would therefore urge the Scottish Government to reinstate the Bus Route Development Fund, which has been useful in expanding the range of bus services serving the Scottish airports.

There also needs to be a recognition that if bus services are to be successful they must be able to operate within designated bus lanes and consequently bypass traffic congestion. In light of the capacity constraints of much of the road network, this will require investment in new road infrastructure in many areas..

Spatial Perspectives

We fully support paragraph 252 that West Edinburgh has the potential to develop as an internationally competitive business location. We are keen to work with Scottish Enterprise and other stakeholders in order to ensure Edinburgh Airport plays its role in ensuring this potential is fully realised.

As identified in paragraph 298, the identification of tasks and establishment of timescales is critical if this Framework is to be delivered effectively. BAA is keen to work with the Scottish Government and other key stakeholders in the development of action plans where appropriate.

Annex – National Developments

With regard to the annex to NPF 2, we would urge the Scottish Government to recognize that for Edinburgh Airport, improved surface transport infrastructure will only be implemented if the Scottish Government gives its full backing to a full STAG appraisal of West Edinburgh. The surface transport infrastructure required goes far beyond improvements to the A8 corridor.

We would question why matters to be addressed at consent stage state include “parking provision” for Edinburgh but “off airport parking provision” for Glasgow. We do not see any reason why the alternative arrangements would be put in place at these two airports and would suggest the wording for Glasgow should be amended to say “parking provision”.

In regards to the criteria at the end of each section, we believe there should be a tick in the box for “smarter” for Glasgow just as there is a tick in the box for “smarter” for Edinburgh.

Making it Happen

We welcome the decision to review the NPF and welcome the overall thrust of the draft document. It is imperative that Scotland has a long term strategic planning document which sets out key priorities. In terms of ensuring delivery, we would reiterate that BAA is committed to working with all stakeholders in playing its part in supporting this Framework.

Anne Follin
Head of Planning
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