

I would like to challenge the four arguments used in deciding whether or not more runway capacity is needed. In addition a recognition of the interdependence of (1) demand (3) climate change and (4) regional airports, is missing.

While it is true that the CCC envisaged growth of 60% in aviation by 2050 to be potentially compatible with CO2 reduction targets, that assumed most other sectors reduced CO2 by 90% rather than 80%. While such reductions (in particular in transport, industry and heating) might be technically possible they become increasingly challenging as the remaining uses are those most dependent of fossil fuels - ie after the picking of 'low-hanging fruit'. Old housing stock for example will remain harder to heat than new housing. It is therefore far from certain that these 90% cuts will happen, and as such the commercial risk attached to airport expansion is very high, insofar as revenue is dependent on these cuts.

It has also rightly been assumed that if the 60% growth does occur the mechanism will be that aviation will need to buy carbon credits from other sectors. As described above this will be costly, implying the possibility of expensive airline ticket prices. This will especially impact leisure demand, and may require a more equitable method of ticket allocation than price alone.

The alternative Kyoto mechanism by which aviation might obtain carbon credits (namely CDM) depends heavily on projects outside Europe being 'additional' ie that they wouldn't have happened anyway. This is almost impossible to verify. In any event following EC proposals just this month it now seems likely that most of the emissions from long-haul flights will escape the the ETS altogether, at least for the near term.

Regional airport growth, meanwhile, is likely to be unconstrained.

In summary, while it is conceivable that additional airport capacity could be compatible with carbon reduction targets it is far more likely to result in failing to meet them, and certainly make the task very much harder (on the latter see 'Predict and Decide', ECI, University of Oxford.) This risk outweigh any economic growth, which could be replaced by growth in other sectors not carrying such risk.