

Aviation and Climate Change – response from Bristol Airport to the questions posed in Section 7 of the Airports Commission Discussion Paper 03 dated April 2013

1. Do you consider that the DfT CO₂ forecasts present a credible picture of future UK aviation emissions? If not, why not?
 - We raised some concerns about the reliability of the DfT passenger forecasts for forecasting demand at regional airports in our evidence to the Commission on aviation demand forecasting. This is less of a concern for CO₂ forecasts and we consider that these forecasts will present a credible picture for the purpose of policy making.
2. To what extent do you consider that the analysis presented in this paper supports or challenges the argument that additional airport capacity should be provided?
 - The analysis of aviation and capacity constraints presents sound evidence to indicate that constraining airport capacity is unlikely to be an effective policy approach for controlling CO₂ emissions from UK aviation. Whether this supports the argument for additional airport capacity is a different matter. The primary drivers for providing additional airport capacity relate to other considerations such as the availability of existing capacity at airports, particularly regional airports, and the economic and social benefits of improved aviation connectivity.
 - The analysis in Chapter 5 of the Discussion Paper is helpful in providing an initial understanding of the potential implications of capacity constraints for emissions. However the international nature of aviation means that this is an exceedingly complex issue. The Commission's analysis is naive to assume that trips between UK airports and overseas airports foregone as a result of capacity constraints will result in a proportionate reduction in global aviation emissions. Airlines operate as international businesses and if they are unable to develop their business in the UK as a result of capacity constraints they will transfer their expansion to airports elsewhere in Europe or beyond where capacity and demand for their services is available. Foreign originating passengers constrained from travelling to the UK by a lack of capacity may transfer their trip to another country instead of foregoing their journey.
 - The issues raised by the paper and developed above confirm that the best way of dealing with CO₂ emissions is through action at a global level rather than through arbitrary airport capacity constraints. A global emissions trading scheme would ensure that there is no scope for leakage and displacement of emissions.
3. How could the analysis be strengthened, for example to allow for the effects of non-CO₂ emissions?
 - The analysis should consider the surface access and operational emission benefits of using local, regional airports to meet demand. These emission benefits derive from shorter surface access journeys, shorter taxiing times, and the use of uncongested airspace which removes the need for holding and delays on the ground.
 - Please refer to Sustainable Aviation for further consideration of the effects of non-CO₂ emissions.

4. How can we best deal with uncertainty around demand and emissions, including in relation to future carbon prices?
 - We would refer you to the work of Sustainable Aviation and the Sustainable Aviation CO₂ Road-Map.
5. What conclusions should be drawn from the analysis of effectiveness, and relative cost, of airport capacity and other abatement measures in Chapter 5? Are there alternative analytical approaches that could be used to understand these issues?
 - The costs of the abatement measures are very high in comparison with the costs of carbon published by DECC for use in public policy appraisal. This would suggest that they are not cost effective policy measures for reducing emissions.
 - Please refer also to the response from Sustainable Aviation.
6. Are there examples of how other countries have considered carbon issues in relation to airport capacity planning that we should be looking at? (Please specify and briefly explain why.)
 - We are not aware of any relevant examples.
7. What do you consider to be the main climate risks and adaptation challenges that the Commission will need to consider (a) in making its assessment of the UK's overall aviation capacity and connectivity needs, and (b) in considering site-specific options to meet those needs?
 - There is considerable uncertainty associated with this and Bristol Airport is therefore not in a position to comment.
8. Are there any opportunities arising from anticipated changes in the global climate that should be taken into account when planning future airport capacity?
 - There is probably insufficient clarity about future changes in the climate to allow them to be accounted for in a meaningful way in the planning of regional airport capacity.