

Dear Sir/Madam,

Please find below general comments with regard to the above paper for your consideration.

- The report should take into emissions related firstly to airport operations and secondly emissions related to how passengers travel to and from airports. Page 7, paragraph 2.7 states aviation emissions account for about 6% of greenhouse gas emissions, I am assuming this does not include emissions from aviation related activities such as the above. The report states that the aviation sector will take longer to decarbonise due to lack of alternative to low carbon fuel and long service life of vehicles but surely there is examples where decarbonisation of airport operations/more sustainable travel to airports may help offset some of the emissions from the actual vehicles themselves. Small local airports like NQY help mitigate significant additional emissions from passengers having to travel - mostly by car as public transport times are much longer, to the next nearest airport or a HUB airport, and these would need to be kept in mind vs emissions from aircraft using these airports. To get to LHR you are looking at 4h drive time or more locally 180km and 3h to BRS
- How will global uncertainties over cheap oil/oil price rise due to peak oil effect the need for additional capacity? I should imagine increased fares would potentially put people off travelling particularly on domestic flights where developments such as high speed rail could form cheaper, possibly faster alternatives to travel. I don't think this has been taken into account under abatement potential (5.20 onwards).
- ETS was designed to cover external cost of emissions and allow other sectors achieving their targets to sell permits effectively offsetting aviation emissions that are above the amount budgeted in line with international agreements; it also ignores the huge levy imposed on the sector which has a disproportionate effect on more marginal routes from smaller airports (NQY). This is not least because a larger proportion are domestic and thus hit by a double whammy of APD (2 sectors), when the environmental case for Air to HSR substitution is extremely dubious (when full life and embedded carbon costs are taken into account, as shown by the EAs for Phases 1 + 2 of the HS2 project), which also no longer uses reduced carbon-emissions on domestic inter-city travel as part of the case for the projects.
- Many small airports again like NQY are at the forefront of carbon reduction initiatives in the industry and should not be penalised disproportionately by generic, badly targeted policy mechanisms designed to capture the industry's environmental costs. NQY are engaged in ACI's Carbon Reduction Accreditation scheme.

Please let me know if I can be of further assistance.

Thanks



Transportation Policy

Transportation

Cornwall Council