Expansion of Bristol Airport to 12mppa - Planning Appeal

PINS Ref APP/D0121/W/20/3259234

Rebuttal Proof

To Proof of Evidence from James Brass ‘Air Traffic Forecasts’

for Bristol XR Elders Group

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XR/W3/4

1. Firstly a correction

James Brass in para 4.4.3 of his Proof states that our position *'cites a series of health-related reasons as to why air travel should not be allowed until the pandemic has been brought under control'.* We are not proposing anything so drastic. Sally Lawson's Proof of Evidence demonstrates how COVID-19 has impeded, and may continue to impede, air travel and its recovery until the pandemic is under control.

Our COVID-19 evidence is part of our case that the impact of COVID on forecasts, and longer-term ability to fly, are underestimated by BAL, and in the Proof of J Brass.

2. Ongoing Forecast Slippage

Mr Brass acknowledges that the Faster Growth to 10 mppa is unlikely (3.4.4) and has stated that to reach 12 mppa the '*Core Case or Slower Growth Case is now more likely than the Faster Growth Case'*(3.5.3). The reasons he gave for this include:

- The Sixth Carbon Budget … '*could result in some increase in the cost of flying over the longer term that could reduce demand'* (2.7.2)
- '*The ongoing impact of travel restrictions and the strong 'second wave' of the pandemic suggests that the Faster Growth Case is now less likely to be achieved, certainly in terms of the point at which Bristol Airport reaches 10 mppa'* (3.4.4)
- *'Overall, at worst, I would suggest the increasing use of video conferencing and communications technology may slow business travel growth towards that seen in the Slower Growth Case forecasts'* (4.9.10)

3. Forecast range

3.1 By disregarding his Faster Growth Case while maintaining the timelines of the other two, Mr Brass is narrowing the forecast range rather than updating and revising each case to reflect the new obstacles to growth outlined in his proof.

3.2 Patrick Folley in his evidence discusses the considerable degree of uncertainty in air traffic forecasting (Section 3), and states that uncertainty in the airports industry is "greater than it has been for decades" (para 4.3). Indeed, recent data and projections for recovery to 2019 levels continue to be worse than the YAL 2020 reasonable worst-case forecasts. This strongly suggests that the 2020 forecasts need to be revised to retain a credible range of Faster, Core and Slower Growth options.

4. The robustness of the 2020 Appeal forecasts

4.1 Impact of the delayed recovery on the long-term forecasts.

In para 1.3.1 Mr Brass states:

> *'while there is uncertainty around the speed of recovery from COVID-19 there is a general consensus amongst industry commentators that demand will return to 2019 levels by around 2024 once travel restrictions begin to lift and air traffic becomes governed by its traditional drivers once more;'*

This 2024 recovery date is even later than the YAL 2020 Slower Growth forecast for 2023. As my Proof pointed out (3.1.4), the statement in the YAL 2020 document (para 3.10) that the Core Growth forecast of 10 mppa for 2024 was in line with the forecasts of a range of commentators is wrong. It would appear that Mr Brass now accepts my correction that most commentators suggest 2024 will see a return to 2019 passenger number levels (8.9 mppa at Bristol Airport).

4.2 Forecasts for 12 mppa.

In para 3.1.1 of his Proof, Mr Brass confirms

> '*York Aviation's forecasts anticipate the airport reaching 12 mppa between 2027 and 2034, with a reasonable most likely outcome being about 2030. This is between 7 and 13 years into the future. I believe that the long-term forecasts are robust and appropriate'.*

Taking Mr Brass' acceptance that Bristol airport is likely to recover to 2019 levels in 2024; then to reach 12 mppa three years later in 2027 would need a passenger growth of nearly 11% pa. This is not realistic, and demonstrates that the Faster Growth scenario of the YAL 2020 forecasts is no longer credible, as Mr Brass has admitted in his proof (para 3.5.3). To reach his 'most likely outcome being about 2030' (the Core Case) would still need a growth of 5% per annum after the recovery to 2019 levels. This is more than double the 2.4% growth rate in passenger numbers at Bristol Airport during the recovery period from the 2008 Global Financial Crisis from 2009 to 2014. (J Brass Proof 2.8.2 and Fig. 6)

4.3 Comprehensive revision required.

The forecasting in the Proof offered by Mr Brass is flawed and internally inconsistent – due in part, we would suggest, to the attempt to continue to work with the 2020 YAL document, despite it's being seriously out of date and overtaken by events.

We propose therefore, that as the YAL 2020 forecasts prepared in the summer of 2020 are no longer robust, they should be comprehensively reviewed and revised.

Abbreviation used:

mppa	million passengers per annum
YAL 2020	'Passenger Traffic Forecasts for Bristol Airport to Inform the Proposed Development to 12 mppa' BAL November 2020