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Update for Examination in Chief

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1. Introduction

1.1 The fleet mix in my Proof Of Evidence on Air Traffic Forecasting (NSC/W1/1) contains a number of errors. In this note I explain these issues, how I have addressed them and the resulting updated fleet mix that I am proposing.

2. Amendments

- 2.1 I consider Mr Brass' comment in paragraph 4.2.1 of his rebuttal (BAL/1/3) relating to the age of the Boeing-767-400ER aircraft valid. Based on a review of United Airlines' fleet, orders and operations, I have replaced this aircraft by the Boeing 787-8.
- 2.2 I consider Mr Brass' comment in paragraph 4.2.1 of his rebuttal (BAL/1/3) relating to the feasibility of operating the Boeing-777 aircraft at Bristol Airport valid. Based on a review of Emirates Airlines' fleet, orders and operations, I have replaced this aircraft by the Boeing 787-9. To cater for a similar demand with this smaller aircraft, for my updated fleet mix I have increased the frequency of this route.
- 2.3 I consider Mr Brass' comment in paragraph 4.2.1 of his rebuttal (BAL/1/3) relating to the retirement of the Boeing-737-700 aircraft by KLM valid. Therefore, in my updated fleet mix I have assumed that KLM would operate with the Embraer 195-E2 instead of the Boeing 737-700.
- 2.4 I consider Mr Brass' comment (in paragraph 4.2.1 of his rebuttal (BAL/1/3)) relating to the future frequency of Lufthansa operations at Bristol valid. I have increased the movements in Lufthansa's Bristol-Frankfurt route (operated with Embraer 190 aircraft) to address this.
- 2.5 When calculating the annual movements by Jet2.com I was not aware of the letter that the airline sent to the Planning Inspectorate (attached in section 8.3 of Appendix A of Mr Brass' rebuttal (BAL/1/3)).
- 2.6 Jet2.com anticipate to grow their capacity at Bristol by an average 8% per annum between 2022 and 2027, based on the abovementioned letter. Assuming they continue growing at this rate, Jet2.com would provide 1.7 million seats at Bristol in 2030.
- 2.7 This would equate to 8,995 movements in 2030 by Jet2.com using the Boeing 737-800. This is more than what I had assumed in my previous the fleet mix (7,855 movements). I have amended this in my updated fleet mix.
- 2.8 As a result of some of the abovementioned changes there is an increase in number of movements in some routes. For comparability, I have kept the total annual movements as 75,350 like in the Appellant's proposal and in my old fleet mix. This has meant reducing the frequency in other routes.
- 2.9 I also note that in Table 3 of my proof (NSC/W1/1), containing my old fleet mix, I had classified the Boeing 787-8, Boeing 787-9 and Embraer 195-E2 aircraft as "existing generation". These should be classified as "next generation".

2.10 In his rebuttal (BAL/1/3), Mr Brass has suggested that there are other errors in my proof besides the ones that I list in this note. I do not agree.

3. Outcome

3.1 Making the amendments described in this note, my updated fleet mix is as follows:

Table 1: Fleet mix in 2030 (by number of air traffic movements on that year)

Aircraft	Appellant's 2030 Fleet Mix	Jacobs 2030 Fleet Mix - Old	Jacobs 2030 Fleet Mix - Updated	Difference between appellant and Jacobs updated fleet mix		
Aircraft used by Jet2.com and others (existing generation)						
Boeing 737-800	2,380	13,781	14,582	+ 12,202		
Next generation Aircraft						
Airbus A320neo	20,200	24,538	23,985	+ 3,785		
Airbus A321neo	15,720	9,887	9,664	- 6,056		
Boeing 737 MAX 10	2,050	2,097	2,050	0		
Boeing 737 MAX 8	14,360	11,684	11,421	- 2,939		
Embraer 195-E2	2,240	-	2,343	+ 103		
Boeing 787-8	510	599	879	+ 369		
Boeing 787-9	-	-	586	+ 586		
All other existing generation aircraft						
Airbus A320	6,540	2,828	2,765	- 3,775		
ATR 72	8,360	5,225	5,108	- 3,252		
Boeing 737-700	750	2,397	-	- 750		
Boeing 767-400	-	300	-	-		
Boeing 777	-	300	-	-		
Embraer 190	2,240	599	878	- 1,361		
Embraer RJ145	-	1,115	1,089	+ 1,090		
Total Next Generation	55,080	48,805	50,928	-4,152		
Total Existing Generation	20,270	26,545	24,422	+4,152		
Total air movements	75,350	75,350	75,350	-		
% Next Generation	73.1%	64.8%	67.6%			

3.2 The above table should replace Table 3 in my Proof of Evidence (NSC/W1/1).

3.3 Due to this, paragraph 7.10 of my Proof of Evidence (NSC/W1/1) should read as follows:

As a result, my 2030 fleet mix sees an increase of c. 12,202 movements (+513%) of the Boeing 737-800 aircraft and a reduction in annual movement of the Boeing 737 MAX 8 (-2,939 movements, that is -20%) and Airbus A320Neo family (-2,271 movements, that is -6%) when compared to the appellant's forecast.

3.4 And paragraph 9.8 of my Proof of Evidence (NSC/W1/1) should read as follows:

This means that the fleet mix in the future years is likely to look different with the introduction of Jet2.com, with a larger proportion of older, noisier and dirtier aircraft. Using an approach aligned as much as possible to the appellant's, I have produced an alternative 2030 fleet mix with Jet2.com in it. The result is an increase of c.12,202 annual movements (+513%) of the Boeing 737-800 aircraft and a reduction in annual movement of the more efficient Boeing 737 MAX 8 (-2,939 movements, that is -20%) and Airbus A320Neo family (-2,271 movements, that is -4%) when compared to the appellant's forecast.

These are material differences that can increase the noise, carbon and air quality impacts of the proposed development. These together with the implications for any relevant planning conditions will be further examined in the evidence of other witnesses on behalf of the Council