



Bristol Airport Draft Master Plan Consultation

Response from the Chartered Institute of Logistics and Transport (UK)

Introduction

- 1 The Chartered Institute of Logistics and Transport (CILT) is a professional institution embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. Our principal concern is that transport policies and procedures should be effective and efficient, based on objective analysis of the issues and practical experience, and that good practice should be widely disseminated and adopted. The Institute has a number of specialist forums, a nationwide structure of locally based groups and a Public Policies Committee which considers the broad canvass of transport policy. This submission draws on contributions principally by the Aviation Policy Group.
- 2 This response to the Bristol Airport Draft Master Plan launched in November 2024 covers three key issues: Demand Forecasts, Greenhouse Gas Emissions and Surface Access. These are issues where CILT has particular knowledge from its members who have been engaged in airport planning and development.

Demand Forecasts

- 3 We note that Bristol Airport served over 10 million passengers in 2024, an increase of around 7% on 2023 and 18% more than 2019. Clearly the Airport is currently on a high growth trajectory compared with the total for the UK, which at the end of 2024 was 2% below 2019 levels. Growth to 15 million passengers by 2036 is 50% more than 2023 or around 3.5% per year and is higher than the most recent DfT forecasts for the UK, albeit these were published in 2017. CILT has considered scenarios of 20%, 30% and 40% growth between 2023 and 2035. Bristol serves a region which is growing faster than the UK average and competes with a number of other airports in the region and in adjacent regions, including Cardiff, Exeter, Bournemouth and Birmingham. The basis of growth at Bristol would primarily be the expansion of activity by airlines such as Easyjet, Jet 2 and Ryanair and it is possible that they may opt for growth at competing airports.
- 4 We note also that a runway extension is proposed in part to better accommodate long haul flights. The prospects for long haul services from Bristol are limited, given the vast range of services available from Heathrow, but nevertheless there may be opportunities for some long haul leisure or flights to North America or to Middle East hubs, especially if long range narrow-bodied aircraft are used.
- 5 It is becoming clear that air fares will rise at a rate higher than general inflation. There will be rises in Air Passenger Duty and fuel costs, particularly those related to Sustainable Aviation Fuel,

the use of a proportion of which is now mandated. Related to this is the cost of carbon credits as part of the UK's Emissions Trading Scheme or the ICAO CORSIA arrangements. Such a rise in air fares will have a dampening effect on demand, in particular in the price-sensitive short haul leisure market.

- 6 However, even with rising air fares and the possibility of growth at other airports, it really only a matter of when, not if, such growth will occur and it is for the airport's owners to decide if they wish to invest in facilities to accommodate growth. The planning regime should look carefully at the impact of such growth and there is a time element which will affect that impact, but approval for expansion should not be withheld solely on the grounds of forecast uncertainty.

Greenhouse Gas (GHG) Emissions

- 7 Current Government policy is to manage aviation GHG emissions at the national level. Nevertheless, it is important to estimate the level of emissions from each airport to gauge how significant it is compared to the scale of national emissions and whether this will have a material impact on the ability to adhere to the Carbon Budgets. Carbon Budget 6 is 965 MtCO₂e or an average of 193 MtCO₂e for the years 2033-2037. CILT estimates that aviation accounted for about 7% of the total emissions in 2019 and, if this 7% is applied to the CB6 average, the target for aviation would be 14 MtCO₂e. Dividing this among UK airports by the proportion of passengers in 2019 would imply that Bristol should keep within 0.49 MtCO₂e per year in the CB6 period.
- 8 It is accepted that, for non NSIP projects, it would not be appropriate to impose a condition on expansion related to all emissions (ie. including those from aircraft in flight) but the forecast ability to meet a target compatible with Carbon Budget 6 should be a material consideration to be taken into account when addressing the planning balance.

Surface Access

- 9 We recall that the Inspectors' Report on the 12 mppa application concluded that the development would not give rise to an unacceptable effect on highway safety nor any severe residual cumulative impacts on the road network. This would then be in accordance with the NPPF, as it then was. The NPPF was updated in December 2024 and the relevant paragraph now states that "116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios." The last seven words are the relevant addition.
- 10 The proposals note a number of planned improvements to the A38 and we have noted the prospects for the WEST rapid transport plan for which an Outline Business Case was submitted in September 2024. Options for a South West corridor include tunnelling, segregation and street running with Bus Rapid transit or Light Rail technologies. The likelihood of the WEST network being in place by 2030 depends on whether arrangements for major capital expenditure by local authorities are better than they have been in the past. The Government seems determined to devolve powers to Mayors and it may be that this will lead to quicker action. However, "all reasonable scenarios" as noted above from the NPPF must include a scenario in which the WEST South West Corridor is not completed and therefore one where the Public Transport Mode Share (PTMS) is based on the current infrastructure, albeit with some planned A38 improvements.

11 The most recent CAA data on surface access is from the 2019 Departing Passenger Survey, which showed a 21.8% PTMS. This is higher than the figures noted at the 12 mppa inquiry and recent indications are that the Airport Flyer services are carrying record numbers of air passengers and staff. In order to demonstrate that the effects on the highways are neither unacceptable nor severe, more recent data on PTMS will be needed, together with an assessment of how this might change in the future in all reasonable future scenarios.

Summary

12 CILT wishes to continue to contribute to the consideration of the Airport's proposals for growth and would be particularly interested in how the above issues related to demand forecasts, GHG emissions and surface access are progressed.

Daniel Parker-Klein
Director of Policy, Communications and Insight

The Chartered Institute of Logistics and Transport (UK)

Daniel.parker-klein@ciltuk.org.uk

January 2025