



Development of Bristol Airport to Accommodate 12 Million Passengers Per Annum

Air Traffic Forecasts

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Rebuttal Proof of Evidence BAL/1/3

Section 78 Town and Country Planning Act 1990 Appeal by
Bristol Airport Limited Relating to Bristol Airport, North Side
Road

Planning Inspectorate Reference: APP/D0121/W/20/3259234
North Somerset Council Reference: 18/P/5118/OUT

1. Introduction

1.1.1. This Rebuttal Proof of Evidence is provided principally to address points made by Mr Folley in his Proof of Evidence relating to the air traffic forecasts for the proposed development (NSC/W1/1 Folley, June 2021). In addition, I also comment on further some points made by Mr Devas (XR/W3/1 Devas, June 2021) in his Proof on air traffic forecasting.

1.1.2. I would note in the first instance that there are substantial areas of areas of agreement between Mr Folley and myself, most notably in relation to the broad timescales for Bristol Airport to reach 12 million passengers per annum (mppa) and in relation to the overall approach to air traffic forecasting and the production of the associated forecast outputs that support the environmental assessment. There are, however, important points of difference, notably in relation to:

- the recovery of business traffic following the COVID-19 pandemic;
- the impact of Jet2 on the future fleet mix at Bristol Airport;
- the impact of the UK leaving the EU;
- the inclusion of quantitative sensitivity tests for forecast outputs.

1.1.3. These are points that I have already addressed in my Proof of Evidence on air traffic forecasting (BAL/1/2 Brass, June 2021) and I do not repeat my general position here on these but do make some additional comments based on the evidence presented by Mr Folley.

1.1.4. Mr Devas's evidence focuses primarily on:

- the influence of the current short-term position and its implications for the air traffic forecasts;
- the fact that GDP is not an important driver of future air traffic growth;
- that rising carbon costs, higher fuel prices, increased tax will weigh on growth in medium to long term;
- the recovery of business travel and the importance of attitudinal change in slowing leisure travel demand growth.

1.1.5. Again, these are all points that I have previously addressed in my Proof of Evidence on air traffic forecasting (BAL/1/2 Brass, June 2021) and I do not comment significantly further here, other than briefly in relation to business travel and the influence of GDP on air traffic demand growth.

1.1.6. I have organised my comments under the following themes:

- Forecasting and Uncertainty;
- Recovery of Business Travel;
- Influence of Jet2;
- Impacts of Mr Folley's Proof to Other Areas;
- Other Comments.

2. Forecasting and Uncertainty

2.1.1. Mr Folley focuses in Section 3 of his Proof of Evidence (page 3 (NSC/W1/1 Folley, June 2021)) on the issue of inherent uncertainty in forecasting and I would agree that there is always an element of uncertainty. I also note that Mr Folley agrees with the approach taken in the Appeal Proposal forecasts in relation to considering uncertainty in relation to the passenger forecasts (para. 3.5 on Page 4 (NSC/W1/1 Folley, June 2021)).

2.1.2. I would, however, comment further on his analysis at para. 3.2 (page 3 (NSC/W1/1 Folley, June 2021)) and the accompanying data in Appendix A. Mr Folley cites a number of examples of future airport forecasts where the passenger throughput at the airport at a given point in time has proven to be inaccurate. Mr Folley then uses this analysis to suggest that the 'margin of error' on forecasts can be wide. I would, however, contend that the situation being considered here is different to the examples Mr Folley cites. In all the examples Mr Folley cites the air traffic forecasts relate to Master Plans for the airports in question. The forecaster is trying to estimate what traffic throughput will be at a particular point in the future. That is not the task in this instance. The passenger throughput for the Appeal Proposal is already known. It is 12 mppa. The question for the air traffic forecasts here is over what approximate timescale will this passenger threshold be reached. This reduces the amount of uncertainty to be dealt with, particularly in terms of the air traffic forecasting outputs that support the environmental assessment, which are relatively insensitive to the passage of time, as I have previously discussed in my Proof of Evidence on air traffic forecasting (para. 3.4.8 (BAL/1/2 Brass, June 2021)). I also note again that the Stansted Appeal decision reached a similar conclusion:

"It remained unclear throughout the Inquiry, despite extensive evidence, why the speed of growth should matter in considering the appeal. If it ultimately takes the airport longer than expected to reach anticipated levels of growth, then the corresponding environmental effects would also take longer to materialise or may reduce due to advances in technology that might occur in the meantime."

2.1.3. This is particularly pertinent here, given the general agreement that in terms of the speed growth at Bristol Airport, the risks are more towards the downside, and, if growth departs from the Core Case, that growth is more likely to tend towards the Slower Growth Case than the Higher Growth Case (see Mr Folley's comment at para.

4.9 on Page 8 (NSC/W1/1 Folley, June 2021)). The passage of time is, in general, likely to result in more newer, quieter, cleaner aircraft entering the fleet, thereby reducing environmental effects with the passage of time. This is a point acknowledged by Mr Folley:

“It is assumed that beyond 2030 the adverse environmental impacts of a 12 mppa airport will not be greater than they are in 2030. Generally speaking, this is likely to be correct since it is anticipated that overall aircraft fleets and surface transport will become increasingly more fuel efficient, less noisy and less reliant upon fossil fuels, whilst capacity will remain capped at 12 mppa.” (para. 3.4, page 4 (NSC/W1/1 Folley, June 2021))

2.1.4. This clearly means that the uncertainty risks around slower growth, the more likely of the alternates around the Core Case, and its environmental effects are inherently limited.

2.1.5. I would, therefore, reject Mr Folley’s conclusion at para. 3.11 (NSC/W1/1 Folley, June 2021). I would contend that uncertainty in this case is in fact relatively limited, and that risks in terms of speed of growth are more towards the Slower Growth Case, which would likely reduce environmental impacts. The air traffic forecasts and associated outputs to support the environmental assessment have considered the implications of faster and slower growth.

3. Recovery of Business Travel

3.1. Introduction

3.1.1. Both Mr Folley (para. 4.12-4.20, para. 4.28-4.29 (NSC/W1/1 Folley, June 2021)) and Mr Devas (para. 5.3.2 (XR/W3/1 Devas, June 2021)) question the speed of recovery in terms of business air travel. This is an issue I have already addressed in my Proof of Evidence on air traffic forecasting (Section 4.9 (BAL/1/2 Brass, June 2021)). However, based on Mr Folley's comments in particular, I make a number of additional points below.

3.2. Previous Patterns of Growth

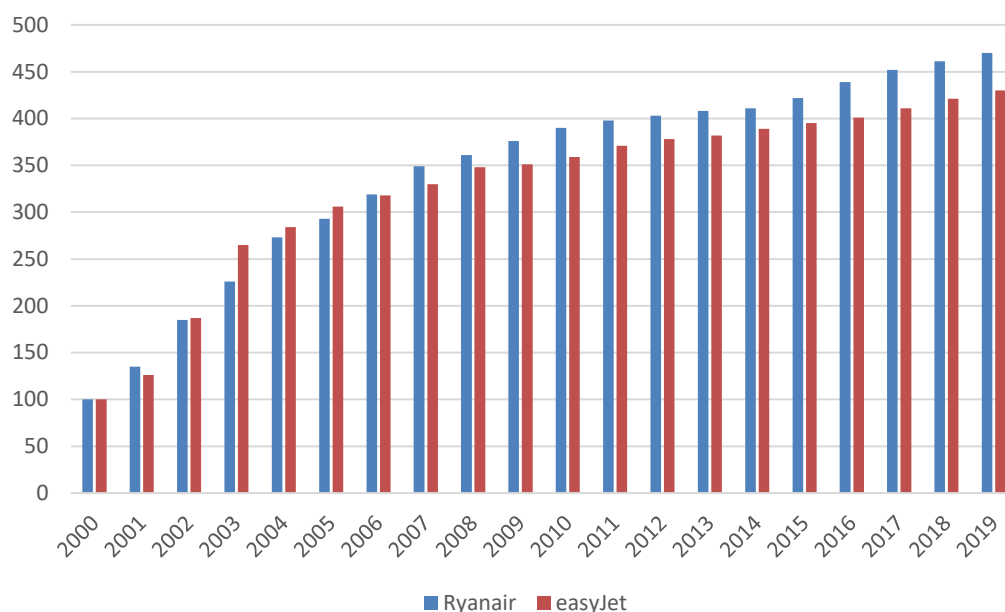
3.2.1. Mr Folley seeks to suggest that leisure traffic has been growing at Bristol Airport substantially faster than business traffic and uses this as evidence to suggest that the future forecast growth for business passengers is unreasonable:

"According to the CAA's passenger surveys 5 , between 2000 and 2019 business passenger numbers grew by an average 4.2% per year at Bristol Airport, while leisure passenger numbers grew by an average 8.1% per year. This showcases how even prior to the Covid-19 pandemic and Brexit, leisure travel was growing at almost double the pace than leisure travel at the Airport." (para. 4.16 (NSC/W1/1 Folley, June 2021))

3.2.2. However, as with any form of time-series analysis, it is important to consider the broader perspective as to what else is taking place in the market. The time period chosen by Mr Folley, 2000¹ to 2019, includes at the beginning the so-called 'low cost bubble', when low cost airlines, such as easyJet and Ryanair, were growing very rapidly and significantly lowering the price of air travel in the market, as can be seen in Figure 1 (supporting data can be found in Appendix A, at para. 8.2). This had a disproportionate impact on leisure markets where passengers are substantially more price sensitive. This period of explosive growth is generally considered to have ended with the onset of the Global Financial Crisis in around 2009. Since that time the market has stabilised as operating models have matured. It is, therefore, vastly more appropriate to look at the market post the disruptive effect of the 'low cost bubble'.

¹ An extract from the CAA Passenger Survey Report 2000 can be found in Appendix A at para. 8.1.

Figure 1: Growth of Ryanair and easyJet passengers between 2000 and 2019 (Index: 2000 = 100)



Source: Ryanair and easyJet corporate statements.

3.2.3. Using the same data source as Mr Folley, the CAA Passenger Survey, I have examined two time periods, 2008 (CD7.6 CAA, 2008, p. 10) to 2019 (CD7.10 CAA, 2020, p. Table 3.4) and 2012 (CD7.9 CAA, 2013, p. 12 Table 3.4) to 2019². Over these time periods, the picture is quite different. Since 2008, business passengers at Bristol Airport have grown at 2.6% per annum, compared to 2.5% per annum for leisure passengers. Since 2012, after recovery from the Global Financial Crisis, business passengers have grown at a rate of 4.9% per annum, compared to 4.7% for leisure passengers. In other words, business passenger numbers have in fact been growing faster than leisure passengers for some time. This is shown in Table 1. This is completely opposite to the trend suggested by Mr Folley, suggesting that the evidential basis for his entire line of argument is illusory and his conclusions, therefore, profoundly misplaced. I also note that the differential in growth rates between business and leisure passengers suggested by Mr Folley is heavily relied upon by Mr Siraut in his evidence on socio-economics. I consider the implications of this for Mr Siraut's conclusions in my socio-economic rebuttal proof (BAL/5/3 Brass, July 2021).

² It should be noted that Bristol Airport is only surveyed around every four years.

Table 1: Business and Leisure Passengers at Bristol Airport

	Passengers (000s)				CAGR		
	2000	2008	2012	2019	2000 to 2019	2008 to 2019	2012 to 2019
Business	503	834	792	1,106	4.2%	2.6%	4.9%
Leisure	1,579	5,267	5,012	6,925	8.1%	2.5%	4.7%

Source: CAA Passenger Surveys.

3.2.4. I would, therefore, conclude that the pattern of business travel growth in the Appeal Proposal forecasts compared to leisure passenger growth is perfectly reasonable and may in fact be conservative.

3.3. *Future Forecast Growth Rates*

3.3.1. In Table 2 on Page 9 Mr Folley sets out the market growth rates for the Core Case for the Appeal Proposal forecasts. As I have set out in my Proof of Evidence on air traffic forecasting (BAL/1/2 Brass, June 2021, p. 28 para. 3.1.3) and in the Appeal Proposal air traffic forecasting report (CD2.21 York Aviation, 2020, pp. 4-6), these have been derived from a detailed analysis that has considered the effect of economic growth, carbon prices, fuel costs and air passenger duty rates moving forward. The extent to which passenger demand reacts to economic growth and the cost of flying (as influenced by carbon prices, fuel costs and air passenger duty rates) has been determined using a series of elasticities³ sourced from the UK Department for Transport UK Aviation Forecasts 2017 (CD6.2 Department for Transport, 2017, p. 22 Table 1). Mr Folley seeks to suggest that the business passenger growth rates derived through this process are overstated. I disagree. I consider his comments below.

3.3.2. In the first instance, Mr Folley seeks to suggest that the business growth rates identified are inconsistent with past trends (para. 4.16 (NSC/W1/1 Folley, June 2021)), as described above in sub-section 3.2. As I have clearly demonstrated, Mr Folley's conclusions in this regard are profoundly unsound and misplaced.

3.3.3. At para. 4.17 (NSC/W1/1 Folley, June 2021) he then seeks to suggest that the pandemic has led to profound upskilling amongst the business community and that this will lead to a slower growth in business travel in the future. I note that Mr Folley presents no evidence to support this position. The pandemic has clearly led to

³ For the avoidance of doubt, in economics, an elasticity refers to a measurement of the percentage change of one economic variable to a change in another.

businesses increasing their use of communications technologies by necessity.

However, I would contend that this is actually part of a long term trend, which has simply been accelerated in the short run by the pandemic. As such, it will have been reflected in past trends and in the econometric analysis used to identify air transport demand elasticities, such as those cited by the Department for Transport. I consider this latter point further below.

3.3.4. At para. 4.18 (NSC/W1/1 Folley, June 2021), he then seems to suggest that Bristol Airport will be more affected than other airports by the upskilling issue he describes because of the leisure focussed nature of its route network. It is profoundly unclear why this should be the case and Mr Folley presents no explanation.

3.3.5. Mr Folley moves on to suggest at para. 4.19 (NSC/W1/1 Folley, June 2021) that the elasticities for business travel developed by the Department for Transport may not be appropriate for forecasting post COVID-19 and the UK's withdrawal from the European Union, based on his flawed arguments set out above. I would contend that Mr Folley has been shown to have no basis for his position. I would make four comments in relation to the Department for Transport's elasticities:

- I would point out that the relationship between past trends in business and leisure travel has no bearing on the elasticity for business travel. It is entirely independent. As previously stated, the elasticity for business travel demand measures its reactivity to economic growth and the cost of flying;
- the Department for Transport's assessment is based on data collected over a significant period of time, 1984 to 2008. During that time there have been multiple recessions, multiple booms, substantial changes in the way we do business and particularly in relation to communication technologies. The analysis has been peer reviewed and extensively tested. It is by some margin the most comprehensive study of air transport demand elasticities available. Mr Folley gives no adequate justification for why he believes that the Department for Transport elasticities identified are not appropriate and on this I think he is simply wrong;
- the Department's elasticities and those used for the Appeal Proposal forecasts include market maturity assumptions that reduce the income elasticities over time, thereby making demand less reactive to economic growth. This reflects the maturity of individual markets, attitudinal change, changes in personal and business habits and the rise of new technologies. These issues appear to be

precisely those about which Mr Folley is concerned. I would note in this context that this is also relevant to Mr Devas's comments as regards accounting for attitudinal change at Section 5.3 of his Proof (XR/W3/1 Devas, June 2021);

- in relation to Mr Folley's point at para. 4.1.8 (NSC/W1/1 Folley, June 2021) and the leisure focussed route network at Bristol Airport, I would point out that the nature of the route network has no bearing on business travellers' elasticity of demand. The extent of demand for travel comes from economic growth and the cost of travel. The availability or otherwise of leisure destinations is not relevant.

3.3.6. I conclude on this basis that Mr Folley's comments are misplaced and that the elasticities used in our analysis remain appropriate.

3.4. Route Development in the Short Term to Support Business Demand

3.4.1. At para. 4.28 (NSC/W1/1 Folley, June 2021), Mr Folley seeks to suggest that the Appeal Proposal forecasts do not demonstrate how future business passenger growth will be supported by new route development. I have already considered this issue in my Proof of Evidence at paras. 4.9.11 to 4.9.12 (BAL/1/2 Brass, June 2021), noting that the next few years will be about building back the route network and that genuinely 'new' routes are likely to be limited in number over that period and that the forecasts over the longer term do not focus on individual routes but the nature of demand. I note that this is standard practice in air traffic forecasting.

3.4.2. However, at para. 4.9.12 of my Proof (BAL/1/2 Brass, June 2021) I do highlight the new Lufthansa Frankfurt route from Bristol Airport as an example of the type of route that will enable business passenger growth at the airport in the future. Below, in Table 2 I have set out the percentage of business passengers travelling on similar Frankfurt services from other airports in the UK to further illustrate the potential of such routes to support business traffic. All these services have business passenger percentages significantly above the general business passenger percentage at Bristol Airport in 2019 of 13.8%. I would also note the comment in the Bristol Post article on the original route announcement in 2019, which highlights that Lufthansa intends to focus on the business market in the region⁴.

⁴ <https://www.bristolpost.co.uk/whats-on/whats-on-news/bristol-airport-lufthansa-uk-flights-3482178>. Appendix A, para. 8.6.

Table 2: % of Business Passengers on Frankfurt Routes at Other Regional Airports

Birmingham (2019)	52%
Manchester (2019)	46%
Edinburgh (2018)	21%
Glasgow (2018)	19%

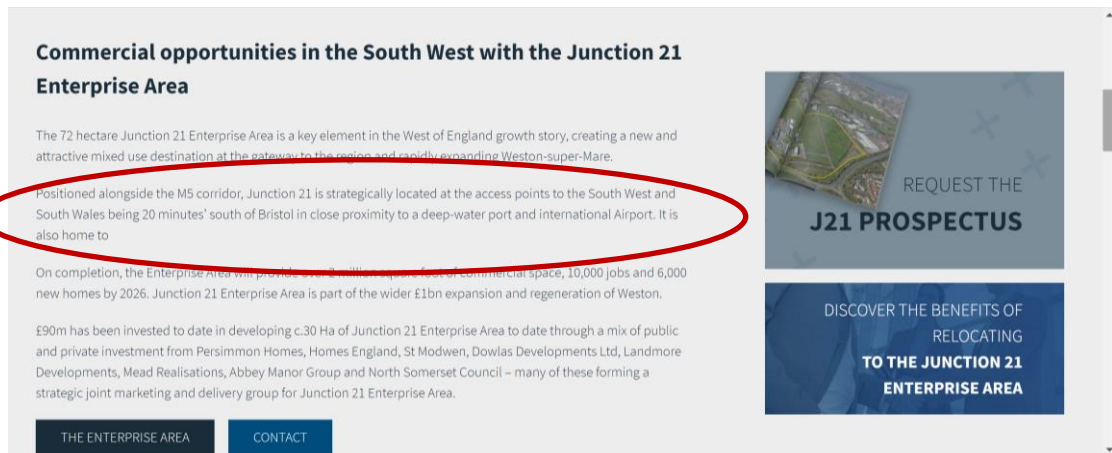
Source: CAA Passenger Surveys.

3.4.3. With so many core leisure routes already served from Bristol, it is reasonable to assume that network development over the period to 2030 would include more hub or city destinations, such as the Lufthansa/Frankfurt service, which would be likely to attract higher percentages of business users and could lead to clawback from other airports (i.e. existing business passengers will switch back to using Bristol as services are launched which would meet their needs). Clearly any route which has a higher percentage of business travellers than the airport's average would help underpin the projected levels of business users within our forecasts. Clawback related to route development is a widely accepted process for regional airports as they grow. In this context, I would note that the continued capacity constraints at Heathrow, the UK's principal hub airport, mean that it is likely that European hub carriers, such as Lufthansa, KLM, Air France and Turkish Airlines, may seek to extend or enhance their presence at UK regional airports, such as Bristol Airport, providing significant breadth of connectivity to support business travel.

3.5. North Somerset Council's Expectations of Future Business Travel Growth at Bristol Airport

3.5.1. In the context of the future growth of business travel at Bristol Airport, I would also note the marketing material for the North Somerset Council Junction 21 Enterprise Area development, about which Mr Siraut in his proof of evidence on socio-economics makes considerable comment (NSC/W5/1 Siraut, 2021, pp. 43 para. 7.2.4-7.2.5).

Figure 2: Screenshot of Junction 21 Enterprise Area Website – Homepage

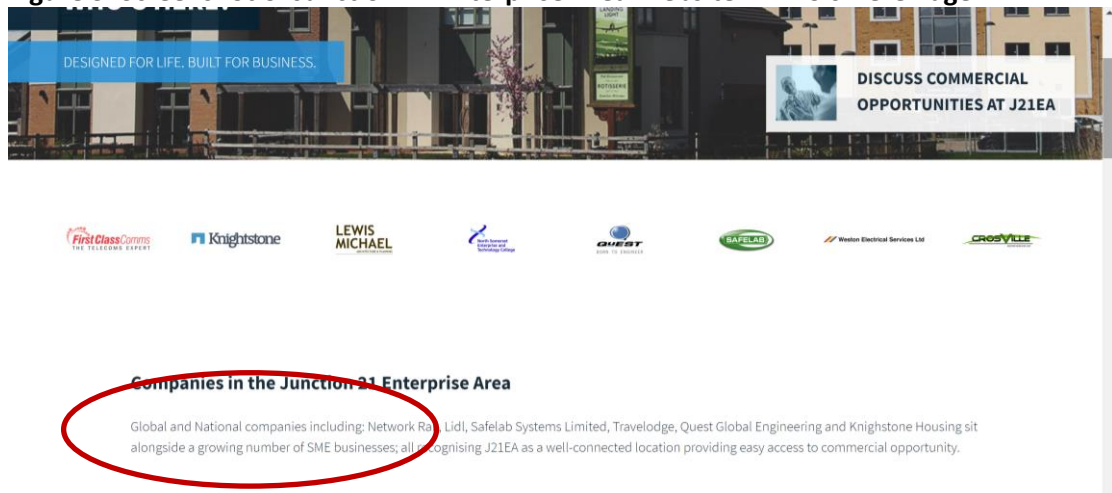


Source: J21 Enterprise Area Website. <http://www.j21.co.uk/>. [Accessed: 3 July 2021].

3.5.2. I note the highlighting of Bristol Airport's role in providing international connectivity for new businesses locating at this key development in North Somerset. This clearly indicates that North Somerset Council expect Bristol Airport to continue being an important and growing source of international connectivity for North Somerset in the future. Indeed, it is relying on it to help attract businesses to locate at Junction 21.

3.5.3. I also note the commentary in relation to some the key customers, as can be seen in Figure 3, highlighting its focus on global and national companies. These are just the type of companies that will drive future business related air travel demand.

Figure 3: Screenshot of Junction 21 Enterprise Area Website – Who's Here Page



Source: J21 Enterprise Area Website. <http://www.j21.co.uk/>. [Accessed: 3 July 2021].

3.6. Conclusions

3.6.1. I have presented a range of additional evidence in support of the Appeal Proposal business passenger forecasts in response to points made by Mr Folley. This evidence

adds to that already presented in my Proof of Evidence (BAL/1/2 Brass, June 2021). I have demonstrated that Mr Folley's analysis of past trends is inappropriate and results in a profoundly inaccurate characterisation of growth at Bristol Airport in the last decade or so. I have identified why Mr Folley's conclusions in relation to the Department for Transport's elasticities are misguided and, finally, I have provided further evidence on the potential for an already secured new route at Bristol Airport to support business demand growth as an example of how the airport might grow.

3.6.2. I also note that at no point does Mr Folley suggest that he does not believe that there will be any growth in business travel as a result of the Appeal Proposal. He merely states that he believes that insufficient evidence has been provided to support the air traffic forecasts. While I completely reject Mr Folley's position in relation to the evidence base, the lack of a statement that he believes that there will be no business demand growth is important in the context of Mr Siraut's evidence on socio-economics and hence I highlight it here. I explain the implications for Mr Siraut's position in my Rebuttal Proof on socio-economics (BAL/5/3 Brass, July 2021).

4. Influence of Jet2 on Fleet Mix

4.1. Introduction

4.1.1. At a number of points in his Proof of Evidence (NSC/W1/1 Folley, June 2021), Mr Folley suggests that the announcement of Jet2's new base at Bristol Airport after the completion of the Appeal Forecasts means that some of the forecast outputs that feed into the environmental assessment are inappropriate. Mr Folley mentions this issue in the context of:

- the Busy Day Timetables developed;
- the number of night movements;
- the assessed fleet mix.

4.1.2. I have already responded to issues around Jet2's arrival at Bristol Airport in my Proof of Evidence at Section 4.12 (BAL/1/2 Brass, June 2021). I do not repeat this evidence here but do conclude that Mr Folley's statements in his Proof of Evidence do not change my conclusion that the indicative fleet mix developed from the air traffic forecasts was appropriate and remains so. I would also highlight again the point made in my Proof of Evidence that the issue is in many ways moot given the likely conditions associated with the granting of the Appeal Proposal.

4.1.3. At the outset, I note that Mr Folley's Table 1 on page 5 (NSC/W1/1 Folley, June 2021), confirms the view that the two dominant airlines at Bristol Airport will be operating a very high proportion of new generation aircraft by the timeframe in which Bristol Airport is expected to reach 12 mppa. This is entirely consistent with the Appeal Proposal fleet mix. I would note that the Appeal Proposal forecast still has 27% of movements operated by current generation aircraft in 2030. I would also note again that the point made above in Section 2 that risks in relation the speed of demand growth are generally considered to be towards the downside, very much limiting the risk in terms of potential environmental impacts being different from the Core Case.

4.1.4. In relation to Mr Folley's comments, I would make the following comments:

- at para. 5.9 on Page 16 (NSC/W1/1 Folley, June 2021), Mr Folley suggests that Jet2 commencing services at Bristol Airport to alter the busy day timetable for the airport but he provides no evidence as to why this might be the case. The fundamental behaviour of airlines, as determined by the preference of passengers, their operating models and the runway and terminal capacity of the

airport, will not change if Jet2 flies demand rather than another low fares or charter airline. Future growth was always assumed to be driven largely by airlines and aircraft based at the Airport, and their pattern of operation, departing first thing in the morning and then returning during the day before finally returning in the evening/night period is consistent whether that is Jet2 or the other carriers with aircraft based at Bristol Airport. There is therefore a high degree of interchangeability between airlines. The fundamental diurnal pattern will not alter significantly. It is, therefore, unclear why Mr Folley feels the busy day timetables will change significantly;

- the same point applies in relation to Mr Folley's comments around the number of night movements at para. 6.4 (NSC/W1/1 Folley, June 2021). Again, he provides no evidence as to why Jet2 should make a difference. Based on the standard operating patterns of based aircraft (regardless of airline) increases in night movement are already projected within the busy day timetable and are interchangeable between airlines
- at para. 7.6 and in Figure 1 (NSC/W1/1 Folley, June 2021), Mr Folley sets out evidence that Jet2's fleet is older than that of easyJet and Ryanair. I would note firstly that the Appeal Proposal fleet mix includes 27% of operations by current generation aircraft, such as those operated by Jet2. Secondly, I would note that this merely serves to demonstrate that the incentives on Jet2 to refleet given the potential cost pressures from the UK emissions trading scheme and international aviation's inclusion within the sixth carbon budget, one of the main purposes of which is to stimulate investment in newer aircraft and in new technologies.

4.1.5. I also note that Mr Folley has put forward an alternative fleet mix at 2030 in his Proof of Evidence at paras. 7.8 to 7.11 (NSC/W1/1 Folley, June 2021). I have a number of comments in relation to this, which I have set out below.

4.2. Comments on Alternative Fleet Mix

4.2.1. Mr Folley's alternative fleet mix is set out in Table 3 on page 20 of his Proof (NSC/W1/1 Folley, June 2021). In my view the fleet mix set out is significantly flawed. It is not logical and does not reflect discussions with airlines, what happens at Bristol today or indeed what is likely to occur at a regional airport such as Bristol in the future. In particular, this alternative fleet mix appears to heavily favour older

generation aircraft, many of which would be anticipated to be retired over the next 9 years to 2030. I think there are a number of implausible features of Mr Folley's suggested fleet mix:

- Mr Folley has assumed Boeing-767-400ER aircraft at Bristol Airport In his 12mppa fleet mix: Only two airlines (United Airlines and Delta Airlines in the United States) operate this old aircraft type globally and these airlines would be unlikely to launch services at Bristol with an aircraft of this size (if at all). The average age of these aircraft is already over 20 years and, as even the youngest of these aircraft is over 19 years old, by 2030 it is likely that these aircraft will be at the end of their operational lives serving passengers and would not be credible to include in a fleet mix at that time. Furthermore, these aircraft have relatively poor runway performance and would struggle to operate off the runway at Bristol. The aircraft would suffer from weight restrictions and airlines would have to fly the aircraft with fewer passengers, less freight (if offering bellyhold freight services) or less fuel, thereby limiting range and the destinations that could be offered and negating any advantages that such larger aircraft would offer. This would make any services disproportionately costly and uneconomic to operate. This suggests that insufficient thought has been given to the credibility of this type in the fleet mix. It is unclear why they have been included;
- Mr Folley has included Boeing-777 operations: For smaller regional airports in the UK by 2030 it is likely that these would be replaced by newer generation aircraft, such as the Boeing-787. As with the Boeing 767, these Boeing-777 aircraft would likely be heavily restricted by the runway length at Bristol, (necessitating reduced passenger loads, less freight or less fuel), unlike new generation aircraft, which have more scope from shorter regional runways;
- Mr Folley's assumption around which airlines will operate the Boeing-737-800 (current generation) within his projections are unclear, but appear to be based on being operated by Jet2: However, based on typical operating patterns for the airline and for low fares operations at Bristol, the 13,781 projected movements would equate to approximately 12 such aircraft being based at the airport, which is a significant increase from Jet2's own submission to the

Inquiry⁵ which envisages just 1.3 million seats by 2027 which, with 189 seats on each aircraft only amounts to 6,878 annual movements. Even allowing for further growth by 2030, there would be little scope for this figure more than doubling to the figures proposed by Mr Folley given that other airlines are likely to have also grown at the airport over that timeframe;

- Mr Folley has not assumed any E195-E2 aircraft, despite this being the aircraft most likely to replace KLM's E-190 at BRS (and the assumption made within the Appeal Proposal forecast outputs): It appears Mr Folley may have assumed that KLM switches to Boeing 737-700s, but KLM announced in 2019 that they were retiring these aircraft so this is not a safe assumption⁶;
- Furthermore, it is not clear what Mr Folley has assumed in relation to the new Lufthansa operations at Bristol Airport, an announcement that he would have been aware of when preparing his fleet⁷: The airline is launching its Frankfurt services with the Embraer 190 aircraft⁸, and the inclusion of only 599 movements annually for this type equates to only 1.6 movements per day. Whilst the service is launching at low frequency initially due to COVID, it is anticipated that this will increase to daily and above over time, as was originally planned when the route was announced in 2019⁹.

4.2.2. Furthermore, I would note that Mr Folley's alternative fleet mix is not actually consistent with a 12 mppa passenger throughput. Table 3 shows that, taking standard assumptions for seat capacity and load factors, Mr Folley's fleet mix actually represents a 12.3 mppa throughput rather than 12.0 mppa. In other words, there are more movements than is necessary to be consistent with BAL's proposed 12.0 mppa passenger cap. Furthermore, it is not clear that Mr Folley's fleet mix is actually consistent with the air noise contour cap being proposed by BAL and he does not suggest that it is. It should also be pointed out that as Mr Folley's fleet mix has substantially too much seat capacity for 12 mppa, it would simply not be delivered by

⁵ Letter from Steve Heapy to Ms L Palmer, dated 12th February 2021. See Appendix A, para. 8.3.

⁶ <https://aeronauticsonline.com/klm-phasing-out-the-boeing-737-700/>. See Appendix A, para. 8.4

⁷ <https://www.bristolairport.co.uk/about-us/news-and-media/news-and-media-centre/2021/2/lufthansa-announces-daily-service-from-bristol-to-frankfurt-and-beyond>. See Appendix A, 8.5.

⁸ See Appendix A, 8.6

⁹ <https://www.bristolpost.co.uk/whats-on/whats-on-news/bristol-airport-lufthansa-uk-flights-3482178>. See Appendix A, para. 8.7.

airlines as it would require them to operate at load factors below their usual targets, which would be uneconomic for them.

- 4.2.3. Ultimately, the result is that Mr Folley has produced a fleet mix that is unrealistically biased towards older generation aircraft which are unrepresentative of the known fleet replacements for many airlines operating at Bristol presently or which could launch services over the next 9 years.

Table 3: Analysis of Fleet Mix Passenger Throughput Potential at Bristol Airport in 2030

Aircraft Type	Appeal Proposal Movements	Mr Folley Fleet Movements	Typical Seats	Assumed Load Factor	Appeal Proposal Passenger Throughput	Mr Folley Fleet Passengers	Seat Assumption
Short Haul Fleet							
Airbus A320	6,540	2,828	186	89%	1.1	0.5	
Airbus A320Neo	20,200	24,538	186	89%	3.3	4.1	
Airbus A321Neo	15,720	9,887	235	89%	3.3	2.1	
Boeing-737-700	750	2,397	142	80%	0.1	0.3	KLM Seating to UK Regional Airports from OAG for 2019
Boeing-737-800	2,380	13,781	189	89%	0.4	2.3	
Boeing-737 Max-8	14,360	11,684	193	89%	2.5	2.0	Between 189 seats (Tui type) and 197 seats (Ryanair type)
Boeing-737 Max-10	2,050	2,097	220	89%	0.4	0.4	
Embraer 190	2,240	599	100	80%	0.2	0.0	
Embraer 195-E2	2,240	0	132	80%	0.2	0.0	
Regional Fleet							
ATR-72	8,360	5,225	68	70%	0.4	0.2	
Embraer RJ145	0	1,115	50	70%	0.0	0.0	
Long Haul Fleet							
Boeing-767-400ER	0	300	246	89%	0.0	0.1	Delta Airlines Configuration
Boeing-777-200ER	0	300	354	89%	0.0	0.1	Qatar Q-Suite Configuration
Boeing-787-8	510	599	288	89%	0.1	0.2	
Total Annual Passengers					12.0	12.3	

- 4.2.4. In Table 4 below, I have compared the proportion of current generation aircraft to new generation aircraft in the Appeal Proposal Fleet Mix and in Mr Folley's fleet mix. In many ways, it is this split that is the defining feature of the fleet mix in terms of the environmental assessments rather than the individual aircraft types. I have then also presented a version of this analysis which corrects for the highlighted unrealistic

assumptions in Mr Folley's fleet mix. This demonstrates that, once the unrealistic assumptions are removed from Mr Folley's assessment, there is in reality a limited difference between the two. An expanded version of Table 4, similar to Table 3, is included in Appendix B for reference.

Table 4: Comparison of Current and New Generation Aircraft Movements by Fleet Mix

	Appeal Proposal	Mr Folley Fleet Mix	Corrected Mr Folley Fleet Mix
Current Generation	20,270	26,545	22,448
New Generation	55,080	48,805	52,902
New Generation %	73%	65%	70%

4.3. Conclusion

4.3.1. Having considered the evidence put forward by Mr Folley in his Proof of Evidence, I continue to conclude that the indicative fleet mix developed from the air traffic forecasts was appropriate and remains so. The alternative fleet mix put forward by Mr Folley is simply not credible and, ultimately, delivers more than the proposed 12 mppa passenger cap and, as such, is not consistent with the 12 mppa passenger restriction.

5. Impacts of Mr Folley's Proof to Other Areas

5.1.1. In Section 8 of his Proof (NSC/W1/1 Folley, June 2021), Mr Folley seeks to articulate what his evidence means for other areas of the assessment. Above, I have demonstrated that Mr Folley's analysis is profoundly flawed and misleading in a range of areas. As a consequence, I reject his conclusions in relation to the impact on other areas of the assessment in their entirety. However, for the avoidance of doubt, I comment on each area below.

5.2. Noise

5.2.1. At para. 8.2 to 8.4 on page 21 of his Proof (NSC/W1/1 Folley, June 2021), Mr Folley seeks to suggest that the Jet2 announcement of a base at Bristol Airport will result in older, noisier aircraft operating at Bristol Airport in the future. As I have discussed above, Mr Folley has presented no adequate evidence to support his claims. Furthermore, he has presented a possible future fleet mix to reflect Jet2 which is entirely implausible and over-specified in terms of seat capacity. When corrected, there is little difference between Mr Folley's fleet mix and the Appeal Proposal fleet mix in terms of the mix of current and new generation aircraft. I would also highlight again that the issue is largely moot as approval is likely to include conditions that effectively secure a fleet mix no noisier than that set out in the Appeal Proposal.

5.3. Air Quality

5.3.1. At para. 8.5 to 8.6 on page 22 of his Proof (NSC/W1/1 Folley, June 2021), Mr Folley makes the same argument in relation to Jet2 in relation to air quality. My response would be the same. Mr Folley has presented no adequate evidence to support his claims and his alternative fleet mix is implausible and over-specified in terms of seat capacity in terms of the mix of current and new generation aircraft. Again, I would also highlight again that the issue is largely moot as approval is likely to include conditions that effectively secure a fleet mix no 'dirtier' than that set out in the Appeal Proposal.

5.4. Economy

5.4.1. At para. 8.5 to 8.6 on page 22 of his Proof (NSC/W1/1 Folley, June 2021), Mr Folley seeks to suggest that the Appeal Proposal forecasts of business passenger demand are overstated. Mr Folley's analysis in this regard is flawed and misleading. Furthermore,

he provides no relevant evidence to support his claim that Department for Transport's passenger demand elasticities are no longer suitable post-COVID and post-BREXIT. I, therefore, reject Mr Folley's contention that there are implications for the assessed economic impacts of the Appeal Proposal. I would, however, note again that there are significant implications for Mr Siraut's evidence from Mr Folley's flawed analysis and position in relation to business travel.

6. Other Comments

6.1. Introduction

6.1.1. In this Section, I briefly comment on a number of other more minor issues that are raised in Mr Folley's and Mr Devas's proofs. Again, these are, in the main, not new issues and I have already presented evidence on these issues in some cases in my Proof of Evidence (BAL/1/2 Brass, June 2021). They do, however, warrant further brief comment given the evidence now presented.

6.2. Underlying Assumptions on Economic Growth and Cost of Air Travel

6.2.1. I think it is important to note that Mr Folley has not challenged the assumptions that underpin the market growth rates within the forecasts. He has not questioned future economic growth, carbon price assumptions, fuel price assumptions or assumptions around air passenger duty rates.

6.3. Sensitivity Testing

6.3.1. At a number of points in his proof (NSC/W1/1 Folley, June 2021), for instance at para. 7.3, Mr Folley expresses concerns about the lack of quantitative sensitivity testing in relation to the forecast outputs, and particularly the lack of quantified outputs to support environmental assessment in relation to the Faster Growth and Slower Growth cases. I have previously explained the rationale around undertaking qualitative sensitivity tests within my Proof of Evidence, noting that the forecast outputs to support the environmental assessment are largely insensitive to the speed of passenger growth at the airport. As a result, there was little merit in undertaking further quantified assessment. This is discussed at para. 3.4.8 of my Proof (BAL/1/2 Brass, June 2021). In this context, I would reiterate again the findings from the recent Stansted Appeal Decision:

"It remained unclear throughout the Inquiry, despite extensive evidence, why the speed of growth should matter in considering the appeal. If it ultimately takes the airport longer than expected to reach anticipated levels of growth, then the corresponding environmental effects would also take longer to materialise or may reduce due to advances in technology that might occur in the meantime." (CD6.13 The Planning Inspectorate, May 2021, p. 6 para 30)

6.3.2. I would also note Mr Folley's comments at this point at para. 4.11 of his Proof (NSC/W1/1 Folley, June 2021) that he feels that Faster Growth is less likely than Core Case growth. This would suggest that the increased passage of time associated with the Core Case would mean that the fleet at Bristol Airport will have more time to see more new generation aircraft enter the fleet, thereby reducing environmental effects in most instances at the point 12 mppa is reached. It should also be noted though that a quantified, noisier fleet mix was assessed at part of the original Environmental Statement within the noise chapter (CD2.5.16 Wood plc).

6.4. BREXIT and Migrant Labour Effects on the Forecast

6.4.1. At para. 4.10 (NSC/W1/1 Folley, June 2021), Mr Folley suggests that the short-term 'bottom up' forecasts should have taken specific account of the potential impacts of the UK's exit from the EU on the migrant labour market at Bristol Airport. I would make two main points in relation to this statement:

- as I have set out in My Proof, the short term forecasts are of limited relevance to the environmental assessment (see Section 2.6 of my Proof (BAL/1/2 Brass, June 2021)) and as such considerations of this very specific nature are of limited relevance; and
- as Mr Folley himself points out, the Eastern European market, which is central to the migrant labour market, is a small part of Bristol Airport's passenger demand. I do not consider that marginal effects in a relatively small market are likely to have a significant effect on the market over the medium to long term.

6.4.2. Overall, I do not consider any potential effect of the UK's exit from the EU on the migrant labour market to be a significant forecast issue. I consider the effect of the UK's exit from the EU to be reflected in long run economic growth forecasts and that it is therefore effectively dealt with in the forecasts. I would also note the recent press reports that around 5.6 million EU nationals have applied for settled status in the UK, clearly demonstrating that the UK remains a popular destination to come and live and work, which will continue to generate visiting friends and relations related travel¹⁰.

6.5. GDP as a Driver of Growth

¹⁰ <https://www.bbc.co.uk/news/uk-57656608>. Appendix A, 8.8

6.5.1. I note Mr Devas's comment at para. 5.2.1 (XR/W3/1 Devas, June 2021) that GDP is a poor predictor of future traffic growth. It should be pointed out that GDP or other measures of economic growth are generally considered to be the strongest predictors of air transport growth. I have discussed in some detail the fundamental drivers of air transport demand in my Proof of Evidence at Section 2.2 (BAL/1/2 Brass, June 2021). I note particularly the Department for Transport's position in relation to this issue, as discussed at para. 2.2.3 of my Proof (BAL/1/2 Brass, June 2021), which clearly identifies the link between economic growth and air transport demand. In relation to the article cited by Mr Devas, this article does not consider the link between economic growth and air transport demand. It is an assessment of low cost carrier penetration in different markets around the world. It is simply not relevant to the point being made.

6.6. Confidentiality of Airline Interviews

6.6.1. I note Mr Folley's comment at 4.22 on page 11 of his Proof (NSC/W1/1 Folley, June 2021) as regards the confidentiality of discussions with airlines at Bristol Airport. I would point out that non-disclosure agreements are common practice in relation to such discussions to protect airlines' commercial interests. I would also note that Mr Folley works for a major global consultancy with large aviation department. I would suggest it is reasonable to assume that he would have access to contacts at easyJet, Ryanair and Tui and could have had his own discussions.

6.7. Comments in Relation to the Logit Model

6.7.1. I note Mr Folley's comments in relation to the information provided in relation to the Logit model (see para. 4.32 (NSC/W1/1 Folley, June 2021)). I would note that discussions have been held between York Aviation and members of Mr Folley's team as regards the variables that are used within the model. I remain unclear as to exactly what information Mr Folley is looking for in this regard. I would, however, also note that Mr Folley does not suggest that the use of a such a model is inappropriate, merely that he is not clear as to its exact structure. I would also note that at para. 4.31 (NSC/W1/1 Folley, June 2021) Mr Folley has indeed listed the variables used.

7. Conclusions

7.1.1. In this Rebuttal Proof, I have provided further evidence in relation to a number of issues raised by Mr Folley and Mr Devas:

- I have explained why uncertainty in this case is more limited than is often the case in air traffic forecasts. The passenger throughput for the Appeal Proposal is known, it is 12 mppa. It is only the broad timeframe over which this threshold will be reached that is at issue. I also note that the balance of risk is towards slower growth, which limits potential risks in terms of environmental impacts;
- I have provided further evidence in relation to the appropriateness of the Appeal Proposal forecasts in relation to business passenger demand. I have identified that Mr Folley's analysis of previous trends is badly flawed and misleading. I have demonstrated that elasticities identified by the Department for Transport remain relevant and appropriate and presented further evidence in relation to the potential for new routes to drive business demand. I have identified that Mr Folley has presented no relevant evidence to suggest that the future forecast growth rates are not appropriate;
- I have demonstrated that the assessed fleet mix remains robust and accurate, even following the Jet2 announcement. I have also shown that Mr Folley's alternative fleet mix is not credible and that, if obvious flaws in the logic are corrected, there is only a limited difference between the Appeal Proposal and Mr Folley's assessment;
- I have rejected Mr Folley's suggestion that his evidence affects the noise, air quality and economy assessments;
- I have made further comment in relation to sensitivity testing, the potential impact of the UK's exit from the EU on migrant labour, and on Mr Devas's comment around the validity of GDP as a driver of demand. In each case, I have demonstrated that issues raised do not impact on the Appeal Proposal forecasts. I have also noted that there is no challenge to the economic growth and cost of travel assumptions that underlie the forecast and that confidentiality in discussions with airlines is common practice.

8. Appendix A: Document Extracts

8.1. CAA Passenger Survey Report 2000, page 20

Table 4
Characteristics of terminating passengers at the 2000 survey airports.

Airport	International Business				International Leisure				Domestic Business				Domestic Leisure				Total	
	UK 000's	%	Foreign 000's	%	UK 000's	%	Foreign 000's	%	UK 000's	%	Foreign 000's	%	UK 000's	%	Foreign 000's	%	000's	%
Bournemouth	7	2.7	5	1.9	223	87.0	16	6.3	0	0.0	0	0.0	6	2.2	0	0.0	256	100.0
Bristol	162	7.8	96	4.6	1309	62.9	114	5.5	239	11.5	6	0.3	153	7.3	3	0.2	2082	100.0
Cardiff	95	6.2	59	3.9	1204	79.3	60	4.0	45	2.9	2	0.2	53	3.5	2	0.1	1519	100.0
London City	375	24.8	434	28.7	192	12.7	229	15.1	167	11.0	6	0.4	102	6.7	9	0.6	1514	100.0
Exeter	2	0.8	1	0.2	179	60.3	6	2.1	37	12.5	2	0.6	68	22.9	2	0.6	297	100.0
Gatwick	1676	6.8	1613	6.6	15685	64.0	3795	15.5	796	3.2	38	0.2	841	3.4	65	0.3	24510	100.0
Heathrow	7927	17.7	7613	17.0	13656	30.5	10973	24.5	2829	6.3	190	0.4	1365	3.1	152	0.3	44706	100.0
Luton	522	9.0	151	2.6	2866	49.5	641	11.1	769	13.3	13	0.2	798	13.8	29	0.5	5789	100.0
Manchester	1289	7.7	762	4.5	10957	65.1	1230	7.3	1228	7.3	173	1.0	981	5.8	203	1.2	16822	100.0
Southampton	75	8.9	49	5.8	106	12.6	30	3.5	283	33.5	5	0.6	288	34.1	8	0.9	843	100.0
Stansted	1506	13.7	663	6.0	5732	52.0	2247	20.4	350	3.2	20	0.2	469	4.3	32	0.3	11019	100.0
Total	13636	12.5	11446	10.5	52111	47.7	19341	17.7	6742	6.2	455	0.4	5123	4.7	506	0.5	109359	100

8.2. Low Cost Bubble Supporting Data and Extracts from Corporate Documents

Year	Ryanair			EasyJet Passengers (millions)		
	Ryanair Passengers (millions)	Growth	Ryanair Index (2000 = 100)	EasyJet Passengers (millions)	Growth	EasyJet Index (2000 = 100)
2000	5.5		100	5.6		100
2001	7.4	35%	135	7.1	26%	126
2002	11.1	50%	185	11.4	61%	187
2003	15.7	41%	226	20.3	78%	265
2004	23.1	47%	273	24.3	20%	284
2005	27.6	19%	293	29.6	22%	306
2006	34.8	26%	319	33.0	11%	318
2007	45.5	31%	349	37.2	13%	330
2008	50.9	12%	361	43.7	17%	348
2009	58.6	15%	376	45.2	3%	351
2010	66.5	14%	390	48.8	8%	359
2011	72.1	8%	398	54.5	12%	371
2012	75.8	5%	403	58.4	7%	378
2013	79.3	5%	408	60.8	4%	382
2014	81.7	3%	411	64.8	7%	389
2015	90.6	11%	422	68.6	6%	395
2016	106.4	17%	439	73.1	7%	401
2017	120.0	13%	452	80.2	10%	411
2018	130.3	9%	461	88.5	10%	421
2019	142.1	9%	470	96.1	9%	430

Sources: Ryanair

- Passengers 2015-2019: 2019 Form 20K Annual Report, pg 6

Operating Data:	Fiscal Year Ended March 31,				
	2019	2018	2017	2016	2015
Operating Margin	13%	23%	23%	22%	18%
Break-even Load Factor	83%	73%	73%	72%	72%
Average Booked Passenger Fare (€)	37.03	39.40	40.58	46.67	47.05
Ancillary Rev. per Booked Passenger (€)	17.15	15.48	14.83	14.74	15.39
Total Rev. per Booked Passenger (€)	54.17	54.88	55.41	61.41	62.44
Cost Per Booked Passenger (€)	47.02	42.08	42.62	47.69	50.92
Average Fuel Cost per U.S. Gallon (€)	1.79	1.65	1.83	2.21	2.34

Other Data:	Fiscal Year Ended March 31,				
	2019	2018	2017	2016	2015
Revenue Passengers Booked (millions)	142.1	130.3	120.0	106.4	90.6
Booked Passenger Load Factor	96%	95%	94%	93%	88%
Average Sector Length (miles)	774	775	770	762	776
Sectors Flown	789,771	725,044	675,482	609,501	545,034
Number of Airports Served at Period End	219	216	207	200	189
Average Daily Flight Hour Utilization (hours)	9.02	9.13	9.33	9.36	9.03
Team Members at Period End	16,840	14,583	13,026	11,458	9,394
Team Members per Aircraft at Period End	36	34	34	34	31

<https://investor.ryanair.com/wp-content/uploads/2019/07/Ryanair-2019-20-F.pdf>

- Passengers 2010-2014: 2014 Form 20K Annual Report, pg 6

Other Data:	Fiscal Year ended March 31,				
	2014	2013	2012	2011	2010
Revenue Passengers Booked...	81,668,285	79,256,253	75,814,551	72,062,659	66,503,999
Revenue Passenger Miles.....	64,470,425,471	59,865,600,628	58,584,451,085	53,256,894,035	44,841,072,500
Available Seat Miles	77,916,511,414	72,829,956,243	71,139,686,423	63,358,255,401	53,469,635,740
Booked Passenger Load					
Factor.....	83%	82%	82%	83%	82%
Average Length of Passenger					
Haul (miles).....	788	754	771	727	661
Sectors Flown.....	524,765	512,765	489,759	463,460	427,900
Number of Airports Served					
at Period End	186	167	159	158	153
Average Daily Flight Hour					
Utilization (hours)	8.81	8.24	8.47	8.36	8.89
Staff at Period End	8,992	9,137	8,388	8,560	7,168
Staff per Aircraft at Period					
End	30	30	30	31	31
Booked Passengers per Staff					
at Period End	9,082	8,674	9,038	8,418	9,253

<https://investor.ryanair.com/wp-content/uploads/2015/04/2014-Annual-Reports-20F-Statement.pdf>

- Passengers 2009-2012: 2012 Form 20K Annual Report, pg 6

Other Data:	Fiscal Year ended March 31,			
	2012	2011	2010	2009
Revenue Passengers Booked....	75,814,551	72,062,659	66,503,999	58,565,663
Revenue Passenger Miles.....	58,584,451,085	53,256,894,035	44,841,072,500	39,202,293,374
Available Seat Miles	71,139,686,423	63,358,255,401	53,469,635,740	47,102,503,388
Booked Passenger Load				
Factor.....	82%	83%	82%	81%
Average Length of Passenger				
Haul (miles).....	771	727	661	654
Sectors Flown.....	489,759	463,460	427,900	380,915
Number of Airports Served at				
Period End	159	158	153	143
Average Daily Flight Hour				
Utilization (hours)	8.47	8.36	8.89	9.59
Personnel at Period End	8,388	8,560	7,168	6,616
Personnel per Aircraft at				
Period End	30	31	31	36
Booked Passengers per				
Personnel at Period End	9,038	8,418	9,253	8,852

<https://investor.ryanair.com/wp-content/uploads/2015/04/2012-Annual-Reports-20F-Statement.pdf>

- Passengers 2007-2010: 2010 Form 20K Annual Report, pg 38

Other Data:	Fiscal Year ended March 31,			
	2010	2009	2008	2007
Revenue Passengers Booked....	66,503,999	58,565,663	50,931,723	42,509,112
Revenue Passenger Miles.....	44,841,072,500	39,202,293,374	34,452,733,067	26,943,689,231
Available Seat Miles	53,469,635,740	47,102,503,388	41,342,195,458	32,043,022,051
Booked Passenger Load				
Factor.....	82%	81%	82%	82%
Average Length of Passenger				
Haul (miles).....	661	654	662	621
Sectors Flown.....	427,900	380,915	330,598	272,889
Number of Airports Served at				
Period End	153	143	147	123
Average Daily Flight Hour				
Utilization (hours)	8.89	9.59	9.87	9.77
Personnel at Period End	7,168	6,616	5,920	4,462
Personnel per Aircraft at				
Period End	31	36	36	34
Booked Passengers per				
Personnel at Period End	9,253	8,852	8,603	9,527

https://www.ryanair.com/doc/investor/2010/Annual_report_2010_web.pdf

- Passengers 2006-2007: Annual Report 2007, pg

Key Statistics	2007	2006	Change
Scheduled passengers	42.5m	34.8m	+22%
Fleet at period end	133	103	+29%
Average number of employees	3,991	3,063	+30%
Passengers per average no. of employees	10,648	11,361	-6%

<https://www.ryanair.com/doc/investor/2007/070920annualreport.pdf>

- Passengers 2004-2005: ANNUAL REPORT & FINANCIAL STATEMENTS 2005, pg 3

Key Statistics	2005	2004	% Change
Scheduled passengers	27.6m	23.1m	+19%
Number of aircraft operated at period end	87	72	+21%
Average number of employees	2,604	2,288	+14%
Passengers per average no of employees	10,596	10,110	+5%

<https://www.annualreportowl.com/Ryanair/2005/Annual%20Report/Download>

- Passengers 2002-2003: ANNUAL REPORT & FINANCIAL STATEMENTS 2003, pg 3

Key Statistics	2003	2002	% Change
Scheduled booked passengers	15.7m	11.1m	42%
Number of aircraft operated at period end	54	41	32%
Number of employees at period end	1,897	1,531	24%
Passengers per employee at period end	8,296	7,244	15%

<https://www.ryanair.com/doc/investor/2003/2003annualreport.pdf>

- Passengers 2000-2001: ANNUAL REPORT & FINANCIAL STATEMENTS 2001, pg 3

Key Statistics	2001	2000	% Change
Scheduled passengers	7.4	5.5m	35%
Number of aircraft operated at period end	36	26	38%
Number of employees at period end	1,476	1,388	6%
Passengers per employee at period end	5,037	3,963	27%

https://www.ryanair.com/doc/investor/2001/a_report_finance_2001.pdf

Sources: EasyJet

- Passengers 2018-2019: Results for the year ending 30 September 2019, pg 3

	2019	2018	Change Favourable/(adverse)
Capacity (millions of seats)	105.0	95.2	10.3 %
Load factor (%)	91.5	92.9	(1.4) ppts
Passengers (millions)	96.1	88.5	8.6 %
Total revenue (£ million)	6,385	5,898	8.3 %
Headline profit before tax (£ million)	427	578	(26.0) %
Total profit before tax (£ million)	430	445	(3.4) %
Headline basic earnings per share (pence)	88.7	118.3	(25.0) %
Revenue per seat (£)	60.81	61.94	(1.8) %
Constant currency ² revenue per seat (£)	60.28	61.94	(2.7) %
Headline cost per seat (£)	56.74	55.87	(1.5) %
Headline constant currency ² cost per seat excluding fuel (£)	43.11	43.43	0.8 %
Proposed ordinary dividend per share (pence)	43.9	58.6	(25.1) %
Headline return on capital employed (%)	11.4	14.6	(3.2) ppt

<https://corporate.easyjet.com/~media/Files/E/Easyjet/pdf/investors/results-centre/2019/fy19-release.pdf>

- Passengers 2016-2017: Results for the year ending 30 September 2017, pg 28

Key statistics

	2017	2016 (restated)	Increase/ (decrease)
Operating measures			
Seats flown (millions)	86.7	79.9	8.5%
Passengers (millions)	80.2	73.1	9.7%
Load factor	92.6%	91.6%	1.0ppt
Available seat kilometres (ASK) (millions)	95,792	87,724	9.2%
Revenue passenger kilometres (RPK) (millions)	89,685	81,496	10.0%
Average sector length (kilometres)	1,105	1,098	0.6%
Sectors	516,902	482,110	7.2%
Block hours	1,009,572	934,223	8.1%
Number of aircraft owned/leased at end of year	279	257	8.6%
Average number of aircraft owned/leased during year	267.3	248.7	7.5%
Number of aircraft operated at end of year	270	249	8.4%
Average number of aircraft operated during year	253.2	234.6	7.9%
Operated aircraft utilisation (hours per day)	10.9	10.9	0.4%
Owned aircraft utilisation (hours per day)	10.3	10.3	0.8%
Number of routes operated at end of year	862	803	7.3%
Number of airports served at end of year	138	132	4.5%

<https://corporate.easyjet.com/~media/Files/E/Easyjet/pdf/investors/results-centre/2017/fy-2017-rns-results-statement-final.pdf>

- Passengers 2014-2015: Results for the twelve months ended 30 September 2015, pg

Key statistics

Operating measures	2015	2014	Change
Seats flown (millions)	75.0	71.5	4.9%
Passengers (millions)	68.6	64.8	6.0%
Load factor	91.5%	90.6%	+0.9ppt
Available seat kilometres (ASK) (millions)	83,846	79,525	5.4%
Revenue passenger kilometres (RPK) (millions)	77,619	72,933	6.4%
Average sector length (kilometres)	1,118	1,112	0.5%
Sectors	457,479	439,943	4.0%
Block hours	892,052	849,790	5.0%
Number of aircraft owned/leased at end of year	241	226	6.6%
Average number of aircraft owned/leased during year	232.6	220.8	5.3%
Number of aircraft operated at end of year	233	217	7.4%
Average number of aircraft operated during year	221.1	210.8	4.9%
Operated aircraft utilisation (hours per day)	11.1	11.0	0.5%
Owned aircraft utilisation (hours per day)	10.5	10.6	(0.9%)
Number of routes operated at end of year	735	675	8.9%
Number of airports served at end of year	136	135	0.7%

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<https://corporate.easyjet.com/~media/Files/E/Easyjet/pdf/investors/results-centre/2015/2015-full-year-results.pdf>

- Passengers 2012-2013: Results for the year ended 30 September 2013, pg 16

F. KEY STATISTICS

Operational measures	2013	2012	Change
Seats flown (millions)	68.0	65.9	3.3%
Passengers (millions)	60.8	58.4	4.0%
Load factor	89.3%	88.7%	+0.6ppt
Available seat kilometres (ASK) (millions)	74,223	72,182	2.8%
Revenue passenger kilometres (RPK) (millions)	67,573	65,227	3.6%
Average sector length (kilometres)	1,091	1,096	(0.5%)
Sectors	420,311	411,008	2.3%
Block hours	799,480	786,854	1.6%
Number of aircraft owned/leased at end of year	217	214	1.4%
Average number of aircraft owned/leased during year	212.6	206.6	2.9%
Number of aircraft operated at end of year	209	203	3.0%
Average number of aircraft operated during year	199.8	195.7	2.1%
Operated aircraft utilisation (hours per day)	11.0	11.0	(0.2%)
Owned aircraft utilisation (hours per day)	10.3	10.4	(1.0%)
Number of routes operated at end of year	633	605	4.6%
Number of airports served at end of year	138	133	3.8%

<https://corporate.easyjet.com/~media/Files/E/Easyjet/pdf/media/latest-news/2013/fy-2013-en.pdf>

- Passengers 2010-2011: Results for the year ended 30 September 2011, pg 16

F. KEY STATISTICS

Operational measures	2013	2012	Change
Seats flown (millions)	68.0	65.9	3.3%
Passengers (millions)	60.8	58.4	4.0%
Load factor	89.3%	88.7%	+0.6ppt
Available seat kilometres (ASK) (millions)	74,223	72,182	2.8%
Revenue passenger kilometres (RPK) (millions)	67,573	65,227	3.6%
Average sector length (kilometres)	1,091	1,096	(0.5%)
Sectors	420,311	411,008	2.3%
Block hours	799,480	786,854	1.6%
Number of aircraft owned/leased at end of year	217	214	1.4%
Average number of aircraft owned/leased during year	212.6	206.6	2.9%
Number of aircraft operated at end of year	209	203	3.0%
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Number of airports served at end of year	138	133	3.8%

<https://corporate.easyjet.com/~media/Files/E/Easyjet/pdf/media/latest-news/2011/15-November-easyJet-plc.pdf>

- Passengers 2008-2009: Results for the year ended 30 September 2011, pg 11

Operational measures	2009	2008	Change
Seats flown (millions)	52.8	51.9	1.8%
Passengers (millions)	45.2	43.7	3.4%
Load factor	85.5%	84.1%	1.4ppt
Available Seat Kilometres (ASK) (millions)	58,165	55,687	4.4%
Revenue Passenger Kilometres (RPK) (millions)	50,566	47,690	6.0%
Average sector length (kilometres)	1,101	1,073	2.6%
Sectors	337,266	333,017	1.3%
Block hours	645,446	631,084	2.3%
Number of aircraft owned / leased at end of year	181	165	9.7%
Average number of aircraft owned / leased during year	174.1	150.1	16.0%
Number of aircraft operated at end of year	170	161	5.6%
Average number of aircraft operated during year	160.1	145.3	10.2%
Operated aircraft utilisation (hours per day)	11.0	11.9	(6.9)%
Number of routes operated at end of year	422	380	11.1%
Number of airports served at end of year	114	100	14.0%

https://corporate.easyjet.com/~media/Files/E/Easyjet/pdf/investors/results-centre/2009/FINAL-16_11_09.pdf

- Passengers 2006-2007: easyJet plc preliminary results 2007, pg 7

Key performance indicators

Return on equity (headline)	14.3%	10.1%	4.2pp
Return on equity (underlying*)	13.6%	10.1%	3.5pp
Profit before tax per seat (headline), £	4.54	3.32	36.7
Profit before tax per seat (underlying*), £	4.30	3.32	29.5
Revenue per seat, £	40.42	41.66	(3.0)
Cost per seat, £	36.12	38.34	(5.8)
Cost per seat excluding fuel, £	26.55	28.36	(6.4)

Output measures

Seats flown (millions)	44.5	38.9	14.4
Passengers (millions)	37.2	33.0	13.0
Number of aircraft owned/leased at end of period	137	122	12.3
Sectors	287,952	253,548	13.6
Block hours	518,410	454,823	14.0
Number of routes operated at end of period	289	262	10.3
Number of airports served at end of period	77	74	4.1

Other performance measures

Load factor	83.7%	84.8%	(1.1)pp
Operated aircraft utilisation (hours per day)	11.6	11.6	-
Available seat kilometres ("ASK") (millions)	43,501	37,088	17.3
Revenue passenger kilometres ("RPK") (millions)	36,976	31,621	16.9
Average sector length (kilometres)	978	954	2.5

https://corporate.easyjet.com/~media/Files/E/Easyjet/pdf/investors/results-centre/2007/easyjet_press_release_results_ye_2007.pdf

- Passengers 2004-2005: Preliminary results for the 12 months to September 2005, pg

Output measures

Number of aircraft owned/leased at end of year ⁽⁷⁾	109	92	18.5
Average number of aircraft owned/leased during year ⁽⁸⁾	102.6	85.0	20.7
Number of aircraft operated at end of year ⁽⁹⁾	103	90	14.4
Average number of aircraft operated during year ⁽¹⁰⁾	94.0	79.9	17.7
Sectors ⁽¹¹⁾	229,068	192,742	18.8
Block hours ⁽¹²⁾	401,588	328,074	22.4
Number of routes operated at end of year	212	153	38.6
Number of airports served at end of year	64	44	45.5
Passengers (millions) ⁽¹³⁾	29.6	24.3	21.4

8

<https://corporate.easyjet.com/~media/Files/E/Easyjet/pdf/investors/results-centre/2005/2005-preliminary-results.pdf>

- Passengers 2002-2003: 2003 Preliminary Results

Selected consolidated operating data	Year ended 30 September	
(unaudited)	2003	2002
Number of aircraft owned/leased at end of year ⁽¹⁾	74	64
Average number of aircraft owned/leased during year ⁽²⁾	67.8	35.2
Number of aircraft operated at end of year ⁽³⁾	71	63
Average number of aircraft operated during year ⁽⁴⁾	66.0	34.2
Sectors ⁽⁵⁾	162,758	89,939
Block hours ⁽⁶⁾	274,567	142,348
Number of routes operated at end of year	105	83
Number of airports served at end of year	38	35
Owned/leased aircraft utilisation (hours per day) ⁽⁷⁾	11.1	11.1
Operated aircraft utilisation (hours per day) ⁽⁸⁾	11.4	11.4
Available seat kilometres ('ASK')(millions) ⁽⁹⁾	21,024	10,769
Passengers (millions) ⁽¹⁰⁾	20.3	11.4
Load factor ⁽¹¹⁾	84.1%	84.8%
Revenue passenger kilometres ('RPK')(millions) ⁽¹²⁾	17,735	9,218
Average internet sales percentage during the year ⁽¹³⁾	93.8%	90.9%
Internet sales percentage during final month of financial year ⁽¹⁴⁾	96.3%	89.9%
Average sector length (kilometres)	869	804
Average fare ⁽¹⁵⁾	£43.28	£46.37
Revenue per ASK (pence) ⁽¹⁶⁾	4.43	5.12
Cost per ASK (pence) ⁽¹⁷⁾	4.19	4.46

<https://www.investegate.co.uk/easyjet-plc/rns/2003-preliminary-results/200311180700321726S/>

- Passengers 2000-2001: Final Results Full-year 2001

Operational and Financial Review

The following tables set forth certain consolidated operating and profit and loss account data.

Selected Consolidated Operating Data	Year ended 30 September	
	2001	2000
(unaudited)		
Number of aircraft owned/leased at end of year(1)	26	19
Average number of aircraft owned/leased during year(2)	21.7	18.2
Number of aircraft operated at end of year(3)	25	18
Average number of aircraft operated during year(4)	21.1	17.3
Sectors(5)	57,513	46,748
Block hours(6)	92,049	74,631
Number of routes operated at end of year	35	28
Number of airports served at end of year	17	18
Owned/leased aircraft utilisation (hours per day)(7)	11.6	11.2
Operated aircraft utilisation (hours per day)(8)	12.0	11.8
Available seat kilometres ('ASK')(millions)(9)	7,003	5,801
Passengers (10)	7,115,147	5,628,215
Load factor(11)	83.0%	80.8%
Revenue passenger kilometres ('RPK')(millions)(12)	5,903	4,730
Average internet sales percentage during the year(13)	86.5%	65.1%
Internet sales percentage during final month of financial year(14)	91.0%	77.8%

<https://www.investegate.co.uk/easyjet-plc--ezj-/rns/final-results-full-year-2001/200110290700342557M/>

8.3. Jet2 Letter of Support



Holiday House
Ingram Street
Leeds
LS11 9AW
England
Tel: +44 (0)113 238 7444
www.jet2.com

12th February 2021

Ms L Palmer
The Planning Inspectorate
Room 3/J
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Ms Palmer,

RE: APPEAL REFERENCE: APP/D0121/W/20/3259234

We understand that an appeal has been filed against the North Somerset Council's decision to reject Bristol Airports planning application, which includes infrastructure improvements and the ability to increase the passenger limit to 12 million passengers per annum.

In support of the appeal **Jet2.com** would like to submit the following information, relating to our use and growth at the airport. We only announced our intention in 2020, despite the current COVID 19 crisis, to start operations from Bristol this year and improve the range of destinations served from the airport and we plan to expand further over the coming years, to provide our product to our customers from the airport, which we consider the most important gateway in the South West.

We would like to submit the following data to support the appeal:

- After commencing operations in the Summer of 2021, we plan to increase our capacity to 865,000 passengers in 2022, increasing over the following years to 1,300,000 in 2027.
- In 2022 we will offer scheduled service to 36 destinations, serving the leisure market and linking European Cities to Bristol and the South West region.
- This expansion will result in considerable employment in the Bristol area. We anticipate that in 2022 we will directly employ 375 staff and our increase in services will provide further opportunities for other agencies, which we believe is important after the impact on local employment following the COVID19 pandemic. A study by York Aviation Consultancy for Airport Council International Europe (ACI), estimated that 760 local jobs would be created for each additional 1m passengers through the airport.
- Aviation has embraced the need to address climate change and to continue to provide much needed services to other countries develop trade and tourism, which benefits so many communities, including Bristol as an important destination for inbound tourists.

Jet2.com Limited Registered in England No: 02739537 VAT No: GB 355 5672 31
Registered Office: Low Fare Finder House, Leeds Bradford International Airport, Leeds, LS19 7TU
All business is conducted subject to the company's standard terms and conditions.

- **Jet2.com** committed to net zero carbon emissions by 2050 in February 2020, so is aligned with Bristol Airport's climate ambitions, and **Jet2.com** is assessing a suite of options on how we can mitigate our current carbon emissions and increase efficiency, to help us get to net zero sooner than 2050. **Jet2.com** is a highly efficient airline ranked as the 11th most environmentally efficient in Atmosfair index and has an emissions per passenger kilometre figure of 67g (FY19/20), which is amongst the best in Europe. Although both travel and tourism contribute to climate change, they are, and will increasingly be, adversely impacted by it. Tackling climate change is therefore a priority for both airlines and airports.
- Many of our existing customers are having to drive long distances to use our services from Birmingham or London. We therefore believe that by offering flights from your local airport, will considerably reduce car journeys to other airports and therefore reduce the overall carbon emissions from road transport. By working collaboratively with Bristol Airport, **Jet2.com** will endeavour to mitigate environmental impacts on surrounding communities, encouraging measures, which reduces traffic noise and promotes public transport.
- We operate a modern fleet of 737 aircraft, which have low emissions on a seat per passenger kilometre and our aircraft have also been certified by ICAO under Annex 16 as Chapter 4 noise compliant, which keeps the noise levels to a minimum in the local area.

We believe that Bristol is strategically important to serve its local Somerset inhabitants and avoid local communities, some having to travel as far as London to use flights that could be served from Bristol, if the capacity was increased.

As the UK's third largest airline, operating from ten UK airports, we believe it is important to offer our customers a service from their local airport, and our services will offer new routes and better frequencies to much of Europe. We would therefore be happy to provide any further information you may require to support Bristol airport's appeal.

Yours sincerely,



Steve Heapy
Chief Executive Officer
Jet2.com & Jet2holidays

8.4. KLM Retirement of Boeing 737-700

7/3/2021

KLM Phasing Out the Boeing 737-700 – Aeronautics

AERONAUTICS

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KLM Phasing Out the Boeing 737-700



INDUSTRY TALK

MARCH 8, 2019 [by Tim Van Donselaar](#) [D](#) [0](#)

KLM Royal Dutch Airlines, the national carrier of The Netherlands, has started phasing out their Boeing 737-700s. On 1 March, the first Boeing 737-700 (registration PH-BGE) was handed over to Luxair. Next month, the second Boeing 737-700 (PH-BGD) will leave the fleet. This aircraft will also be handed over to Luxair. In the next few years, the remaining 16 Boeing 737-700s will leave the fleet.

KLM Royal Dutch Airlines has a mixed Boeing 737 fleet with Boeing 737-700, Boeing 737-800, and Boeing 737-

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United Airlines has placed its largest order ever, for 270 brand-new Airbus and Boeing aircraft. The airline has also announced major changes to its aircraft cabins which will hopefully bring a better passenger experience.

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<https://aeronauticsonline.com/klm-phasing-out-the-boeing-737-700/>

1/4

900 aircraft. At the moment, the airline has 49 Boeing 737 planes in their fleet.

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Before the end of March, the airline will receive two brand new, bigger Boeing 737-800s from the Boeing Factory in Renton. The Boeing 737-800 can carry 42 passengers more than the smaller Boeing 737-700. Later this year, the Dutch Airline will receive another two Boeing 737-800s.



Photo taken by Tim van Donselaar / Aeronautics Online

KLM Royal Dutch Airlines aims to modernize their fleet. In addition to replacing old 737s, the airline is replacing their Boeing 747-400 fleet with the modern Boeing 787-9 and Boeing 787-10 Dreamliner. At the moment, KLM has already received 13 Boeing 787-9 Dreamliners, while the first Boeing 787-10 Dreamliner will be delivered in July. Meanwhile, KLM's subsidiary, KLM Cityhopper, has modernized their fleet with the Embraer 175+, which replaced the Fokker 70.

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 **KLM Says Goodbye to the Boeing 747**

MARCH 30, 2020

 **Amsterdam Schiphol: An Airport With a Different Design**

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Air France-KLM, the parent company of KLM, will make a decision about the future narrowbody fleet of its major airlines (Air France and KLM) later this year. With an all-Boeing narrowbody fleet, aviation experts expect a future order of multiple Boeing 737 MAX aircraft to replace the current Boeing 737 fleet.

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Featured image by Tim van Donselaar / Aeronautics Online

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AUTHOR: TIM VAN DONSELAAR

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8.5. Bristol Airport Lufthansa February 2021

7/3/2021

Lufthansa announces daily service from Bristol to Frankfurt and beyond | Bristol Airport

Lufthansa announces daily service from Bristol to Frankfurt and beyond

Created: 25th Feb 2021

Lufthansa strengthens its commitment to Bristol Airport today (Thursday 25 February) announcing a daily service from Bristol to Frankfurt will commence from 28 June 2021.

The new route provides business travellers with increased opportunity to trade in one of the world's leading financial centres and opens the door for multiple onward connections for leisure travellers. With a vast, global, multi-hub network fares to Frankfurt start from £104 return (including taxes, fees, carrier charges and carry on baggage) and are available to book now at lufthansa.com.

Frankfurt is renowned for its world-class attractions, including the opera house, Goethe Museum and the Deutsches Film Museum; culture seekers in particular can now take advantage of the convenient new services. This is the first Frankfurt service for Lufthansa from Bristol strengthening the South West's accessibility to Germany.

Announcing the new flight, "Andreas Köster, Senior Director Sales UK, Ireland & Iceland, Lufthansa Group said: "We are looking forward to resuming our Bristol service this upcoming summer and offering our customers great connectivity within our world-wide, multi-hub system. As one of the largest carriers in Europe, with just a short stopover in Frankfurt, our customers will have access to hundreds of connections to numerous destinations within our vast, global network."

The Frankfurt service demonstrates Lufthansa's commitment to the UK market and will provide increased connectivity to long-haul destinations such as Tokyo, Cape Town and Singapore. Supporting the development of tourism and business links between both markets, the service will also create additional employment opportunities.

Dave Lees, CEO, Bristol Airport said:

"This is incredibly positive news for Bristol Airport and the region. Lufthansa is a major global airline and this decision shows confidence in air travel returning to normal. The new daily service commencing 28 June between Bristol and Frankfurt opens up a wide range of European and worldwide connections to our customers. Frankfurt is a great city whether for business or leisure and the link between Bristol and Frankfurt allows us to promote the South West and Wales region to inbound visitors from Germany and beyond. Today's news is a strong indication of the confidence in the region. We see great potential for this new service and will work with Lufthansa on other exciting route opportunities in the future."

For full details of all destinations and fares on offer, visit lufthansa.com or contact your local travel agent.

<https://www.bristolairport.co.uk/about-us/news-and-media/news-and-media-centre/2021/2/lufthansa-announces-daily-service-from-bristol-to-frankf...> 1/2

8.6. OAG (Official Airline Guide) Lufthansa Scheduled Departure Frequency and Aircraft Type

OAG Power Table Report

analytics.oag.com/analyses-client/schedules-analyser/power-tables-report

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Schedules Analyser - Power Table Report

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Carrier Code	Carrier Name	Dep Airport Code	Arr Airport Code	Specific Aircraft Name	Frequency's	TimeSeries's
LH	Deutsche Lufthansa AG	BRS	FRA	Embraer 190	31	202108
LH	Deutsche Lufthansa AG	BRS	FRA	Embraer 190	30	202109
LH	Deutsche Lufthansa AG	BRS	FRA	Embraer 190	31	202110
LH	Deutsche Lufthansa AG	BRS	FRA	Embraer 190	30	202111
LH	Deutsche Lufthansa AG	BRS	FRA	Embraer 190	31	202112

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8.7. Bristol Post Article on Lufthansa Announcement

7/3/2021

Bristol Airport launches new Lufthansa flight route to Frankfurt in Germany - Bristol Live

BristolLive

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IN ASSOCIATION WITH PRIDE OF BRITAIN

Bristol Airport launches new Lufthansa flight route to Frankfurt in Germany


It will operate twice a day

Naah Baker Business Editor

CT 2019

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Bristol Airport (Image: Bristol Post)

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<https://www.bristolpost.co.uk/whats-on/whats-on-news/bristol-airport-lufthansa-uk-flights-3482178>

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A new direct flight to Germany is launching from [Bristol Airport](#) next spring.

German airline Lufthansa has announced plans to run a twice-daily flight to Frankfurt from Bristol from March 30, 2020.

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The flight route is an "endorsement" of the city and will be "critical" to the region, according to Bristol Airport's business development director Nigel Scott.

"[This route] is hugely significant for Bristol," he said. "Frankfurt is a key destination. It is the financial capital of Europe and we have a strong financial sector in Bristol."

The flight will only be 40 per cent leisure travellers, with Lufthansa targeting the business market in the region, according to [Business Live](#).

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Andreas Koster, a senior director at Lufthansa Group, said: "We want a stronger footprint in the region."

"Bristol is an important city in the Lufthansa network for point-to-point passengers as well as for passengers connecting to one of the many other Lufthansa destinations.

"The business market in the West of England is strong and we are a very business focused airline."

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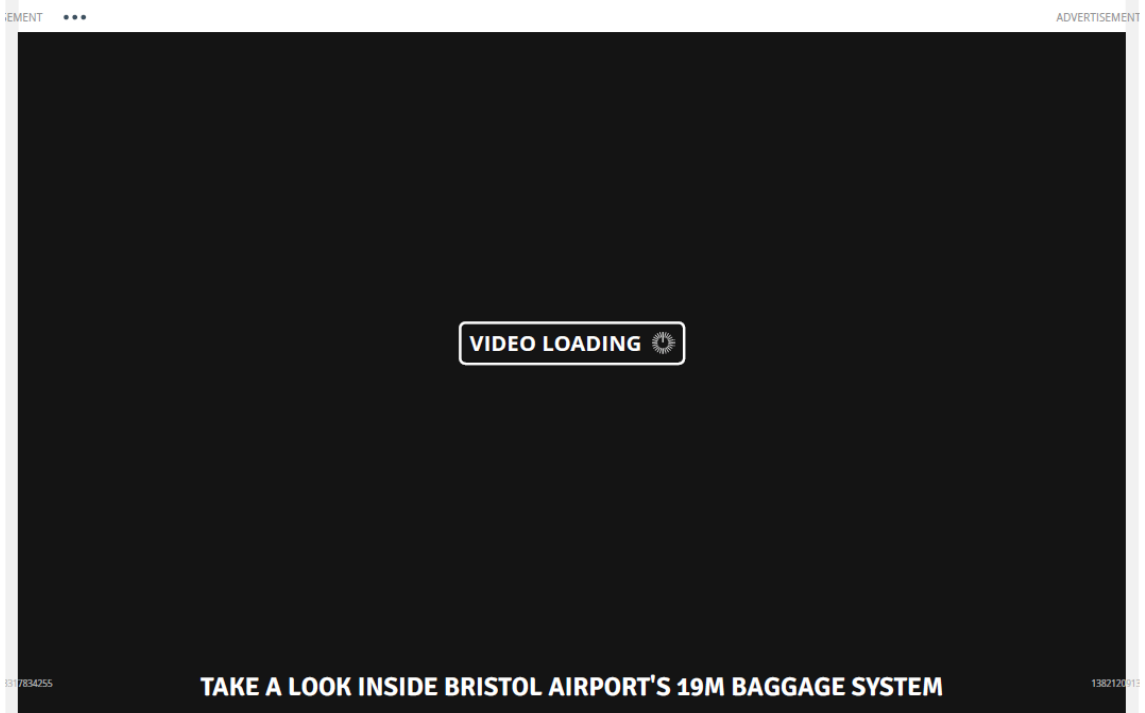
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But the airline hopes to attract more travellers looking to visit Germany and destinations further afield too.



Mr Koster added: "[In Frankfurt] you can discover a metropolis of great diversity - culture, tradition, shopping, finance and trade shows."

He says Brexit has not impacted the growth of the airline group, which includes Lufthansa, Austrian, Swiss, Brussels Airlines and Eurowings.

He added: "The Brexit discussion has been going on for over three years and we got hit with the pound rate falling but we are still growing because of the strength of the economy."

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► Bristol Airport is recruiting for dozens of jobs including firefighters

The cost of a return journey will be around £10 (departing at 12.10pm) and 5.50pm (arriving at 8.25pm) each day.

Tickets for flights go on sale today.

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8.8. Excerpt from BBC News Article on Settled Status Applications

11/01/21 EU settlement deadline: Who's registered and who's at risk - BBC News

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EU settlement deadline: Who's registered and who's at risk?

 **Dominic Casciani**
Home and legal correspondent
@BBCDomC

5 days ago

< EU Settlement Scheme



Wednesday 30 June is the deadline for most European Union (EU) citizens to apply to live permanently in the UK as settled residents.

The take-up of the European Union Settlement Scheme (EUSS) has been huge - but there are serious concerns that thousands of people have still not applied. Anyone not registered loses their legal right to live in the UK.

<https://www.bbc.com/news/health-57955503>

1/5

What is the EU Settlement Scheme?

The EUSS was launched in March 2019 to register EU citizens as settled residents in the UK.

It's a follow-on from Brexit, which ended freedom of movement and the right of people from the EU to come to the UK - and for UK citizens to go the other way.

By the end of May 2021, 5.6 million people had applied for the scheme - far more than expected (it was estimated in March 2019 that there were 3.7m EU nationals in the UK).

- Brexit: How many more EU nationals in UK than previously thought?

Who can apply?

The application is online and anyone who can prove they have been living in the UK continuously for at least five years before the end of 2020, can seek "settled status" - legal recognition that they live here permanently.

Anyone who shows they have been here for less than five years gets "pre-settled status".

This gives them the right to continue living in the UK - but they then have to make a application later on for full settled status.

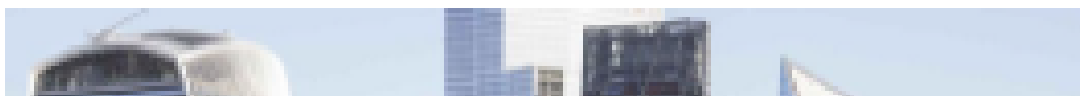
What happens if people do not apply?

Some experts believe there could be more than 100,000 people who will fail to apply before the deadline.

Anyone who has not applied or received a status would technically become an illegal immigrant overnight and face a number of problems:

- it would be illegal for them to work
- they would no longer be able to receive benefits
- they would face huge charges for using the NHS

In England, private landlords must check the immigration status of tenants - and the housing charity Shelter predicts this will be a disaster.



9. Appendix B: Adjusted Alternative Fleet Mix Comparison

Aircraft Type	Appeal Proposal Fleet	Mr Folley Fleet	Corrected Mr Folley Fleet	Correction Notes
Short Haul Fleet				
Airbus A320	6,540	2,828	2,828	
Airbus A320Neo	20,200	24,538	25,638	
Airbus A321Neo	15,720	9,887	9,887	
Boeing-737-700	750	2,397	0	Changed to E195-E2 as KLM
Boeing-737-800	2,380	13,781	12,681	Removed 1,100 movements to A320Neo to allow for growth in based aircraft by other airlines
Boeing-737 Max-8	14,360	11,684	11,684	
Boeing-737 Max-10	2,050	2,097	2,097	
Embraer 190	2,240	599	599	
Embraer 195-E2	2,240	0	2,397	Changed from B737-700 for KLM
Regional Fleet				
ATR-72	8,360	5,225	5,225	
Embraer RJ145	0	1,115	1,115	
Long Haul Fleet				
Boeing-767-400ER	0	300	0	Changed to B787-8
Boeing-777-200ER	0	300	0	Changed to B787-8
Boeing-787-8	510	599	1,199	
Current	20,270	26,545	22,448	
New	55,080	48,805	52,902	
Total Movements	75,350	75,350	75,350	
New Generation %	73%	65%	70%	

10. References

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