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**Bristol Airport Inquiry**  
**Response to Mr Folley's 'Note in Response to Mr Brass's Evidence in Chief' (29<sup>th</sup> July 2021)**

1. I have now had an opportunity to review Mr Folley's note (INQ18) produced on the 29<sup>th</sup> July 2021 in response to my Evidence in Chief. The note largely focuses on Mr Folley's own assumptions and approach to developing a fleet mix and it is recognised that there are differences between myself and Mr Folley in this regard. Hence, I do not feel it is necessary to respond on most of the points submitted in the note. The absence of a specific response on a point submitted by Mr Folley should not be taken as an endorsement or agreement of such point, these are merely already covered in the evidence before the Inquiry.
2. In relation to my comments in Evidence in Chief, I addressed two main areas:
  - the lack of growth in Airbus A320 family movements compared to 2019, which suggests very limited growth from easyJet, the largest airline at Bristol Airport;
  - the large numbers of Boeing 737-800 aircraft in the fleet mix over and above those related to Mr Folley's assumed growth for Jet2.com, which Mr Folley has stated relate to operations by Ryanair and Tui.
3. In relation to my first point and the limited growth of easyJet, Mr Folley states that *"In fact in the Jacobs' Fleet mix easyJet, Ryanair and Tui all increase total movements by a similar amount in 2030 compared to 2019 (all between 10% and 12% growth). Ryanair and Tui's numerical increase combined is less than easyJet's. However, the implications of the growth plans outlined in the Jet2.com letter are such that it means that Jet2.com adds more new flights than all of the other three airlines combined, based on their growth plans."* In other words, Mr Folley seems to be suggesting that Jet2 essentially 'squeezes out' growth from the other airlines at Bristol Airport. In my view, this position simply demonstrates the difficulties and dangers of trying to forecast a fleet mix on an airline specific basis. It simply forces trade-offs to be made that are ultimately not realistic and that are not based in evidence. We cannot sensibly know which airlines will be flying what routes and with how many passengers in 9 years' time. That is precisely why the Appeal Proposal fleet mix is not airline specific and, instead, focusses on identifying an appropriate balance of current and new generation aircraft across all of the airlines. I continue to regard Mr Folley's revised fleet mix as flawed in this regard. The assumption of such limited growth by the largest airline at Bristol Airport is simply not realistic.
4. In relation to the numbers of Boeing 737-800 aircraft that are within Mr Folley's revised fleet mix and that are identified by Mr Folley as relating to activity by Ryanair and Tui, I made two points in evidence in chief and I believe these points remain following Mr Folley's note.

5. In Mr Folley's fleet mix, there are 14,582 Boeing 737-800 movements. Mr Folley states that 8,995 of these relate to Jet2. This leaves 5,587 Boeing 737-800 movements by other airlines, namely Ryanair and Tui. Mr Folley's fleet mix identifies a further 13,741 movements by Boeing 737 Max aircraft. This means that, excluding Jet2, around 29% of Boeing 737 movements are by current generation aircraft in 2030.
6. Mr Folley's original revised fleet mix, as set out in INQ10, did not provide a breakdown between Ryanair and Tui in relation to these Boeing 737-800 movements. My comment in evidence in chief in relation to Ryanair reflected that 29% of movements by current generation aircraft appeared very high in the context of Mr Folley's own proof of evidence, as set out in NSC/W1/1 in Table 1 on Page 5, which identified an expectation that the Ryanair fleet would be 93% new generation aircraft by 2030. I do, however, note that Mr Folley has clarified how many Boeing 737-800 movements are by Ryanair in his latest note (INQ18) in Table 1. This suggests that 11.2% of Ryanair's movements are by Boeing 737-800 aircraft in 2030, which is more consistent with Mr Folley's estimates for the Ryanair fleet as a whole but still a higher percentage than the overall fleet average. I note Mr Folley's comment, in INQ18 Para 20, that *"Secondly, in my experience it is more likely that Ryanair will introduce new nextgen aircraft into its new bases or step change growth at an existing base by adding new aircraft. This means that next-gen aircraft will not be introduced uniformly across all the bases (i.e. some bases will receive more next-gen aircraft than others). Given Ryanair's established position at Bristol, I consider that this is not one of the bases which would receive the highest levels of next-gen aircraft (although it would receive some next gen aircraft, as I have shown in my fleet mix). Thus the 11% figure in table 1 to this Note is slightly higher than the 7% figure in table 1 to my proof for these reasons."* I simply disagree with his view here. In my experience Ryanair will base new aircraft at strong and successful bases, such as Bristol, and there is no reason to believe that Bristol Airport will be significantly out of step with the fleet as a whole.
7. This brings me to the position in relation to Tui. INQ18 clarifies that 4,033 Boeing 737-800 movements are assumed to be operated by Tui in Mr Folley's revised fleet mix. These movements account for 77% of Tui Boeing 737 family movements at Bristol Airport in 2030. In other words, Mr Folley is assuming that 77% of Tui's Boeing 737 movements in 2030 will be by current generation aircraft. I highlighted in my evidence in chief that Tui has publicly stated that its intentions is to switch to entirely new generation aircraft in the short term. Mr Folley states (at Paragraph 22) that he was unable to find evidence of Tui's intention to operate only new generation aircraft. I have included a copy of one such article in **Figure 1** of this note, taken from CH-Aviation, a leading global source of aviation news and data.
8. Mr Folley also states that Tui Airways (UK) has no further new generation aircraft on order and that it does not receive aircraft from TUI Group's order. In fact, all of the Boeing 737Max aircraft in the UK fleet were ordered by the parent group. **Figure 2** is a press release from TUI Group related to the start of its Boeing 737Max deliveries which clearly states that these aircraft will be delivered to all its airlines, including in the United Kingdom. In this regard, I therefore conclude that Mr Folley is simply wrong in regard to Tui's future fleet intentions and orders.
9. Hence, if the position in relation to Ryanair and Tui is combined, particularly now there is clarity on the extent of Tui's movements within Mr Folley's revised fleet mix, I continue to believe that the number of Boeing 737-800 movements is significantly overstated in Mr Folley's revised fleet mix and simply does not reflect the available evidence. His balance between current generation and new generation aircraft is therefore flawed and that his revised fleet mix is not plausible.

10. In relation to some other issues within INQ18, Mr Folley (at Paragraph 15) claims that I did not provide detailed load factor information to Jacobs. To the best of my knowledge, this load factor information was not requested by Jacobs during our engagement with them. My load factor information is taken from internal data from Bristol Airport which shows the exact aircraft types, their number of seats and actual passengers carried in relation to each flight at Bristol over the previous 5 years and is more relevant than general industry assumptions. Applying these Bristol specific load factors to Mr Folley's fleet would, as I have stated, result in the movements he claims generating more than 12 mppa throughput and, as such, his aircraft movement forecast could not be realised. These assumed load factors were included in my Rebuttal Proof (BAL/1/3 Page 18 Table 3, Column 5) and were available to Mr Folley before he produced his second iteration of the fleet and could have been used to determine that his own fleet projections could lead to higher passenger numbers than the 12 mppa being considered by the Inquiry.
11. In conclusion, my position in relation to Mr Folley's revised fleet mix remains the same. It is simply not plausible. The balance between current and new generation aircraft is incorrectly weighted towards current generation aircraft and there is ultimately too much seat capacity being flown given the load factors observed at Bristol Airport.
12. Importantly, I would also reiterate that minor differences in the overall fleet mix are not relevant to the Inquiry because ultimately planning conditions are proposed which would mean the Appeal Proposal could not result in the operation of a fleet any noisier than that proposed in the Environmental Statement Addendum (ESA). Furthermore, in so far as Mr Folley has made changes to the With Development case, these would also apply equally to the Without Development case of 10 mppa at 2030. Therefore, any quantified difference in effect between the cases would likely be comparable to those contained in the ESA in any event.

James Brass  
5 August 2021

Figure 1: Article Indicating Tui's Intention to Move to Total New Generation Fleet

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TUI Group to simplify fleet, mulls more B737 MAX 10s




Illustration of TUI fly Boeing 737-10

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24.07.2018 - 15:49 UTC

TUI Group is planning to simplify the fleet of its six airline units to just two Boeing families, the B737 MAX and the B787, by the early 2020s, the board member for aviation David Burling has told Air Transport World. The group is also mulling swapping some of its orders for B737-8s for larger B737-10s.

"More than likely, the MAX 10s will go up [from the current order of twenty] because of supply constraints at airports like London Gatwick, Düsseldorf, and Amsterdam Schiphol, where we are unlikely to get more slots, so we will need to use a bigger variant," Burling said.

The group is currently expecting the first B737 MAX 10 to deliver in late 2020. Besides the twenty units of the type it has on order with lessors, it has also ordered fifty-two B737 MAX 8s, some of which can be converted.

By that time, the leisure group intends to be well into its process of fleet simplification.

First, its remaining eight B737-700s (of which three are operated by TUI fly (Germany) and five by TUI fly (Belgium)) are due to leave the fleet in 2019. The B757s and B767s will be retired in the early 2020s. According to the ch-aviation fleets module, the group currently operates fourteen B757-200s (in its British unit TUI Airways), and six B767-300(ER)s (in the UK, Belgium, and at TUI fly (Netherlands)).

Following the retirement of the older types, the group's fleet will include solely narrowbody B737-800s, B737 MAX 8s, and B737 MAX 10s, as well as widebody B787-8s and B787-9s. The B737-800s, of which the group currently operates 101, will likely retire at some point during the 2020s.

About TUI fly (Germany)

Type	Scheduled Carrier
Base	Hanover
Aircraft	26
Destinations	36
Routes	129
Daily Flights	82

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**Figure 2: TUI Group Press Release on Delivery of New -Max Aircraft**

The screenshot shows a web browser displaying a press release from TUI Group. The browser's address bar shows the URL: <https://www.tuigroup.com/en-en/media/press-releases/2018/2018-01-29-fleet-renewal-tui-receiving-aircraft>. The page has a blue header with the title "Fleet renewal – TUI is receiving new modern and efficient aircraft". On the left, there is a sidebar with navigation links: "Press releases", "TUI Stories", "Annual General Meeting 2021", "Key financial information", "Interviews, speeches & presentations", "AGM", "Photos", "Calendar", "Contact", "TUI Ticker on the Coronavirus", and "TUI Ticker on Restart 2021". The main content area features the title "Fleet renewal – TUI is receiving new modern and efficient aircraft" and a list of bullet points: "TUI's aircraft fleet becomes more economical and environmentally-efficient", "Significantly lower kerosene consumption and less CO2 emissions", "Fleet renewal will be completed by 2023: Delivery of the first of 70 orders begins", "Tomorrow delivery of TUI's first Boeing 737 MAX 8 to TUI fly Belgium in Brussels", and "By the end of 2018, nine new Boeing 737 MAX 8s for TUI's Airlines". Below the bullet points, there is a paragraph about the fleet renewal and a section titled "Nine 737 MAX 8 by the end of 2018". To the right of the main text, there is a "CONTACT" section with a photo of Kuzey Esener, Head of Media Relations Corporate, and a link to "Contact details".

**Fleet renewal – TUI is receiving new modern and efficient aircraft**

- TUI's aircraft fleet becomes more economical and environmentally-efficient
- Significantly lower kerosene consumption and less CO2 emissions
- Fleet renewal will be completed by 2023: Delivery of the first of 70 orders begins
- Tomorrow delivery of TUI's first Boeing 737 MAX 8 to TUI fly Belgium in Brussels
- By the end of 2018, nine new Boeing 737 MAX 8s for TUI's Airlines

TUI is proceeding with the renewal and modernisation of its Europe-wide aircraft fleet. The objective of upgrading the fleet is to make flights more economical, cost-efficient and environmentally-efficient. Since 2013, TUI has ordered a total of 70 Boeing 737 MAX aircraft which are intended to replace aircraft currently in service. This type of aircraft is particularly cost-saving and emission-efficient.


**Nine 737 MAX 8 by the end of 2018**

The first aircraft arrives tomorrow with the transfer of a Boeing 737 MAX 8 from Seattle/USA. It will be operated by TUI's subsidiary TUI fly Belgium. The transfer is made today at Boeing in Seattle. After a stopover in Iceland, the flight will land tomorrow in the morning in Brussels. The CEO of the TUI Group, Fritz Jousen, is going to receive the latest aircraft at the airport in Brussels.

By the end of 2018, a total of nine 737 MAX 8 will be delivered to the airlines of TUI Group. These aircraft will be operated by TUI in Belgium, Sweden, the United Kingdom and the Netherlands. The first 737 MAX for TUI fly Germany is scheduled to be delivered in early 2019. TUI Group has ordered 70 new aircraft in total to renew its narrow-body aircraft fleet by 2023 according to the current planning.

After delivery of the first aircraft to TUI fly Belgium, there are 51 additional orders of the 737 MAX 8 and 18 orders for the 737 MAX 10. TUI was the first European operator to select the latest and largest member of the 737 MAX family of airplanes. The TUI Group owns six European airlines in Germany, UK, the

**CONTACT**

  
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Source: <https://www.tuigroup.com/en-en/media/press-releases/2018/2018-01-29-fleet-renewal-tui-receiving-aircraft>