

Editors Note: The Final Report on the consultation for the Norwich Airport Airspace Change Proposal is contained below. Due to a number of pressing issues which include but are not limited to the need for supplementary consultation with statutory consultees and amendments to the design of the airspace the process has unfortunately taken longer than we initially envisaged.

PROPOSAL TO ESTABLISH CONTROLLED AIRSPACE IN THE VICINITY OF NORWICH INTERNATIONAL AIRPORT

FINAL REPORT ON THE CONSULTATION

EXECUTIVE SUMMARY

1. Norwich International Airport (NIA) proposes to submit to the Civil Aviation Authority (CAA) a case for the establishment of controlled airspace in the vicinity of NIA in order to enhance the safety of commercial and other flights operating to and from the Airport in the critical stages of flight and also of other flights operating in the area. The development of the proposed airspace change is conducted in accordance with the CAA requirements specified in CAP 724¹ and CAP 725².
2. As the third stage in the airspace development process NIA has carried out a full consultation with aviation Industry and other interested parties as specified in CAP 725.
3. Of the 276 consultees consulted 213 responded (77.2%). Of the 213 responses, 94 consultees (44.1%) supported the proposal, 96 consultees (45.1%) had no opinion or no comment to make, whilst 23 consultees (10.8%) objected to the proposal. 63 of the 276 consultees (22.8%) did not respond to the consultation. In addition, NIA received a further 537 responses from individual members of the General Aviation fraternity and others. NIA considers this to be an excellent rate of interest and response to an airspace consultation.
4. The issues raised by those objecting to the proposals, including those raised by responses not on the original consultee list, have been carefully analysed by NIA to determine whether there were any material issues affecting the proposal as a whole or whether any refinement of the proposed airspace design was necessary before submitting the formal proposal to the CAA. NIA has taken an even-handed approach throughout this examination and has sought the advice of the CAA where necessary.

¹ CAP 724: The Airspace Charter

² CAP 725: CAA Guidance on the Application of the Airspace Change Process"

5. NIA has concluded that, on balance, there were no new issues arising which would materially affect the proposal as a whole. Indeed, most of the issues raised by objectors had already been anticipated and taken into account in the earlier stages of the proposed airspace development.
6. Notwithstanding, in the interests of reaching an accord with the principle groups who raised objections to the establishment of controlled airspace, NIA has carried out in depth reviews of certain aspects of the proposed airspace configuration and has engaged with the key representatives of stakeholder organisations so that suitable solutions which will facilitate ease of access to the proposed controlled airspace can be investigated.
7. As a consequence, a number of changes have been made to the final configuration of the controlled airspace. However, regrettably, it has not been possible to reach complete consensus with all stakeholder organisations.
8. NIA has been encouraged by the level of support for the proposal. It has concluded, therefore, that the proposal to establish Class D controlled airspace in the vicinity of Norwich International Airport remains valid and will continue with the airspace change process. Now that post-consultation discussions with stakeholders have been completed, NIA intends to prepare a formal proposal for submission to the CAA in accordance with the provisions of CAP 724 and CAP 725.

PROPOSAL TO ESTABLISH CONTROLLED AIRSPACE IN THE VICINITY OF NORWICH INTERNATIONAL AIRPORT

FINAL REPORT ON THE CONSULTATION

1 Introduction

1.1 Norwich International Airport (NIA) proposes to submit to the Civil Aviation Authority (CAA) a case for the establishment of controlled airspace in the vicinity of NIA in order to enhance the safety of commercial and other flights operating to and from the Airport in the critical stages of flight and also of other flights operating in the area.

1.2 This document is the Report of a consultation carried out by NIA between 21 April 2009 and 28 August 2009 and supplementary consultation between November 2009 and October 2010. The background to the consultation and methodology used is detailed at Appendix A.

1.3 This Report replaces the Interim Report published on the NIA website on 7 October 2009. It includes a detailed review of the responses received from listed consultees and submissions from other individual aviators and members of the public and identifies key issues raised by those objecting to the proposal. It also contains statistical information previously set out in the Interim report and NIA comment on the responses and submissions.

1.4 It should be recognised that the consultation process requires that NIA should take a balanced judgement on the key issues raised by consultees and, if necessary, adapt the proposed airspace design to incorporate appropriate aspects. This Report details the balanced conclusions reached by NIA.

1.5 NIA extends its thanks to all consultees and other individuals who took the time to participate in this consultation.

2 Confidentiality

2.1 The CAA requires that all consultation material, including copies of responses from consultees and others, is included in any formal submission to the CAA of the proposal to establish controlled airspace.

2.2 NIA undertakes that, apart from the necessary submission of material to the CAA and essential use by our consultants for analysis purposes, NIA will not disclose personal details or content of responses and submissions to any third parties. Our consultants are signatories to confidentiality agreements in this respect.

3 Statistics

3.1 A total of 276 Consultation Letters were distributed as detailed in Appendix A paragraph A3. A list of Consultees was detailed in Appendix I of the Sponsor Consultation Document³. The Consultee Groups are detailed in Figure 1 below.

3.2 The Sponsor Consultation Document was distributed via a dedicated link on the NIA website. A number of hard copy documents were distributed to consultees when requested.

3.3 During the consultation period the website link was visited 2224 times.

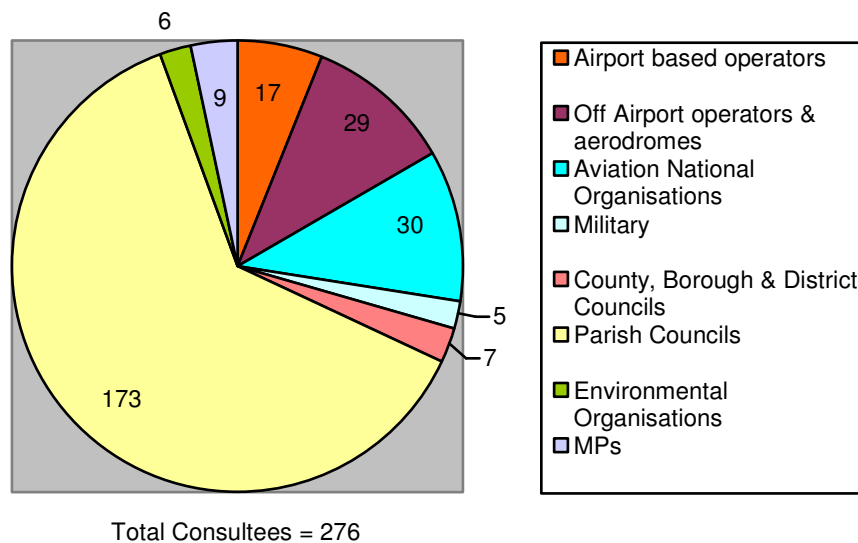


Figure 1: Distribution of consultees

Note: Aviation “National Organisations” comprises those organisations who are members of the CAA’s National Air Traffic Management Advisory Committee (NATMAC). It includes some CAA Departments who, for reasons of CAA impartiality, do not respond to consultations.

³ Subsequent to the release of the Sponsor Consultation Document 3 additional consultees were included and the Title of one consultee organisation was corrected.

3.4 Responses were received from a total of 213 (77.2%) of consultees as follows:

	Listed Consultee Groups	Number Consulted	Responses	%
1	Airport based operators	17	15	88.2
2	Off-airport airspace users and aerodrome operators	29	15	51.7
3	Aviation "National Organisations"	30	18	60
4	Military Airspace User Groups	5	1*	100
5	County, Borough, District and City Councils	7	5	71.4
6	Parish Councils	173	152	87.9
7	National or local Environmental Organisations	6	3	50
8	Members of Parliament	9	0	0

Note: MOD provided a consolidated response on behalf of all military consultees. This is standard MOD practice. Thus, all military consultees are deemed to have responded.

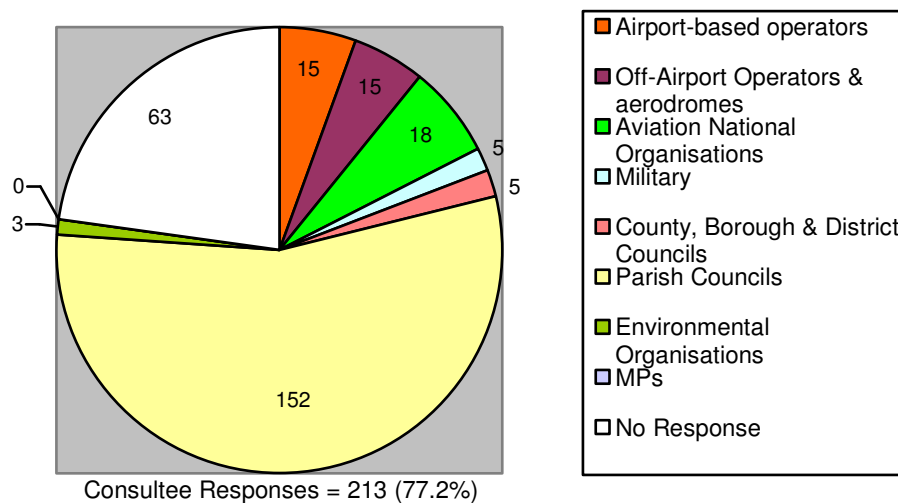


Figure 2: Responses from listed consultees

3.5 In addition to the responses from consultees shown in Figure 2, a further 537 submissions were received from other individuals or groups.

3.6 Only 3 enquiries were received seeking clarification about the consultation process or the proposed airspace design, which indicated that the format and content of the document suited the requirements of the majority of consultees.

3.7 Some responses included comment on issues which were not a part of the airspace change consultation (e.g. Government Airports Policy, NIA future development). The Sponsor Consultation Document clearly indicated that these issues would not be covered by the consultation and such comments have therefore not been included in the analysis.

4 Analysis

4.1 Of the 213 responses received from the listed consultees

94 consultees (44.1%) supported the proposal to establish controlled airspace;

96 consultees (45.1%) stated that they had no opinion or no comment to make on the proposal.

23 consultees (10.8%) objected to the proposal;

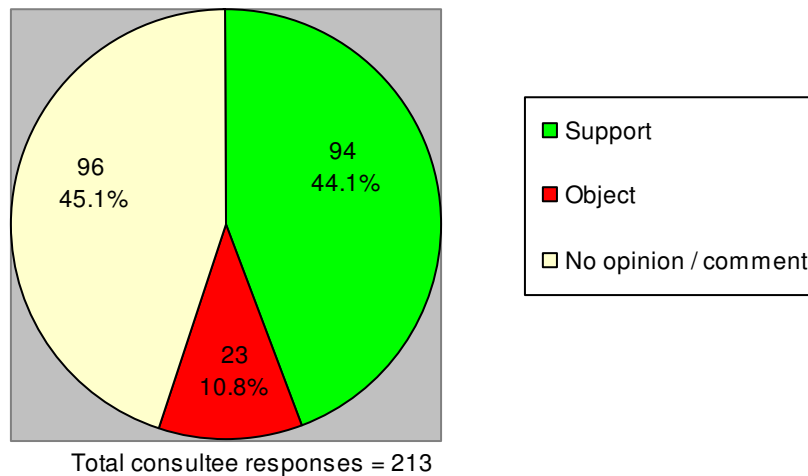


Figure 3: Support Ratio from listed consultees

4.2 Of the 537 submissions from individuals or organisations not on the consultation list, all except 3 objected to the proposal. From the initial analysis, the objections appear to be based on common issues. Whilst such responses are outside the accepted process for consultation promulgated by the CAA, it is nonetheless recognised that individuals have exercised their right to make a response and these responses have been considered. It should be noted that the national representative organisations of all aviation interests are formal consultee

organisations by virtue of their membership of the CAA's National Air Traffic Management Advisory Committee (NATMAC). The issue of the CAP 725 consultation process has been raised at a recent NATMAC meeting. Notwithstanding, the positions presented generally echoed those raised by the consultees objecting to the proposal.

- 4.3 It is noted that one submission from a non-consultee organisation included the opinion that the whole consultation was flawed because the consultee list was inappropriate. NIA, from discussion with some consultee organisations, believes that there may be some lack of understanding amongst organisations as to how, and why, the consultation list is developed. Further comment on this matter is made at paragraph 6.5.

5 Key Themes arising from Listed Consultee Responses

- 5.1 It should be noted that the consultation conducted by NIA in accordance with the CAA's Airspace Change Process (CAP 725) is the third stage in the overall process leading to a formal request for an airspace change.
- 5.2 The first stage of the process involved a basic airspace design proposal compiled by experts in this field of aviation, having extensive experience of both airspace design in the UK and involvement in the development of the UK and European regulatory requirements. The experts therefore have extensive knowledge of the likely areas of contention and the initial design proposal took these into account. The second phase of the proposal development involved the use of Focus Groups comprising the primary local airspace user and environmental interests. At this stage the initial airspace design proposal was modified where practicable and a more detailed analysis of local issues carried out.
- 5.3 Thus, by the time the third stage of widespread consultation is reached there should be few, if any, areas of contention that have not already been identified or addressed. Any issues or objections raised by those consulted would normally be expected to fall into categories or themes already considered.
- 5.4 In analysing all the responses from the listed consultees, NIA has identified key themes in those responses which objected to the proposed development of controlled airspace. For each of the key themes NIA has taken a balanced approach in considering and responding to each issue. In a number of cases inaccuracies and misconceptions in the consultee responses were identified by

NIA and comment made as appropriate. The analysis of the consultee responses, together with NIA consideration of the themes raised is detailed at Appendix C.

6 Submissions from other parties

- 6.1 A total of 537 submissions were received from individuals or groups who were not part of the formal list of consultees. Except for 3 submissions, all of the individuals or groups concerned objected to the proposed establishment of controlled airspace.
- 6.2 National representative organisations with membership on the CAA's NATMAC were listed as formal consultees by NIA. NIA expected that these organisations would consult their memberships and then present a consolidated return on their behalf. It should be understood that through NATMAC, these organisations have influenced the development of the CAA's current Airspace Change Process and the associated regulatory requirements for controlled airspace.
- 6.3 Almost all of the submissions received reflected all or part of 'specimen objection lists' posted on the national organisations' websites or in-house journals and which, in turn, reflected the organisations' formal responses to the Sponsor Consultation. In many cases the submissions simply stated "I support the *[named organisation]* response" whilst others simply contained, verbatim, the text from the organisations' websites. Some individuals used their own words to state the same issues. In many cases the inaccuracies were repeated. However, some individuals submissions reflected their own particular concerns.
- 6.4 Notwithstanding that the representative organisations had submitted their considered response to the consultation on behalf of their memberships, all of the additional submissions received have been documented and analysed by NIA and they will form part of the submission to be made to the CAA in due course.
- 6.5 As mentioned at paragraph 4.3, only one of the submissions raised a new issue which had not been raised by the formal consultees; this concerned the validity of the consultee list. NIA considered that this concern was perhaps understandable and valid given that there are many parties that the process requires an airport to consult who may be outside the immediate range of the CAA's process development. A response to this issue was therefore sent and, for the benefit of

consultees and others, a brief outline of the consultation list development is given at Appendix B.

7 Post-Consultation Review

7.1 NIA remains committed to mitigate, as far as is practicable, the principle concerns of those aviation consultees who objected to the proposed airspace development detailed in the Sponsor Consultation Document. In so doing, NIA is mindful of the need to take a balanced approach between the concerns of the aviation community, the regulatory requirements specified in CAP725 and the safety and efficiency objectives of the proposed controlled airspace operation.

7.2 The approach taken by NIA was to review the airspace design in the light of the significant points of objection raised by consultees and to continue a dialogue with the principle objectors to assuage, as far as was practicable, their concerns.

7.3 The post-consultation actions undertaken are detailed below.

Post-Consultation Airspace Development

7.4 Following closure of the Sponsor Consultation, and in the light of the response themes noted, NIA undertook a detailed review of 5 particular aspects of the proposed airspace design, namely:

- a) The South-Western CTA Boundary;
- b) The Eastern CTA boundary;
- c) The South-Eastern CTA boundary;
- d) The proposed Upper Limit;
- e) The proposed Airspace Classification.

7.5 In each case, whilst cognisant of the overriding regulatory requirements specified in CAP725, NIA concluded that, on balance, some adjustment of the proposed base level or lateral boundaries could be made without a significant compromise to either the regulatory requirements or the operational efficiency of the proposed airspace. In each case the proposed revisions offered operational improvements to the General Aviation fraternity, particularly with respect to the perception of “choke points” to the east of the proposed CTA.

7.6 The revised airspace configuration is shown at Appendix D.

Supplementary Consultation

7.7 In conjunction with the post-consultation airspace design review detailed above, NIA held post-consultation meetings with particular interested parties to discuss their particular concerns and whether potential modifications to the airspace configuration would allay their concerns.

7.8 Meetings took place between November 2009 and October 2010 as follows:

- a) 04/11/09 CHC Helicopters, N Denes
- b) 05/11/09 Norfolk Gliding Club
- c) 11/11/09 Kimberley Hall Airstrip
- d) 12/11/09 Premier Flight Training
- e) 12/11/09 CHC Helicopters, N Denes
- f) 12/11/09 NHGPA
- g) 26/11/09 and 28/10/10 Felthorpe Flying Group
- h) 28/11/09 Shipdham Aerodrome
- i) 06/01/10 Northreps Airport
- j) 29/01/10 BMAA
- k) 21/05/10 LAA & BGA
- l) 28/10/10 Old Buckenham Aerodrome

7.9 Whilst the majority of the supplementary consultation meetings were fruitful and consultees appreciated the proposed further reductions in the dimensions of the proposed CTR/CTA, nonetheless it was not possible to reach a complete accord with all stakeholder groups.

Conclusions from the Supplementary Consultation

7.10 The Supplementary Consultation meetings provided a useful forum to discuss particular aspects of contention raised by some consultees over the design of the proposed CTR/CTA. They provided the opportunity to clarify with consultees the

particular regulatory requirements governing the design of controlled airspace in general and the proposed Norwich CTR/CTA in particular. Except as detailed above, the further refinements to the proposed CTR/CTA configuration were welcomed by the consultees, particularly with respect to the impacts on local airspace user groups.

- 7.11 Whilst it is regrettable that complete consensus could not be reached with all airspace user groups, the Supplementary Consultation nonetheless proved useful and demonstrated to NIA that the proposed modifications to the CTR/CTA configuration would prove worthwhile to the GA airspace user community.
- 7.12 NIA considers that the Supplementary Consultation completed with interested parties and the reviews and consequent modifications carried out to the proposed airspace configuration demonstrates the NIA commitment to taking a balanced approach to the airspace design and to accommodating the needs of the aviation community to the maximum extent practicable.

8 NIA Conclusions

- 8.1 All of the comments received, both from listed consultees and from individuals, have been subjected to a detailed analysis and review by NIA. The NIA management has taken a balanced view on the key issues raised.
- 8.2 NIA has found that no new or unexpected issues have arisen which would materially affect the fundamental case for the introduction of controlled airspace (based on the safe and efficient conduct of air transport flights in the critical stages of flight).
- 8.3 NIA concludes that, on balance, given the safety responsibilities and accountabilities placed upon the airport management, under Article 169 of the Air Navigation Order 2009, the NIA Safety Management System and the regulatory requirements specified by the CAA, there are no material issues arising from the objections to the proposal which would justify withdrawal of the proposal.. Consequently, NIA remains convinced that the case for the establishment of controlled airspace is sound and that post-consultation adjustments to the airspace dimensions proposed in the Sponsor Consultation Document will not impact on the safe operation of the proposed airspace arrangements. .

8.4 Now that post-consultation discussions are complete, NIA intends to proceed with the submission of a case to the CAA for the introduction of controlled airspace in the vicinity of Norwich International Airport.

9 Subsequent Change Process Actions

9.1 NIA will continue to prepare its formal submission to the CAA for the establishment of controlled airspace in the vicinity of NIA. The CAA requires that all consultation documentation, including responses to the consultation and the NIA analysis, be included in this formal submission. This Report, and the preceding Interim Report, will also form a part of that submission. It is planned to present the case to the CAA for consideration in early 2011.

9.2 Following receipt of the formal Proposal, the CAA will carry out a Documentation Check to ensure that the NIA submission is complete and will request clarification and/or additional if necessary. Subsequently, the CAA process aims to reach a Regulatory Decision within 6 months. (Notionally this is anticipated to be July 2011).

9.3 In the event that the CAA DAP Regulatory Decision supports the introduction of controlled airspace, then the Implementation Phase would result in the introduction of the Norwich Control Zone and Control Area approximately 8 weeks later (in accordance with International Requirements for the promulgation of Aeronautical Information) at AIRAC 10/2010, although this may be subject to adjustment to align with NATS System Build schedule.

A Background to the Consultation

A.1 Introduction

- A.1.1 The CAA sets out its regulatory requirements and process for applications to change the status of airspace or associated arrangements in CAP 724 “The Airspace Charter” and CAP 725 “CAA Guidance on the Application of the Airspace Change Process”. An essential element of the airspace development process is for the change Sponsor to carry out an extensive consultation with the airspace users who may be directly or indirectly affected by the change and, moreover, with organisations representing those who may be affected on the ground by the environmental impact of the change.
- A.1.2 The airspace development proposal and consultation has been conducted in accordance with the CAA requirements.
- A.1.3 NIA carried out this consultation between 21 April 2009 and 28 August 2009 (see paragraph A2.3) in accordance with the principles set out in the Cabinet Office Code of Practice on Consultation.

A.2 Consultation methodology

- A.2.1 A comprehensive Sponsor Consultation Document was prepared by NIA with the assistance of Cyrrus Ltd, a specialist airspace management consultancy company with extensive experience of managing Airspace Change Proposals and conducting consultation to meet the CAA requirements.
- A.2.2 The Sponsor Consultation Document was posted at a discrete link on the NIA website (www.norwichinternational.com/airspaceconsultation). Notifying letters were sent to consultees by e-mail wherever practical, or by post where e-mail was not practicable, detailing the consultation and how to access the consultation document⁴. Paper copies of the Consultation Document were made available to consultees on request.
- A.2.3 The Cabinet Office Code of Practice on Consultation and the CAA requirements specify a minimum period of 12 weeks for consultation. In order to allow for Bank Holiday periods NIA extended the consultation period to 14 weeks. Thus

⁴ Originally NIA had intended to distribute the Consultation Document either by hard copy or by CD-ROM to all consultees. However, on the advice of the CAA the methodology detailed above was adopted...

the Consultation began on 21 April 2009 and was intended to close on 28 July 2009. However, due to a distribution error some consultees did not receive the consultation letter on time. As soon as this error was identified NIA took corrective action and the consultation period was extended to 28 August 2009 in order that all consultees should have not less than 14 weeks to consider the proposal.

A.2.4 Within the consultation period consultees were asked to consider the proposal and submit a response to NIA, either through a discrete e-mail address (cas.consultation@norwichinternational.com) or in writing. In addition, consultees were given the opportunity to seek clarification of the terminology used or any other aspects of the consultation or the proposed airspace design.

A.2.5 In order to promote maximum response, NIA was proactive throughout the consultation process. A review of responses received was undertaken 1 month prior to the end of the consultation and, for those who had not responded, a reminder e-mail was sent. Subsequently this was followed up, where necessary, with individual telephone calls to organisations or representatives in the last two weeks to elicit a response.

A.3 **Consultees**⁵

A.3.1 At the start of the consultation NIA sent out a notification to 273 consultees, comprising:

- 16 Airport-based operators
- 27 Off-airport airspace users and aerodrome operators
- 30 Aviation “National Organisations” (CAA NATMAC list)
- 5 Military Airspace User Groups (NATMAC participants)
- 7 County, Borough, District and City Councils
- 173 Parish Councils
- 6 National or Local Environmental Organisations
- Members of Parliament

A full list of Consultees was detailed at Appendix I of the Sponsor Consultation Document.

⁵ As detailed in paragraph 4.3 of the Report, a brief summary of the development of the Consultee List is given at Appendix B.

- A.3.2 Following a change of sitting MP in one constituency during the consultation period an additional copy of the document was sent to the new incumbent. In addition, two further consultee organisations were identified bringing the total consultee list to 276.
- A.3.3 Access to the Sponsor Consultation Document was not limited in any way. Members of the public (including individual aviators), as well as listed consultees had access to the Document through the NIA website. Submissions received from individuals or organisations (e.g. submissions which could not be positively linked as a response from a consultee organisation) have been included in the analysis and will be taken into account by NIA.

B Brief outline of the development of a consultation list for Airspace Change Proposals

- B.1 A widespread formal consultation with interested parties and organisations is the third stage in the overall development process leading to an Airspace Change Proposal as laid down by the CAA in CAP 725. Prior to consultation, the earlier stages of the process include the initial airspace design developed by NIA with help from airspace design experts. The designers take into account the local operational requirements, the CAA regulatory requirements and identified likely areas of contention. This is followed by the Focus Group stage, which involves local operators and airspace user groups, together with environmental interests, to refine the design and address particular local issues. At this stage the initial airspace design may be modified and a more detailed analysis of particular issues can be carried out and a balanced judgement reached. The formal Sponsor Consultation then follows.
- B.2 The “Consultee List” is dictated very much by the CAA requirements specified in CAP 725. NIA sought advice and guidance from the CAA prior to the compilation of an appropriate list of consultees and subsequently this was agreed with the Authority staff.
- B.3 The CAA requires that Consultation with non-aviation bodies includes Statutory Bodies and appointed Councils up to and including Parish Councils throughout the area that would be overlaid by the proposed airspace change design. Thus 173 Parish Councils were identified as consultees, together with 7 Councils at District City and County level. It was expected that some of the incumbents of the lower tiers of government would have little, if any, aviation knowledge. Notwithstanding this the offer was made, within the documentation, for them to seek clarification if they so desired.
- B.4 Conversely, with respect to the “aviation interests” side, the CAA requires “local” aviation parties to be included in the process as individual entities; these being aerodromes or operators lying within, beneath or immediately adjacent to the proposed airspace development. Some of these parties had also been included in the earlier Focus Group Stage of the airspace development so that particular

local issues could be addressed and, where necessary, Draft Letters of Agreement (LOAs) developed.

- B.5 However, such is the national interest in airspace usage that the consultation process needs to include the wider aviation community (including more distant aerodromes and airspace user groups). The CAA expects national bodies (such as LAA, BGA, AOA, BALPA etc) to represent their members interests through the auspices of the CAA's National Air Traffic Management Advisory Committee (NATMAC). These member organisations are inherently more aware of the wider issues involved and, moreover, have been directly involved in the development of the CAA's regulatory process for airspace change. Consequently it is reasonable to expect that they should respond objectively to the consultation.
- B.6 A number of military organisations are also members of the NATMAC and are, individually, included as consultees. However, it is standard practice for the MOD to provide a consolidated response representing all military branches.
- B.7 Whilst the CAA's NATMAC is conducted under the auspices of the Directorate of Airspace Policy (DAP), certain other CAA Departments are participants in their own right. Whilst these departments are included as Consultees in the distribution of Consultation documents, they do not respond individually to consultations in order to preserve the impartiality of the CAA as a whole.

C Analysis of Key Issues and Themes arising from Consultee Responses and Other Submissions

- C.1 In analysing Responses from those Consultees who objected to the proposed development of controlled airspace in the vicinity of NIA, a number of Key Issues and areas of contention were identified by NIA. Submissions from non-consultees repeated the same concerns, either by simply stating that they agreed with their National Representative Organisation's response or by directly copying specimen objections posted on websites.
- C.2 The Table below identifies the Key Issues and summarises some of the "typical" statements given around those themes. NIA comment and response to each of the main issues is included. There were no technical or operational issues arising that had not been considered by the development team in the earlier stages of the airspace development.
- C.3 In a number of submissions from non-consultees, the authors quoted their own historic military or other flying experiences in the East Anglia area. However, NIA contends that such experiences are not necessarily tempered by knowledge of present day Air Traffic Management principles or the statutory obligations for Safety Management placed upon Air Navigation Service Providers under Article 169 of the Air Navigation Order 2009.

Table C1: IDENTIFICATION OF ISSUES ARISING FROM THE SPONSOR CONSULTATION

Serial	Issue	Specimen Comment	NIA Comment
1.	NIA traffic levels and forecast growth	<p>NIA traffic levels do not justify Class D airspace.</p> <p>NIA traffic in decline.</p> <p>ATM figures are inflated.</p> <p>Growth figures unrealistic.</p> <p>NIA unlikely to expand.</p> <p>No basis for projecting growth.</p>	<p>The CAA does not utilise “threshold” traffic or passenger figures as being necessary for the establishment of controlled airspace. Each location is unique and must be judged on the specific threats to commercial air transport traffic in the locality. CAA DAP has confirmed that there has been no challenge to this established policy in the NATMAC forum and no changes are planned.</p> <p>It is acknowledged that NIA traffic has declined, in common with other regional airports, since the programme to establish controlled airspace was initiated in 2005. The decline in traffic at NIA has been no greater than at similar UK Airports.</p> <p>Figures quoted in the Sponsor Consultation Document were those detailed in the NIA Business Plan and were valid at the time of preparation of the Document. The NIA Business Plan is reviewed at 3-monthly intervals and currently forecasts growth in the Summer of 2010. Up-to-date figures will be included in the submission to CAA.</p> <p>With respect to the longer term future, major housing development and population growth is planned for the Norwich area which will increase the catchment for NIA. Government Policy is to encourage people to use their local airport rather than travel to more distant airports.</p>
2.	Proposed airspace dimensions.	<p>Proposed dimensions disproportionate to number of ATMs.</p> <p>Proposed CAS is larger than Gatwick’s CAS.</p>	<p>The dimensions of any controlled airspace (CAS) are not based on numbers of air transport movements (ATMs) but on the CAA’s regulatory requirements for containment of Instrument Flight Procedures. The CAA requires both the radar-based operation and the non-radar procedures to be contained (including the Primary Areas of Instrument Approach Procedures [IAP] in the latter case). The basis of the Regulatory Requirements was explained in some detail in the Sponsor Consultation Document.</p> <p>The proposed CAS at NIA is <u>not</u> larger than the CAS established for Gatwick operations. The Gatwick CAS extends to FL140 and contains 2 holding patterns (16 holding levels), non-radar IAPs from the holds, radar vectoring operations and Standard Instrument Departure procedures and is, in the main, Class A controlled airspace comprising Control Zone (CTR) and Control Area (CTA) and significant portions of the London Terminal Control Area (TMA).</p>

		<p>Should be no bigger than a Military Air Traffic Zone (MATZ)</p> <p>1500ft CTA too low.</p> <p>Redesign IAPs to allow CTA base 2000ft.</p> <p>NDB IAPs are no longer used.</p> <p>Adverse environmental impact of 1500ft base forcing GA flights to fly lower.</p>	<p>Comparison of a civil CTR/CTA with a MATZ is inappropriate. A MATZ does not contain the Primary Areas of IAPs or radar directed arrival and departure routes, as required by the CAA, and does not serve the same purpose as civil CAS.</p> <p>During the development of revised IAPs as a precursor to the development of CAS, NIA, in conjunction with the CAA, considered a number of variations of procedure design in order to limit the potential dimensions of any future CAS. Raising the Initial Approach Altitude to 2500ft, to permit a CTA segment with base level 2000ft, was considered and, on balance, was rejected due to the necessary lengthening of the procedures that would be required. As well as extending the IAP Primary Areas and the associated dimensions of the CTA, there would have been a significant environmental detriment to communities on the extended final approach tracks (particularly on Runway 09 as Dereham would necessarily be overflown by all arriving aircraft). The environmental and dimensional disadvantages, on the advice of the CAA, outweighed the perceived disadvantages of a 1500ft CTA base level.</p> <p>However, in the development of the revised IAPs NIA, in conjunction with the CAA, utilised a number of measures to reduce the Primary Areas of the IAPs. For example, speed limiting the procedures to 210kt instead of ICAO speeds, using “UK Winds” instead of “ICAO Winds” and “DME limiting” the procedures instead of using only “timed” procedures.</p> <p>The CTR/CTA dimensions are also designed to protect departing flights in the initial stages of flight when cockpit workload is high and “see and avoid” is inappropriate.</p> <p>It should be noted that the ICAO minimum level for a CTA is 700ft agl (ICAO Annex 11) and this overriding minimum applies in a number of CTAs in the UK. Whilst the CTA itself does not exclude access by all classes of aircraft, it should be noted that a base level of 1500ft amsl, in the case of the proposed Norwich CTA, enables those aircraft operators who choose to remain below the CTA to remain in compliance with the Low Flying Rules in both Visual and Instrument Meteorological Conditions (VMC & IMC).</p> <p>As noted in the Sponsor Consultation Document and as a matter of CAA Policy, Class D CAS is available for use by all classes of aircraft. Flights are not “forced” to fly lower as a consequence of the airspace classification. Any perceived adverse environmental impact would therefore only be a consequence of the individual pilot electing to remain below the CTA base level. There is currently no noise modelling system which can quantify the</p>
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		<p>Consider Transponder Mandatory Zone (TMZ) or Radio Mandatory Zone (RMZ) as an alternative to CAS</p> <p>Use Class E airspace</p> <p>NIA should upgrade to Mode S instead of CAS.</p> <p>The airspace is not busy</p>	<p>environmental impact of light aircraft on random tracks outside CAS and the random effect of a number of aircraft opting to operate at a lower altitude (albeit at altitudes which are currently equally valid for light aircraft operations) on diverse tracks is unquantifiable. This issue has been discussed with CAA ERCD during the development of the proposal.</p> <p>As noted by many of the responses, many GA aircraft do not carry transponders and many do not carry RTF. Thus a TMZ would require non-equipped aircraft to obtain special permission. The proposed Class D airspace, in accordance with the national rules below FL100, does not require a transponder for VFR flights. Provision can be made, by prior arrangement, for non-radio flights within Class D airspace. Overall, a TMZ or an RMZ would disadvantage a greater proportion of GA flights than Class D airspace.</p> <p>Use of Class E airspace for CTR is contrary to ICAO Annex 11 Standard. Use of Class E airspace in general is contrary to established CAA Policy.</p> <p>NIA SSR data is provided from the NATS Radar installation at Cromer, which is Mode S SSR equipment. However, whilst Mode S may facilitate airframe identity, it does not indicate pilot intentions. It does not show, for example, that a fast moving military response intends to make a sharp turn across the final approach track, nor that the pilot of a slow moving light aircraft intends to manoeuvre on the final approach track for 20 minutes. In each of these examples in Class G airspace the NIA radar controller would still need to apply 5nm/3000ft separation against the response whose intentions and operating flight rules are unknown. The responses received on this issue indicated a possible widespread misunderstanding of the functionality of Mode S amongst the GA community and this will be taken up with the CAA.</p> <p>With respect to “busyness” of the airspace, a GA pilot is generally only aware of activity within 1nm or so of his aircraft. Conversely, the radar controller is providing service within an airspace volume of diameter 80nm and up to 19000ft. So whilst the airspace might appear to be “quiet” in a particular locality, over the whole of the ATC service volume there are likely to be numerous “unknown” activities which the controller has to take into account. At the higher levels this is manageable within the normal ATC operating rules outside CAS, but at the lower levels where there is a greater volume of flights whose intentions are not known to ATC the risk to commercial air transport flights increases. The purpose of the proposed CAS is to enhance protection to flights in the critical stages of flight when cockpit workload is higher.</p>
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3.	Military traffic levels	<p>Military traffic has declined since Coltishall closed.</p> <p>Coltishall agreement misrepresented.</p> <p>No increase in military traffic as a result of relocation from Germany.</p> <p>Use of LFA5 has reduced.</p>	<p>Whilst it is accepted that, overall, military flying at low-level in the UK as a whole may have reduced in recent years it is the particular nature of military operations in the vicinity of NIA and in close proximity to final approach and departure tracks which justifies the provision of CAS. The local airspace utilisation by military aircraft has fundamentally changed since the closure of RAF Coltishall. The nature of military operations in proximity to NIA reflects the current operational roles of the RAF and other air forces.</p> <p>A number of responses cited former military experience as pilots operating from Coltishall in their viewpoint of the airspace utilisation. However, previous military flying experience does not reflect the present-day safety management culture in civil ATM operations and the legal accountabilities placed upon civil Air Navigation Service Providers (ANSPs).</p>
4.	Resolve differences with military agencies without CAS.	<p>NIA problem seems to be only military traffic. Why not resolve this by agreement with MOD instead of CAS?</p> <p>What measures have been investigated with the military and why were they not successful?</p> <p>If the military won't agree to resolution then they clearly do not think there's a problem.</p>	<p>NIA has, on numerous occasions and at a number of levels, sought to establish viable segregation of military and civil operations in proximity to NIA in Class G airspace.</p> <p>The approaches that have been made will be documented in the submission to the CAA.</p> <p>It should be noted that a number of foreign air forces may not have been briefed on discrete UK agreements for particular portions of uncontrolled airspace. Conversely, any aviator has to recognise properly notified CAS.</p> <p>MOD has indicated support for the proposal to introduce controlled airspace in the vicinity of NIA.</p>
5.	Choke Points	<p>Choke points identified.</p> <p>Eastern side of CTA, narrow strip for overland flights outside CTA. Conflict with Offshore Helicopter operations from North Denes and Norwich.</p> <p>8nm corridor to the west with large amount of traffic, 2</p>	<p>It must be borne in mind that GA flights are not excluded from Class D airspace as a function of the airspace classification or the Air Traffic Services provided. Those pilots who make the conscious decision not to transit through CAS must do so in the full knowledge of the nature of the surrounding airspace. Thus the perception of choke points is a function of piloting decisions, not airspace classification. This issue has been discussed with CAA. .</p> <p>The steps taken by NIA to limit the extent of the IAPs (as detailed above) have reduced the dimensions of the airspace necessary to meet the regulatory requirements. Without those measures, and the mitigations which NIA intends to develop for those areas where the regulatory requirements are not being met, the CTA would have extended in the east</p>

		<p>aerodromes, Watton, Stanta, D208, Marham MATZ, Old Buckenham Parachute Area, Honington Zone.</p>	<p>beyond the coastline and to the west as far as Gt Fransham Hang Glider site.</p> <p>At the Focus Group stage of the airspace development, as a result of airspace user input, NIA concluded that, on balance, it was possible to “roll back” the originally proposed western boundary by an additional 0.5nm and to “roll back” the south-western corner to relieve a potential interaction with the Watton gliding site and improve the situation of Shipdham aerodrome. No issues regarding the proposed eastern CTA boundary were raised by local airspace users in the Focus Groups,</p> <p>Nonetheless, NIA undertakes to review in detail certain aspects of the proposed airspace design with a view to alleviating to the maximum extent practicable the perceived adverse impact on the GA community</p> <p>Marham MATZ is Class G airspace.</p> <p>“Honington Zone” was disestablished many years ago. Honington MATZ i has been permanently disestablished. .</p>
6.	Impact on Glider operations.	<p>East Anglia is best gliding location in UK.</p> <p>Proposed CAS will prevent north/south glider transits.</p> <p>6000ft upper limit too high for gliders.</p> <p>Not feasible for gliders to transit below 1500ft base.</p> <p>Swanton Box arrangement excludes gliders.</p> <p>Very few glider pilots have RT licences. Prohibited by law from using ATS frequencies.</p>	<p>NIA is conscious of the attraction of northern East Anglia for gliding operations.</p> <p>Gliders are not excluded from Class D airspace as a function of the airspace classification or the ATS provided. MATS Part 1 contains guidance to controllers regarding the integration of gliding activity with other airspace usage.</p> <p>NIA has offered to develop LoAs where appropriate and to provide R/T training for glider pilots.</p> <p>Many National and Regional Gliding Competitions take place in CAS, e.g. London TMA, Luton CTR, East Midlands CTA. Suitable arrangements can be made</p>

		<p>NGC hosts many national and Regional Competitions. BGA Rules forbid tasking through CAS.</p> <p>Significant choke points</p> <p>Does not take account of recognised BGA VRPs.</p>	<p>NIA intends to carry out further discussions with local gliding clubs and Groups to try and develop acceptable agreed procedures to ease the routine operation of gliders within the proposed CAS to the maximum extent practicable, commensurate with the safety management obligations placed upon NIA as an ANSP</p>
7.	Hang Glider & paraglider issues	<p>CTA downwind from launch site (East Fransham) is a major obstacle to cross country flights.</p> <p>Airspace limitations already exist to the west and south of the site.</p> <p>MATZ dimensions of CAS would be acceptable.</p> <p>Not consulted on IAP changes.</p>	<p>NIA intends to discuss local hang gliding issues with NHGPC to ascertain most frequent hang-gliding profiles and airspace usage data and to investigate whether some hang gliding activity could take place within the CTA similar to Glasgow CTR/CTA, subject to Swanton Box arrangements.</p> <p>It was not necessary to consult BHPA or NHGPC in respect of the IAP changes. The IAP consultation was conducted in accordance with the CAA requirements and to a Consultee list agreed with CAA.</p>
8.	Microlight issues	<p>Microlights operate on Permits to Fly.</p> <p>Many microlights are non-radio.</p> <p>Most microlights are not transponder equipped.</p> <p>ATC treats Class D as mandatory transponder.</p>	<p>PTF does not preclude access to CAS.</p> <p>Arrangements can be made for non-radio transit of Class D CAS.</p> <p>Transponder not required for access to Class D airspace below FL100 by VFR flights.</p> <p>NIA is not aware of any Air Navigation Service Providers who consider Class D airspace to require the mandatory carriage of transponders for VFR flights. This is an issue for the CAA to address if considered a problem by BMAA.</p>

		Class D transit never granted.	It is most unlikely that microlight flights would be routinely refused clearance by Norwich ATC. The CAA requires records to be kept of refusals of clearance in respect of new CTR/CTAs as part of the airspace review requirements.
9.	“Rights” issues (including specimen comments from non-consultees)	<p>Private pilots should not have freedom curtailed to save airlines minimal delays.</p> <p>GA is not a problem to NIA so should not be unfairly penalised by Class D airspace.</p> <p>Priority should be given to GA training in “free” airspace.</p> <p>NIA has no right to claim airspace.</p> <p>Infringement of civil liberties.</p> <p>Airspace is a “god given right” to GA.</p> <p>Robbing citizens of freedom.</p> <p>Grandfather rights.</p> <p>LAA should seek compensation from NIA.</p>	<p>Airspace is a State asset which is not “owned” by any aviation faction nor any ANSP. Designation of airspace as CAS does not confer nor imply “ownership” by the Controlling Authority and it attracts no commercial value.</p> <p>The objectives for the regulation of airspace by the CAA are laid down in the Transport Act 2000 and the associated Ministerial Directions.</p> <p>The CAA does not allow airspace controlling authorities to “manage by exclusion” and access to the proposed CAS by “the aviating public” is not denied. (The passengers in the commercial airliners are equally part of “the aviating public”.) NIA does not propose, nor would it be allowed, to “appropriate” the airspace for “commercial reasons”.</p>

D Revised configuration of the proposed controlled airspace in the vicinity of NIA

