

## NORWICH INTERNATIONAL AIRPORT

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

#### INTERIM REPORT ON THE SPONSOR CONSULTATION

#### 1. Introduction

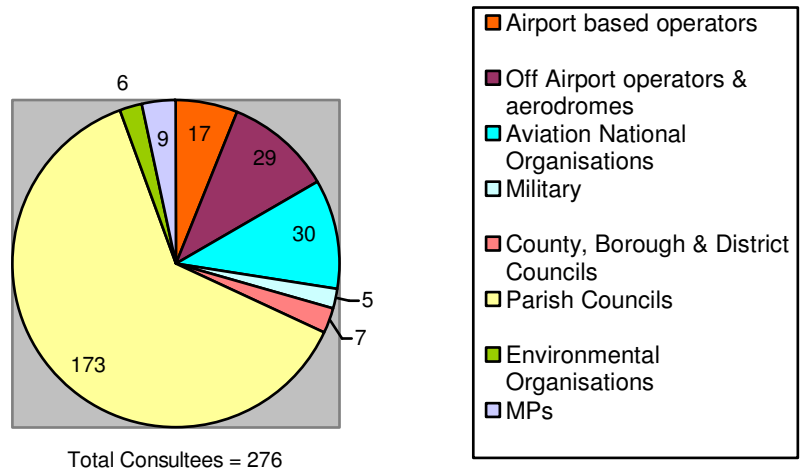
- 1.1 Norwich International Airport (NIA) proposes to submit to the Civil Aviation Authority (CAA) a case for the establishment of controlled airspace in the vicinity of NIA in order to enhance the safety of commercial and other flights operating to and from the Airport in the critical stages of flight and also of other flights operating in the area.
- 1.2 This document is an Interim Report on a consultation carried out by NIA between 21 April 2009 and 28 August 2009. The background to the consultation and methodology used is detailed at Appendix A.
- 1.3 This Report details the preliminary statistical data arising from the responses received during the consultation. It will be followed by a Final Report when the analysis of the responses has been completed.
- 1.4 NIA thanks all consultees and other individuals who took the time to participate in this consultation.

#### 2. Statistics

- 2.1 A total of 276 Consultation Letters were distributed as detailed in Appendix A paragraph A3. The list of Consultees is detailed in Appendix I of the Sponsor Consultation Document<sup>1</sup>.
- 2.2 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.
- 2.3 During the consultation period the website link was visited 2224 times.

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<sup>1</sup> Subsequent to the release of the Sponsor Consultation Document 3 additional consultees were included and the Title of one consultee organisation was corrected.

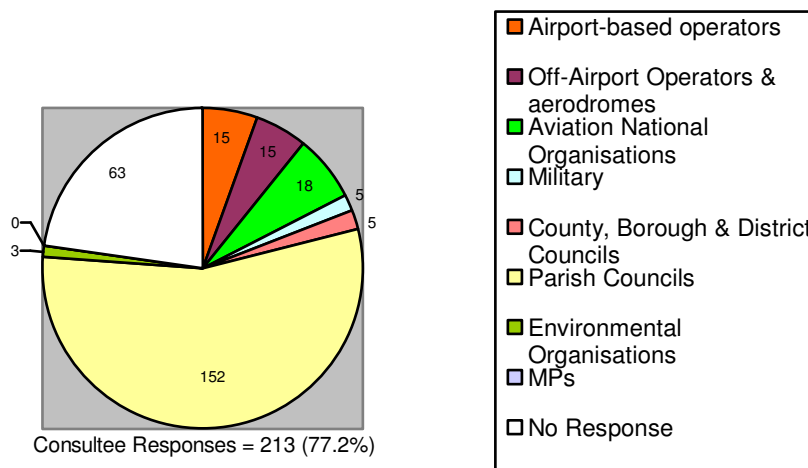


**Figure 1. Distribution of consultees**

2.4 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**

- 2.5 In addition to the responses from consultees detailed above, 537 submissions were received from other individuals or groups.
- 2.6 Only 3 enquiries were received seeking clarification about the consultation process or the proposed airspace design were received, which indicated that the format and content of the document suited the requirements of the majority of consultees.
- 2.7 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 of the consultation.

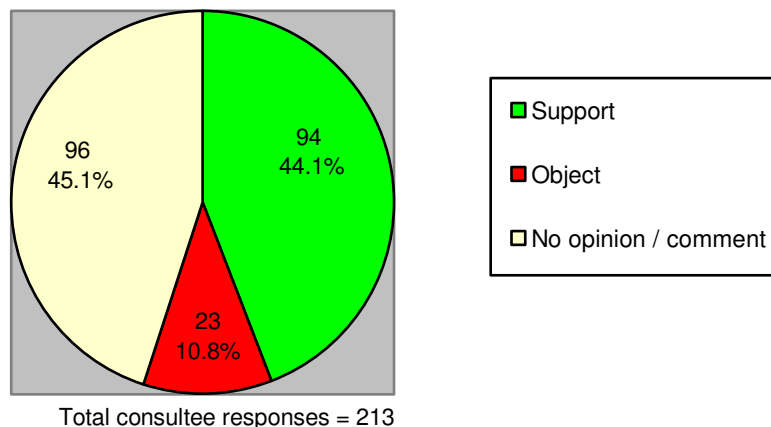
### 3. Analysis

3.1 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**

3.2 Of the 537 responses from individuals or organisations not on the consultation list, all except 3 objected to the proposal. It is unusual to receive such a large number of responses from a particular sub-set of the aviation community which, from the initial analysis appeared to be based on objections to common issues. Indeed it appears that this might have been an orchestrated campaign against the proposal (through corporate websites and other means) outside the accepted process for consultation promulgated by the CAA. 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). This apparent action outside the recognised consultation process is the subject of further evaluation and discussion with the CAA.

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

#### **4. Next Action**

4.1 Collectively, all of the comments received (including those from non-consultees) will be subject to a detailed analysis and review by NIA in order to identify issues of concern and derive a balanced and well reasoned Final Report. Where appropriate, NIA will contact consultees or individuals for clarification of issues raised. The issues of concern and NIA considered response will be compiled into the Final Report on the Consultation which will be posted on the NIA website in due course. Individual responses will not be sent.

4.2 Following review of the consultation responses NIA will submit its case to the CAA for the establishment of controlled airspace in the vicinity of NIA.

**5. Confidentiality**

- 5.1 The CAA requires that all consultation material, including copies of responses from consultees and others, are included in any formal submission to the CAA of the proposal to establish controlled airspace.
- 5.2 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 also party to confidentiality agreements in this respect.

## **Appendix A Background to the Consultation.**

### **A1. Introduction**

A1.1 The CAA lays down 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.

A1.2 The airspace development proposal and consultation has been conducted in accordance with the CAA requirements.

A1.3 NIA carried out this consultation between 21 April 2009 and 28 August 2009 (see para A2.3), in accordance with the principles set out in the Cabinet Office Code of Practice on Consultation.

### **A2. Consultation methodology**

A2.1 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.

A2.2 The Sponsor Consultation Document was posted at a discrete link on the NIA website. ([www.norwichinternational.com/airspaceconsultation](http://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 Document<sup>2</sup>. Paper copies of the Consultation Document were made available to consultees on request.

A2.3 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

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<sup>2</sup> 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 consultative 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.

A2.4 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](mailto: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.

A2.5 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.

### **A3. Consultees.**

A3.1 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
- 7 County, Borough, District and City Councils
- 173 Parish Councils
- 6 National or Local Environmental Organisations
- 8 Members of Parliament

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

- A3.2 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.
- A3.3 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 Sponsor Consultation 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.

## **Appendix 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. The earlier stages prior to consultation include the initial airspace design developed by NIA in conjunction with airspace design experts taking into account the local operational requirement in conjunction with the CAA regulatory requirements and 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 has, at all stages, sought advice from the CAA and agreed the Consultee List with them.
- 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. 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.