

Norfolk Vanguard & Norfolk Boreas Wind Farms

Vanguard & Boreas Wind Farms Gateway Documentation:

Stage 3

3D: Collate and Review Responses (Incorporating Step 4A Update Design)





Authorship

Action	Role	Date
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Reviewed Approved	Manager, Airspace Change Compliance and Delivery NATS	February 2021
Reviewed Approved	Senior Strategy Advisor- Aviation Vattenfall Wind Power Ltd.	February 2021
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References

Ref No	Description	Hyperlinks
1	Norfolk Vanguard & Norfolk Boreas Wind Farms CAA web page – progress through CAP1616	<u>link</u>
2	Stage 1 Assessment Meeting Presentation	link
3	Stage 1 Assessment Meeting Minutes	link
4	Stage 1 Design Principles	link
5	Stage 2 Design Options	<u>link</u>
6	Stage 2 Design Principle Evaluation	link
7	Stage 2 Options Appraisal (Initial) & Safety Assessment	<u>link</u>
8	Stage 3 Consultation Strategy	<u>Link</u>
9	Stage 3 Full Options Appraisal	<u>Link</u>
10	Stage 3 Consultation Document	<u>Link</u>
11	NATS Wind farm Safety Assurance Report	Supplied Separately to CAA

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1. Introduction

- 1.1 This document forms part of the document set required in accordance with the requirements of the CAP1616 airspace change process.
- 1.2 This document aims to provide adequate evidence to satisfy:
 Stage 3, Step 3D Categorisation of Responses.
 Stage 4, Step 4A Update Design.
 Stage 4, Step 4A Options Appraisal (phase III Final), including Safety Assessment.

2. Consultation

- 2.1 Vattenfall has completed a consultation focused on the introduction of a 2-stage mitigation which includes radar blanking and a Transponder Mandatory Zone (TMZ) surrounding the Norfolk Boreas and Vanguard wind farms, including a 2 Nautical Mile (NM) buffer zone.
- 2.2 The timeline for this proposed airspace change is fixed by an agreed target implementation date of Aeronautical Information Regulation And Control (AIRAC) 13/2021 which is the target AIRAC implementation date prior to the hanging of the first blades. This has been determined by the programmed construction of the wind farm commencing Q2 2024, with the first turbine rotation scheduled for early 2025.
- 2.3 The consultation strategy document (Ref 8) describes the focus of the consultation including previous engagement activities completed, the audience of the consultation and justification behind the consultation strategy.
- 2.4 A consultation document (Ref 10) was written for the proposed airspace change and provided to stakeholders. This included a description of the current airspace, the proposed changes and the impact of the proposal.
- 2.5 A targeted group of stakeholders were specifically engaged for this consultation. These included appropriate Air Navigation Service Providers (ANSPs), six offshore helicopter operators, relevant members of the National Air Traffic Management Advisory Committee (NATMAC) and the Ministry of Defence (MOD). These are all listed in Annex A: List of Stakeholders. A description of engagement activities and reasoning behind why these specific stakeholders were targeted can be found in the Consultation Strategy Document (Ref 8).
- 2.6 The consultation targeted the stakeholders listed in Annex A: List of Stakeholders but was not exclusive to this list. Any individual or organisation could submit a response; however, we only specifically targeted the organisations listed. No responses were received from non-targeted stakeholders.
- 2.7 The targeted stakeholders were sent a notification email to inform them when the consultation was live. This included information on how to respond via the online portal and that the consultation document was available to download from the portal.
- 2.8 Reminder emails were sent to all stakeholders, who had not submitted a consultation response, at the mid-point and at the start of the final week of consultation which included a link to the online consultation portal. This was to prompt stakeholders who wished to respond and had not done so.



- 2.9 Stakeholders which had actively engaged with stages 1 and 2 of this ACP were followed up, by telephone, if they had not already responded by the final week of the consultation.
- 2.10 The consultation has been conducted via an online portal which included an overview into the proposed changes, the consultation document available for download and a survey which allowed users to submit feedback. Stakeholders could also download and print or request a form to return via post. No responses were received by post.
- 2.11 A link to the consultation portal was shared on the Norfolk Boreas and Norfolk Vanguard project and NATS websites.
- 2.12 A list of the questions used in the online portal can be found in Annex C: Online Portal Questions.
- 2.13 The consultation commenced on Monday 23rd November 2020 and closed on Sunday 31st January 2021; a period of ten weeks as agreed by the CAA.
- 2.14 Responses have been managed and uploaded to the portal by the CAA.
- 2.15 There were no responses which required any additional material or information.

3. Summary of Consultation Responses

- 3.1 A total of 13 responses were received during the consultation period. Nine of the responses were submitted via the online portal, three, the British Gliding Association, Maritime & Coastguard Agency (MCA) and NATS En Route Ltd (NERL) were emailed directly to the consultation mailbox and one response was received from the British Microlight Aircraft Association (BMAA) by telephone. The email and telephone responses were manually uploaded to the online portal. There were no postal responses.
- 3.2 The categorisation of responses has been split into those which may impact final proposals and those which would not. This is summarised later, in Section 4 of this document.
- 3.3 Responses were received from the following targeted stakeholders: NHV Helicopters Ltd., Airfield Operators Group (AOG), British Gliding Association (BGA), Defence Airspace and Air Traffic Management (DAATM), Association of Remotely Piloted Aircraft Systems (ARPAS) UK, Guild of Air Traffic Control Officers (GATCO), Norwich Airport Ltd., Bristow Search and Rescue (SAR), BMAA, MCA, British Balloon & Airship Club (BBAC), NERL. and NATS Aberdeen (Offshore).
- 3.4 There were no responses from non-targeted stakeholders.
- 3.5 When asked if they supported the proposed TMZ described in the consultation document, eight of the 13 responses received specified that they SUPPORT the ACP (62%) and five chose NO COMMENT (38%) (However, these respondents are assumed not to object as no negative feedback was received see Table 2). No respondents responded that they were AMBIVALENT (0%) or OBJECTED (0%) to the proposal. The responses have been summarised below in Table 1 and Figure 1.



Response ID	Organisation	Position Title	<i>Do you support the airspace changes in this proposal</i>
VATTENFALL -1	NHV Helicopters Ltd.	UK Flight Operations Manager	NO COMMENT
VATTENFALL-2	Airfield Operators Group	Chairman	NO COMMENT
VATTENFALL -3	British Gliding Association	Not Answered	NO COMMENT
VATTENFALL -4	Defence Airspace & Air Traffic Management	SO2 Airspace Plans	NO COMMENT
VATTENFALL-5	ARPAS UK	Director	SUPPORT
VATTENFALL-6	GATCO	Vice President Policy	SUPPORT
VATTENFALL -7	Norwich Airport Ltd.	Head of Airfield Operations	SUPPORT
VATTENFALL -8	Bristow SAR	Captain	SUPPORT
VATTENFALL -9	British Microlight Aircraft Association	Chief Executive	NO COMMENT
VATTENFALL-10	HM Coastguard, Maritime & Coastguard Agency (MCA)	Offshore Energy Liaison Officer	SUPPORT
VATTENFALL-11	British Balloon & Airship Club	Regional Liaison Officer/NATMAC Representative	SUPPORT
VATTENFALL -12	NATS- NERL	Manager NATS Operational Policy	SUPPORT
VATTENFALL-13	NATS- Aberdeen Offshore	Manager ATC	SUPPORT

Table 1: Reponses Overview





Figure 1: Consultation Responses to Proposed Airspace Change

- 3.6 Overall the airspace change is supported:
 - 62% of responses Support the proposed change;
 - 38% have No Comment;
 - No responses were Ambivalent; and
 - There were no objections made to the proposal.
- 3.7 The online portal invited comments on the proposed changes. These have been reviewed and are summarised in Section 4.

4. Categorisation of Consultation Responses and Themes

- 4.1 The responses received have been reviewed; some comments had several different elements.
- 4.2 The responses and associated elements have been broken down into two types: those which may lead to changes of the proposed design and those which do not. These have been split out in Sections 4.6 and 4.7 below. Where responses had multiple elements, these have been separated out and categorised as such.
- 4.3 No response elements were identified as having a potential impact on the final proposed design.
- 4.4 Thirteen response elements were captured as not having an impact on the final proposed design. These are summarised in Table 2, Section 4.7.
- 4.5 This consultation complies with the first part of CAP1616's "We asked, you said, we did" approach.



4.6 Responses which may impact the final proposal

There were no responses from the 13 different respondents that have the potential to impact on the proposed design.

4.7 Responses which do not impact the final proposal

The following 13 respondents did not provide any new information or suggestions that could lead to an adaptation in the final proposed design. Additional relevant feedback is captured, including any actions or considerations arising. Table 3 below summarises these responses.

Response ID	Comment	Themes of comment	<i>Why the proposal is not impacted</i>	Any relevant considerations/ feedback
VATTENFALL -1	TMZs have little effect on commercial offshore traffic.	General	No comments containing new information or suggestions	N/A
VATTENFALL-2	As the operator of an airfield in Norfolk not far from the proposed TMZ I have an interest on behalf of based aircraft and incoming visitors. I would be extremely surprised if anyone flying that far away from the coast was not Transponder equipped, so I do not feel that this proposal will have any practical impact on GA.	General	No comments containing new information or suggestions	N/A
VATTENFALL -3	This proposed TMZ does not impact gliding operations, which do not extend that far out to sea.	General	No comments containing new information or suggestions	N/A
VATTENFALL -4	MOD are content subject to the mitigation being approved, implemented and operational before erection of the wind turbine generators as per the Condition of the development agreement.	General	No comments containing new information or suggestions	N/A
VATTENFALL -5	We would like to support the TMZ because in the long term it will enhance safety in the area for both manned and unmanned aviation.	General	No comments containing new information or suggestions	N/A



VATTENFALL -6	We support the implementation of a TMZ as you have described in your consultation and have no comments to make.	General	No comments containing new information or suggestions	N/A
VATTENFALL -7	The TMZ will have a negligible impact on Norwich Airport operations; all Norwich based North Sea Helicopters are SSR equipped and therefore will be able to comply.	General	No comments containing new information or suggestions	N/a
VATTENFALL -8	Azimuth Range Blanking coupled with a Transponder Mandatory Zone should mitigate the associated reduction in radar performance.	General	No comments containing new information or suggestions	N/A
VATTENFALL -9	No comment provided.	General	No comments containing new information or suggestions	N/A
VATTENFALL -10	The MCA supports the Bristow SAR response and do not have any further comments.	General	No comments containing new information or suggestions	N/A
VATTENFALL -11	The TMZ will have no impact on hot air ballooning.	General	No comments containing new information or suggestions	N/A
VATTENFALL -12	There is no impact on systems or procedures and therefore NERL supports the proposal.	General	No comments containing new information or suggestions	N/A
VATTENFALL -13	In respect of the Anglia Radar ATC operation (which is provided by NATS Aberdeen - Offshore) we would be content with Option D, the provision of a TMZ to mitigate the blanking of Cromer primary radar.	General	No comments containing new information or suggestions	N/A

Table 2: Reponses which do not impact the final proposal.



5. Step 4A Update Design

- 5.1 Sections 1-4 complete the Step 3D document "we asked, you said".
- 5.2 This section completes the CAP1616 "you said, we did" approach
- 5.3 No responses were received suggesting a change is needed for this proposal, thus no modifications to the design were made.
- 5.4 There are subsequently no changes to the previously published options appraisal nor to the safety assessment; they become the Final Options Appraisal and Safety Assessment as per Stage 3 Full Options Appraisal.

6. Final Options Appraisal

6.1 Table 3 is based on the key analyses described in CAP1616 Table E2.



Group	Impact	Level of Analysis	Evidence
Communities	Noise impact on health and quality of life	Qualitative	There are no proposed changes to air traffic patterns so there will be no impact for noise. The designated area is approx. 47 kilometres (km) from the Norfolk coast.
Communities	Air quality	Qualitative	No changes to aircraft trajectories below 1,000 (feet) ft.
Wider society	Greenhouse gas impact	Monetise and quantify	The introduction of a RAG Blanking and TMZ Primary Radar Mitigation Scheme (PRMS) will have no impact on transponder equipped aircraft. All commercial aircraft and the majority >99% of General Aviation (GA) aircraft are transponder equipped and will remain unaffected. The introduction of the wind farms is anticipated to provide CO ₂ e benefits of c. 6.3 MT per annum ¹ , which is a benefit of this project. This environmental benefit negates any disbenefit caused by increased track millage of any non-transponder equipped aircraft avoiding the proposed TMZ and will only be realised if the airspace change is implemented.
Wider society	Capacity/ resilience	Qualitative	This option will have no anticipated impact.
General Aviation	Access	Qualitative	For GA aircraft equipped with an operating transponder there would be no change in access due to the proposed TMZ. Aircraft without an operational transponder would be restricted from entering the TMZ without first being granted access to the TMZ from TMZ controlling Authority. Without this clearance they would be required to fly a route avoiding the TMZ. GA users without an operating transponder wanting to access the TMZ without obtaining access from the controlling authority will have a one-off cost implication (approx. £2,000) to purchase a transponder. ² Given the offshore location (47 km from Norfolk coastline), the demand for GA aircraft without a transponder wanting to fly over this area is minimal. The vast majority of GA aircraft, >99%, are transponder equipped and will not be impacted by this airspace change.
General Aviation/ commercial airlines	Economic impact from change in effective capacity	Qualitative	There would be no change in effective capacity.

¹ Calculated using <u>https://www.renewableuk.com/page/UKWEDhome_and https://group.vattenfall.com/uk</u>

² A rebate of up to £250 for new Electronic Conspicuity (EC) devices are now available thanks to funding from the Department for Transport (DfT) aimed at encouraging more adoption of EC. <u>https://www.caa.co.uk/General-aviation/Aircraft-ownership-and-maintenance/Electronic-Conspicuity-devices/</u>



General Aviation/ commercial airlines	Fuel burn	Monetise	No expected change to fuel burn for commercial airlines as flight plannable routes will remain unchanged and they will be able to route through the TMZ as currently. GA users may incur increased fuel burn if they are forced to reroute around the TMZ if they do not have the relevant equipage. However, the likely volume of non-transponder equipped aircraft which may pass through this area and any potential increase in fuel burn as a result would be negligible (estimate ~ 1 per day).
Commercial airlines	Training cost	Qualitative	N/A – there are not expected to be any airline training cost associated with this development.
Commercial airlines	Other costs	Qualitative	Updates to FMS and flight planning systems will by the routine AIRAC updates. There are no other known costs which would be imposed on commercial aviation.
Airport/ Air navigation service provider	Infrastructure costs	Qualitative and quantitative	There would be no associated infrastructure costs. The developer has agreed to cover all engineering costs for implementation of the Radar RAG Blanking.
Airport/ Air navigation service provider	Operational costs	Qualitative	N/A – this proposal would not lead to changes in operational costs.
Airport/ Air navigation service provider	Deployment costs	Qualitative	N/A – no costs for the ANSP anticipated for the deployment of the TMZ.

Table 3: Option C analysis based on CAP1616 Table E2



7. Safety Assessment

This assessment is unchanged from the equivalent Stage 3 Document:

7.1 Safety Assessment

The Option D "RAG blanking of the wind farm locations with a simplified polygon TMZ "rubber banded" around proposed wind farm locations extended to include a 2 NM buffer" is proposed as the optimum solution to mitigate the impact of the Norfolk Vanguard and Boreas WTGs on the Cromer Primary Surveillance Radar (PSR) system.

This option will provide:

- Effective suppression of all primary radar clutter associated with the WTGs.
- The promulgation of a TMZ over the RAG blanked area will ensure that aircraft within the RAG Blanked area must be transponder equipped and hence will be visible to ATC via secondary surveillance radar.
- The dimensions of the TMZ include a 2 NM buffer which is adequate to ensure that ATC have sufficient time to identify when an infringement of the TMZ is taking place and take appropriate action.

Experience from previous wind farm developments has demonstrated that the implementation of radar RAG blanking coupled with an associated TMZ provides safe and effective mitigation against radar issues associated with WTGs.

Initial qualitative assessment from NATS Safeguarding has confirmed that the proposed Option D design would provide adequate mitigation to fulfil the requirements required of the NERL Cromer: PSR Mitigation Scheme.

7.2 Safety Assessment Conclusion

The proposed Option D TMZ coupled with RAG blanking provides safe and effective mitigation against the radar issues associated with WTGs.

8. Conclusion and Next Steps

- 8.1 This document will be published onto the Norfolk Vanguard & Norfolk Boreas Wind farms CAA web page alongside the documents referenced on Page 3.
- 8.2 Sections 1-4 completed the Sep 3D "we ask, you said". Section 5 completed the Step 4A "you said, we did".
- 8.3 With Steps 3D and 4A completed by this document, the next step will be to publish the formal Airspace Change Proposal and submit this to the CAA.
- 8.4 Should this proposal be approved, it will be implemented in AIRAC 13/2021.



9. Reversion Statement

- 9.1 Vattenfall considers this consultation to be the 'do minimum' option. A 'do nothing' option would not provide mitigation against radar clutter. Should the proposal be approved and implemented, it would not be possible to revert to the pre-implementation state without affecting NATS ATC operations. The proposed changes would permanently change the airspace structure.
- 9.2 In the unlikely event that there are unexpected issues caused by this proposal, then short notice changes could be made via NOTAM. For a permanent reversion, the changes would have to be reversed by incorporating this into an appropriate future AIRAC date to align with NATS' engineering updates.; of which there are only four a year.



Туре	Stakeholder
	Aircraft Owners and Pilots Association (AOPA)
	Airfields Operators Group (AOG)
	Airlines UK
	Airport Operators Association (AOA)
	ARPAS - Association of Remotely Piloted Aircraft Systems
	Aviation Environment Federation (AEF)
	BAe Systems
	BBAC - British Balloon & Airship Club
	BHPA - British Hang gliding & Paragliding Association
	BMAA - British Microlight Aircraft Association
	BMFA - British Model Flying Association
	British Sky Diving (formally BPA)
~	British Airline Pilots Association (BALPA)
IAC	British Airways (BA)
NATMAC	British Business and General Aviation Association (BBGA)
Ž	British Helicopter Association (BHA)
	BGA- British Gliding Association
	GAA- General Aviation Alliance
	General Aviation Safety Council (GASCo)
	Guild of Air Traffic Control Officers (GATCO)
	Heavy Airlines
	Helicopter Club of Great Britain (HCGB)
	Light Aircraft Association (LAA)
	Light Airlines
	Low Fare Airlines
	MOD DAATM
	PPL/IR (Europe)
	British Airways (BA)
	Babcock Helicopters ³
ter Srs	Bristow Helicopters
cop	CHC Scotia
Helicopter Operators	Heli Holland
ΤÜ	NHV Helicopters
	Maritime and Coastguard Agency (MCA)
	Aberdeen ATC
ATC	NATS En Route Limited (NERL)
F	LVNL
	Maastricht UAC
<i>"</i>	Humberside Airport
Airports	Norwich Airport
Airp	
-	

10. Annex A: List of Stakeholders

³ Babcock Helicopters informed us during Stage 2 engagement that they no longer operate in the affected area and wished to be removed from the stakeholder list.



11. Annex C: Stakeholder Engagement Evidence

11.1 Email sent to Stakeholders Informing them of Consultation Launch 23rd November 2020.

Dear Colleague,

Introduction of a New Transponder Mandatory Zone in the North Sea

Vattenfall Wind Power Ltd. would like to invite you to respond to the above consultation, regarding the introduction of a new Transponder Mandatory Zone in the North Sea.

The consultation is open for 10 weeks from 23th November 2020 to 31st January 2021.

The consultation material is available, including the consultation document, on the CAA's Airspace Change portal using the following link:

https://airspacechange.caa.co.uk/PublicProposalArea?pID=86

Please take the time to consider this proposal and complete the short questionnaire provided on the portal. If you need to provide additional documents as part of your response there is the facility to do this. All feedback is valuable, even if you support, object or ambivalent to these proposed changes.

Kind regards

NATS Airspace Change Team

11.2 Email reminder sent to Stakeholders midway through Consultation 4th January 2021

Dear Colleague,

Please see the email below relating to a consultation Vattenfall Wind Power Ltd. is currently undertaking regarding **Introduction of a New Transponder Mandatory Zone in the North Sea** which opened on the 23rd November.

If you have already responded thank you for your time. If not, this consultation closes on the 31st January, in 4 weeks' time. If you would like to provide feedback please do so before this date. We would value any input you provide.

Kind regards

NATS Airspace Change Team







Fareham, Hants P015 7FL



From: Airspace ConsultationSent: 23 November 2020 08:31Subject: Introduction of a New Transponder Mandatory Zone in the North Sea

Dear Colleague,

Introduction of a New Transponder Mandatory Zone in the North Sea

Vattenfall Wind Power Ltd. would like to invite you to respond to the above consultation, regarding the introduction of a new Transponder Mandatory Zone in the North Sea.

The consultation is open for 10 weeks from 23rd November 2020 to 31st January 2021.

The consultation material is available, including the consultation document, on the CAA's Airspace Change portal using the following link:

https://airspacechange.caa.co.uk/PublicProposalArea?pID=86

Please take the time to consider this proposal and complete the short questionnaire provided on the portal. If you need to provide additional documents as part of your response there is the facility to do this. All feedback is valuable, even if you support, object or ambivalent to these proposed changes.

Kind regards

NATS Airspace Change Team

11.3 Final Email reminder sent to Stakeholders 25th January 2021

Dear Colleague,



Please see the email below relating to a consultation Vattenfall Wind Power Ltd. is currently undertaking regarding **Introduction of a New Transponder Mandatory Zone in the North Sea** which opened on the 23rd November.

If you have already responded thank you for your time. If not, this consultation closes on the **31**st **January**, in 6 days' time. If you would like to provide feedback please do so before this date. We would value any input you provide.

Kind regards



NATS Airspace Change Team



From: Airspace ConsultationSent: 23 November 2020 08:31Subject: Introduction of a New Transponder Mandatory Zone in the North Sea

Dear Colleague,

Introduction of a New Transponder Mandatory Zone in the North Sea

Vattenfall Wind Power Ltd. would like to invite you to respond to the above consultation, regarding the introduction of a new Transponder Mandatory Zone in the North Sea.

The consultation is open for 10 weeks from 23rd November 2020 to 31st January 2021.

The consultation material is available, including the consultation document, on the CAA's Airspace Change portal using the following link:

https://airspacechange.caa.co.uk/PublicProposalArea?pID=86

Please take the time to consider this proposal and complete the short questionnaire provided on the portal. If you need to provide additional documents as part of your response there is the facility to do this. All feedback is valuable, even if you support, object or ambivalent to these proposed changes.

Kind regards

NATS Airspace Change Team



11.4 Email response from The British Gliding Association 25th November 2020.

Hi

Thanks for engaging with the British Gliding Association.

This proposed TMZ does not impact gliding operations, which do not extend that far out to sea.

Kind regards

11.5 Email response from The British Gliding Association 26th January 2021.

Hi

Many thanks for completing this feedback.

I'd prefer for the comment not to come from both Bristow SAR and MCA, however, I do not have any further remarks.

Therefore Paul, could you possibly comment that the MCA supports the Bristow SAR response and do not have any further comments.

Hope this is ok.

Cheers

, Offshore Energy Liaison Officer

HM Coastguard, Maritime & Coastguard Agency

Marine House, Blaikies Quay, Aberdeen, AB11 5EZ

Direct: Mobile:

Generic email:

Safer Lives, Safer Ships, Cleaner Seas



11.6 Email response from NERL 28th January 2021.

Hi

SWN has carried out an Impact Assessment on the proposal. The NATS NERL response is that there is no impact on systems or procedures and support the proposal.

Please let me know if you require anything else.

Regards



Manager NATS Operational Policy

M:

E:



12. Annex C: Online Portal Questions

The following questions were included in the online portal for users to complete. Imposed answers have also been shown below, alongside whether the question was mandatory or not.

- 1. What is your name? (*Mandatory*)
- 2. What is your email address? (*Mandatory*)
- 3. Please enter your postcode, UK only. (Most relevant to your response home/ work/ organisation etc.) (*Optional*)
- 4. If responding from outside the UK, please supply an address or location description. (Optional)
- 5. Who are you representing? Representing (Mandatory)
 - a. I am responding as an individual (If the user selects this, Q6–8 will not be provided)
 - b. I am responding on behalf of an organisation (If the user selects this, Q6–8 will be provided)
- 6. In accordance with the UK Civil Aviation Authority's CAP 1616 airspace change process, consultation responses will be published on Citizen Space via the Airspace Change Portal. Responses will be subject to moderation by the Civil Aviation Authority. If you wish your response to be published anonymously your personal details (Name, Address & Position) will be redacted and only be seen by the Civil Aviation Authority? (*Mandatory*)
 - a. Yes I want my response to be published with my details
 - b. No I want my response to be published anonymously
- 7. What is your organisation name? (*Mandatory* if answered "b" to Q4)
- 8. What is your position/ title? (Optional)
- 9. Do you support the introduction of the TMZ described in this proposal? (Mandatory)
 - a. SUPPORT I support the proposed changes
 - b. NO COMMENT I neither support or object
 - c. AMBIVALENT I have mixed feelings
 - d. OBJECT I object to the proposed changes
- 10. Please give your feedback comments on the overall proposal. Please Consider:
 - What do you believe will be the impact of the TMZ on your operation?
 - How often do you think these impacts will occur?
 - Do you have any suggested mitigations or design changes you think should be considered?
 - Do you think there may be any unintended consequences of the TMZ? (Optional) Blank text box
- 11. Upload a document. (Optional)
- 12. Do you have any comments on the consultation content? (Optional) Blank text box