

Neart na Gaoithe and Inch Cape Offshore Wind Farm TMZ

Consultation Report

Date: 1 October 2015 Revision: Issue 1 Osprey Ref: 70851 021

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Executive Summary

Neart na Gaoithe Offshore Wind Limited (NNGOWL) and Inch Cape Offshore Limited (ICOL) are the Sponsors for a proposed airspace change over the proposed development sites of the Neart na Gaoithe (NNG) and Inch Cape (IC) Wind Farms. The Development Areas lie off the east coast of Scotland with NNG lying to the south of IC by approximately 8 kilometres (km). NNG will be located in the Outer Firth of Forth; 15.5 km from Fife Ness, with IC located approximately 15 km off the Angus coastline.

As part of the Civil Aviation Authority's (CAA) Airspace Change Process (ACP) Civil Aviation Publication (CAP 725) [Reference1], NNGOWL and ICOL are required to submit a case to the CAA to justify the establishment of a Transponder Mandatory Zone (TMZ) over the NNG and IC Wind Farms, and to undertake a consultation exercise with all relevant stakeholders. This ensures that all stakeholders who may be directly or indirectly affected by the proposed change are consulted, as well as highlighting any environmental impacts that the proposed airspace change may have.

NNGOWL and ICOL have engaged Osprey Consulting Services Limited (Osprey) to project manage the ACP on their behalf.

This document is the Final Report on the consultation carried out by NNGOWL and ICOL between 19th June 2015 and 7th September 2015 in accordance with the requirements of CAA CAP 725 [Reference 1]. It includes an analysis of all submissions received throughout the consultation and identifies the main issues raised by consultees. It also provides NNGOWL and ICOL's views in relation to the issues raised and outlines post-consultation action taken, or planned to be undertaken by NNGOWL and ICOL.

This document will form part of the Airspace Change Proposal submission to the CAA that will detail the case for the proposed TMZ.

Subject of the Consultation

The purpose of this consultation was to gather and analyse the views of the various stakeholders concerning a proposal to establish a TMZ over the proposed NNG and IC Wind Farms off the Fife and Angus coastlines. Fundamentally, the aim of the consultation was to enable NNGOWL and ICOL to obtain or confirm views and opinions about the impact of the proposed airspace change.

Consultees

The Consultation Document was circulated to a total of 62 consultee organisations or individuals. The aviation consultees included aviation parties such as the Ministry of Defence (MOD), airlines, aircraft operators, adjacent aerodromes, all local airspace users and the national bodies representing all UK aviation interests who may be affected by the regulatory requirements within the TMZ. National bodies such as Light Aircraft Association (LAA), British Airline Pilots' Association (BALPA), Airport Operators Association (AOA) etc. are represented through the auspices of the National Air Traffic Management Advisory Committee (NATMAC), sponsored by the CAA. A number of military organisations are also members of the NATMAC.



Non-aviation stakeholders for consultation include but are not limited to environmental and heritage organisations and the local lighthouse authority. In addition, the views of individual members of the public were welcomed.

Consultation Statistics

A total of 11 responses (approximately 18 % of consultees) were received from a total of 62 consultees.

Of the 11 responses received from the consultee organisations; 4 consultees supported the proposal to establish a TMZ over the NNG and IC Offshore Wind Farms and 7 did not object to the proposal.

Next Stages

The consultation process constitutes the fourth stage of the CAA's overall process laid down in CAP 725 [Reference 1] leading to an Airspace Change Proposal.

NNGOWL and ICOL will submit a formal Airspace Change Proposal to the CAA detailing the case for the proposed TMZ.

Following receipt of the formal Airspace Change Proposal, the CAA then requires a 16-week period to conduct its own internal analysis of the final proposal and consultation results, before arriving at a Regulatory Decision.

NNGOWL and ICOL extend their thanks to all consultees and other individuals who took the time to participate in this consultation and for their very useful feedback.



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Introduction

This document is the report of the consultation, carried out between 19th June 2015 and 7th September 2015, on the establishment of a Transponder Mandatory Zone (TMZ) over the proposed development sites of the Neart na Gaoithe (NNG) and Inch Cape (IC) Wind Farms. The aim of this report is to present details on the statistical data arising from the responses to the consultation, together with an analysis of the feedback received.

General

Neart na Gaoithe Offshore Wind Limited (NNGOWL) and Inch Cape Offshore Limited (ICOL) are the Sponsors for a proposed airspace change over the proposed development sites of the Neart na Gaoithe (NNG) and Inch Cape (IC) Wind Farms. The Development Areas lie off the east coast of Scotland with NNG lying to the south of IC by approximately 8 kilometres (km). NNG will be located in the Outer Firth of Forth; 15.5 km from Fife Ness, with IC located approximately 15 km off the Angus coastline.

As part of the Civil Aviation Authority's (CAA) Airspace Change Process (ACP) Civil Aviation Publication (CAP 725) [Reference 1], NNGOWL and ICOL are required to submit a case to the CAA to justify the establishment of a Transponder Mandatory Zone (TMZ) over the NNG and IC Wind Farms, and to undertake a consultation exercise with all relevant stakeholders. This ensures that all stakeholders who may be directly or indirectly affected by the proposed change are consulted, as well as highlighting any environmental impacts that the proposed airspace change may have.

NNGOWL and ICOL have engaged Osprey Consulting Services Limited (Osprey) to project manage the ACP on their behalf. The NNG and IC TMZ airspace change is hereafter referred to as 'the proposal'.

This document is the report on the aforementioned consultation. The background to this consultation and the methodology used are detailed in Annex A1 to this document. The aim of this report is to present details on the statistical data arising from the responses to the consultation, together with an analysis of the feedback received.

Subject of the Consultation

The purpose of this consultation was to gather and analyse the views of the various stakeholders concerning a proposal to establish a TMZ over the proposed NNG and IC Wind Farms off the Fife and Angus coastlines.

This consultation concerns the proposed implementation of a TMZ to mitigate the impact of NNG and IC Wind Turbine Generators (WTG) on the Leuchars Primary Surveillance Radar (PSR). The TMZ is required to enable Leuchars to continue to



provide safe and efficient Air Traffic Service (ATS) to aircraft once WTGs are being constructed and operational.

In reaching their conclusions, stakeholders were requested to individually consider each of the two options for application of the TMZ. A consultation response was requested if individually or any combination of the two options would affect stakeholder operations. Stakeholders were asked to consider the operating environment within which the proposed TMZ lies and to consider the following questions before responding:

- Do you regularly fly in the airspace within the location of the Development Areas and within the region of the proposed TMZ?
- *If yes, would the proposed TMZ affect your operation?*
- Are there any unforeseen consequences of the proposed TMZ, which the developers should be made aware of?

Development of the consultee list

A full list of consultees was developed with the advice of the CAA and is given at Annex A2.

At the start of the consultation, NNGOWL and ICOL sent out a notification to 62 consultees, comprising:

- 37 Aviation "National Organisations" (CAA NATMAC list);
- 11 Aviation organisations;
- 10 Local aerodromes; and
- 4 Non-Aviation organisations.

Further detail on the categories of consultee organisations is provided in Section 2.2 of this report.

Confidentiality

All the feedback from the consultation has been made available to the CAA as part of the Airspace Change Proposal. This will allow the CAA to assess independently whether the appropriate conclusions have been drawn in the development of the proposed design. Responses will be treated with due care and sensitivity by the developers, Osprey and by the CAA.

Document structure

This document contains six main sections and two Annexes, outlined below for convenience:

- Section 1, this section, introduces the document;
- Section 2 details the consultation statistics;
- Section 3 provides an overview of the responses and support ratio;
- Section 4 highlights the post-consultation actions;
- Section 5 provides a list of acronyms and defined terms; and
- Section 6 provides a list of references.

There are two Annexes:



- Annex A1 details the background to this consultation and the consultation methodology; and
- Annex A2 lists the consultees.



Consultation Statistics

The NNG and IC TMZ consultation invitations were circulated to a total of 62 stakeholder consultee organisations or individuals. A total of 11 responses to this consultation were received.

Overview

This section describes the categories of consultee organisations and individuals that were consulted and gives a breakdown of the responses received.

Consultee organisations

The NNG and IC TMZ consultation invitations were circulated to a total of 62¹ stakeholder consultee organisations or individuals detailed in Annex A2.

Consultees broadly fall into two categories:

- Aviation consultees; and
- Non-aviation consultees.

Aviation consultees included aviation parties such as the MOD, airlines, aircraft operators, adjacent aerodromes, all local airspace users and the national bodies representing all UK aviation interests who may be affected by the regulatory requirements within the TMZ. National bodies such as the Light Aircraft Association (LAA), British Airline Pilots' Association (BALPA), Airport Operators Association (AOA) etc. are represented through the auspices of the National Air Traffic Management Advisory Committee (NATMAC), sponsored by the CAA. A number of military organisations are also members of the NATMAC.

Non-aviation stakeholders for consultation included environmental and heritage organisations and the public. The consultee groups are detailed in Figure 1 below.

 $^{^{1}}$ It should be noted that NATMAC comprises a total of 37 organisations, represented by 45 individuals. The consultation document was circulated to each individual. However, this analysis reflects the views of the organisations as a whole and not of the individuals representing them. In some cases it was found that representation had changed from the list provided by the CAA.



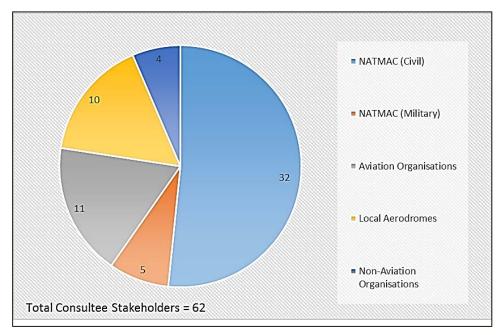


Figure 1 Distribution of Consultees

Responses

A total of 11 responses (approximately 18 % of consultees) to this consultation were received. A breakdown of these is provided in Table 1 and Figure 2 below.

	Consultee Groups	Number Consulted	Responses	%
1	NATMAC (Civil)	32	7	21.9
2	NATMAC (Military)	5	1	20.0
3	Aviation organisations	11	0	0
4	Local aerodromes	10	1	11.1
5	Non-Aviation Consultees	4	2	50
	Totals	62	11	17.7%

Table 1 Responses from consultees



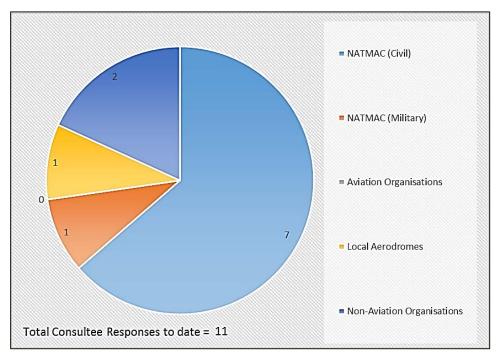


Figure 2 Responses from Listed Consultees

It should be noted that "NATMAC (Civil)" and "NATMAC (Military)" comprise those organisations who are members of the CAA's NATMAC. The NATMAC consultee list includes some CAA Departments who, for reasons of CAA impartiality, do not respond to consultations.

Pre-consultation with major stakeholders

Prior to the commencement of the consultation period, a number of consultation meetings were requested with the following stakeholders:

- Aberdeen Airport
- Perth Airport
- Dundee Airport
- Fife Airport
- Arbroath Aerodrome (Royal Marine Condor)
- Kingsmuir Aerodrome
- Archerfield Aerodrome
- East Fortune Aerodrome
- Edinburgh Airport
- Bond Offshore Helicopters
- CHC Scotia Limited
- Bristow Group
- Scottish Area Control Centre (ACC)

A meeting was held on 17th February 2015 at Aberdeen Airport in which a brief on the proposed TMZ was presented. This meeting was attended by National Air Traffic Services (NATS) Aberdeen Airport, Bristow Group and Bond Offshore Helicopters.



CHC Scotia and the Scottish ACC were unable to attend. Information was subsequently exchanged by email with CHC Scotia and the Scottish ACC.

Of the above, Aberdeen Airport, Archerfield Airstrip, Dundee Airport, Edinburgh Airport, Perth Aerodrome, Arbroath Aerodrome, Bond Offshore Helicopters, CHC Scotia and Bristow Group stated that they had no objection to the proposal.



Analysis of Responses

A total of 11 responses were received of which 4 supported the proposal and 7 did not object to the proposal.

Introduction

This section provides details on the number of responses received from the various organisations and individuals that were consulted. It also explores the support ratio of consultee responses received to give a general indication on the stakeholder acceptance of this proposal.

Response support ratio

Of the 11 responses received from the consultee organisations:

- 4 consultees (36.4 %) supported the proposal; and
- 7 consultees (63.6 %) did not object to the proposal.

There were no objections to the proposal.

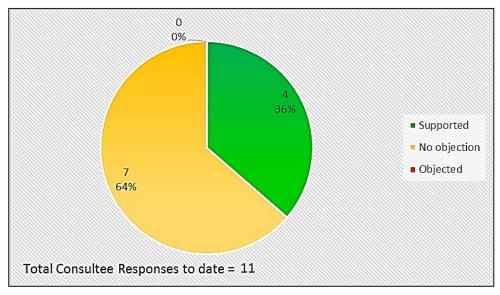


Figure 3 Support Ratio from Listed Consultees



Key issues arising from consultee responses

British Gliding Association

The British Gliding Association (BGA) highlighted their concern with respect to the establishment of Controlled Airspace (CAS) and similar restrictions. The BGA have no objection to the introduction of CAS where levels of risk to Commercial Air Traffic (CAT) justify such levels of protection, but do not support restrictions where risks are un-assessed or based solely on prejudice or supposition.

The BGA said that the proposal lacks justification and suspect that a proper analysis would confirm that no action needs to be taken. The introduction of a TMZ would thus be seen as dis-proportionate to actual risk. The Association therefore reiterated their statement that no precedent should be taken from its lack of formal objection. The BGA stated that given that in this case the airspace in question is of little or no strategic interest, the Association stopped short of submitting a formal objection and for reasons of expediency only have recorded its formal position as "no objection".





Post-Consultation Actions

No new or unexpected issues have arisen which would affect NNGOWL and ICOL's proposal to introduce a TMZ over the NNG and IC Offshore Wind Farms. NNGOWL and ICOL will submit a formal Airspace Change Proposal to the CAA detailing the case for the proposed TMZ.

Post-consultation review

All responses received throughout the consultation period have been subjected to a detailed review and analysis by NNGOWL and ICOL, in order to identify emerging issues of concern.

NNGOWL and ICOL conclusions

Based on the comments received, NNGOWL and ICOL have concluded that no new or unexpected issues have arisen which would affect their proposal to introduce a TMZ over the NNG and IC Offshore Wind Farms.

Next stages of the ACP

The consultation process constitutes the fourth stage of the CAA's overall process laid down in CAP 725 [Reference 1] leading to an Airspace Change Proposal.

NNGOWL and ICOL will submit a formal Airspace Change Proposal to the CAA detailing the case for the proposed TMZ. It is a requirement of the consultation process that the Sponsors will provide the CAA with full details of the consultation (including copies of responses and correspondence) together with all documentation necessary for the promulgation of the proposed TMZ.

Following receipt of the formal Airspace Change Proposal, the CAA then requires a 16-week period to conduct its own internal analysis of the final proposal and consultation results, before arriving at a Regulatory Decision. Should the CAA, without the need for further design optimisation or analysis, accept the Airspace Change Proposal, NNGOWL and ICOL suggest that the implementation of the TMZ would take place on a single date to coincide with the full operational date of the NNG and IC Offshore Wind Farms, expected to be in Q2/Q3 2019.



Glossary

Acronyms

Acronym	Meaning
AAIB	Air Accident Investigation Board
ACP	Airspace Change Process
ACAS	Airborne Collision Avoidance System
AEF	Air Experience Flight
agl	Above ground level
AIP	Aeronautical Information Publication
amsl	Above mean sea level
ANO	Air Navigation Order
AOA	Airport Operators Association
AOPA	Aircraft Owners and Pilots Association
AR	Airspace Regulation
ARA	Advisory Radio Area
ASA	Advisory Safety Area
ASL	Above Sea Level
ATC	Air Traffic Control
ATCO	Air Traffic Control Officer
ATM	Air Traffic Management
ATSOCAS	Air Traffic Service Outside Controlled Airspace
ATS	Air Traffic Service
ATSU	Air Traffic Service Unit



BAA	British Airports Association
BABO	British Association of Balloon Operators
BALPA	British Airline Pilots' Association
BATA	British Air Transport Association
BBAC	British Balloon and Airship Club
BBGA	British Business and General Aviation Association
BGA	British Gliding Association
вна	British Helicopter Association
ВНРА	British Hand Gliding and Paragliding Association
ВМАА	British Microlight Aircraft Association
BMFA	British Model Flying Association
ВРА	British Parachute Association
CAA	Civil Aviation Authority
САР	Civil Aviation Publication
CAS	Controlled Airspace
CAT	Commercial Air Transport
CO ₂	Carbon Dioxide
СТА	Control Area (Class D UK Airspace)
DAATM	Defence Airspace and Air Traffic Management
DAP	Directorate of Airspace Policy (part of the CAA – now SARG)
DfT	Department for Transport
DME	Distance Measuring Equipment
DS	Deconfliction Service
ELFAA	European Low Fares Airline Association
FL	Flight Level



ft	feet
GA	General Aviation
GASCo	General Aviation Safety Council
GAT	General Air Traffic
GAPAN	Guild of Air Pilots and Air Navigators
GATCO	Guild of Air Traffic Control Officers
нссв	Helicopter Club of Great Britain
IAIP	Integrated Aeronautical Information Package
IC	Inch Cape
ICOL	Inch Cape Offshore Limited
IFP	Instrument Flight Procedure
IFR	Instrument Flight Rules
ILS	Instrument Landing System
IMC	Instrument Meteorological Conditions
km	Kilometre
LAA	Light Aircraft Association
LARS	Lower Airspace Radar Service
LoA	Letter of Agreement
MAA	Military Aviation Authority
Mil AIP	Military Aeronautical Information Publication
MMATM	Manual of Military Air Traffic Management
MOD	Ministry of Defence
MTWA	Maximum Total Weight Authorised
NATMAC	National Air Traffic Management Advisory Committee
NATS	The National Air Traffic Service Provider



NERL	NATS En-Route Ltd	
NCHQ	Navy Command Head Quarters	
NM	Nautical Miles	
NO ₂	Nitrous Dioxide	
NOTAM	Notice to Airmen	
os	Ordnance Survey	
PSR	Primary Surveillance Radar	
RAF	Royal Air Force	
RAG	Range-Azimuth Gating	
RDR	Radar	
RMZ	Radio Mandatory Zone	
SAR	Search and Rescue	
SARG	CAA Safety and Airspace Regulation Group	
SID	Standard Instrument Departure	
SRG	Safety Regulation Group (part of the CAA)	
SSR	Secondary Surveillance Radar	
TMZ	Transponder (SSR) Mandatory Zone	
UKAB	UK Airprox Board	
UKFSC	UK Flight Safety Committee	
VFR	Visual Flight Rules	
VGS	Volunteer Gliding Squadron	
VOR	VHF Omni Directional Radio Range	

Defined Terms



Development Area	The area of the Inch Cape or NNG Wind Farm which includes the WTGs, inter-array cables, offshore substation platforms and initial part of the Offshore Export Cable and any other associated works
Development Areas	The combination of the Development Area as defined for both Inch Cape and NNG
TMZ	The Transponder Mandatory Zone, covering the Development Areas as defined with a 5 NM separation distance between the Development Areas, and a 2 NM buffer.



References

Reference	Name	Origin
Reference 1	CAP 725 CAA Guidance on the Application of the Airspace Change Process Third Edition (corrected) April 2007	CAA ISBN 978 0 11790 739 3
Reference 2	Code of Practice on Consultation July 2008	Cabinet Office URN 08/1097

Table 2 Table of references



A1 Consultation Background and Methodology

A1.1 Background to the consultation

NNGOWL and ICOL wish to respectively develop the NNG and IC Wind Farms. The presence of the NNG and IC Wind Farm WTGs would affect the Leuchars PSR and its operational environment. The presence of the NNG and IC WTGs will affect Leuchars Aerodrome flying and radar based ATS operations thereby requiring a change to the arrangements and procedures in the immediate airspace surrounding the Development Areas.

NNGOWL and ICOL, as the sponsors of the proposed airspace change, are required to submit a case to the CAA to justify the change in airspace over the NNG and IC Offshore Wind Farms. Also, as part of the CAA's Airspace Change Process, it is NNGOWL and ICOL's responsibility to consult with all relevant stakeholders who may be directly or indirectly affected by the proposal.

A1.2 Method of consultation

The NNG and IC TMZ consultation was conducted in accordance with the principles set out in the Cabinet Office Code of Practice on Consultation [Reference 2], as required by the CAA.

Osprey on behalf of NNGOWL and ICOL prepared a comprehensive Consultation Document, approved by the CAA SARG. Full details of the proposed change, including rationale, perceived impacts and the mitigation measures undertaken by NNGOWL, ICOL and the MOD, were provided in the Consultation Document.

A link to the Consultation Document was made available on the developers' websites². All consultees were notified by email detailing the consultation and how to access the Consultation Document.

Local aviation stakeholders were engaged at an early stage during the design process. Prior to the preparation of the Consultation Document, information briefs were exchanged with the following major stakeholders:

- Aberdeen Airport;
- Perth Airport;
- Dundee Airport;
- Fife Airport;
- Arbroath Aerodrome (Royal Marine Condor);
- Kingsmuir Aerodrome;
- Archerfield Aerodrome;
- East Fortune Aerodrome;
- Edinburgh Airport:
- Bond Offshore Helicopters;

 $^{^2\} NNG-http://www.neartnagaoithe.com/TMZ-Consultation.asp\\ IC-http://www.inchcapewind.com/publications/TMZ/TransponderMandatoryZone$



- CHC Scotia Limited;
- Bristow Group; and
- Scottish ACC.

The primary purpose of these briefs was to present the detail that would be incorporated into the Consultation Document to ensure there are no surprises for stakeholders when it comes to formal comment.

Full consultation commenced with wide circulation of the electronic Consultation Document to all identified stakeholders on 19th June 2015 on completion of the design process and environmental studies. The consultation process ran until 7th September. This allowed a minimum of twelve weeks required for formal consultation³, recognised the number of Public Holidays during the period and provided scope for any unforeseen delays at the start, or any significant issues that might arise during the process.

Consultees were asked to consider the proposal and submit a response to NNGOWL and ICOL in writing or through a dedicated email address (NNI@ospreycsl.co.uk).

In order to promote maximum response, three reminder emails were sent to those consultees who had not yet provided a response to date. The first email reminder was sent, on 5^{th} August 2015 (more than one month before the end of the consultation period), to all consultees listed at Annex A2 who had not responded by that date. A second email reminder followed on 24^{th} August to only consultees who had not responded by that date. A final email to all those consultees who had not responded by the end of consultation was sent providing a further day for response to the consultation request.

³ The Cabinet Office Code of Practice on Consultation [Reference 2] and the CAA requirements specify a minimum period of 12 weeks for consultation.



A2 Stakeholder / Consultee List

A2.1 Aviation Consultees

National Organisations (NATMAC)

Consultee	Also known As
Aircraft Owners and Pilots Association	AOPA UK
Airport Operators Association	AOA
Aviation Division Navy Command Headquarters	NCHQ
Aviation Environment Federation	AEF
BAESystems Warton	BAES
British Air Transport Association	BATA
British Airline Pilots' Association	BALPA
British Airports Association	BAA
British Airways	BA
British Association of Balloon Operators	BABO
British Balloon and Airship Club	BBAC
British Business and General Aviation Association	BBGA
British Gliding Association	BGA
British Hang Gliding and Paragliding Association	ВНРА
British Helicopter Association	вна
British Microlight Aircraft Association	BMAA
British Model Flying Association	BMFA
British Parachute Association	BPA



Civil Aviation Authority	CAA SRG
Defence Airspace and Air Traffic Management (incl. the Military User Advisory Consultative Team)	DAATM (MUACT)
Euro UAV Systems Centre Ltd	
European Low Fares Airline Association	ELFAA
General Aviation Safety Council	GASCo
Guild of Air Pilots and Air Navigators	GAPAN
Guild of Air Traffic Control Officers	GATCO
Headquarters Director Army Aviation	HQ DAAvn
Heavy Airlines	
Helicopter Club of Great Britain	HCGB
Light Aircraft Association	LAA
Light Airlines	
Low Fares Airlines	
Ministry of Defence	MOD
NATS (NSL)	NSL
NATS En-Route Ltd	NERL
PPL/IR Europe	PPL/IR
The British Business and General Aviation Association	BBGA
UK Airprox Board	UKAB
UK Flight Safety Committee	UKFSC
3 AF-UK/A3	



Aviation Consultees

Consultee
Bristow Group Aberdeen
CHC Scotia Limited Aberdeen
Bond Offshore Helicopters Aberdeen
British Association of Balloon Operators (BABO)
Eastern Airways
Fisheries Protection Agency
Helicopter Safety Steering Group
Loganair
NATS Limited Aberdeen
NHV UK (North Sea Helicopters)

A2.2 Aerodromes / Local Aviation Consultees

The General Aviation Alliance

Consultee	
Leuchars EGQL SATCO	
Dundee Airport EGPN SATCO	
Perth Aerodrome EGPT SATCO	
Aberdeen Airport AGPD SATCO	
Edinburgh Airport EGPH SATCO	
Arbroath Aerodrome RM Condor OC 662 Volunteer Gliding Squadron (VGS)	
Fife Aerodrome EGPJ SATCO	
Kingsmuir Aerodrome Sorbie	
East Fortune Aerodrome	



Archerfield Aerodrome

A2.3 Non-Aviation Consultees: National Bodies

Consultee
Friends of the Earth
Scottish National Heritage
Northern Lighthouse Board
Maritime and Coastguard Agency

A2.4 Information Organisations: Civil Aviation Authority

Consultee	Also known As
Safety and Airspace Regulation Group	SARG
Safety and Airspace Regulation Group Head of Aerodrome & Air Traffic Standards Division	SARG AAA Manager Aerodromes
Safety and Airspace Regulation Group Flight Ops Division	SARG Flight Ops Division
Safety and Airspace Regulation Head of Airspace Regulation	SARG AAA Manager Airspace Regulation