

o/c

MANAGING COMMITTEE
2019 - 2020

CREDAI - MCHI

Ref. No. MCHI/PRES/19-20/075

November 16, 2019

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CREDAI-MCHI UNITS
PRESIDENT, THANE
Ajay Ashar

PRESIDENT, KALYAN-DOMBIVLI
Deepak Mehta

PRESIDENT, MIRA VIRAR CITY
Ashit Shah

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Prakash Baviskar

To,
Shri Arvind Singh (IAS)
The Hon'ble Chairman
Airport Authority of India
'C' Block, Rajiv Gandhi Bhawan,
Sri Aurobindo Marg, Safdarjung Airport Area,
Jor Bagh, New Delhi 110003

Sub : Issue concerning building height permissions issued by AAI - Obstacle Limitation Surfaces (OLS) Infringement Restrictions

Ref : (1) Letter No. CMS/19/3922838 dated 4th July 2019 from Hon'ble Chief Minister addressed to Hon'ble Minister of Civil Aviation.

(2) Letter No. MCHI/PRES/18-19/263 dated 25th April 2019 from CREDAI-MCHI addressed to Hon'ble Secretary, Ministry of Civil Aviation.

Respected Sir,

With reference to the above mentioned subject, we would like to submit as under:-

- 1) Based on the report of the Expert Committee constituted by MoCA, the Appellate Committee adopted Guidelines for Maximum Allowable Penetration of Obstacle Limitation Surfaces (OLS) through the conduct of Aeronautical Study. Copy of guidelines dated 26-Mar-2015 is enclosed herewith as Annexure 1.
- 2) PIL matter 86/2014 was disposed off on 6-Apr-2018 allowing the Appellate Committee to pass final orders in terms of the aeronautical study reports submitted by the Appellate Committee to the Hon'ble High Court of Bombay in compliance to the interim orders.
- 3) Sub-Committee was appointed by the Appellate Committee on 26-Apr-2018 to examine the aeronautical study reports submitted earlier to the Hon'ble High Court of Bombay. Sub-Committee, during its meeting held on 15-May-2018, revised the interpretation of OLS Guidelines, due to which in 21 nos. of cases, there was a variance in permitted heights. Taking note of the report of the Sub-Committee, the Appellate Committee decided to submit these 21 nos. of cases to the Hon'ble High Court of Bombay for record purpose.
- 4) Representation was submitted by CREDAI-MCHI dated 13-Jul-2018 proposing:-
 - a) Grant of permitted heights based on old Aeronautical study reports submitted to the Hon'ble High Court of Bombay in 21 nos. of cases pending with the Appellate Committee
 - (OR)
 - b) Implementation of proposed interpretation of OLS Guidelines as suggested by CREDAI-MCHI
- 5) Based on instructions from Secretary, MoCA - joint Meeting was held on 7-Aug-2018 with AAI under chairmanship of DGCA wherein the entire matter was discussed, interpretation from CREDAI-MCHI & AAI was presented and matter was referred to DGCA for their opinion.

CREDAI - MCHI

Maker Bhavan II, 4th Floor, 18, V. Thackersey Marg, New Marine Lines, Mumbai - 400 020.
Tel.: 4212 1421, Fax : 4212 1411 / 407 • Email: secretariat@mchi.net • Website: www.mchi.net

- 6) Opinion from DGCA was received & submitted to Secretary, MoCA which concurred with proposed interpretation as suggested by CREDAI-MCHI as being more logical.
- 7) On 14-Feb-2019, the Hon'ble High Court of Bombay cleared the matter and asked Appellate Committee to provide copy of revised aeronautical study report and allow the Applicants to make submissions arising out of the revised aeronautical study reports during personal hearing.
- 8) In adherence to the Hon'ble High Court of Bombay's Order dated 14-Feb-2019 and decision by the Appellate committee in its meeting held on 26-Feb-2019, copy of revised aeronautical study report were shared with all Applicants. Thereafter, written as well as oral submissions were sought during the personal hearing held on 16-Mar-2019.
- 9) The Appellate Committee considered the submissions (oral as well as written) made by the Applicants during the personal hearing held on 16-Mar-2019 and provided point wise reply on the submission made by the Applicants during its meeting held on 20-Mar-2019. However, the Appellate Committee rejected the request for Applicants to grant permitted heights based on old Aeronautical study reports and also rejected Implementation of proposed interpretation of OLS Guidelines as suggested by CREDAI-MCHI.
- 10) Pursuant to the decision of Appellate Committee during meeting held on 20-Mar-2019, CREDAI-MCHI submitted another representation to the Hon'ble Secretary dated 25-Apr-2019. By virtue of this representation, point-wise reply was submitted by CREDAI-MCHI highlighting that the decision and justification provided by the Appellate Committee while rejecting the implementation of proposed interpretation of OLS Guidelines as suggested by CREDAI-MCHI during its meeting held on 20-Mar-2019 is incorrect due to the adoption of incorrect process and without any legal sanctity. Detailed technical note on the OLS Calculations alongwith supporting and relevant back-up documents were enclosed as Appendix 1 to the said representation dated 25-Apr-2019. Copy of representation dated 25-Apr-2019 submitted by CREDAI-MCHI is enclosed herewith as Annexure 2.
- 11) In this regard, we would also like to submit that the Hon'ble Chief Minister of Maharashtra had also highlighted the issues pertaining to OLS and the negative consequences it has on the development of the city of Mumbai to the Hon'ble Minister of Civil Aviation vide above letter dated 4th July 2019. Copy of letter from Hon'ble Chief Minister to the Hon'ble Minister of Civil Aviation dated 25-Apr-2019 is enclosed herewith as Annexure 3.

We understand that the AAI has referred the entire OLS matter to the International Civil Aviation Organization (ICAO) to give its views on the OLS issue i.e. the variance between the interpretation of OLS Guidelines as suggested by the Sub-Committee and adopted by AAI since 15-May-2018 vis-a-vis the proposed interpretation of OLS Guidelines as suggested by CREDAI-MCHI and concurred by DGCA as being more logical.

We are reliably given to understand that the terms of reference given to ICAO to give guidance on the OLS issue are not in accordance with Annexure 14 of the ICAO Guidelines and all the facts in this matter are not disclosed to ICAO.

Hon'ble sir with respect, we submit that the ICAO report will only be as good as the information provided to ICAO in this regard. We are reliably informed that the information provided to ICAO is not in conformity with the ground reality and as such

the ICAO findings will not be in consonance with the ground reality. In view thereof, we request you to allow us, as the Apex Representative of developers of Mumbai to make a representation to ICAO directly so that the ICAO report in respect of the OLS issue is based on accurate information and ground reality. Hon'ble Sir, you will appreciate that matters pertaining to scientific calculations are not matters of subjective interpretation. However to reach correct scientific conclusion based on ICAO guidelines accurate information has to be provided failing which the entire exercise is bound to fail. Our endeavour is only to provide accurate information which can be verified and/or contested by AAI in this process.

We also request you to invite the Government of Maharashtra, which is a key stakeholder also to make a presentation to the ICAO in this regard. Hon'ble Sir by allowing the concerned stakeholders to be a party to this exercise, it will active participation by all stakeholders.

We would also like to submit that all the costs related to our participation in this process including any reimbursement required to be paid to ICAO shall be paid by us, if necessary.

We request you to therefore pass necessary orders to allow our organization and the Government of Maharashtra to provide information/make presentation to the ICAO.

Thanking you,

Yours Sincerely,
For CREDAI-MCHI



Nayan Shah
President



Bandish Ajmera
Hon. Secretary



Sanjiv S. Chaudhary MRICS
Chief Operating Officer

CC To:-

(1) Ms. Rubina Ali

The Chairman, Appellate Committee & Joint Secretary
Ministry of Civil Aviation
'B' Block, Rajiv Gandhi Bhawan,
Sri Aurobindo Marg, Safdarjung Airport Area,
Jor Bagh, New Delhi 110003

(2) Shri Praveen Pardeshi (I.A.S.)

Municipal Commissioner
Municipal Corporation of Greater Mumbai
Mumbai - 400 001.

(3) Dr. Nitin Kareer (I.A.S.)

Additional Chief Secretary
Urban Development Department
Government of Maharashtra
Mantralaya, Mumbai - 400 032



3/18/11/19
लिपिक

प्रधान सचिव (नवि-१)
नगरविकास विभाग,
महाराष्ट्र शासन, मंत्रालय,
मुंबई - ४०० ०३२.

**Ministry of Civil Aviation
Rajiv Gandhi Bhawan, New Delhi-110003**

**GUIDELINES ON ALLOWABLE PENETRATION OF OLS IN AERONAUTICAL
STUDY REPORTS**

An Expert Committee was constituted in MoCA to examine the reports of the Aeronautical Study and submit their recommendations to facilitate decision on the Aeronautical Study reports by the Appellate Committee.

The Expert Committee in their meeting held on 9th February, 2015 desired that there should be guidelines by the Competent Authority to accept the percentage of penetration of the AGA surfaces indicated in the Aeronautical Study reports. Earlier the Appellate Committee in its meeting of 24th September, 2013 had also taken a decision with regard to processing of the cases and minuted as follows:

"Permitting construction of a large numbers buildings penetrating AGA surfaces through Aeronautical Studies may lead to a cluster of buildings. The Committee is of the opinion that extent of penetration of AGA surfaces may be restricted to ensure certain uniformity and symmetry in permitting such penetration in the overall interest of safety of operations."

Subsequent to the above meeting of Expert Committee another meeting of the Expert Committee was held in which members of the Appellate Committee were also present wherein a consensus view was taken that the increased height penetrating OLS even though permitted from Aeronautical Study needs to be gradual and uniform as the distance of the object from the Airport Runway End increases.

The Airports Authority of India has conducted a study to check the deterioration in performance of the NAV AIDS particularly at Mumbai Airport due to terrain in its close proximity and also due obstacles penetrating the OLS of that airport. The study report reflects that:-

"1) AAI is finding it difficult to meet the standard siting criteria for installation of CNS facilities due to existence of several hills very near to airport and the airport being in the midst of the city.

2) The performance of navigational aids is also being affected, for example:

- a) ILS runway 09 coverage is restricted at lower levels.*
- b) ILS Glidepath 14 is not meeting coverage requirement at lower levels.*
- c) DVOR, Mumbai abrupt change of Radial observed between 110 Deg. to 150 Deg."*

Contd. On page 2/-



The deficiency in the coverage as reflected in the report has been attributed to terrain profile and obstacles around the airport where the terrain profile is of permanent nature.

The above study report of AAI has suggested following actions:

"1) With the existing obstacles and terrain profile, situation in and around Mumbai airport has already become difficult any further deterioration in obstacle profile in and around the airport is likely to aggravate the situation. It is therefore essential that obstacle profile in and around airport is maintained so that further deterioration in performance of Navaids facilities is avoided.


2) NOC cases for new constructions in and around Mumbai airport need to be examined carefully and no relaxation should be given for height clearance.

The Appellate Committee in its meeting on 26th March, 2015 considered the above views of the Expert Committee, Airports Authority of India 'study report' with regard to performance of Nav-aids at Mumbai Airport, the observations made in Aeronautical Study report regarding degraded operational performance of aircraft and adopted the following guidelines for restricting penetration above OLSs by objects which are granted higher heights through Aeronautical Study as follows:

- 1) In IHS higher heights penetrating OLS to be restricted in the slope of 1.27% from end of the Transitional surface upto the maximum height of 90 m above Aerodrome Elevation
- 2) In continuation thereto in the conical surface including outer conical surface the heights penetrating OLS to be restricted in the slope of 4.11% from the end of the IHS upto the maximum height of 300 m above Aerodrome Elevation

The above guidelines shall apply to all cases except for structures needed for specific operational aviation requirement at all airports and shall be included in the guidelines for Aeronautical Study which was already issued with regard to the decisions taken in the Appellate Committee meeting of 11th July, 2014.

The Expert Committee may finalise the Aeronautical Study reports accordingly as per the guidelines at (1) and (2) above.


(V.SOMASUNDARAM)
MEMBER (ANS), AAI

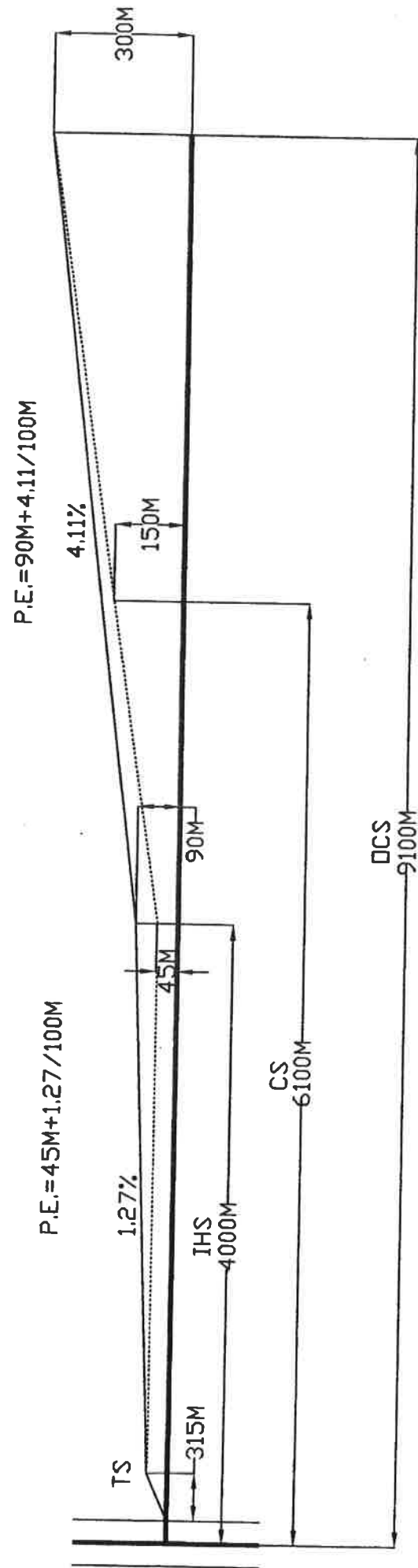

(J.S. RAWAT)
JT. DGCA


(K.GOHAIN)
TECHNICAL EXPERT


(ARUN KUMAR)
JT. SECY, MOCA
CHAIRMAN, APPELLATE COMMITTEE

Place: New Delhi

Date: 26th March, 2015



Devendra Fadnavis

Chief Minister
Maharashtra



Mantralaya
Mumbai-400 032
No. CMS/19/3922838
04 JUL 2019

Sub: Obstruction Limitation Surface (OLS) Infringement Restrictions

Dear Shri. Hardeep Puri/,

The Chhatrapati Shivaji Maharaj International Airport, (CSMIA) Mumbai is situated in the heart of the city. The city has grown around the Airport and therefore the development of lands surrounding the airports are governed by the various restrictions imposed by the Airports Authority of India (AAI). There is no doubt that the areas in the funnel zone i.e. the take off and landing area must all times restrict development so that the safe movement of air traffic is not compromised. With this in mind the Government of Maharashtra is devising a scheme whereby redevelopment of the old and dilapidated building of the funnel zone is clubbed with lands situated outside the funnel zone such that the objective of both rehabilitation and safe movement of air traffic is met. However, it has come to my notice that, even land situated outside the funnel zone are severely affected by some of the methods particularly the Obstruction Limitation Surface (OLS) infringement restriction and it is my view that development of land outside the funnel zone is required to be looked at from the point of view of the peculiar situation of the Mumbai Airport and in this regards. The following is brought to your attention:

1. Initially, the Ministry of civil Aviation (MOCA) had notified that once Aeronautical Study is ordered by the MOCA, the restrictions imposed by AGA (Aerodromes and Ground Aids) Surface stand removed and the Limitation Imposed due to CNS (Communication and Navigation Services) or ILS (Instrument Landing System) / Procedures are only to be considered and accordingly building height are to be sanctioned as per the most restrictive of these parameters. This was in accordance with International Civil Aviation Organisation (ICAO) guidelines. This was done based on the fact that an Aeronautical Study would provide an accurate site specific scientific data and therefore the AGA restrictions which are general in nature would be adequately addressed in an Aeronautical Study.

2. In the year 2015 a new criterion under AGA was introduced which Inter alia restricted the Maximum Allowable Penetration of OLS in an Aeronautical Study Report. As per this criteria, and increased building height penetrating OLS, even though permitted and considered safe as per the Aeronautical Study, was without scientific reason mandated to be gradual and uniform as the distance of the object from the Airport Runway End increases. The Appellate Committee therefore recommended that "Inner Horizontal Surface Area" (IHS), height of any structure penetrating OLS be restricted in the slope of 1.27% from the end of the Transitional Surface up to a maximum of 90 meters above aerodrome elevation" In continuation there to in the conical surface area including outer conical surface area the height penetrating OLS was restricted in slope of 4.11% from the end of IHS up to a maximum of 4.11% and from the end of the IHS up to maximum of 300 meters above Aerodrome Elevation. Both these restrictions were not based on any ICAO guidelines and have no bearing whatever on the safe movement of air traffic. This also meant that even though site specific aeronautical study may conclude that building of a certain height could be permitted in the IHS, no structure exceeding can be 90 meters permitted, thus artificially restricting height of building even though the aeronautical study permits the same

3. Moreover, from 2018 onwards the AAI has implemented different interpretations of the above and finally decided on implementing the most conservative approach by considering the shortest distance from the end of the Transitional Surface for allowable penetrations calculation for all portions of Inner Horizontal Surface (IHS) even though the result of such an approach was contrary to the findings of the aeronautical survey and thus unscientific.

4. The first restrictive methods introduced in March 2015, led to substantial reduction in sanctioned height in large number of cases. The second restriction further reduced the sanctioned height in some cases up to 20 meters, particularly in the areas of such as Bandra-Kurla Complex, etc. which are not even in the take-off and landing funnel zone.

5. Although several industry and trade associations have submitted representations before the Secretary, MOCA to reconsider the uninformed change in interpretation of OLS Guidelines and DGCA has already concurred to their representations, the second restriction has not been lifted.

In view of the above and in order to ensure that development around the airport (excluding the funnel zone) the restrictions imposed by OLS should be done away with and the findings of a site specific aeronautical survey carried out by the AAI/MOCA ought to be followed for grant of height approvals as the same is scientific and more precise. As an interim measure, the report from DGCA on the change in interpretation of OLS guidelines needs immediate consideration.

With regards,

Yours truly,



(Devendra Fadnis)

Shri. Hardeep Singh Purji,
Hon'ble Minister of Civil Aviation,
New Delhi.

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Nayan A. Shah

IMMEDIATE PAST PRESIDENT
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Rajnikant Ajmera
Late G. L. Raheja
Late Lalit Gandhi
Late Babubhai Majethia

CREDAI-MCHI UNITS

PRESIDENT, THANE
Ajay Ashar

PRESIDENT, KALYAN-DOMBIVLI
Ravi Patil

PRESIDENT, MIRA VIRAR CITY
Ashit Shah

PRESIDENT, RAIGAD
Ataouque Khot

PRESIDENT, NAVI MUMBAI
Prakash Baviskar

Ref. No.: MCHI/PRES/18-19/263

April 23, 2019

To,
Shri Pradeep Singh Kharola
Hon'ble Secretary
Ministry of Civil Aviation
'B' Block, Rajiv Gandhi Bhawan,
Safdarjung Airport Area, Jor Bagh,
New Delhi - 110003, India

Subject:- Issue concerning building height permissions issued by AAI - Obstacle Limitation Surface

Reference:- (1) Letter dated 13-Jul-2018 addressed to Secretary, MoCA
(2) Letter dated 2-Jan-2019 addressed to Hon'ble Minister, MoCA
(3) Letter dated 1-Feb-2019 addressed to Joint Secretary, MoCA with copy to DGCA
(4) Letter dated 26-Mar-2019 address to Secretary, MoCA

Dear Sir,

With reference to the above mentioned subject, we would like to submit as follows :-

- 1) PIL matter 86/2014 was disposed off on 6-Apr-2018 allowing the Appellate Committee to pass final orders in terms of the aeronautical study reports submitted by the Appellate Committee to the Hon'ble High Court of Bombay in compliance to the interim orders.
- 2) Sub-Committee was appointed by the Appellate Committee on 26-Apr-2018 to examine the aeronautical study reports submitted earlier to the Hon'ble High Court of Bombay. Sub-Committee, during its meeting held on 15-May-2018, revised the interpretation of OLS Guidelines, due to which in 21 nos. of cases, there was variance in permitted heights. Taking note of report of the Sub-Committee, the Appellate Committee decided to submit these 21 nos. of cases to the Hon'ble High Court of Bombay for record purpose.
- 3) Representation was submitted by CREDAI-MCHI dated 13-Jul-2018 proposing :-
 - a) Grant of permitted heights based on old Aeronautical study reports submitted to the Hon'ble High Court of Bombay in 21 nos. of cases pending with the Appellate Committee
(OR)
 - b) Implementation of proposed interpretation of OLS Guidelines as suggested by CREDAI-MCHI
- 4) Based on instructions from Secretary, MoCA - Joint Meeting was held on 7-Aug-2018 with AAI under chairmanship of DGCA wherein the entire matter was discussed, interpretation from CREDAI-MCHI & AAI was presented and the matter was referred to DGCA for their opinion.

- 5) Opinion from DGCA was received & submitted to Secretary, MoCA which concurred with proposed interpretation as suggested by CREDAI-MCHI as being more logical.
- 6) On 14-Feb-2019, the Hon'ble High Court of Bombay cleared the matter and asked Appellate Committee to provide copy of revised aeronautical study report and allow the Applicants to make submissions arising out of the revised aeronautical study reports during personal hearing.
- 7) In adherence to the Hon'ble High Court of Bombay's Order dated 14-Feb-2019 and decision by the Appellate committee in its meeting held on 26-Feb-2019, copy of revised aeronautical study report were shared with all Applicants. Thereafter, written as well as oral submissions were sought during the personal hearing held on 16-Mar-2019.
- 8) The Appellate Committee considered the submissions (oral as well as written) made by the Applicants during the personal hearing held on 16-Mar-2019 and provided point wise reply on the submission made by the Applicants during its meeting held on 20-Mar-2019.
- 9) The Appellate Committee rejected the request of Applicants to grant permitted heights based on old Aeronautical study reports and also rejected Implementation of proposed interpretation of OLS Guidelines as suggested by CREDAI-MCHI. Justification for rejection is mentioned in Minutes of Appellate Committee meeting dated 20-Mar-2019.

Point-wise Reply on opinion of the Appellate Committee is submitted below :-

Submission by Applicant during personal hearing	Response of Appellate Committee	Further reply from CREDAI-MCHI
a) Letter from DGCA post meeting on 7-Aug-18 concurs with the proposed interpretation as suggested by CREDAI-MCHI	<p>The opinion from DGCA was examined by experts in AAI and the same wasn't considered based on report of committee of three GM's constituted by Member (ANS) and Sub-committee's report.</p> <p>The Committee is of the considered opinion that revised methodology of implementation i.e. the calculation of the shortest distance of the site from the end of Transitional Surface is correct. Calculation of height in Transitional Surfaces is also done similarly.</p> <p>Hence, the submission of Applicants is rejected.</p>	<p>The revised interpretation adopted by AAI was challenged by CREDAI-MCHI. Hence, the Secretary (MoCA) suggested DGCA to chair the meeting and give opinion on the issue. However, DGCA's opinion was rejected by the 3 member team comprising of GM's from AAI and was committee was constituted by Member (ANS) from AAI itself. This is just an effort to regularize the wrong interpretation. The constitution of the 3 member Committee is not fair and the process adopted does not have any legal sanctity.</p> <p>With respect to technical submission that calculation of height in Transitional Surfaces is also done similarly, please refer note annexed herewith as <u>Appendix 1</u></p>

		Schematic representation of the technical note referred herein is annexed herewith as <u>Appendix 2</u>
b) DGCA CAR Series 'B' Part I was referred stating that power to interpret any standard and reference guidance rests with DGCA	<p>The Guidelines on Allowable Penetration of OLS in Aeronautical Study Reports dated 26-Mar-2015 are not part of DGCA CAR Series 'B' Part I.</p> <p>Hence, the submission of Applicants is rejected.</p>	<p>DGCA is the regulatory body governing the safety aspects of Civil Aviation industry in India. Rule 29C of the Aircraft Rules 1937 enables DGCA to lay down standards and procedures not inconsistent with the Aircraft Act, 1934. One of the functions of DGCA is to maintain air safety and Aerodrome standards & Licensing. If, therefore, DGCA is of the view that the interpretation proposed by the industry is the correct interpretation and would not harm the safety of aircraft, then there is no reason for the Appellate Committee to have taken the AAI team members view that the distance of the building has to be calculated from the end of the transitional surface (Shortest distance ignoring OLS design concept Reference point Radial distance), which ignored very basis of the OLS allowable infringement introduction " as regard to the reference point of measurement and objective of Guidelines, for restriction/ penetration above OLS by objects, <u>even though</u> cleared by the Aeronautical study with consensus view of " <u>gradual and uniform as the distance of the object from the runway end increases</u>".</p>
c) Aeronautical study was carried out by ICAO for BKC plots of MMRDA using old calculation method and height clearance was granted	<p>The Top elevations permitted by the Appellate Committee to the MMRDA plots are in compliance with the revised interpretation of the Guidelines.</p> <p>Hence, the submission of Applicants is rejected.</p>	<p>ICAO report for MMRDA plots (33 plots in BKC and 11 plots in WTT) was approved by Appellate Committee on 11-Sep-2017. This report is never revised by ICAO and submitted to Appellate Committee for re-consideration. There is no mention of compliance to the revised interpretation of the Guidelines in the minutes of Appellate Committee's decision on MMRDA plots dated 7-Sep-2018. AAI's claim that revised interpretation of the Guidelines doesn't affect</p>

by Appellate Committee as per old calculations		MMRDA plots is incorrect statement , as the permitted heights for WTT plots will get reduced if the report is revised. Please refer comparative chart annexed herewith as Appendix 3
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We request you to consider our Suggestions and grant us a hearing for meeting with you & the members of the Appellate Committee (comprising of Joint Secretary, Jt. DG & Member-ANS) at the earliest to resolve the matter.

Thanking you,

Your sincerely,

For CREDAI-MCHI



Nayan A. Shah
President



Bandish Ajmera
Hon. Secretary



Sanjiv Chaudhary MRICS
Chief Operating Officer

Copy To :-

1. **Smt. Usha Padhee**
Joint Secretary
Ministry of Civil Aviation
'B' Block, Rajiv Gandhi Bhawan,
Safdarjung Airport Area, Jor Bagh,
New Delhi - 110003, India
2. **Mr. J. S. Rawat**
Jt. Director General
The Directorate General of Civil Aviation
Aurbindo Marg, Opp. Safdarjung Airport,
Jor Bagh, New Delhi 110 003, India
3. **Mr. Guruprasad Mohapatra**
Chairman
Airport Authority of India
'C' Block, Rajiv Gandhi Bhawan,
Safdarjung Airport Area, Jor Bagh,
New Delhi - 110003, India

APPENDIX 1 - TECHNICAL NOTE ON OLS CALCULATIONS

In accordance with the Annex 14, Volume 1 and Civil Aviation Requirements(CAR), Section 4, Series 'B, Part 1, Provision:

The new interpretation was introduced by AAI , Member (ANS) team through Appellate Committee and the same was challenged technically by the Industry body (CREDAI/NAREDCO/PEATA)based on Obstacle Limitation Surfaces (OLS) , Inner Horizontal Surface (I H S) design concept reason.

It is also relevant to mention that the opinion of the Director General of Civil Aviation [DGCA] was called for by the Secretary, Ministry of Civil Aviation and the DGCA in its note dated 18.09.2018 has also supported the aforesaid view-

"In view of the above, it is opined that the interpretation on part of CREDAI to consider the distance of the obstacles from the transition surface on a radial from the center of runway extremity, is more logical and would restrict the obstacles below the gradually rising surface."

However, the design technical reason provided is analyzed and supported by the State Regulatory authority, DGCA has been reviewed and rejected by the AAI three member Committee, constituted by the AAI Member (ANS) is a biased view and just an effort to regularize the wrong interpretation. The constitution of the 3 member Committee is not fair and the process adopted does not have any legal sanctity.

The submission of the applicants is rejected due quoted that the calculation of shortest distance of the site from the End of Transitional Surface is correct. **Calculation of the height in the transitional surface is also done similarly.**

It is pertinent to mention that :

1. The objective of Transitional Surface and the Inner Horizontal Surface (I H S) are different.
2. Transitional surface is a complex surface **along the side of the runway strip and part of the side of the approach surface**, that slopes upwards and outwards to the inner horizontal surface.

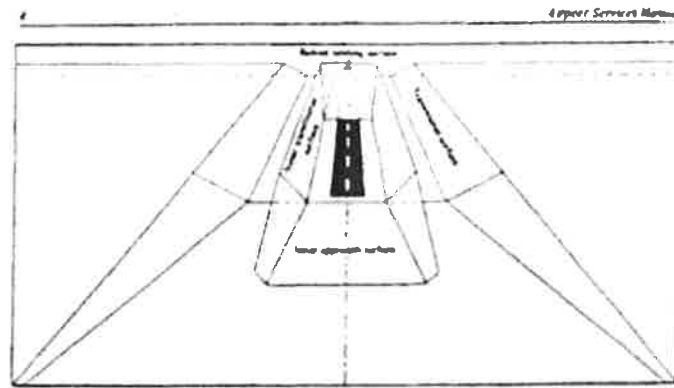


Figure 1-3

- a) **Area 1 : Along the length of the strip parallel to the runway centre line;** The corresponding Runway Strip is considered as Reference Point for transitional surface limitations calculation. i.e., datum is Runway Centerline. The Same concept is applicable for I H S central portion (Along the length of the strip parallel to the runway centre line). No deviation from design concept of Transitional Surface and I H S reference point for calculation and hence uniform and gradual is maintained from the runway centerline.
- b) **Area 2: Part of the side of the Approach Surface :** A lower edge beginning at the intersection of the side of the approach surface with the inner horizontal surface and extending down the side of the approach surface to the inner edge of the inner edge of the approach surface . The inner edge of the approach surface (Distance from runway threshold / runway end when threshold is located on extremity of runway) is considered as Reference Point for transitional surface limitations calculation. i.e., datum is Runway End , Two part calculations i.e. First - Distance (Longitudinal) from the approach surface inner edge to centerline intersection point from object + Second - distance (Lateral) from the edge of approach surface and object. Reference Point is Runway Extremity. Hence, Longitudinal and Lateral distances are considered for Transitional surface calculations. (Not only Lateral distance in the side of approach surface area). No deviation from design concept in the Transitional Surface calculations. Hence , Calculation of the height in the transitional surface is also done similarly (only shortest distance ignoring OLS reference point) is contrary to the transitional surface limitations specifications (visible deviation) and not valid.

The Similar concept is applicable for I H S side of the approach surface (**Other than Central portion** - Along the length of the strip parallel to the runway centre line). The calculation being made by AAI completely ignores the reference point i.e. the centre line

point of the end of runway on either side which is the key starting point of measuring distances.

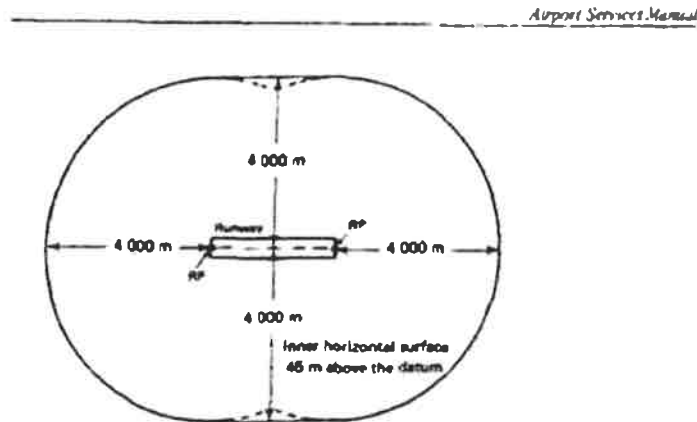


Figure 1-1. Inner horizontal surface for a single runway
(where the runway code number is 4)

The IHS is itself measured as a radius from the end of the centre line of the runway. Therefore, the distance of the buildings from the runway end is the relevant criteria to be taken into account. At the same time, the distance of the building from the end of transitional surface has also to be taken into account to comply with the Guidelines Recommendations. Both the aforesaid points [namely End of Runway and End of Transitional Surface] are relevant and one cannot be ignored. In this view of the matter, the real estate industry has repeatedly represented to the Airport Authority of India, Civil Aviation Ministry, etc that the distance of the buildings should be calculated from the "intersection" of the point where a line drawn from the reference point, i.e. from the end of the runway, intersects the end of transitional surface.

This would ensure that the reference point i.e. the distance from the runway is factored in and the height of the building is determined with reference to the runway, but at the same time distance is calculated from the end of transitional surface [as per the Guidelines Recommendation].

No deviation from design concept of Transitional Surface and IHS reference point for calculation and hence uniform and gradual is maintained from the runway centerline/end.

The interpretation being given by AAI that the height of the building would depend upon the shortest distance of the building from the end of the transitional surface, without reference to the distance of building from the runway, is contrary to the OLS design Specifications Standards as regard to the reference point of measurement and objective of Guidelines, for restriction/ penetration above OLS by objects, even though

cleared by the Aeronautical study with consensus view of “ gradual and uniform as the distance of the object from the runway end increases”. IHS and other areas is linked to the distance from the end of runway.

Thus, the distance from the runway end (Reference Point) shall be considered to meet the objective of the additional restriction criteria has to be taken into account.

APPENDIX 3 - COMPARATIVE CHART ON MMRDA WTT PLOTS WITHIN I.H.S

SL NO	MMRDA PLOT NAME	OLD AAI INTERPRETATION CALCULATION			NEW AAI INTERPRETATION CALCULATION		
		DISTANCE FROM RUNWAY END	OLD FORMULA	OLD FORMULA PERMISSIBLE ELEVATION (M)	SHORTEST DISTANCE FROM TRANSITIONAL SURFACE END	NEW INTERPRETATION CALCULATION	NEW INTERPRETATION PERMISSIBLE ELEVATION (M)
1	WTT-1	3829.3	$45 + (3828.30 - 465) \times 0.0127 + 12.13$	$99.85/99.62$ (ICAO - 99.59)	2196.69	$45 + (2196.69 \times 0.0127) + 12.13$	85.05
2	WTT-1.24	3994.72	$45 + (3994.72 - 465) \times 0.0127 + 12.13$	$101.95/101.72$ (ICAO - 101.69)	2398.24	$45 + (2398.24 \times 0.0127) + 12.13$	87.58
3	WTT-1.28	3920.12	$45 + (3920.12 - 465) \times 0.0127 + 12.13$	$101.01/100.70$ (ICAO - 100.74)	2314.63	$45 + (2314.63 \times 0.0127) + 12.13$	86.52
4	WTT-1.4	3918.24	$45 + (3918.24 - 465) \times 0.0127 + 12.13$	$100.98/100.75$ (ICAO - 100.72)	2257.68	$45 + (2257.68 \times 0.0127) + 12.13$	85.8

5	WTT-2.32	3719.35	45 + (3719.35 - 465) x 0.0127 +12.13	98.46 / 98.23 (ICAO - 98.19)	2134.95	45 + (2134.95 x 0.0127) +12.13	84.24
6	WTT-2.37	3837.44	45 + (3837.44 - 465) x 0.0127 +12.13	105.86 / 105.63 (ICAO - 99.69)	2291.81	45 + (2291.81 x 0.0127) +12.13	86.23
7	WTT-2.41	3913.39	45 + (3913.39 - 465) x 0.0127 +12.13	100.92 / 100.69 (ICAO - 100.66)	2380.41	45 + (2380.41 x 0.0127) +12.13	87.36
8	WTT-2.45	3860.28	45 + (3860.28 - 465) x 0.0127 +12.13	100.25 / 100.02 (ICAO - 99.56)	2359.28	45 + (2359.28 x 0.0127) +12.13	87.09
9	WTT-2.49	3890.92	45 + (3890.92 - 465) x 0.0127 +12.13	100.63 / 100.40 (ICAO - 100.25)	2446.16	45 + (2446.16 x 0.0127) +12.13	88.19
10	WTT-2.53	3978.71	45 + (3978.71 - 465) x 0.0127 +12.13	101.75 / 100.52 (ICAO - 101.49)	2478.96	45 + (2478.96 x 0.0127) +12.13	88.61