

**Ref.No. : CREDAI/SRT/F.24/30/2022**

**Date : 30/05/2022**

To,  
The Deputy Secretary,  
Govt. of India,  
B-Block, Rajiv Gandhi Bhavan,  
New Delhi-110003  
Email Id: soai.moca@nic.in

**Sub : Suggestions for GSR333(E) dated 02-05-2022 with reference to Displaced Runway at Surat Airport**

**Ref : Ministry of Civil Aviation Notification number GSR333(E) dated 02-05-2022, New Delhi (Annexure – 8)**

Respected Sir,

1. With respect to above subject and above referred notification of MoCA; it is to state that Surat airport operator has suggested displacing the threshold point of R22 by 615 mt towards runway end R04. Same has been approved by DGCA and notum was published as **annexure-1**.
  - In survey of 2018 some buildings (existing objects) were found to be penetrating up to 12.30 mt in OLS at Surat airport.
  - Considering above existing object of 12.30 mt height threshold R22 was displaced by 615 mt.

RAVJI PATEL Chairman 99252 05961	SANJAY MANGUKIYA President 98251 22383	G.R. ASODARIA Vice- President 98251 43517	DR. JIGNESH PATEL Vice- President 93755 44000	VIJAY DHAMELIA Vice- President 98258 00402	BHAVESH SANGHAVI Hon. Secretary 98251 20206
AMAR RAVAL Hon. Jt. Secretary 98251 26001	TUSHAR LAKHANI Hon. Jt. Secretary 98259 05444	UMESH PATEL Hon. Jt. Secretary 98251 35657	DIPAN DESAI Treasurer 98241 14798	HARESHBHAI MOTISARIYA Jt. Treasurer 98243 55311	HARSHIL DELIWALA Chief Co-ordinator 98251 40401

- **Displacement of runway R22 threshold was made since a long time. Even though growth of Surat airport has tremendously increased**

For Surat Airport, we suggest to make displaced R22 threshold as permanent threshold and displaced threshold shall be taken as reference point for determining the approach surface for the following reasons:

2. **Surat obstacle issue affects total 29 projects having 110 buildings and affects 1440 flats and more than 12,000 residents who are occupying these premises since more than 9 years. Those innocent residents are innocent victims of obstacle issue.**
  - As per letter of DGCA to chairman AAI (**Annexure 2**), those obstacles are system generated obstacles so it cannot be removed without payment of compensation as per 9B and 9C of Aircraft act, 1934. Considering so many obstacles (existing object), compensation amount will be approx. 2,500 cr, which is a huge amount.
  - To avoid this huge amount of compensation to be paid by AAI, we suggest to make displaced R22 threshold as permanent threshold and displaced threshold shall be taken as reference point for determining the approach surface.
  -
3. **Central CREDAI had represented regarding PAN India obstacle issue on behalf of all builder associations to the ministry of civil aviation India. Considering PAN India obstacle issue, MoCA, has constituted the committee to examine**
  - a. The current Indian regulations governing the height clearance for building and other structures around aerodromes.
  - b. The ICAO regulation governing the height clearance for building and other structure around aerodromes.
  - c. The comparison between ICAO regulation & Indian regulation and requirement of change in Indian regulation, if any.

RAVJI PATEL Chairman 99252 05961	SANJAY MANGUKIYA President 98251 22383	G.R. ASODARIA Vice- President 98251 43517	DR. JIGNESH PATEL Vice- President 93755 44000	VIJAY DHAMELIA Vice- President 98258 00402	BHAVESH SANGHAVI Hon. Secretary 98251 20206
AMAR RAVAL Hon. Jt. Secretary 98251 26001	TUSHAR LAKHANI Hon. Jt. Secretary 98259 05444	UMESH PATEL Hon. Jt. Secretary 98251 35657	DIPAN DESAI Treasurer 98241 14798	HARESHBHAI MOTISARIYA Jt. Treasurer 98243 55311	HARSHIL DELIWALA Chief Co-ordinator 98251 40401

d. To consider forthcoming ICAO new concept of OFS/OES and SHRS in place current OLS.

- **Under chairmanship of Air chief Marshal Fali H. Major a committee** was constituted by Ministry of Civil Aviation vide their order dated 17-02-2021 and revised order dated 06-08-2021; a report of this committee to Examine Aerodrome Safeguarding Policy and Regulations Vis-a-Vis Development of Cities around Airports are attached herewith as **Annexure –3**. Key findings of this report in respect of Surat obstacle issue are given as under:

- a. **8.1.17 :- (page – 12) :-** it is suggested as per Para 11.2 of attachment A of Annex 14, - *“if an object extends above the approach surface and the object cannot be removed, consideration should be given to displacing the threshold permanently”*.

As per last Para, considering the landing distance available, the selected position for the threshold should be such that the obstacle free surface shall not be steeper than 3.3% for airports having code number 4 or not be steeper than 5% for code number is 3. **Thus it is clear that a 3.3% gliding slope can be kept in case of code-4 runway airports.**

- Surat airport runway is code 4 runway. Surat airport operator has displaced threshold of R22 by 615 mt towards runway end 04, and thus gliding slope of 2% was maintained and penetrations are cleared.
- If gliding slope will be kept 2.9%; and considering original location of R22, all penetrations due to all buildings (existing object) in surrounding of Surat Airport, will be cleared automatically at 2.9% gliding slope.
- **Considering the growth of Surat Airport and parallel development of Surat city surrounding the airport, we suggest to make the displaced threshold R22 as permanent threshold.**

RAVJI PATEL Chairman 99252 05961	SANJAY MANGUKIYA President 98251 22383	G.R. ASODARIA Vice- President 98251 43517	DR. JIGNESH PATEL Vice- President 93755 44000	VIJAY DHAMELIA Vice- President 98258 00402	BHAVESH SANGHAVI Hon. Secretary 98251 20206
AMAR RAVAL Hon. Jt. Secretary 98251 26001	TUSHAR LAKHANI Hon. Jt. Secretary 98259 05444	UMESH PATEL Hon. Jt. Secretary 98251 35657	DIPAN DESAI Treasurer 98241 14798	HARESHBHAI MOTISARIYA Jt. Treasurer 98243 55311	HARSHIL DELIWALA Chief Co-ordinator 98251 40401

- b. **8.1.31 (Findings) (page – 16) :-** ICAO is in the process of introducing new surface viz. OFS, OES and SHRS with effective implementation in 2023 and applicability by 2026.

Thus very shortly new concept of OFS and OES will be applied at all ICAO member Airports including Surat Airport.

In this new rule of ICAO gliding slope is suggested at 3.5% for calculation of OLS. Considering new rule of ICAO, there will be no reduction of existing runway length in future. Hence, we suggest to make displaced R22 threshold point as permanent. And it can be recovered after application of new rules of IOCA.

- c. **Recommendation no. 2 on Displaced threshold (ref. para 8.1.14 – 8.1.23) (page no. 37) :-** Wherever a threshold is displaced due to obstacle of a permanent nature (existing object), the airport operator is in consultation with the regulator will determine the reference point of approach surface either from the extremities, or the displaced threshold, on a case to case basis in consonance with ICAO annex. 14 OLS provisions.

- As per letter of Jt. DGCA to chairman AAI, ***“all the buildings which are obstructing the safe aircraft operation are constructed in compliance with the valid aviation NOC”***.
- Considering provisions of GSR770(E) dated 17-12-2020 (**annexure 4**) ***“rule 3(b) (VIII) (a) existing object include those structure which have been duly constructed as per valid NOC.”***

Thus all building under obstacle issue of Surat Airport are constructed as per legal and valid NOCs of AAI. Hence it is covered under existing objects and it cannot be treated as obstacles.

RAVJI PATEL Chairman 99252 05961	SANJAY MANGUKIYA President 98251 22383	G.R. ASODARIA Vice- President 98251 43517	DR. JIGNESH PATEL Vice- President 93755 44000	VIJAY DHAMELIA Vice- President 98258 00402	BHAVESH SANGHAVI Hon. Secretary 98251 20206
AMAR RAVAL Hon. Jt. Secretary 98251 26001	TUSHAR LAKHANI Hon. Jt. Secretary 98259 05444	UMESH PATEL Hon. Jt. Secretary 98251 35657	DIPAN DESAI Treasurer 98241 14798	HARESHBHAI MOTISARIYA Jt. Treasurer 98243 55311	HARSHIL DELIWALA Chief Co-ordinator 98251 40401

- As per MoCA committee report, in new rule of ICAO, gliding slope will be 3.5% for OLS.
- As per letter of Jt. DGCA to chairman AAI (Annexure 2) **all the buildings are constructed in compliance of NOC. Thus as per GSR770(E) rule 3b all the buildings are existing object only but not obstacles.**

By considering all these facts AAI can consider displaced threshold as a permanent threshold for establishing OLS.

- d. **Recommendation no. 10 shielding benefit with respect to existing buildings (ref. Para 9.38 – 9.41) (page no. 38):-** Presently, shielding benefit is applicable only in case of natural terrain. It is recommended that AAI carry out a detailed study in extending the shielding benefit in respect of building or any other man-made structure as is being done in many other countries.

To resolve the shielding benefit issue and detailed study, we suggest to make displaced threshold point as permanent. And from this displaced threshold point, determine the reference point of approach surface for OLS.

4. During July, 2020 an online hearing for **Surat Airport obstacle** issue was done by DGCA office in consultation with project stakeholders and AAI.

**After this hearing, Jt. DGCA has concluded hearing issues and had written a letter to chairman of AAI (Annexure 2).** Key findings of this hearing were stated in his letter as mentioned below:

- a. **All the projects have a valid NOCs.**
- b. **All the buildings are constructed in compliance with NOC.**
- c. **AGL Building height of all buildings is exact as shown in NOCs.**

RAVJI PATEL Chairman 99252 05961	SANJAY MANGUKIYA President 98251 22383	G.R. ASODARIA Vice- President 98251 43517	DR. JIGNESH PATEL Vice- President 93755 44000	VIJAY DHAMELIA Vice- President 98258 00402	BHAVESH SANGHAVI Hon. Secretary 98251 20206
AMAR RAVAL Hon. Jt. Secretary 98251 26001	TUSHAR LAKHANI Hon. Jt. Secretary 98259 05444	UMESH PATEL Hon. Jt. Secretary 98251 35657	DIPAN DESAI Treasurer 98241 14798	HARESHBHAI MOTISARIYA Jt. Treasurer 98243 55311	HARSHIL DELIWALA Chief Co-ordinator 98251 40401

**d. The anomaly in respect of identification of obstacle has risen due to shortcomings of system of issuing NOC prevailing at that time. Therefore the resultant violation if any cannot be attributed to the owner.**

**e. It cannot be concluded that owners of identified obstacles, have violated the condition/specification of NOC issued to them.**

- Thus all building owners have obtained airport NOC and none of them have built even a single inch higher height than the AGL height granted under NOC.
- **All buildings have obtained Building Use Certificate (BUC) from SMC and all buildings are occupied since a long time of 9 years.**
- Safety measures are already taken by airport authority & DGCA by displacing threshold R22 by 615 mt. **(Annexure 1& 6). So there is no any safety threat at Surat Airport.** DGCA office has filed an affidavit in Gujarat High Court stating the same. **(Annexure 6)**
- **AAI has filed an affidavit in Gujarat High Court (Annexure 5).**
- **In last part of Para 15 of affidavit (Annexure 5) it is stated that the safety measures were taken under as per the directions of the DGCA and the threshold had been displaced by 615 mt and to keep the flight path clear as per norms of the GSR751(E) with the written approval of the competent authority and NOTAM is being circulated worldwide for information.**
- **In Para 23 of affidavit AAI (Annexure5) it is stated that NOTAM for displacement of threshold was issued and it was also stated that length of the runway available is sufficient for handling of the aircraft being operated from Surat airport.**
- **In Para 24 of affidavit AAI (Annexure - 5) stated that RESA is available for operation from both the ends as per standard norms.**

**By considering above fact, we suggest to make displaced threshold permanent and determine the approach surface from that point.**

RAVJI PATEL Chairman 99252 05961	SANJAY MANGUKIYA President 98251 22383	G.R. ASODARIA Vice- President 98251 43517	DR. JIGNESH PATEL Vice- President 93755 44000	VIJAY DHAMELIA Vice- President 98258 00402	BHAVESH SANGHAVI Hon. Secretary 98251 20206
AMAR RAVAL Hon. Jt. Secretary 98251 26001	TUSHAR LAKHANI Hon. Jt. Secretary 98259 05444	UMESH PATEL Hon. Jt. Secretary 98251 35657	DIPAN DESAI Treasurer 98241 14798	HARESHBHAI MOTISARIYA Jt. Treasurer 98243 55311	HARSHIL DELIWALA Chief Co-ordinator 98251 40401

5. As per provision of GSR770(E) (**Annexure 4**) dated 17-12-2020; rule 3(b) (VIII) ) **(a):“existing object include those structure which have been duly constructed as per valid NOC.”**

Considering fact stated in letter of DGCA (Annexure 2) to chairman AAI and provision of GSR770(E) (Annexure 4) dated 17-12-2020; rule 3(b) (VIII) ) **(a) :buildings under obstacle issue of Surat Airport are not an obstacles, but it is existing objects only, and hence it cannot be demolished without paying compensation to flat owners because Flat owners/builders have not violated any condition of NOC.**

**Thus by making displaced threshold permanent, obstacle issue will be cleared without payment of Rs. 2,500 cr. As compensation as per 9b and 9c of aircraft act, 1934.**

6. a) **Buildings under obstacle issue of Surat Airport, are constructed during 2010-15 which was seen from ATMC tower of Surat airport.**
- All the above buildings were handed over to the members of societies since last 7-9 years, all these buildings are in possession of flat owners since 9 years and they are residing in it. Hence there is no role of builders for that innocent flat owners are being victim of this obstacle issue.**
  - Most of flat owners of above buildings have availed Bank Loan on their flats and they are paying all local taxes to govt. and semi govt. body.**

RAVJI PATEL Chairman 99252 05961	SANJAY MANGUKIYA President 98251 22383	G.R. ASODARIA Vice- President 98251 43517	DR. JIGNESH PATEL Vice- President 93755 44000	VIJAY DHAMELIA Vice- President 98258 00402	BHAVESH SANGHAVI Hon. Secretary 98251 20206
AMAR RAVAL Hon. Jt. Secretary 98251 26001	TUSHAR LAKHANI Hon. Jt. Secretary 98259 05444	UMESH PATEL Hon. Jt. Secretary 98251 35657	DIPAN DESAI Treasurer 98241 14798	HARESHBHAI MOTISARIYA Jt. Treasurer 98243 55311	HARSHIL DELIWALA Chief Co-ordinator 98251 40401

**b) AAI Surat airport have carried out obstacle (existing object) survey in 2018 instead of every 2 years. As per obstacle survey maximum height of obstruction is only 12.30 mt.**

- Considering above (existing objects) at Surat airport threshold of R22 was displaced by 615 mt towards R04 by AAI and DGCA and **Notam dated 1-6-2018 (Annexure 1) was published.**
- **Even after displacing the threshold since long time of 5 years Surat airport has seen tremendous growth in numbers of passengers and air traffic movements. This clearly shows that displacement of threshold has not restricted growth of Surat airport in any way.**
- **As per GSR770(E) page no. 46 in master plan, at Surat airport proposed Runway length is 3810 mt. (Annexure 4) After displacement of threshold by 615mt. Remaining runway length i.e. 3810 mt – 615 mt = 3195 mt. After 615 mt displaced threshold remaining runway length of 3195 mt is sufficient for operation of all types of Wide Body aircrafts.**
- Existing runway length is 2905 mt which can be extended up to 3810 mt. For that a culvert over ONGC pipeline was suggested. So after construction of culvert it will be extended up to 3810 mt and there will not be any issue for wide body aircraft.
- **AAI has filed an affidavit in Gujarat High Court (Annexure 5).**
- **In Para 23 of affidavit AAI stated that NOTAM for displacement of threshold was issued and it was also stated that after displacement of threshold length of the runway available is sufficient for handling of the aircraft being operated from Surat airport. (Annexure 5)**
- **In Para 24 of affidavit AAI stated that RESA is available for operation from both the ends as per standard norms. (Annexure 5)**

RAVJI PATEL Chairman 99252 05961	SANJAY MANGUKIYA President 98251 22383	G.R. ASODARIA Vice- President 98251 43517	DR. JIGNESH PATEL Vice- President 93755 44000	VIJAY DHAMELIA Vice- President 98258 00402	BHAVESH SANGHAVI Hon. Secretary 98251 20206
AMAR RAVAL Hon. Jt. Secretary 98251 26001	TUSHAR LAKHANI Hon. Jt. Secretary 98259 05444	UMESH PATEL Hon. Jt. Secretary 98251 35657	DIPAN DESAI Treasurer 98241 14798	HARESHBHAI MOTISARIYA Jt. Treasurer 98243 55311	HARSHIL DELIWALA Chief Co-ordinator 98251 40401

- ICAO is in process of introducing new concept of OES/OFS and shortly i.e. during 2023-26 new ICAO guideline will be applicable.
- After the application of new guidelines of ICAO in 2023-26, slope of Approach Surface will be 3.5% as per OFS, thus all penetrations at Surat Airport will be cleared.
- At 2.9% landing gliding slope at Surat airport, all obstacle issue will be cleared, and runway length will not be reduced so full runway length can be used for landing of wide body aircrafts.

By considering new guidelines of ICAO, MoCA committee has suggested maximum 3.3% gliding slope for displacement of threshold. So for Surat airport we suggest to make displaced threshold 22 as a permanent threshold which will resolve the obstacle issue of Surat airport.

7. Surat airport has proposed second parallel runway having a length of 3810 mt for operation of wide body aircraft operation. (Annexure 7) showing reservation T-1 on master plan of khuda.

- 890.64 hector land was allocated for second runway of 3810 mt length is proposed in master plan of local authority of KHUDA. (Khajod Urban Development Authority)
- This proposed development plan of KHUDA is already submitted to Gujarat govt.
- Considering above facts there will not be any restriction of wide body aircraft operation on proposed second runway length 3810 mt.

RAVJI PATEL Chairman 99252 05961	SANJAY MANGUKIYA President 98251 22383	G.R. ASODARIA Vice- President 98251 43517	DR. JIGNESH PATEL Vice- President 93755 44000	VIJAY DHAMELIA Vice- President 98258 00402	BHAVESH SANGHAVI Hon. Secretary 98251 20206
AMAR RAVAL Hon. Jt. Secretary 98251 26001	TUSHAR LAKHANI Hon. Jt. Secretary 98259 05444	UMESH PATEL Hon. Jt. Secretary 98251 35657	DIPAN DESAI Treasurer 98241 14798	HARESHBHAI MOTISARIYA Jt. Treasurer 98243 55311	HARSHIL DELIWALA Chief Co-ordinator 98251 40401

**By considering Para 1 to 7 We suggest that displaced threshold of R22 of Surat Airport shall be made permanent and determine the reference point of approach surface from displaced threshold for resolving the obstacle issue of Surat Airport.**

**Thanking You  
Yours sincerely**



**Ravjibhai Patel**  
**Chairmen**  
**Credai-Surat**



**Sanjay Mangukiya**  
**President**  
**Credai-Surat**



**Bhavesh Sanghavi**  
**Secretary**  
**Credai-Surat**

RAVJI PATEL  
Chairman  
99252 05961

SANJAY MANGUKIYA  
President  
98251 22383

G.R. ASODARIA  
Vice- President  
98251 43517

DR. JIGNESH PATEL  
Vice- President  
93755 44000

VIJAY DHAMELIA  
Vice- President  
98258 00402

BHAVESH SANGHAVI  
Hon. Secretary  
98251 20206

AMAR RAVAL  
Hon. Jt. Secretary  
98251 26001

TUSHAR LAKHANI  
Hon. Jt. Secretary  
98259 05444

UMESH PATEL  
Hon. Jt. Secretary  
98251 35657

DIPAN DESAI  
Treasurer  
98241 14798

HARESHBHAI MOTISARIYA  
Jt. Treasurer  
98243 55311

HARSHIL DELIWALA  
Chief Co-ordinator  
98251 40401