

## NPA 2016-04

### Maintaining Aerodromes Rules – CS ADR-DSN Issue 3

<b>Commentor:</b>	UK CAA
<b>Page No:</b> 52	
<b>Paragraph No:</b> CS ADR-DSN.D.335 Holding bays, runway-holding positions, intermediate holding positions, and road-holding positions, (b)	
<b>Comment:</b> The UK permits the location of a runway-holding position that will cause an infringement of the 'planning' OLS, <u>but not the 'operational' OFZ</u> , by a manoeuvring aircraft; this is permissible only if no interference with radio navigation aids occurs and the impact of the infringement is addressed in the calculation of the OCA/H.	
<b>Justification:</b> The guidance given in ICAO Annex 14 Volume 1, which forms the basis for the EASA CS is ambiguous: <ul style="list-style-type: none"><li>a. Annex 14 Vol 1, Chapter 3, Table 3-2 indicates that Obstacle Free Zone (OFZ) has been used to decide the position of Category I, II or III holds (Note b), which does not correspond with Chapter 3, paragraph 3.12.3.</li><li>b. Annex 14 Vol 1 Chapter 3, paragraph 3.12.3 states that; “A <i>runway-holding position shall be established on a taxiway if the location or alignment of the taxiway is such that a taxiing aircraft or vehicle can infringe an obstacle limitation surface or interfere with the operation of radio navigation aids.</i>” This paragraph directly conflicts with Table 3-2 as aircraft holding at the distance specified in this table would conflict with the Transitional Surface (one of the obstacle limitation surfaces).</li><li>c. Annex 14 Vol 1 Chapter 3, Paragraph 3.12.9 introduces specific reference to the “<i>obstacle free zone, approach surface, take-off climb surface</i>” and refers back to paragraph 3.12.3 which, if complied with, would have already resulted in a hold which would not introduce an infringement of the approach or take-off climb surfaces, these both being part of the obstacle limitation surfaces referred to in paragraph 3.12.3.</li></ul> EASA has adopted only Annex 14, article 3.12.3 and not 3.12.9. However, the reference to the approach surface and take-off climb surface can be considered to be superfluous as they are already included in paragraph 3.12.3.	