



## CAA Decision Log

Temporary Airspace Change Proposal Title	Temporary Danger Area for BVLOS Operations in the Northern North Sea
Temporary Airspace Change Proposal Reference	ACP-2023-083
Change Sponsor	Flylogix Ltd.
AIS Submission Target Date	19/04/2024
CAA Decision Target Date	19/04/2024
<p><i>Instructions</i></p> <p>In providing a response to each question and/or status, the following colour coding should be used:</p> <ul style="list-style-type: none"> <li>• COMPLIANT/NOT APPLICABLE</li> <li>• NOT COMPLIANT/ACTION REQUIRED</li> <li>• ISSUE/CONCERN TO HIGHLIGHT</li> </ul>	
<p><b>Executive Summary</b></p> <p>Flylogix, an unmanned aircraft service (UAS) provider focussed on the offshore energy sector, have been contracted to complete methane emission surveys of oil and gas platforms from Shetland. The surveys are achieved using an unmanned aircraft fitted with methane sensor in a beyond-visual-line-of-sight (BVLOS) regime. In order to conduct these flights safely, in accordance with current regulatory requirements and in the absence of suitably approved detect-and-avoid capability, the BVLOS activity must be segregated. To achieve this, the sponsor has requested a Temporary Danger Area (TDA) complex for the 90 day period to undertake this work. The TDA complex originates from Shetland out to oil and gas platforms to the east and west of the island (distance approximately 120nm). It is proposed that operation takes place between 2 May and 14 July 2024. The UAS is to be operated from SCATSTA, a disused airport approximately 15nm from the closest airfield at Tingwall.</p> <p>The sponsor intends to only activate the TDA on the days the flights are taking place and for the period of the flights. The intended activity is planned for the weekends where possible to minimise impact on offshore helicopter operations which are the most frequent users of the airspace. Given the above, the impact on other airspace users will be low while offering protection to the BVLOS RPAS operation.</p>	

PART A – Airspace Change Process		
<b>A.1</b>	<b>Airspace Change Portal</b>	
A.1.1	<a href="https://caa.co.uk">Airspace change proposal public view (caa.co.uk)</a>	
<b>A.2</b>	<b>CAA SharePoint site</b>	
A.2.1	<a href="https://sharepoint.com">Temporary Danger Area (TDA) for BVLOS operations in the Northern North Sea - Project - All Documents (sharepoint.com)</a>	
<b>A.3</b>	<b>Chronology</b>	
A.3.1	<p>04/12/2023: Statement of Need received.</p> <p>25/01/2024: Assessment Meeting held.</p> <p>21/03/2024: Proposal submitted to CAA</p> <p>19/04/2024: CAA Decision and submission to AIS</p>	
<b>A.4</b>	<b>Are there any additional process requirements of the Civil Aviation Authority (Air Navigation) Directions 2023 (the “Air Navigation Directions”) and/or the Air Navigation Guidance 2017 which apply to this airspace change, and have they been complied with?</b>	<b>NA</b>
A.4.1		

PART B – Airspace Change Process – STAGE 5			
<b>B.1</b>	<b>Subject Matter Expert (SME) Regulatory Assessments</b> NOTE: this captures RAG status only – full details contained within each of assessment (hyperlinks inserted below)		
<b>ATM Safety</b>	<i>COMPLETE</i>	<b>Environmental</b>	<i>COMPLETE</i>
<b>Economic Assessment &amp; Statement</b>	<i>NOT APPLICABLE</i>	<b>Instrument Flight Procedure</b>	<i>NOT APPLICABLE</i>
<b>Engagement / Consultation</b>	<i>COMPLETE</i>	<b>Operational</b>	<i>COMPLETE</i>
B.1.1	Is there any other information outside of the regulatory assessments above which should be brought to the attention of the decision maker (e.g. outstanding Letters of Agreement)? <ul style="list-style-type: none"> <li>Air Traffic Management and the RPAS team will still need to see appropriate Letters of Agreement, Temporary Operating Instructions and HAZID.</li> </ul>		
<b>B.2</b>	<b>Other Relevant Documents (title and hyperlinks to be inserted)</b>		
<b>B.3</b>	<b>Has the relevant legal and policy framework to the airspace change process been taken into account, including:</b> <ul style="list-style-type: none"> <li>the Air Navigation Directions;</li> <li>the Airspace Modernisation Strategy;</li> <li>section 70 of the Transport Act 2000;</li> <li>the Air Navigation Guidance 2017; and</li> <li>CAP 1616 and associated publications?</li> </ul>		<i>Y</i>

<p><b>B.4</b></p>	<p><b>CAA consideration of whether the proposal is in accordance with the Airspace Modernisation Strategy (Air Navigation Directions, direction 5(1)).</b></p> <p><u>NOTE:</u> the left column captures RAG status only and the right column captures the rationale – full details will be contained within the SME Regulatory Assessments. Reference should be made to the AMS characteristics (<a href="#">CAP 1616f</a>, 6.61). For more information on the AMS strategic objectives, see <i>Airspace Modernisation Strategy 2023-2040 Part 1: Strategic Objectives and Enablers</i> (<a href="#">CAP 1711</a>).</p>
<p>Safety</p>	<p><i>Using AMS characteristics, insert a short summary (3-4 sentences) for each row which provides the rationale and evidence for whether the objective has been met. Consideration of the objectives as a whole takes place in section C.1 below, noting that not all characteristics need to be met in order for the proposal to be approved. Only identify those characteristics which are relevant to the proposal – both beneficial and detrimental.</i></p>
<p>Integration of diverse airspace users</p>	<p>The proposed TDA ensures that the RPAS is segregated from other airspace users as per current policy. The inclusion of a SUACS further achieves the maintenance of safety by providing a crossing service should one be required. The TDA is designed in such a way that the RPAS may be monitored through several 'areas' which are published by NOTAM and AIC.</p>
<p>Simplification of airspace system</p>	<p>The TDA complex is between SFC and 1300ft AMSL for use by an RPAS. The vast majority of the TDA is over the sea and there are no terrain issues between the take-off point and the coast.</p>
<p>Environmental sustainability</p>	
<p><b>B.5</b></p>	<p><b>CAA consideration of factors material to our decision whether to approve the change (section 70, Transport Act 2000).</b></p> <p><u>NOTE:</u> the left column captures RAG status only and the right column captures a summary of the rationale – full details will be contained within the SME Regulatory Assessments. Reference should be made to the Section 70 characteristics (<a href="#">CAP 1616f</a>, 6.80).</p>
<p>Maintain a high standard of safety in the provision of air traffic services section 70(1)(a)</p>	<p>The TDA itself is not afforded an ATS but the ANSP, Aberdeen (Brent and Sumburgh Radars) will provide SUACS in accordance with the LoA and TOI.</p>

<p>Secure the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic section 70(2)(a)</p>	<p>The TDA is within Class G airspace and activated by NOTAM; SUACS provided by Aberdeen (Brent and Sumburgh Radar).</p>
<p>Satisfy requirements of operators and owners of all classes of aircraft section 70(2)(b)</p>	<p>There is no change in airspace classification – the TDA facilitates potentially hazardous activity taking place with sufficient notification to other airspace users and mitigates the risk of interaction with non-participating traffic.</p>
<p>Take account of the interests of any other person (other than an operator or owner of an aircraft) in relation to the use of any particular airspace or the use of airspace generally section 70(2)(c)</p>	<p>There was no concern raised from identified stakeholders about the complexity of the TDA complex and a similar complex was utilised by the Sponsor in late 2023. Feedback from the ANSP was that there were no issues.</p>
<p>Take into account the Secretary of State’s guidance relating to spaceflight activities section 70(2)(ca)</p>	<p>N/A</p>
<p>Take into account the Secretary of State’s guidance on environmental objectives section 70(2)(d)</p>	<p>N/A</p>
<p>Facilitate the integrated operation of air traffic services provided by or on behalf of the armed forces of the Crown and</p>	<p>Aberdeen (Brent and Sumburgh Radar) will be providing a SUACS. The precise shape and location of the TDA complex has been designed to minimise the impact on other airspace users. All relevant local operators (including MOD) have been notified via the stakeholder engagement process. In addition, the sponsor has agreed to contact several stakeholders to consult on timings of flights or to notify activation,</p>

<p>other air traffic services section 70(2)(e)</p>	<p>depending on their requirements. ACP notified by AIC and NOTAM action.</p>	
<p>Take account of the interests of national security section 70(2)(f)</p>	<p>N/A</p>	
<p>Take account of any international obligations notified to the CAA by the Secretary of State section 70(2)(g)</p>	<p>No such international obligations have been notified to the CAA under section 70(2)(g) of Transport Act 2000.</p>	
<p><b>B.6</b></p>	<p><b>Are there any other associated publications relevant to the proposal and, if so, have the requirements of those publications been met?</b>  <u>NOTE:</u> associated publications include Airspace Policy Statements listed <a href="#">here</a>.</p>	<p>NA</p>
<p>B.6.1</p>		
<p><b>B.7</b></p>	<p><b>Conclusions in respect of requirement to ensure that the amount of controlled airspace is the minimum required to maintain a high standard of air safety and, subject to overriding national security or defence requirements, that the needs of all airspace users is reflected on an equitable basis.</b>  <u>NOTE:</u> this section only applies if the CAA is classifying or amending the classification of UK airspace.</p>	
<p>B.7.1</p>		

PART C – Stage 5 Recommendation		
<b>C.1</b>	<b>Taking the above information into account, what is your recommendation to the decision-maker for this proposal?</b>	
C.1.1	The team of regulatory Subject Matter Experts recommend to approve ACP-2023-083.	
<b>C.2</b>	<b>Are there any Recommendations and/or Conditions for the change sponsor to address prior to implementation (if approved)?</b>	Y
C.2.1	<p>The following conditions must be met <u>prior to activation</u> of the TDA:</p> <p><b><u>Engagement and Consultation:</u></b></p> <ol style="list-style-type: none"> <li>1. The TOI that has been referred to should be finalised and provided to the CAA. If the final decision is to approve the ACP, finalised and signed copies of this from all parties mentioned will be required before the CAA approves activations of the TDA.</li> <li>2. The sponsor should inform all stakeholders (including their wider stakeholder audience) of the decision (when published), the likely impacts and what will happen next. At a minimum, this will need to include information about any changes in dates for operation, contact details for providing feedback, information regarding the frequency of flights and when these will be conducted (weekends or weekdays or both) and changes to the TDA design, namely the removal of TDA F. Any feedback received regarding the changes should be addressed appropriately by the sponsor.</li> <li>3. The sponsor should update the Engagement Summary Report to reflect details of the removal of TDA F and add the associated engagement summary and evidence with NATS Aberdeen and Avinor regarding this change. The sponsor should also explain the change in dates for operation within the updated Engagement Summary Report.</li> <li>4. The sponsor must engage with Isavia ANS to ensure they are aware of the proposal, to ensure they have up to date contact details in the event of incursion into the Reykjavik FIR and agree how this would be coordinated as per they did for a previous ACP. Evidence of this engagement along with an updated engagement summary should be included in an updated version of the Engagement Summary Report.</li> <li>5. The sponsor must make efforts to elicit a response from Gama Aviation and PDG Helicopters, address any feedback raised appropriately and add this engagement evidence and a summary of the engagement to an updated version of the Engagement Summary Report.</li> <li>6. The sponsor is required to undertake regular engagement with stakeholders while the temporary change is in operation and to collate, monitor and report to the CAA on the level and contents of complaints associated with the TDA once it has been implemented and throughout its period of operation (para 303 CAP1616). This information is expected on a two-weekly basis throughout the duration of the TDA and should include nil returns.</li> </ol>	

The sponsor may choose to submit all material in response to the above conditions in a single document if that would be preferable.

### **Environmental**

- The sponsor is required to clarify the frequency of flights. In v8 of the Final Submission (submitted 18/04/2024) the sponsor states that they plan to conduct a total of 15 flights during the 90-day period and may conduct multiple flights per active day. The flights will be undertaken during three separate periods which are indicatively planned for 2 May to 19 May 2024, 30 May to 16 Jun 2024 and 28 June to 14 July 2024 (subject to weather and serviceability). The frequency of flights stated in Section 6: Noise Assessment within the Final Submission states, '*When the total flights have been concluded, no more than 10 and mainly at the weekends, the AIC will be cancelled.*' This contradicts the previous statements in the document in respect of frequency of flights. It is, therefore, necessary for the sponsor to clarify the number of flights which will be conducted.
- Additional recommendation: It is recommended that any information provided to representative organisations and/or local communities should include operational diagrams of sufficient detail for those potentially affected to identify where they live in relation of the changes in traffic patterns.

### **ATM and RPAS Teams**

- Air Traffic Management and the RPAS team will still need to see appropriate Letters of Agreement, Temporary Operating Instructions and HAZID.

### **General**

- The change sponsor must publish all versions of the submission documents on the Airspace Change Portal (with each version appropriately labelled) for accountability and clarity.
- *The change sponsor should inform the stakeholders of the decision (when published), likely impacts and what will happen next.*

Also, the sponsor must undertake to meet the following conditions during the operation of the TDA:

- *The sponsor is required to collate, monitor, and report to the CAA on the level and contents of feedback received during the period of the TDA. The CAA expect reporting on the level and contents of any stakeholder feedback received on a*



	<p><i>fortnightly basis throughout the duration of the TDA (this should include nil returns). The sponsor should send these reports to the assigned Account Manager.</i></p> <ul style="list-style-type: none"> <li>The change sponsor must notify the CAA at the end of the temporary airspace change if any noise related complaints were received.</li> </ul>		
<b>C.3</b>	<b>Are any other consents and approvals needed in order to permit the intended operation (title and hyperlinks to be inserted)?</b>		
<b>C.4</b>	<b>Are there any other comments/observations for the decision maker?</b>		N/A
C.4.1	.		
<b>C.5</b>	<b>Regulator's Signature</b>		
Account Manager			19/04/2024



PART D – Final Regulatory Decision – Comment/Approval [Delete signatory rows below dependent on Decision Maker]			
<b>Airspace Regulation Principal comments and recommendation:</b>			
Airspace Regulation Principal	[REDACTED]	[REDACTED]	29/04/24
<b>Manager Airspace Regulation comments and recommendation/regulatory decision:</b> <i>If the decision-maker is Head AAA or Group Director SARG, delete 'regulatory decision'.</i>			
Manager Airspace Regulation	<i>Insert name</i>	<i>Insert signature</i>	<i>Insert date</i>
<b>Head AAA comments and recommendation/regulatory decision:</b> <i>If the decision-maker is Group Director SARG, delete 'regulatory decision'.</i>			
Head AAA	<i>Insert name</i>	<i>Insert signature</i>	<i>Insert date</i>
<b>Group Director SARG comments and regulatory decision:</b>  <i>GD SARG endorses the recommendations set out in this document and adopts the recommended decision and recommended reasons set out above as the CAA's decision in respect of this airspace change and the reasons for it. GD SARG endorses the [recommendations/conditions/PIR requirements as set out above]</i> or <i>GD SARG has considered the conclusions and recommendations set out in this document. GD SARG sets out the decision in respect of this airspace change and the reasons for it as follows:</i>			

Group Director SARG	<i>Insert name</i>	<i>Insert signature</i>	<i>Insert date</i>
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