

CAA Targeted Engagement Assessment – Temporary Airspace Changes

Title of airspace change proposal	BVLOS operation of cargo UAS within the Shetland Islands
Change sponsor	Windracers
Project reference	ACP-2022-051
Case study commencement date	02/12/2024
Case study report as at	26/06/2025
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the 'status' column is completed using the following options:</p> <ul style="list-style-type: none"> • YES • NO • PARTIALLY • N/A <p>To aid the SARG Lead it may be useful that each question is also highlighted accordingly to illustrate what is:</p> <p>resolved YES not resolved PARTIALLY not compliant NO</p>	

Targeted Engagement Assessment		
1	Has the change sponsor identified the right audience(s) and provided a rationale for selecting them?	YES
	<p>The sponsor (Windracers) has engaged with stakeholders who provided an appropriate representation of the proposal's operational region. The method by which these were identified were through consideration of members of NATMAC, in addition to regional stakeholders, including airport managers, regional airlines, air traffic controllers, pilots, and general aviation users.</p> <p>CAP1616g requires sponsors to engage with aviation stakeholders, i.e. aviation users, ANSPs' and airports only. The sponsor has engaged with a total of 89 stakeholders across the following six groups (A full list of all engaged stakeholders can be found in section 10.07 of the final submission):</p> <ul style="list-style-type: none"> • Airports: 14 airports in the surrounding region of the Shetland and Orkney Islands. • ANSPs: NATS Aberdeen, NATS (NERL). • Military: DAATM, Military Aviation Authority (MAA), Navy Command HQ, United States Visiting Forces (USVF), HQ United States Country Rep-UK (HQ USCR-UK), engaged through NATMAC. 	

- NATMAC: All 36 NATMAC members.
- Additional Stakeholders (Authorities, Councils, Government and Environmental Organisations): Orkney Island Council, Shetland Island Council, Scottish Natural Heritage, Marine and Coastguard Agency, Visit Scotland, Transport Scotland, NatureScot, Northern Lighthouse Board.
- Other Aviation Users: 31 aviation operators, companies and pilots operating in the surrounding airspace, including SAR and HEMS operators.

Of the identified stakeholders, the sponsor recognised 24 'key stakeholders' based on their requirements to enter the proposed TDA whilst active, or in the case of airport operators, their proximity to the proposed TDAs. As shown in table below:

Table 5 – List of key stakeholders

Key Stakeholders
Airtask Group
Babcock
Babcock Mission Critical Services
Bristow Helicopters
CHC
Foula Airfield Trust
Gama Aviation
Highlands and Islands Airports Limited (HIAL)
HITRANS
Kirkwall Airport
Lamb Holm International Airport
Loganair
Marine and Coastguard Agency
National Trust for Scotland (Fair Isle Airport)
NATS Aberdeen
NHV
Orkney Island Council
PDG Helicopters
SaxaVord Spaceport
Scotland's Charity Air Ambulance (SCAA)
Shetland Island Council
Sumburgh Airport
Wick Airport
2Excel Aviation

	<p>The sponsor also provided a list of stakeholders as part of their wider engagement (table 6 pg. 27) which included broader aviation and non-aviation organisations in the Shetland Islands. However, some of the stakeholders identified are listed as overarching groups. For instance, GA Orkney, GA Tingwall, Shetland UAV Operators, South Airports, West Airports, Local GA Community. It is unclear which organisations exactly within these groups the sponsor has engaged with and consequently the method of engagement with these stakeholders. This has been addressed as a clarification question to specify which organisations within these groups have been engaged with. The sponsor specified names of individuals within these broader groups and clarified that they are local GA owners and operators in the area.</p>	
2	Has the change sponsor explained the engagement methodology / approach used?	YES
	<p>The sponsor articulated that the engagement for this ACP consisted of two separate engagement efforts. The initial one was a combined engagement strategy with the Orkney Airspace Change Proposal, reference ACP-2022-049. These engagement efforts lasted from late 2022 till May 2023. A period of 5 months. It must be noted, however, that although this ACP is similar in nature to ACP-2022-049, the 5 months engagement period cannot be directly accounted for this proposal as this is a different ACP altogether which requires its own engagement efforts to be carried out.</p> <p>For this proposal, four rounds of formal engagement were conducted.</p> <p>First engagement period from 16th August 2024 to 11th October 2024. Period of 8 weeks. The sponsor sent the first engagement material letter to all stakeholders via email.</p> <p>The second letter was issued on the 30th of October with the feedback submission deadline on the 13th of November. A period of 2 weeks, in conjunction with the first engagement round, this totalled to a 10-week engagement period. The sponsor specified that although the official stakeholder engagement period came to an end, any additional feedback received through the dedicated email address (contact.operations@windracers.com) will be acknowledged and shared with the CAA.</p> <p>The third round of engagement started on 30th January 2025 with a feedback deadline on the 13th of February 2025, a period of 2 weeks. This was completed due to a change in the implementation dates of the proposal. The sponsor determined that 2 weeks would be appropriate, as the only suggested change were the implementation dates of the proposal. This engagement effort additionally requested feedback on an operational period lasting until 28th of October 2025.</p> <p>Finally, the fourth round of engagement period lasted from the 14th of April 2025 to the 9th of May 2025, a period of 4 weeks. This was due to a further timeline change, the removal of two spoke airfields and the addition of Lamb Holm Airfield. The sponsor deemed this length appropriate as changes were not as significant from the previous rounds of engagement.</p>	

	<p>Moreover, as part of the engagement approach, the sponsor has also conducted individual meetings with some of their key stakeholders as illustrated in table 7 pg. 28-31 of the final submission document. The table includes a brief summary of the discussions/actions, lists of the attendees, and the organisations they represent.</p> <p>In addition to individual meetings, the sponsor carried out Hazard Identification (HazId) workshops with key stakeholders. The objective of these workshops included a full walkthrough of the planned Windracers operations and assessment of potential hazards and applicable mitigations, an awareness between all parties of current mitigations and Windracers operating processes and discussion of additional processes or requirements relating to the project and any agreement on actions to be implemented prior to operations. The attendees of these workshops included: Shetland Space Centre, Shetland Islands Council, Airtask, NATS Aberdeen, NatureScot, Foula Airfield Trust, AFIS Tingwall Airport, Kirkwall ATC and Orkney Islands Council.</p> <p>Note that there is no evidence to suggest that the sponsor has sent any reminder emails to stakeholders to proactively seek responses. Though, it can be noted that the sponsor received 13 responses in round 1, 10 responses in round 2, 15 responses in round 3 and 12 responses in round 4 of the engagement periods. Considering the sponsor has received a reasonable amount of responses within each engagement round, the CAA does not foresee the lack of reminder emails as a concern with this proposal. Although, this will be reminded to the sponsor for any future submissions.</p>
3	<p>What materials have been used by the change sponsor during the targeted engagement?</p> <p>PARTIALLY</p>
	<p>Alongside the final submission document, the sponsor has submitted three engagement letters that were sent to stakeholders at the start of each engagement period. The sponsor has utilised three engagement letters for the four rounds of engagement. For the third and fourth periods of engagement, the same letter was used as the only change being the operational period.</p> <p>Within the first two engagement letters, the sponsor stated that the trials will run for 90 days (from 6th February to 6th May 2025). The requirement of the ACP was to seek a TDA to demonstrate the use of UAS for delivering on-demand supplies to remote communities in the Shetlands currently hindered by unreliable or limited logistics. Tingwall Airport was going to serve as the central operations hub. From Tingwall, three routes were going to be established: Tingwall-Baltasound, Tingwall-Foula and Tingwall-Fair Isle. To conduct these operations, the sponsor was proposing the use of one TDA using 10 segments (E-F-G-H-I-L-M-N-O-P).</p> <p>Due to operational changes, flights are now restricted to the route between Tingwall and Lamb Holm (Orkney) from 22nd August to 20th November 2025. The TDA consists of 8 segments (A-G-H-J-K-L-M-N), with segments G and H extending north from Tingwall near Baltasound Airport. However, the UAS will not land at Baltasound but will return mid-air to demonstrate potential future cargo deliveries to northern</p>

Shetland Islands. This decision was made after the fourth round of engagement, during which Baltasound Airport opted out of the ACP. Despite this, the sponsor retained the same TDA design without the need of informing other stakeholders of the change. If the ACP is approved, the sponsor must notify all stakeholders that Baltasound Airport is not involved in the ACP before activation of the TDA. This requirement is addressed as a condition prior to activation, please refer to question 11.

The first engagement letter is 6 pages long, it depicts TDA locations (segments A to I), operating procedures with altitude of 1500 amsl and activation period from 06/02/2025 to 06/05/2025 with specific scheduling to be confirmed closer to the activation period. The letter cites deconfliction procedures with the use of ADSB-in/out and Mode S transponder. The document includes details of failsafe mechanisms, holding locations, a brief summary of noise impacts and finally the reasons for engaging with stakeholders. The letter does not address details about the crossing service (SUAACS/SUAAIS) and impact on stakeholders. In general, it is quite light in detail.

The second engagement letter is more comprehensive. It is 15 pages long, in addition to the first engagement letter, it addresses changes to TDA segments, vertical limits from 2000ft to 4000ft, update to the route schedule timetables and additional holding points. The letter confirms a crossing service for Shetland and intended Info Service for Orkney, it depicts TDA locations/segments (and potential extension to Eday on a separate map). It also explains the current day scenario, environmental considerations, and a full impact assessment. Unfortunately, it is unclear why the sponsor did not provide these details on the first engagement round. Moreover, only two weeks were given to stakeholders to provide feedback as opposed to the 8 weeks on the first round, however, it must be noted that the sponsor received feedback in both rounds and no criticism was received from stakeholders for the shortened engagement period in round 2.

The third engagement letter is 12 pages long and very similar in detail to the second engagement letter. However, in response to previous feedback, the Tingwall - Foula and Tingwall – Fair Isle flights have been removed. Additionally, the sponsor added a route between Tingwall and Lamb Holm (Orkney). The TDA is now composed of 8 segments (A-G-H-J-K-L-M-N) and implementation dates are between 22nd August and 20th November 2025.

The sponsor set out the Operational Safety Case, operating limitations, their proposed design together with principles and rationale relating to the design, information on notification and activation of the TDA. The material also presents a map for the TDA illustrating the TDA complex which displays the exact location and boundaries of the flight path. Whilst there was no scale included, there was a table listing the dimensions and coordinates of the TDA. Deconfliction and failsafe mechanisms have also been detailed including a description of the current day scenario.

The material addresses safety, operational viability and impact on stakeholders including airspace users, local residents and surrounding environmental heritage sites. The sponsor highlighted that although the official stakeholder engagement has come to an end, any additional feedback provided after the submission of this ACP will be shared with the CAA.

4	<div data-bbox="322 252 1585 351">Does the Engagement Summary Report clearly detail the period of engagement? Please include the start/end date and duration of engagement period along with a summary of the change sponsors rationale for pursuing a shorter/longer engagement (where applicable).</div> <div data-bbox="1585 245 2016 357">YES</div>
	<p>The final submission document indicates that four rounds of formal engagement were conducted. The rationale for the selected engagement period was not included in the initial submission, but this was addressed through a clarification question. In the revised document (V1.1), the sponsor explained that the 10-week engagement period was considered sufficient, given their prior experience in the region from an earlier approved ACP (ACP-2022-049), which had a five-month engagement period. The sponsor also noted that stakeholder responses diminished towards the end of the second engagement period, with no concerns raised about the duration of the engagement.</p> <p>The first round of engagement commenced on 16th August 2024 and ended on 11th October 2024. A period of 8 weeks. Post this engagement, Kirkwall was removed as a potential airport, prompting changes to the TDA design. Instead of operating from Kirkwall, the route was redesigned to depart from Eday, also within the Orkney Islands. This modification led to the removal of TDA A and a shortening of TDA Q, now covering only the north route from Eday.</p> <p>As a result of these changes, a second round of engagement took place from the 30th October and ended on 13th November 2024. Lasting 2 weeks. This round informed stakeholders that no flight route would be established between Tingwall and Kirkwall and sought input on the viability of the Tingwall to Eday route. Other updates shared in this round included the removal of TDA A, refinements to TDAs to avoid ATZ infringements, and adjustments to vertical limits for Orkney (from SFC to 2500ft) and Shetland (from 2000ft to 4000ft).</p> <p>During further engagement with Orkney Island Council, the sponsor determined that operating from Eday Airfield was not feasible due to project timelines. This led to another redesign of the TDAs, resulting in a final design proposal focused on operations within the Shetland Islands. The sponsor promptly communicated these changes to stakeholders and sought feedback to confirm whether the revised start dates would pose any operational challenges.</p> <p>Version 1.3 of the submission document states that a third round of engagement was completed due to a change in the implementation dates of the proposal. The engagement letter was sent on 30th January 2025 with a feedback deadline on the 13th of February 2025, a period of 2 weeks. The sponsor determined that 2 weeks would be appropriate, as the only suggested change were the implementation dates of the proposal. This engagement effort additionally requested feedback on an operational period lasting until 28th of October.</p> <p>Finally, due to a further timeline change, the removal of two spoke airfields and the addition of Lamb Holm, the sponsor carried out a fourth engagement round. The engagement period lasted from the 14th of April 2025 to the 9th of May 2025, a period of 4 weeks. The sponsor</p>

	deemed this length appropriate as changes were not as significant from the previous rounds of engagement.	
5	Was the period of engagement appropriate?	YES
	CAP1616g recommends six weeks as a reasonable starting point for an engagement period; however, the sponsor conducted engagement over a total of 16 weeks. The first round lasted 8 weeks, although the information shared with stakeholders was limited. The second round provided more detailed information but only allowed 2 weeks for feedback. Despite the shorter feedback period, no stakeholders raised concerns. The third round consisted of two weeks and finally the fourth round consisted of four weeks. Given the sponsor's familiarity with the operations, stakeholders in the area, and prior engagement on a similar ACP (ACP-2022-049), the 16-week engagement period is considered sufficient. This is further supported by the sponsor's ability to facilitate effective two-way engagement.	
6	Has the change sponsor accurately summarised what stakeholders have said and identified all the issues raised during the engagement in the stakeholder engagement summary document? Does the stakeholder engagement summary document detail the change sponsor's response to the identified issues?	PARTIALLY
	<p>Out of the 89 stakeholders contacted, the sponsor received feedback from 17. The sponsor has summarised their engagement activities in Table 8 (pages 31-33) of the final submission document and has provided evidence of communication with stakeholders to support the submission.</p> <p>The Stakeholder Engagement Meeting Table (Table 7) provides a brief summary of discussions and actions, listing the names of attendees and the organisations they represent. The CAA asked for supporting documents such as meeting notes, minutes, or follow-up correspondence to show how stakeholder feedback was addressed. Although the sponsor has not provided copies of meeting minutes, within engagement rounds 3 and 4, it can be seen that the sponsor has correctly acknowledged and provided response to stakeholders' comments, offering an appropriate audit trail as opposed to the previous engagement rounds.</p> <p>Some feedback in Table 8 appears to be incorrectly attributed to the engagement evidence in Appendix B. For instance, feedback from Airtask is listed under B2.13, B3.01, and B3.04, but the responses in Appendix B relate to Tingwall Airport. Similarly, B2.16 and B2.17 mention NATS Aberdeen, but the comments in Appendix B seem to come from a different stakeholder. This was addressed through a clarification question. The sponsor submitted V1.1 of the document, correcting most of the misattributions. However, Airtask feedback, originally listed under B2.13, B3.01, and B3.04, has now been attributed to Shetland Island Council. The sponsor has been asked to confirm whether engagement with Airtask occurred and provide evidence of this engagement. This was corrected in version 1.3 of the document where engagement with Airtask was evidenced, feedback with the stakeholder has been correctly attributed to B3.01 and B5.02.</p> <p>The sponsor has initiated an LoA and TOIs with NATS Aberdeen. A meeting was held with NATS Aberdeen, and the outcome was for NATS to</p>	

	<p>develop TOIs and provide contact details to the sponsor. The sponsor has also submitted four LoAs and a ConOps to the CAA (for Baltasound, Fair Isle, Foula, and Tingwall), which appear to have been drafted by the sponsor. However, the email evidence in Appendix B does not show that these LoAs or the ConOps resulted from engagement with the relevant parties. The sponsor was asked to provide proof that the draft agreements were the outcome of engagement with stakeholders. In version 1.3 of the submission document, the sponsor included evidence in Appendix B5 demonstrating stakeholder engagement that led to the development of the Letters of Agreement (LoAs). However, similar evidence is required for the draft Concept of Operations (ConOps). While it is noted that the sponsor has initiated contact via email, responses from stakeholders have not yet been received. These agreements must be finalised and formally signed by all relevant parties prior to the activation of the TDA. The sponsor later submitted a picture of the signed ConOps from Lamb Holm, and equally provided email correspondence with Airtask confirming that the ConOps will be soon signed. Although, this evidence has been provided, a signed ConOps is also required from the other stakeholders. <u>Also addressed as a condition, please refer to question 11.</u></p>	
7	Is the change sponsor's response to the issues raised appropriate/adequate?	PARTIALLY
	<p>The submission document includes evidence of responses received from each stakeholder along with a response from the change sponsor. Overall the change sponsor's response to the issues raised are appropriate, as detailed below:</p> <p><u>SUAACS/ATS Provision</u></p> <p>The Ministry of Defence (MoD) asked whether a SUAACS would be provided for other aircraft, while NATS Aberdeen inquired about the UAS movement volumes and the overall design of the TDA complex. NATS also questioned the sponsor's TDA deactivation procedures.</p> <p>Sponsor's Response: The sponsor informed the MoD that they are working with NATS Aberdeen to establish a crossing service. NATS Aberdeen will develop TOIs and provide contact details as needed. A meeting was held with NATS Aberdeen, and it was decided to update the TDA design to a "floating" configuration for most TDA segments, ranging between 2,000 and 4,000 ft. A draft ConOps was also provided to the stakeholder for review.</p> <p><u>Involvement of Kirkwall Airport</u></p> <p>Highlands and Islands Airports Limited (HIAL) raised concerns about the use of Kirkwall Airport as part of the TDA, including queries about the use of a visual observer, the expected timeline for operations, pressure changes when crossing geographical areas, and mitigations for non-compliant aircraft, general aviation (GA) traffic, and non-UK traffic. Kirkwall ATC also expressed concerns on the intended TDA's proximity to the published procedures and traffic. The locations, boundaries and scheduling are not effectively deconflicted from arriving, departing and transiting traffic in the vicinity of Kirkwall Airport.</p> <p>Sponsor's Response: The sponsor removed Kirkwall Airport from the TDA design. Also, in reply to Kirkwall ATC, the sponsor held a meeting</p>	

with the stakeholder to agree deconflicting procedures. The sponsor agreed on operating on Sundays when traffic is relatively low, the ConOps was also provided for the stakeholder's view.

Involvement of Eday Airfield

Orkney Island Council (OIC) expressed reservations about including Eday Airfield in the ACP.

Sponsor's response: The sponsor confirmed that Eday Airfield would not be a part of the ACP.

Involvement of Sumburgh Airport

Sumburgh Airport noted that TDA position and levels could affect flights, particularly search and rescue (SAR) and oil helicopter traffic operating to the North West and North East. They also pointed out that the controlled airspace outside operating hours is deactivated, requiring prior notice when the TDA is active.

Sponsor's Response: The sponsor confirmed that Sumburgh Airport is no longer part of the ACP.

Involvement of Foula Airstrip

Foula Airstrip Trust raised several questions on the intended Foula operation, including whether the sponsor would stay on the island for the trial, the types of cargo being carried, and how quickly the TDA could be removed. They also asked which buildings would be needed and what measures would be in place to ensure the airstrip remains usable for other operators in case of an emergency. The Trust emphasised that any disruptions to the Airtask service, which is a lifeline service to the island, would not be accepted. During the third engagement round, the stakeholder rejected to support this ACP due to believing that this will add significant disruption to the Airtask lifeline service. The stakeholder also did not see value of the ACP to the community of Foula.

Sponsor's Response: The sponsor confirmed that operators would remain on the island during the trial to manage UAV flights and reduce strain on the Airtask service. Windracers would supplement, not replace, Airtask's cargo service, and the sponsor would support carrying non-critical cargo alongside Airtask's critical cargo. The sponsor confirmed ongoing engagement with Airtask and that Airtask operations would take precedence, subject to coordination and deconfliction procedures. The sponsor also noted that their operational requirements at the airstrip are minimal, requiring just a small indoor space, access to power, and possibly the installation of a couple of antennas. Emergency procedures were also confirmed, including manual takeover for safe UAV landings and a comprehensive emergency response plan to keep the airstrip operational for other users. Following the third engagement round, the sponsor removed Foula Airstip from this ACP.

Involvement of Fair Isle

Fair Isle Airport informed the sponsor that they felt the risks of the operation outweighed the benefits of this proposal. Specifically, as to the impact on Fair's Isle's internationally significant environment and the added pressure on the area supporting the lifeline flight service.

Sponsor's response: A response to the correspondence is visible from the Hitrans SATE Business Manager informing the stakeholder that they are committed to working around Airtask's lifeline service and ensure there are no disruption to essential flights. They also proposed to collaborate on timetables that minimise any additional workload on the stakeholder's side. However, as no further correspondence was received, the sponsor removed Fair Isle from this proposal.

Deconfliction with Airtask Operations/Operation from Tingwall Airport

Shetland Island Council raised concerns during both engagement rounds about TDA segments H & G, which overlap with Airtask's flight paths to and from Foula and Fair Isle, as well as segments L, M, and N, which could cause operational issues for Tingwall Airport. During the third engagement round, **Airtask** asked the sponsor if they are aware of the runway resurfacing at Tingwall Airport in May and the subsequent closing down of the airport.

Sponsor's Response: The sponsor met with Shetland Island Council and updated the TDA geometry. The sponsor proposed an agreement to allow Airtask to access active TDA segments without needing deconfliction, giving Airtask operations primacy until their return flights from Foula or Fair Isle. The sponsor also indicated they would contact Sumburgh radar to coordinate the arrangement so Airtask wouldn't need to request a crossing service every time the TDA is crossed. Additionally, in response to Airtask, the sponsor confirmed that they were aware of the runway resurfacing works and confirmed that they will not be flying from Tingwall while the resurfacing works are ongoing.

Potential conflict with Spaceport activities/ Operation from Baltasound Airfield

SaxaVord Spaceport confirmed that the use of Danger Area EGD902 would not interact with TDA operations, but any concurrent operations would need to be coordinated. During the fourth engagement round, with the change of operational dates, the stakeholder informed that they are no longer able to support the proposal.

Sponsor's Response: The sponsor met with the Spaceport, agreeing to share emergency contact details and closely coordinate for any Baltasound activities. Following the withdrawal from the stakeholder, the sponsor removed Baltasound from the TDA design.

Deconfliction with SAR and HEMS Operations

Shetland Island Council raised concerns about the potential conflict between the sponsor's operations and critical SAR and HEMS operations at Tingwall Airport, which handles rescue helicopters and air ambulances on short notice. The **Northern Lighthouse Board (NLB)** informed that

PDG Helicopters run operations in Orkney and Shetland, and have planned operations from 23rd August to 17th November 2025. **Sumburgh Airport** and **Sumburgh Search and Rescue (SAR) – Bristow Group** also raised concerns about the impact of TDA vertical limits on SAR and helicopter traffic. **Sumburgh SAR** also requested that SAR helicopters should have immediate access to/through the TDAs via ATC and that TDAs are only activated for the shortest possible time window. **Offshore Heli** requested a KML file of the TDA and **NHV Helicopters** proposed a cruising of the UAS in the TDA below 1000ft.

Sponsor's Response: The sponsor met with Shetland Island Council and agreed on procedures via a ConOps document, with the Council as a signatory. Since operations are now limited to the Shetland Islands, deconfliction will be agreed with NLB to avoid any disruptions. Although PDG Helicopters was contacted, no feedback was received. The sponsor reviewed vertical limits for the TDAs, updating them to a "floating" design with most segments between 2,000 and 4,000 ft. They also communicated with Sumburgh SAR, requesting details about SAR vertical distances and confirming they would work closely with ATC to allow SAR helicopters to transit through or access the TDAs as needed. The sponsor also confirmed that TDAs would only be active for the minimum time necessary. However, no evidence of agreement from Sumburgh SAR was provided. The sponsor confirmed that the "floating" design was based on feedback from Sumburgh SAR, but the feedback evidence is still missing. During the third engagement round, Bristow Group confirmed they had no further comments to raise. In response to Offshore Heli, the sponsor provided a KML file of the TDA. However, they had no further comments to provide. The sponsor informed NHV helicopters that NATS Aberdeen will be providing a SUACS which will allow helicopters to use the TDA when the UAV is not flying.

GA Considerations

The **British Gliding Association (BGA)** did not raise specific objections but inquired about the choice of 3,000 ft as the operating height for the TDA, noting that the highest elevation in the Shetlands is 1,480 ft. During the third engagement, they confirmed that ACP does not impact gliding operations. **AOPA** raised a concern on the impact of this TDA on VFR traffic in the Shetland Islands. Where the proposed airspace can constrain access to GA and rotary wing routes. The stakeholder requested careful coordination and clear, timely NOTAM publication to mitigate disruption to other airspace users.

Sponsor's Response: The sponsor confirmed to the BGA that TDA operations in the Shetlands will operate at 3,000 ft AMSL, with flights, wherever possible, taking place over water. In answering AOPA, the sponsor confirmed that they are in constant engagement with helicopter operations throughout Orkney and Shetland. NOTAMs will be published no later than 24 hours in advance of TDA activation and will notify stakeholders of any changes to flight schedules at least 5 working days in advance.

ACP-2024-032

Blackswan Ltd on behalf of **Flylogix** notified that they have a similar ACP in the area reference ACP-2024-032, however, they have confirmed that this ACP will be deconflicted by time and space so have no objections to the proposal.

Environmental Considerations

During the first and second engagement round, **NatureScot** requested more information on timing, frequency and approach routes and heights for operations at Baltasound to assess potential impacts on Hill of Colvadale and Sobul SSSI and Schedule 1 species, which are designated sites for breeding seabirds. The stakeholder also reported that this proposal is likely to have a significant effect on the qualifying interests of Foula Special Protection Area (SPA), Seas Off Foula SPA, Fair Isle SPA, Fetlar SPA and Bluemull and Colgrave Sounds SPA. The stakeholder also provided a response to the third and fourth engagement round. Within the fourth round, NatureScot informed this proposal would have a significant effect on qualifying interests of Scapa Flow SPA which is protected for non-breeding seabirds. And therefore, the CAA is required to carry out an appropriate Habitats Regulations Assessment (HRA) in view of the site's conservation objectives. NatureScot further added that based on their appraisal carried out to date, their conclusion is that the proposal will not adversely affect the integrity of the site.

ConOps

The sponsor submitted a ConOps document for signing by several parties, including NATS Aberdeen, Shetland Island Council, Airtask Group, and Lamb Holm Airfield. The document addresses most stakeholder concerns and the engagement evidence shows that it was sent to stakeholders for comment. However, there is no evidence that Airtask and Lamb Holm Airfield replied confirming they are in agreement with the planned operation. The ConOps will need to be signed prior to the TDA activation. The sponsor later submitted a picture of the signed ConOps from Lamb Holm, and equally provided email correspondence with Airtask confirming that the ConOps will be soon signed. Although, evidence has been provided, a signed ConOps is also required from other stakeholders. So this will still be addressed as a condition prior to activation, please refer to question 11.

Letters of Agreement (LoAs)

The sponsor submitted three LoAs, with one drafted by NATS Aberdeen and the rest by the sponsor. These must be finalised and signed by both parties prior to activation, this has been addressed as a condition, please refer to question 11:

- Tingwall LoA with Shetland Islands Council
- Lamb Holm LoA with Lamb Holm International Airfield
- NATS Aberdeen LoA with Windracers

Miscellaneous

Whilst **ARPAS-UK** and the **British Helicopter Association (BHA)** had no objections to the proposal. **Loganair** provided their summer and winter timetables for 2024/2025 to allow the sponsor to deconflict their operations. Loganair also responded to the second and fourth engagement round confirming that the operations from Shetland will not significantly impact their operations.

8	Has the change sponsor set out how they will collate, monitor, and report to the CAA on the level and content of the complaints?	YES
	<p>The sponsor has stated within the final submission document, that live feedback will be collected and also regularly reviewed. If the ACP passes the decide stage, Windracers will notify stakeholders of the CAA's decision and encourage them to submit feedback via the contact.operations@windracers.com email address. Any feedback received during the trial period will be assessed by Windracers, and if the impact is deemed significant, the trials will be temporarily paused to address the concerns, and consequently shared with the CAA. In addition to the above, within the engagement letters, the sponsor has stated that <i>"Windracers will provide a channel of communications to receive feedback or complaints from all stakeholders and general public during the period of implementation of the TDAs. All queries received will be informed to the CAA and action will be taken where necessary to reduce the impact of this Airspace Change."</i></p> <p><u>This has been addressed as a condition prior to activation, please refer to question 11.</u></p>	
9	Is the proposal likely to affect traffic operating below 7000ft over an inhabited area? If yes, has the change sponsor provided the brief impact analysis to explain the likely impacts and explained how they will inform relevant community stakeholders?	YES
	<p>The proposal does affect traffic operating below 7000ft over inhabited area (or being briefly). As a response to this, the change sponsor has included within the submission document Section 15 'Noise Assessment' which shows that the change sponsor carried out a noise assessment on the 17/03/2023 at Llanbedr airfield, Wales for ULTRA. This test adhered to the guidelines provided by the CAA. The test was carried out into a standard circuit at 850 ft, with the decibel meter positioned as close to the centre of the circuit as possible. The test was run for a total of 10 minutes, with an LAmax value of 52.7 dB being recorded. Using the inverse square law and applying the 10 dB tonal penalty, an altitude threshold of 652.3 ft was calculated. As planned flights are at 3000 ft Above Mean Sea Level (AMSL), therefore they do not require notification of noise levels.</p> <p>Additionally, Section 11.07 of the submission document shows that advice from NatureScot has indicated that the sponsor's operations will not significantly affect natural heritage interests of international importance in the SPA. Additionally, it was noted that existing flights from Tingwall have led to habituation among bird populations, which either tolerate or avoid these disturbance zones. Windracers will ensure that overflight of East Mainland Coast, Shetland SPA will occur at a minimum altitude of 3,000 ft, in accordance with CAP1616g guidance.</p>	
10	Taking the above considerations into account, does the SME recommend that this proposal has met the engagement requirements of the Temporary Airspace Change process?	PARTIALLY

	Overall, the sponsor has achieved meaningful two-way engagement with aviation stakeholders, engaging with them within an appropriate length of time and providing a sufficient rationale for the engagement period and methodology. The change sponsor has responded to stakeholder feedback and formalised procedures through LoAs with NATS Aberdeen, Tingwall Airport, and Lamb Holm Airport. There is also evidence of two-way engagement with these stakeholders during the development of the LoAs and ConOps. Furthermore, although Baltasound Airfield has withdrawn from the Airspace Change Proposal (ACP), the sponsor has retained the original TDA design. As a result, it is essential that all stakeholders are informed of this modification prior to the TDA's activation.		
11	Are there any Condition(s) which the change sponsor must fulfil before activation (if approved)? If yes, please list them.		YES
	<p>Before activation:</p> <ul style="list-style-type: none"> The sponsor is required to notify all relevant stakeholders that, although the design of the TDA remains unchanged, Baltasound Airport is no longer included in the scope of the proposal. The TOIs/LOAs and ConOps mentioned in the final submission between the sponsor and certain airspace users are produced. Evidence can be provided that these documents are in draft. If the final Decision is to approve the ACP, finalised and signed copies of these agreements will be required before the CAA approves activations of the TDA. The change sponsor must inform any previously identified communities affected by noise impacts from the airspace change if the proposal is approved. This should include, the decision (when published), likely impacts and what will happen next. <p>During activation:</p> <ul style="list-style-type: none"> The sponsor is required to collate, monitor, and report to the CAA on the level and contents of feedback, including complaints received during the period of the TDA/Trial. The CAA expect reporting on the level and contents of any stakeholder feedback received on a fortnightly basis throughout the duration of the TDA/Trial (this should include nil returns). The sponsor should send these reports to the assigned Account Manager/Case Officer. 		
Targeted Engagement Assessment sign-off			
	Name	Signature	Date
Assessment completed by Airspace Specialist (Engagement and Consultation)			26/06/2025
Assessment reviewed by Airspace Regulator (Engagement and Consultation)			30.06.2025

