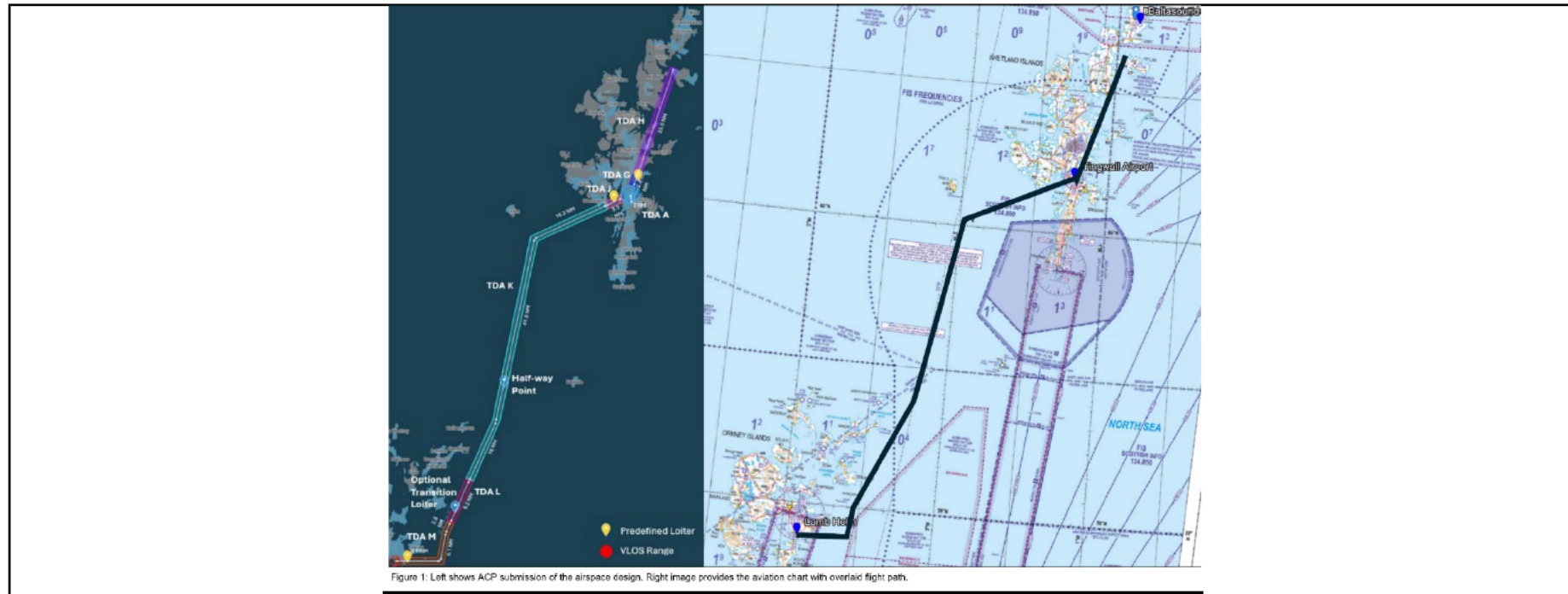


CAA Decision Log

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| Temporary Airspace Change Proposal Title | TDA to enable BVLOS Demonstration of Cargo UAV within the Shetland Islands |
| Temporary Airspace Change Proposal Reference | ACP-2022-051 |
| Change Sponsor | Windracers Ltd. |
| AIS Submission Target Date | 11/07/2025 |
| CAA Decision Target Date | 02/07/2025 |
| <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"> COMPLIANT/NOT APPLICABLE NOT COMPLIANT/ACTION REQUIRED ISSUE/CONCERN TO HIGHLIGHT | |
| <p>Executive Summary</p> <p>The ACP proposes to establish a Temporary Danger Area (TDA) to enable Beyond Visual Line of Sight (BVLOS) cargo UAS operations using Windracers' ULTRA aircraft. The trial has been established to support the Sustainable Aviation Test Environment (SATE) initiative and aims to demonstrate middle-mile logistics using UAS between Tingwall (Shetland) and Lamb Holm (Orkney). The operational period is from 22 August to 20 November 2025, operating between 09:10 - 16:30 Monday to Friday.</p> | |



| PART A – Airspace Change Process | |
|----------------------------------|--|
| A.1 | Airspace Change Portal |
| A.1.1 | Airspace change proposal public view |
| A.2 | CAA SharePoint site |
| A.2.1 | TDA BVLOS demonstration of Cargo UAV within the Shetland Islands - Project - All Documents |
| A.3 | Chronology |
| A.3.1 | 18/07/2022: Statement of Need received. |

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| | <p>23/11/2022: Assessment Meeting held.</p> <p>08/08/2024: Second Assessment Meeting held (due to delays caused by dependency on the delayed ACP-2022-049)</p> <p>24/09/2024: Statement of need v2 received.</p> <p>15/11/2024: Final submission received.</p> <p>21/02/2025: Final Submission v1.2, Shetland Engagement letter v3, Concept of operations v 1.2 and Hazard Log v3 received</p> <p>22/05/2025: Statement of Need v3 received</p> <p>04/06/2025: Updated Stage 4 documents received.</p> | |
| A.4 | 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? | N |
| A.4.1 | <i>Insert requirements (if relevant).</i> | |

| PART B – Airspace Change Process – STAGE 5 | | | |
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| B.1 | Subject Matter Expert (SME) Regulatory Assessments NOTE: this captures RAG status only – full details contained within each of assessment (hyperlinks inserted below) | | |
| | ATM Safety | COMPLETE | Environmental |
| | Economic Assessment & Statement | NOT APPLICABLE | Instrument Flight Procedure |
| | Engagement / Consultation | COMPLETE | Operational |
| 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)? | | |
| B.2 | Other Relevant Documents (title and hyperlinks to be inserted) | | |
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| B.3 | Has the relevant legal and policy framework to the airspace change process been taken into account, including: <ul style="list-style-type: none"> the Air Navigation Directions; the Airspace Modernisation Strategy; section 70 of the Transport Act 2000; the Air Navigation Guidance 2017; and CAP 1616 and associated publications? | | Y |
| B.4 | CAA consideration of whether the proposal is in accordance with the Airspace Modernisation Strategy (Air Navigation Directions, direction 5(1)). | | |


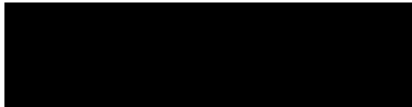
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| | <p>NOTE: the left column captures RAG status only and the right column captures the rationale – full details will be contained within the SME Regulatory Assessments. Reference should be made to the AMS characteristics (CAP 1616f, 6.61). For more information on the AMS strategic objectives, see <i>Airspace Modernisation Strategy 2023-2040 Part 1: Strategic Objectives and Enablers</i> (CAP 1711).</p> |
| Safety | Safety is maintained as the temporary Danger Area is segregated by nature and the hazardous activity can be contained within the airspace structure. |
| Integration of diverse airspace users | The airspace structure is a Danger Area and is designed to be segregated. |
| Simplification of airspace system | N/A |
| Environmental sustainability | <p>The ANG 2017 sets out the Government's environmental objectives with respect to air navigation. These environmental objectives are 'designed to minimise the environmental impact of aviation within the context of supporting a strong and sustainable aviation sector'. For temporary ACPs less than 90 days duration, the change sponsor is only required to provide typical noise levels at key locations which must be conveyed to those affected. In addition, the change sponsor is required to conduct a Habitats Regulations Assessment screening to determine whether the proposed airspace change will adversely affect European sites. There is no requirement to assess any other environmental impacts because these are likely to be negligible for such a short-term change.</p> <p>On the basis of the rationale and evidence submitted by the change sponsor, the noise levels anticipated as a result of the ACP are expected to be below the daytime noise threshold of 65 dB LASmax and there is, therefore, no specific requirement for the change sponsor to inform stakeholders of noise impacts. The structure of the proposed TDA, timing of operations and mitigation measures, minimise the consequential impacts of the proposed change. Through engagement with the Statutory Nature Conservation Body (NatureScot), the change sponsor has demonstrated to the CAA that there is no requirement for an Appropriate Assessment to be conducted under HRA.</p> <p>Consequently, this trial ACP is consistent with the Government's environmental objectives.</p> |
| B.5 | <p>CAA consideration of factors material to our decision whether to approve the change (section 70, Transport Act 2000).</p> <p>NOTE: 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 (CAP 1616f,</p> |

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| | 6.80). |
| <p>Maintain a high standard of safety in the provision of air traffic services</p> <p>section 70(1)(a)</p> | <p>The proposal maintains a high standard of safety by segmenting the TDA structure, these are supported by Letters of Agreement and Temporary Operating Instruction's that define clear ATS responsibilities and fallback procedures. The use of SUAAS and SUACS ensures real-time coordination and situational awareness, while Mode S and ADS-B surveillance provide continuous tracking of the unmanned aircraft. Safety risks have been assessed through a structured HazID process, and the airspace design includes appropriate buffers and contingency measures to ensure safe operations.</p> |
| <p>Secure the most efficient use of airspace consistent with the safe operation of aircraft and the expeditious flow of air traffic</p> <p>section 70(2)(a)</p> | <p>The proposal supports efficient use of airspace by segmenting the Temporary Danger Area (TDA) structure, allowing for flexible activation and minimising disruption to other users. Safety is maintained through robust coordination procedures, including Letters of Agreement and a Temporary Operating Instruction. The sponsor has analysed traffic patterns and controller workload, ensuring the design does not adversely impact the flow of air traffic.</p> |
| <p>Satisfy requirements of operators and owners of all classes of aircraft</p> <p>section 70(2)(b)</p> | <p>The vertical limits for the floating TDA segments (TDA-H, TDA-J and TDA-K) have been selected to reduce the impact on other airspace users. By operating between FL30 and FL50, the design avoids known helicopter routes and remains below commercial air traffic, preserving access for both sectors. This approach supports the needs of general aviation, offshore operations, and commercial airspace users by minimising disruption and maintaining safe separation. The segmentation and altitude selection reflect a proportionate and inclusive design that considers the operational profiles of multiple aircraft classes.</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</p> <p>section 70(2)(c)</p> | <p>The sponsor has considered the interests of non-aviation stakeholders by designing the TDA complex to avoid populated areas and environmentally sensitive zones. The vertical limits of the floating segments were selected to minimise noise and visual impact, particularly over coastal and marine areas. Engagement with local authorities, airport operators, and environmental stakeholders has been documented, and the flight path has been optimised to reduce potential disturbance.</p> |
| <p>Take into account the Secretary of State's guidance relating to spaceflight activities</p> | <p>N/A</p> |

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| section 70(2)(ca) | | |
| Take into account the Secretary of State's guidance on environmental objectives section 70(2)(d) | <p>The Government's environmental objectives, as listed in the ANG2017 are to:</p> <p>a. limit and, where possible, reduce the number of people in the UK significantly affected by adverse impacts from aircraft noise;</p> <p>b. ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions; and</p> <p>c. minimise local air quality emissions and in particular ensure that the UK complies with its international obligations on air quality.</p> <p>The Government's environmental objectives listed in the ANG2017 aim to reduce the noise, global emissions and local air quality impacts from aviation. The impacts of this trial, in terms of noise, emissions and local air quality, are anticipated to be negligible and short term. Consequently, this trial ACP is not in conflict with the Government's environmental objectives.</p> | |
| Facilitate the integrated operation of air traffic services provided by or on behalf of the armed forces of the Crown and other air traffic services section 70(2)(e) | The proposal supports integrated ATS operations by ensuring coordination between civil and military stakeholders through Letters of Agreement and the Temporary Operating Instruction. The use of SUAAIS and SUACS services enables real-time coordination, and the segmented structure allows for flexible access and deconfliction. | |
| Take account of the interests of national security section 70(2)(f) | N/A | |
| Take account of any international obligations notified to the CAA by the Secretary of State section 70(2)(g) | No such international obligations have been notified to the CAA under section 70(2)(g) of Transport Act 2000. | |
| B.6 | Are there any other associated publications relevant to the proposal and, if so, have the requirements of those publications been met? | Y/N/NA |

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| | NOTE: associated publications include Airspace Policy Statements listed here . | |
| B.6.1 | <p>Yes, the proposal aligns with the requirements set out in SARG Policy 133 Policy for the Establishment and Operation of Special Use Airspace and CAP740 UK Airspace Management Policy.</p> <p>The design of the Temporary Danger Area (TDA) complex reflects key principles from the policy, including segmentation, minimised vertical and lateral dimensions, and activation only when required. The use of SUAAIS and SUACS services, as well as the modular structure of the TDAs, supports the Flexible Use of Airspace (FUA) concept and ensures efficient integration with other airspace users.</p> | |
| B.7 | <p>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.</p> <p>NOTE: this section only applies if the CAA is classifying or amending the classification of UK airspace.</p> | |
| B.7.1 | <i>Insert narrative as required.</i> | |


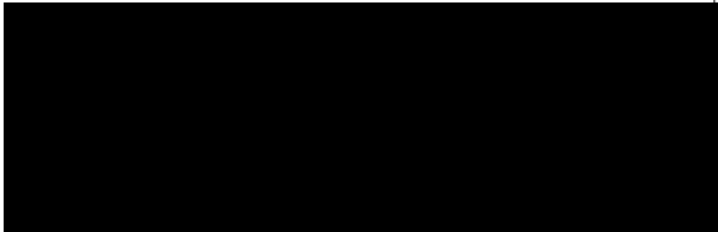
| PART C – Stage 5 Recommendation | | |
|---------------------------------|--|----------|
| C.1 | Taking the above information into account, what is your recommendation to the decision-maker for this proposal? | |
| C.1.1 | Recommend to Approve with conditions. | |
| C.2 | Are there any Recommendations and/or Conditions for the change sponsor to address prior to implementation (if approved)? | Y |
| C.2.1 | <p><i>This section will initially be populated with those recommended by the SMEs but will be updated to reflect only those which have been deemed necessary by the decision makers.</i></p> <p><i>Recommendations are not mandatory, whereas conditions are requirements that must be met before the airspace change is activated. Conditions may include, for example, the need for all other necessary consents and approvals to be in place, notification and management processes, etc.</i></p> <p><u>Conditions</u></p> <p>Engagement & Consultation:</p> <p>Before activation:</p> <ul style="list-style-type: none"> • The sponsor is required to inform 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. 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. | |

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| | Environment: During activation: <ul style="list-style-type: none"> Change sponsor to provide the CAA with details of any future engagement with NatureScot, including ornithological studies, relating to the impact of this ACP on breeding birds in protected areas overflowed by the UAV. Technical: Before activation: <ul style="list-style-type: none"> A valid RPAS Operational Authorisation shall need to be in place prior to activation. | | |
| C.3 | Are any other consents and approvals needed in order to permit the intended operation (title and hyperlinks to be inserted)? | | |
| <i>Operational Authorisation - RPAS Sector</i> | | | |
| | | | |
| C.4 | Are there any other comments/observations for the decision maker? | | N |
| C.4.1 | <i>Use this section to provide a short summary (by numbers and themes) of any correspondence that we have received directly in relation to the airspace change proposal. Relevant data can be obtained from the Airspace Specialist (Correspondence). Insert additional narrative as required.</i> | | |
| C.5 | Regulator's Signature | | |
| Technical Regulator / Account Manager | |  |  02/07/2025 |

PART D – Final Regulatory Decision – Comment/Approval

[Delete signatory rows below dependent on Decision Maker]

Airspace Regulation Principal comments and recommendation: Approved with conditions

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| Airspace Regulation Principal |  |  | 04/07/2025 |
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