



DAP1916 - Statement of Need

Tracking Code: **RP9FQL6**

BEFORE YOU BEGIN

- ☐ Please ensure the contents of CAP 1616f, Guidance on airspace change process for permanent airspace change proposals are referred to prior to completing this form. *

TYPE OF CHANGE

1. Category of Airspace Change

Does your proposal concern Changes to Notified Airspace Design or Planned and Permanent Redistribution of Air Traffic? *

- ☒ Changes to Notified Airspace Design ☐ Planned and Permanent Redistribution of Air Traffic

Which of the following categories is the proposal being progressed under? *

- ☐ Permanent ☐ Temporary ☒ Trial

2. Title of proposal

Please enter a title for this intended change, (max 80 characters - the title should be succinct and include a location (where appropriate)): *

North Norfolk TRA (+TMZ) for BVLOS Onshore Cable Corridor Survey

- ☒ Have you previously submitted a Statement of Need?

If known, please provide the ACP/PPR reference number (###-YYYY-NNN)

ACP-2024-018

Please provide your rationale for submitting a revised Statement of Need below: *

Hexcam Ltd was acquired by StirlingX shortly after submitting initial SoN. The acquisition required a pause in external activities which has now been lifted.

SPONSOR

3. Change Sponsor Details

Please select the appropriate category and complete. *

- ☒ A Company
☐ An Unincorporated Association or other body
☐ Individual (including sole traders and partnerships)

3a. A Company

Registered Company name (in full) *

StirlingX

Registered Company Number

StirlingX Ltd

Trading Address (primary site)

StirlingX, Felthorpe Airfield, Taverham Rd

Trading name (if applicable)

E-mail

[REDACTED]

Postcode

EC2A 4NE

Registered Office Address

3rd Floor 86-90 Paul Street, London, England,

Country of Company Registration

United Kingdom

Country

United Kingdom

Postcode

NR10 4DR

Email *

[REDACTED]

Confirm Email *

[REDACTED]

☒ Do you require access to the CAA's Airspace Change Portal?

Telephone *

[REDACTED]

Primary Point of Contact Name *

[REDACTED]

Website address

stirlingX.io

Additional Contacts

You can add up to 4 additional contacts (this is useful to ensure that periods of absence are covered)

Contact 1

Contact Name *

☒ Do you require access to the CAA's Airspace Change Portal?

Telephone *

Email *

Confirm Email *

 DELETE CONTACT

Contact 2

Contact Name *

☒ Do you require access to the CAA's Airspace Change Portal?

Telephone *

Email *

Confirm Email *

 DELETE CONTACT

Contact 3

Contact Name *

☒ Do you require access to the CAA's Airspace Change Portal?

Telephone *

Email *

Confirm Email *

— DELETE CONTACT

+ Add Contact

STATEMENT OF NEED

Independent Aviation/Airspace Consultancy

☒ Is an Independent Aviation/Airspace Consultancy involved in this proposal?

Aviation Consultancy

Registered Company name (in full) *

Registered Company Number

Country of Company Registration

Registered Office Address

Postcode

Trading name (if applicable)

Trading Address (primary site)

Country

Postcode

Website address

Primary Point of Contact Name *

Primary Contact

☐ Should the CAA use the Independent Consultancy as the primary point of contact for this airspace change proposal?

☒ Do you require access to the CAA's Airspace Change Portal?

Telephone *

E-mail *

Additional Contacts

You can add up to 4 additional contacts

+ Add Contact

Statement of Need

Please complete the following four sections. For administrative changes to the Aeronautical Information Publication, please complete relevant questions accordingly and mark the rest as "Not Applicable".

What is the objective of the proposed change? *

In May 2023, HexCam/StirlingX was successfully accepted into the UK Civil Aviation Authority's (CAA) Beyond Visual Line of Sight (BVLOS) Airspace Sandbox initiative. As part of this programme, HexCam/StirlingX is requesting the establishment of a Temporary Reserved Area (TRA), accompanied by a Transponder Mandatory Zone (TMZ), in Norfolk for a six-month trial period.

The proposed TRA will serve as a controlled environment to demonstrate the transition from 'accommodation' to 'integration' as outlined in CAP2533. This aligns with the strategic objectives of airspace integration set forth in the CAP1711 Airspace Modernisation Strategy (AMS).

The primary objective of the trial is to validate the safe integration of BVLOS Uncrewed Aircraft Systems (UAS) with other airspace users in unsegregated Class G airspace. This will be achieved through the provision of a Traffic Service by NWI ANSP and the use of Electronic Conspicuity (EC) on the UAS, in conjunction with a ground-based sensor network. Together, these systems aim to deliver a level of safety equivalent to or exceeding that of traditional visual see-and-avoid methods.

To support these objectives, StirlingX is seeking access to a suitable volume of Class G airspace for the creation of the TRA. The purpose of this BVLOS sandbox initiative is to demonstrate that, with the appropriate operational procedures and technological enablers, BVLOS operations can be safely and effectively integrated into the wider airspace environment.

Please provide a summary of the issue or opportunity this proposal is seeking to address including any safety, operational, technical, environmental or economic factors. *

Key Issue

The primary challenge addressed by this trial is the integration of a diverse range of low-level airspace users within unsegregated airspace, with a particular focus on Beyond Visual Line of Sight (BVLOS) UAS operations. Under current aviation regulations, BVLOS UAS must demonstrate an equivalent level of safety to the traditional 'see-and-avoid' principle in order to operate safely alongside other airspace users.

Environmental Considerations – Noise

StirlingX recognizes that BVLOS operations conducted within the Vanguard BVLOS Sandbox may generate noise that is perceptible to ground-based stakeholders. However, due to the predominantly rural nature and low population density of the operational corridor, the overall environmental impact is considered to be minimal.

Opportunities

Accommodation to Integration Pathway

The trial presents an opportunity to demonstrate a safe, scalable, and phased approach to BVLOS operations in unsegregated airspace—progressing from initial accommodation to full integration.

Environmental Efficiency

BVLOS operations enable efficient linear asset surveys while minimising disruption to landowners, wildlife, and vegetation. This reduces the need for ground-based personnel and vehicle access, thereby lowering environmental intrusion.

Policy Development

This initiative provides StirlingX with a platform to contribute to the development of procedures for integrating new airspace user groups into unsegregated airspace. It also aims to inform future policy on the coexistence of crewed and uncrewed aircraft, and to establish a robust risk assessment framework and criteria for routine BVLOS operations—particularly in linear and construction corridor contexts within the UK.

Please provide a description of the current airspace design (i.e. the airspace structure and flight procedures) relevant to this proposal. *

Airspace Context and Proximity to Aerodromes

The proposed Temporary Reserved Area (TRA) is situated in proximity to two aerodromes: RAF Marham and Norwich Airport. In addition, there are several smaller, unlicensed aerodromes within the local area; however, these facilities do not have associated Aerodrome Traffic Zones (ATZ) or Air Traffic Services (ATS) provisions.

The majority of the proposed TRA lies within Class G airspace, offering a flexible environment for BVLOS operations. However, a portion of the TRA extends into the Norwich Control Zone (CTR), which is designated as Class D airspace from the surface (SFC) up to 4,000 feet above mean sea level (AMSL). Furthermore, part of the TRA will be situated beneath Norwich CTA 1, which spans vertically from 1,500 feet AMSL to 4,000 feet AMSL and is also classified as Class D airspace.

To the west of the proposed TRA lies the Marham Military Aerodrome Traffic Zone (MATZ). It is important to note that the lateral boundaries of the MATZ and the TRA do not intersect or overlap.

Please provide a description of the current prevailing air traffic situation (i.e. frequency and number of movements) and an indication of estimated forecast growth (where applicable). *

During the informal consultation phase, StirlingX has proactively engaged with a broad range of stakeholders, including local general aviation (GA) airfields, commercial operators, the Air Ambulance service, and military representatives. The overall response has been strongly supportive of the project, with consensus that the proposed temporary airspace change will have minimal impact on existing airspace users.

While there is a prevailing sentiment among some stakeholders against the creation of segregated airspace—often perceived as an “airspace grab”—feedback from low-level, non-EC-equipped users has generally been positive. This is largely attributed to the unobtrusive design and carefully considered extents of the proposed TRA.

StirlingX operates from Felthorpe Airfield, which hosts a mix of GA and microlight activity, including aircraft not equipped with Electronic Conspicuity (EC). Members of the airfield community have expressed their support for the initiative.

Norwich Airport serves as the operational base for Bond Helicopters, CHC, and Bristow—offshore helicopter service providers operating primarily AW139 aircraft to the Southern North Sea. Informal discussions with these operators have indicated a supportive stance toward the project.

The East Anglian Air Ambulance (EAAA), operating 24/7 from Norwich Airport with an EC135, has expressed opposition to segregated airspace in principle. However, they are supportive of operations conducted within accommodation airspace, recognising the safety and integration benefits.

The Army Air Corps (AAC), operating AH-64E Apache helicopters from Wattisham Airfield, frequently conducts low-level operations in the region. Engagement with the AAC has been constructive, and HexCam has been granted access to the Centralised Aviation Data Service (CADS) to facilitate flight notifications and enhance coordination.

Five-Letter Name Codes (5LNC)

☐ Does this request solely concern the reservation of new Five-Letter Name Codes (5LNC) in advance of a future proposal?

Secretary of State for Transport’s priorities

☐ Is the proposal being progressed under any of the priorities set by the Secretary of State for Transport or any other CAA priority such as safety or national security?

Airspace Modernisation Strategy *

☒ Is the proposal supporting the delivery of the Airspace Modernisation Strategy? If not, please use the text box below to explain how the proposal is not inconsistent with the Airspace Modernisation Strategy

Additional Information

Please use the box below to add any further information which the CAA should be aware of when considering this submission (for example dependencies on other airspace change proposals, proposed operating date(s) and/or funding deadlines)

StirlingX is aiming to deliver supporting data to the CAA alongside BVLOS operations for the cable corridor client, by Q4 2025

SUBMISSION INSTRUCTIONS

Submission

Your form has been successfully submitted. Please keep a copy of this acknowledgement for your records.

Date and Time:
17 Jun 2025 6:20:21 PM

Please note that the Airspace Regulation team will contact you to acknowledge receipt of your Statement of Need and to confirm the unique ACP reference number (ACP-YYYY-NNN) allocated to this submission. Following receipt of your unique ACP reference number, you will be required to create an associated airspace change proposal on the **CAA's Airspace Change Portal** (<https://airspacechange.caa.co.uk/>). Please refer to CAP 2385 Airspace Change Portal Important Information Guide.

Given the high number of new airspace change proposals (ACP), together with those proposals which are already in the system, it is possible that the proposal may not be assigned to a Technical Regulator/Account Manager immediately following submission of the Statement of Need. New proposals are allocated on a first come first served basis, unless the proposal is directly related to safety or national security matters, or as directed by the Secretary of State for Transport's priorities.

Once your submission has been assigned to an Account Manager/Case Officer, arrangements will be made for you to attend an Assessment Meeting. One of the key outputs from this meeting will be an indicative timeline for the proposed ACP. For Permanent changes (Level 1 and Level 2 only), to enable the CAA to consider your proposed timescales, you will be expected to present dates for the following milestones at the Assessment Meeting:

- DEFINE Gateway
- DEVELOP & ASSESS Gateway
- CONSULT Gateway
- Formal Airspace Change Proposal Submission
- DECIDE Gateway
- Target AIRAC

The CAA holds Gateway Assessment Meetings on a monthly basis and the annual schedule is published on the **CAA's airspace change portal** (<https://airspacechange.caa.co.uk/about-airspace-change/>).

Finally, you should also note that from September 2018 any amendments submitted by a Data Originator or ANSP for onward promulgation in the UK IAIP will be subject to the Aeronautical Data Quality Requirements. See Regulation (EU) No. 73/2010 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018 and **CAP 1054: Aeronautical Information Management** (<https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=6808>) guidance material for further information. These requirements will be discussed in greater details during the course of your initial meeting with the CAA.

When you have completed this form, click this button to submit the form for processing. Do not click this button more than once. You will then be provided with further instructions.