



DAP1916 - Statement of Need

Tracking Code: CC7YSSN

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)): *

BVLOS wildlife survey in Western Moray Firth on behalf of Nature Scot

- Have you previously submitted a Statement of Need?

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

ACP-2025-043

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

To update the category from a temporary to a permanent change.

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) *

Flylogix Holdings Ltd

Registered Company Number

[REDACTED]

Trading Address (primary site)

N/A

Trading name (if applicable)

N/A

E-mail

[REDACTED]

Postcode

[REDACTED]

Registered Office Address

[REDACTED]

Country of Company Registration

United Kingdom

Country

N/A

Postcode

N/A

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

N/A

Additional Contacts

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

+ 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) *

Black Swan S&L Ltd

Registered Company Number

██████████

Country of Company Registration

██████████

Registered Office Address

████████████████████

Postcode

██████████

Trading name (if applicable)

N/A

Trading Address (primary site)

N/A

Country

N/A

Postcode

N/A

Website address

N/A

Primary Point of Contact Name *

[Redacted]

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 *

[Redacted]

E-mail *

[Redacted]

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? *

To establish SUA within the western portion of Moray Firth, to support a wildlife survey on behalf of Nature Scot, one day a month for two years.

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

Flylogix is a UAS operator specialising in long range surveying of offshore assets. This operation seeks to conduct a low impact survey on bird populations. Nature Scot have a Regulatory requirement to establish a baseline of bird activity in the area in order to assess the impact of a proposed wind farm facility.
The opportunities that will presented are:
Safety: Replacing crewed aviation with uncrewed systems for the same function to reduce the risk to life.
Safety: The UAS will be conspicuous to other airspace users both electronically and visually. This will be achieved by the carriage of Mode-S, ADSB In/Out and strobe lighting. The remote pilot will have the ability to communicate with ANSPs by mobile phone with redundancy provided by a backup phone. The UAS to be utilised has a proven safety record, operating over long distances (up to 450nm) and over extended time periods (6-7 hours) in a maritime environment.
Environment: Using a UAS to conduct a survey for the establishment of the wind facility has a double environmental benefit, it is more fuel efficient and environmentally sustainable than a comparative crewed aircraft and supports the government target of meeting of net zero by 2050.
Economic: Reduced costs compared to equivalent crewed aircraft currently utilised for these surveys.

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

The proposed operation will be fully contained within CLASS G Airspace. Within the proposed area RAF Lossiemouth has a MATZ and ATZ, Inverness, an ATZ and both have associated FRZ's. EGD702 and EGD703 are adjacent to the area of operations. We are aware of the ongoing HIAL Inverness ACP to establish Class D airspace. Close to Inverness is a known paragliding site.
The proposed SUA would be established for one day per calendar month, for up to 8 hours per day, operating up to approximately 1000ft AMSL, operating predominantly in a maritime environment.

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). *

RAF Lossiemouth is H24, although activity is predominantly weekdays. It operates fixed and rotary wing military traffic under both VFR and IFR. Quick Reaction Alert fast jets can be expected to operate at any time. RAF Lossiemouth provides a LARS service to transit traffic in addition to Air Traffic Services to organic traffic at low and medium level. Inverness predominantly operates commercial Air traffic operating IFR. Additionally based at Inverness are Helimed and SAR rotary wing aircraft which can be expected to operate H24.
GA operate throughout the area.
The proposed operation is not expected to generate any traffic growth due to the intermittent and short-term nature of the proposal.

Are you submitting this Statement of Need to complete an Applicability and Policy Alignment Check (please refer to CAP 1616 version 5, paragraphs 2.8 to 2.11 for further details)?

Instrument Flight Procedures

Does your proposal have the potential to include a change to and/or new IFPs?

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?

CAP 1616h Pre-Scaled Airspace Change Proposals

Does your proposed change to airspace design fall within scope of one of the Pre-Scaled Airspace Change Proposals detailed in the appendices within CAP 1616h?

DVOR / DME / NDB Rationalisation - RNAV Substitution

Is the proposal being progressed against the requirements set out in CAP1781: VOR / DME / NDB Rationalisation: Guidance for the use of RNAV Substitution?

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)

Nature Scot have a regulatory requirement to establish a baseline for bird activity in the western Moray Firth, as part of the planning proposal for a new wind facility. On behalf of Nature Scot Flylogix are requesting SUA to conduct an aerial survey one day a month for 2 years, ideally commencing in Spring 2026. Using a UAS for this purpose reduces the negative impact on the bird population due to reduced noise and shadowing. We are aware of the ongoing ACP for the creation of Class D airspace around Inverness which may impact on this proposed activity.

SUBMISSION INSTRUCTIONS

Submission

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

Date and Time:

22 Oct 2025 10:30:44 AM

Application Submission Number:

DAP1916V2-1685

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 \(https://airspacechange.caa.co.uk/\)](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 \(https://airspacechange.caa.co.uk/about-airspace-change/\)](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 \(https://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=6808\)](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.

