

**MINUTES OF ACP-2025-043 ASSESSMENT MEETING
HELD ONLINE ON 21 October 2025**

Present

[REDACTED]

Appointment

[REDACTED]

Representing

Flylogix Holdings Ltd
Black Swan S&L Ltd
Black Swan S&L Ltd
Black Swan S&L Ltd
[REDACTED]
CAA
CAA
CAA
CAA

CAA Assessment Meeting Opening Statement

CAA noted that the *Assessment Meeting Agenda and Presentation* were received in advance of the Assessment Meeting and confirmed that the documents must be published by the sponsor, together with minutes of the meeting, on the Airspace Change Portal page. CAA explained the purpose of the meeting and confirmed that the meeting was an Assessment Meeting and not a Gateway. The CAA reinforced that the sponsor was required to provide a broad description of their proposed approach to meeting the CAA's CAP 1616 requirements, but the CAA was not deciding whether the proposed approach met the detailed requirements of the CAA's process at this stage. The purpose of the Assessment Meeting (set out in detail in CAP 1616) was broadly:

- for the Sponsor to present and discuss their Statement of Need,
- to enable the CAA to consider whether the proposal concerned falls within the scope of the formal airspace change process, including determining whether the proposal falls within the scope of a pre-scaled ACP process/Level 3,
- to enable the CAA to consider the appropriate provisional Level to assign to the change proposal.

Additionally, the sponsor was required to provide information on how it intended to proceed to fulfil the requirements of the airspace change process and to provide information on timescales. Lastly, the sponsor was required to provide information on how it intended to meet the engagement requirements of the various stages of the airspace change process.

	ACTION
<p>Item 1 – Introduction Introductions were made by all participants.</p> <p>[REDACTED] provided background to the proposal, explaining that it concerns a low-level, offshore wildlife survey on behalf of NatureScot. Operations would occur one day per month over a two-year period.</p> <p>[REDACTED] noted that while the Assessment Meeting Presentation references the temporary airspace change process (CAP 1616G), the sponsor recognises that, subject to further discussion, pursuing a permanent airspace change process may be more appropriate.</p> <p>The sponsor requested that, should a permanent ACP be required, the proposal be considered at Level 3 due to its low frequency and limited operational and Environmental impact.</p>	
<p>Item 2 – Statement of Need (discussion and review) The Statement of Need (SoN) was summarised.</p>	

<p>confirmed that Flylogix is an established and competent service provider with a proven record of safe BVLOS operations. The environmental rationale for the proposal is significant: using an uncrewed platform eliminates the need for crewed aircraft, reducing emissions, noise, and wildlife disturbance, in alignment with national net-zero targets.</p> <p>The sponsor has identified nearby aviation activity including RAF Lossiemouth, Inverness Airport and local GA operations. Early informal engagement has occurred with the GA community, who expressed interest in further consultation. CAT A access will be ensured.</p>	
<p>Item 3 – Issues or opportunities arising from proposed change</p> <p> explained that a 24-month wildlife survey is a planning requirement of wind farm development. Historically, this has been conducted by small twin-engine aircraft carrying high-performance cameras. The use of UAS provides environmental and safety advantages, particularly reducing disturbance caused by noise and aircraft shadowing. Cost savings are secondary to these environmental and safety benefits.</p>	
<p>Item 4 – Options to exploit opportunities or address issues identified</p> <p>BVLOS operations continue to offer environmental and safety advantages compared to crewed alternatives.</p> <p>An initial review identified nearby SSSI sites. The sponsor confirmed that NatureScot will be engaged and a Habitat Regulations Assessment (HRA) will be conducted as part of the Stage 2 requirements.</p>	
<p>Item 5 – Current day scenario</p> <p>Airspace imagery was presented showing the operating area from the Lossiemouth ATZ/MATZ to Inverness.</p> <p>Operations are expected at approximately 1200 ft AMSL, following a consistent route once per month. confirmed the sortie duration would be approximately six hours to complete the survey path.</p> <p>The Take-Off and Landing Point (TOLP) is anticipated to be land based, launching directly out offshore.</p>	
<p>Item 6 – Provisional indication of the scale level and process requirements*</p> <p> asked whether the airspace would be sectorised and whether SUACS/SUAAIS were envisaged. SS responded that sectorisation remains under consideration and provision of SUACS/SUAAIS depend on outcomes from engagement with RAF Lossiemouth and Inverness ATC.</p> <p>The sponsor committed to ensuring suitable access for CAT A traffic.</p> <p> stated that route modifications are possible if local user feedback highlights particular constraints.</p> <p> requested that a letter of permission from the TOLP site owner be included in the submission.</p> <p>The sponsor confirmed a comprehensive stakeholder mapping exercise is underway, referencing the NATMAC list and local aviation users. requested that nearby wind farm operators also be engaged.</p> <p> advised that, if a Level 3 ACP is agreed, engagement duration may be scaled proportionately, provided justification is documented (CAP1616H paragraphs 2.24–2.34).</p> <p> confirmed that environmental assessments can likewise be scaled, but rationale must be clearly stated. CAP1616i para 2.12 and para 2.16 & 2.17</p>	

<p><i>* When the sponsor submits their gateway materials for each Gateway at the agreed submission deadline, the period between this and the gateway decision will be an analysis by the CAA Airspace Regulatory team (Airspace Regulation) of the documentation submitted, for the purposes of making a recommendation to the CAA Gateway decision maker(s). In conducting the gateway assessment, the CAA is assessing the process employed and its compliance with the guidance stipulated within CAP 1616. It is not an assessment of the merits of the submission itself, which is reviewed at Stage 5 - Decision. We may request documentation from the sponsor that is referred to in the gateway submission but has not been provided as part of the Gateway submission materials. We may also request the sponsor to provide information by way of clarification relating to statements or assumptions made in the submission. Any further information sought by Airspace Regulation at this stage is for clarificatory purposes and is only for determining compliance with the CAP 1616 process.</i></p> <p><i>In any instance where a sponsor has not met the requirements of the process, we will inform them after the gateway decision and advise of next steps.</i></p> <p><i>Please note that <u>this text does not apply to airspace change proposals involving the sole implementation of RNP Instrument Approach Procedures (IAPs) without an Approach Control</u>, as Gateway Assessments are not required. Therefore, this text can be removed from the Assessment Meeting minutes.</i></p>	
<p>Item 7 – Provisional process timescales*</p> <p>Timescales will be finalised once the level of the ACP is confirmed.</p> <p>The sponsor noted the customer’s desired start date of spring 2026 but accepted that autumn 2026 (September/October) is more realistic if a Level 3 ACP is confirmed.</p> <p>█ advised that initial phases may be undertaken using crewed aircraft to meet project timelines, transitioning to uncrewed operations once the ACP is approved.</p> <p>█ requested consideration of a reduced 10-week period for the DECIDE Gateway due to the proposal’s simplicity.</p> <p>█ reiterated, that, under a Level 3 classification, the full 12-week engagement period is not mandatory and engagement can be scaled but the sponsor must provide justification for their decision.</p> <p>█ also stated, that although it is not a requirement, but the sponsor may find it beneficial to produce an engagement strategy and materials that sets out how the sponsor intends to facilitate effective engagement to the CAA for comment. There is a template strategy in Appendix B of CAP1616f that can be used as a starting point. The elements that should be included are set out in paragraphs 2.30 and 2.31. If you don’t produce a strategy or materials, we would need to see all these elements as part of the submission at Stage 4.</p> <p>It was confirmed that the timescale should align with the AIRAC cycle.</p> <p><i>* The timeline agreed may become subject to change by the CAA. As outlined in CAP 2541 it is not the CAA’s intent to conduct a re-prioritisation of all ACPs currently in progress, but only to prioritise when we believe this is required. Such prioritisation will be conducted on a case-by-case basis and in accordance with the principles outlined in CAP 2541. Should it be considered necessary to reprioritise an ACP a member of the Airspace Regulation team will contact the sponsor directly.</i></p>	
<p>Item 8 – Safety Case requirement¹</p>	
<p>Item 9 – Next steps</p> <p>█ concluded that the temporary route is not appropriate given the duration of operations.</p> <p>A permanent airspace construct, potentially a Danger Area, activated as required, would provide operational flexibility.</p>	

<p>■ was provisionally supportive of a Level 3 ACP classification given the low operational impact and offshore location.</p> <p>Actions and next steps:</p> <ul style="list-style-type: none"> • Sponsor to update the Statement of Need to reflect a requirement for permanent airspace. • Sponsor to seek confirmation from the CAA on the appropriate ACP Level and documentation required for submission. • Environmental and engagement regulators to provide additional written guidance for inclusion within the minutes. <p>Environmental assessment requirements</p> <p>The requirements for the environmental assessments for a Level 3 ACP are described in CAP1616h and CAP1616i. The requirements are scalable and proportionate and are determined by the characteristics of the change and the potential for impacts (CAP 1616i para 2.12).</p> <p>The change sponsor must describe the current day scenario (CAP1616h para 2.15); as a minimum description must include information on the airspace design, airspace users, aircraft types, frequency/number of movements, typical altitudes, European sites overflown below 3000 ft.</p> <p>The airspace change sponsor must analyse the potential environmental impacts of the proposed change, including all direct and consequential impacts (CAP 1616i para 2.18).</p> <p>An environmental assessment for local air quality, greenhouse gas emissions and tranquillity, will not be required if the airspace change sponsor can demonstrate to the CAA using a robust rationale supported with appropriate evidence that the implementation of the airspace change is unlikely to lead to a change in flight behaviours/patterns.</p> <p>The requirements for noise impacts from remotely piloted aircraft systems are described in CAP1616i chapter 11 para 11.9-11.11. The change sponsor must provide information on the chosen take-off and landing points (TOLPs) and use the results of the noise assessment to identify the affected communities (if any) that must be informed of the airspace change if the proposal is approved.</p> <p>In addition, the airspace change sponsor must undertake a Habitats Regulation Screening exercise, as per CAP 1616i para 9.8-9.10, to determine if the proposed airspace change will impact any protected European site in the zone of influence.</p> <p>Besides the direct impacts as a result of the airspace change proposal, the change sponsor must also consider the environmental impact due to indirect consequential changes on the flight behaviour of other airspace users (CAP 1616i para 2.18) and must include relevant information to support their rationale as regards the potential for consequential impact on noise sensitive receptors (if any) and the identified European sites.</p> <ul style="list-style-type: none"> • Draft minutes to be submitted to the CAA for review/comments by 23 October 2025. <p>No further questions were raised.</p> <p>Post Meeting Notes: 2025/10/29 CAA confirmed that this ACP is a Permanent Level 3. Portal entry will be updated with the relevant Statement by CAA in due course.</p>	
<p>Item 10 – Any other business</p> <p>Nil.</p>	

¹ The default position is that if the safety case contains proprietary information which is commercially sensitive in nature, it may be agreed by the CAA not to have it published in its entirety at stage 4. However, it must be submitted to the CAA, labelled accordingly and a Plain English summary of the final safety assessment explaining why the proposal will maintain a high standard of safety, must be published on the Portal, in accordance with CAP1616 para 1.31'.

ACTIONS ARISING FROM ACP-2025-043 ASSESSMENT MEETING

Subject	Name	Action	Deadline
Statement of Need	Black Swan	Update Statement of Need to reflect permanent airspace requirement	07 Nov 25
Minutes	Black Swan	Submit updated minutes to CAA for comment	23 Oct 25
Process	CAA	Confirm ACP level and process requirements	

Flylogix Holdings Ltd.
ACP Sponsor