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FLYLOGIX

Stakeholder Consultation Document

ACP-2025-043

Beyond Visual Line of Sight (BVLOS) Wildlife Survey in Western Moray Firth on Behalf of NatureScot.

DATE: 20 April 2026

VERSION: 1.0

Authorship and Revision History

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Consultation Material	1.0	20 April 2026

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1 Introduction

1.1 Flylogix

1.1.1 Flylogix Holdings Ltd (Flylogix) are proposing this Airspace Change Proposal (ACP), following the regulatory process defined by the Civil Aviation Authority's (CAA) CAP1616 Airspace Change Process.

1.1.2 Flylogix is a UK-based operator of long-range Uncrewed Air Systems (UAS) specialising in offshore and monitoring, Beyond Visual Line of Sight (BVLOS) operations. Flylogix aircraft are designed to undertake long-endurance missions in the maritime environment, with ongoing success in supporting the offshore energy sector. They have a well-established safety record from consistently operating in the North Sea.

1.1.3 The use of UAS in place of traditional crewed aircraft is considered to result in a lower environmental impact, less noise and less pollution.

1.1.4 Flylogix has been contracted to undertake a wildlife monitoring survey within the Moray Firth on behalf of NatureScot. NatureScot has a regulatory requirement to establish a baseline of bird activity in the area as part of the environmental assessment process supporting a proposed offshore wind development.

1.1.5 The purpose of this document is to provide stakeholders with information about the proposal and to invite feedback on the potential impacts of the proposed airspace design.

1.2 What changes for Airspace Users?

As an airspace user, the impact of this proposal means:

- The Change Sponsor is requesting a new Danger Area be established.
- It will be active approximately one day per month, including weekends for two years.
- Activation will be notified in advance by NOTAM.
- Outside activation periods, the airspace remains available.
- When active, pilots may be able to transit through the airspace subject to approval from the notified Air Navigation Service Provider (ANSP) (via Special Use Airspace Information Service SUAAIS/ Special Use Airspace Crossing Service SUACS where available).

1.3 The CAP1616 Airspace Change Process

1.3.1 Changes to UK airspace are defined by the CAA's Regulatory Airspace Change Process, within CAP1616. This process ensures that Airspace Changes are developed in a structured and transparent way and that stakeholders have an opportunity to understand proposals and provide feedback.

1.3.2 CAP1616 categorises proposals according to their scale and complexity. This proposal is being progressed as a Level 3 ACP due to the low complexity, small scale and expected limited potential impact. CAP 1616H provides further detail on Level 3 ACPs.

1.3.3 For Level 3 ACPs, elements of stage 2 are addressed proportionately and do not require a formal gateway decision.

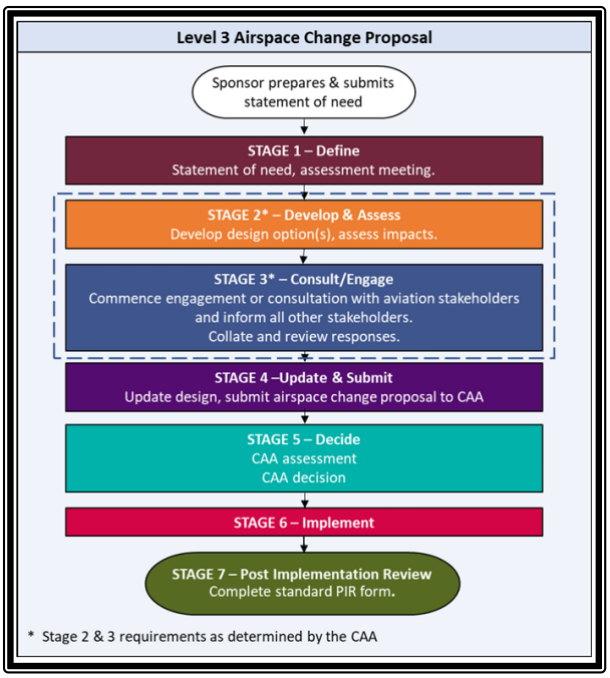

Figure 1. Level 3 ACP. Source: CAP1616h.

1.3.4 The CAP1616H Level 3 process (shown at Figure 1) follows stages as below:
Stage 1 – Sponsor defines the requirement and develops design principles
Stage 2 – Sponsor develops and assesses airspace design options
Stage 3 – Sponsor engages with stakeholders on proposed design
Stage 4 – Sponsor refines the preferred design and submits the proposal to the CAA for decision.

1.3.5 This consultation document forms part of Stage 3 of the process, where stakeholders are invited to review the proposed design concepts and provide feedback.

1.3.6 The feedback received during this consultation period will be considered before the final proposal is submitted to the CAA.

2 Description of Proposal

2.1 Operational Requirement

2.1.1 Importantly, this ACP establishes an airspace segregation mechanism only. It does not authorise physical development, construction, seabed disturbance, marine works or habitat alteration within any designated site.

2.1.2 This Airspace Change Proposal addresses the Statement of Need (SoN)

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

2.1.3 This ACP proposes the establishment of a series of sectorised Permanent Danger Area(s) (DAs) within the Moray Firth, the vicinity of Hay Farm, Cruden Bay, Aberdeenshire, and a corridor joining the two. Shown in figure 2 below.

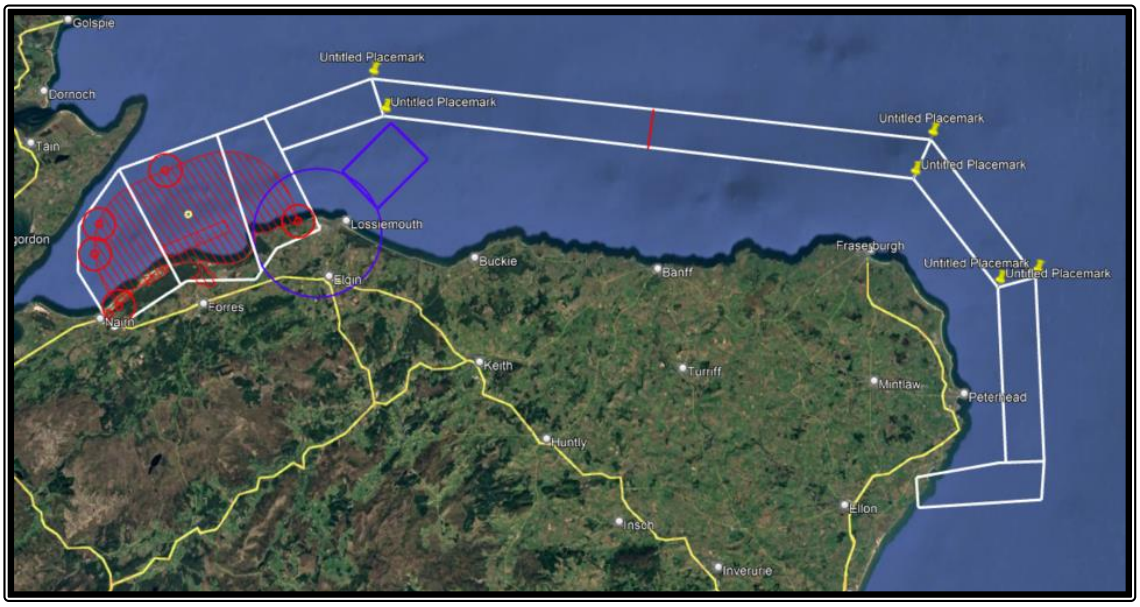

Figure 2. Satellite image showing the survey area (red) and the danger area sectors (white) from Cruden Bay

2.1.4 The Danger Area is required to:

- Be permanently established in the UK AIP and represented on aeronautical charts.
- Be activated only when required by NOTAM. The NOTAM will also reference the associated AIP SUP Document.
- Be active for approximately one day per month, which may include weekends.
- Support one BVLOS UAS survey flight per activation.
- Operate over a two-year survey programme.

2.1.5 The Operational Requirements for the survey flights are that the UAS will (subject to further consultation):

- Launch from Hay Farm (OSGR NK 07683 35035 / 57°24.20'N 001°52.27'W), Cruden Bay, Aberdeenshire.
- Climb to a minimum of 400 ft AGL up to 700 ft AGL remaining within Visual Line of Sight until established within the Danger Area.
- Once established within the lateral and vertical confines of the Danger Area, the flight will then be subject to BVLOS rules, proceed offshore and transit along a corridor of segregated airspace 3 NM wide to the survey area.
- The Danger Area comprising the launch area and corridor is expected to extend from SFC to 1300 ft AMSL, which includes the addition of a safety buffer.
- From the corridor, the UAS will enter the survey area and remain BVLOS. The survey has been requested at an altitude of 396 m (approximately 1300 ft AMSL). The addition of a safety buffer will mean this area is potentially from SFC to 1500 ft AMSL.

- Once the survey is completed, the UAS will descend to transit altitude and return to the vicinity of Hay Farm.
- Once the criteria for VLOS flight is met, the UAS will recover and land under the control of the ground ops team.

2.1.6 All coastal crossing altitudes are expressed as AGL. All airspace vertical limits are expressed as AMSL unless otherwise stated.

2.1.7 Flights will not take place within one hour of dawn or dusk and will not occur at night.

2.1.8 The exact dates and times of activation will be notified in advance by NOTAM, which will also reference the relevant AIP SUP document.

2.1.9 Each activation is expected to last between six and eight hours total duration. The survey is expected to last approximately 4 hours, and the transit expected to take 1 hour each way.

2.1.10 The proposed sectorisation will allow the ANSPs to manage the airspace more efficiently and, where possible, enable other airspace users to be procedurally deconflicted from the survey activity.

2.1.11 The design aims to use the smallest volume of airspace necessary to safely support the operation while minimising impact on other airspace users.

2.1.12 The Flylogix FX2 Operational Limits can be found at paragraph 6.2.6

2.1.13 To enable VFR GA transit above the danger area, clear of cloud and in sight of the surface (VFR flight in Class G airspace below 3000 ft AMSL[1]) a minimum cloud ceiling[2] of 2000 ft AMSL will be applied to Flylogix operations wherever possible.

3 Why Special Use Airspace for BVLOS Ops?

3.1 See and Avoid Principle

3.1.1 Within Class G, uncontrolled airspace, the fundamental safety principle is that of ‘see and avoid’ to maintain safe separation between aircraft and minimise the risk of Mid-Air Collision. Current UK CAA Regulation expects that when this visual separation cannot be assured, another robust mitigation must be applied. BVLOS Operations cannot rely on the conventional ‘see and avoid’ principle used in General Aviation. The establishment of segregated airspace, a Danger Area in this case, therefore, provides a necessary and proportionate safety barrier, ensuring separation between the UAS and other airspace users.

3.2 Segregation

3.2.1 Segregation and the application of Special Use Airspace is the most reliably recognised mechanism, by separating BVLOS operations from other aviation activity,

[1] Visual Flight Rules below at or below 3000 ft AMSL in class G airspace, distance from cloud. Source: SERA.5005(f).
[2] The height above the ground or water of the base of the lowest layer of cloud below 20,000 ft, covering more than half the sky (BKN or OVC) Source: ICAO Annex 2.

segregation provides an acceptable safety barrier. Segregated airspace structures such as Danger Areas, Temporary Danger Areas and Temporary Restricted Areas provide an established and well-understood mechanism for accommodating aviation activities that require separation from other airspace users.

3.2.2 Segregated airspace also protects other airspace users by providing clear notification that activity is taking place (via NOTAM, AIP information, Charts etc), it enables flights to be planned around/ above the area when it is activated and enables coordination through the provision of SUAAIS or SUACS where appropriate.

3.2.3 No standing segregated airspace exists within the proposed lateral and vertical limits, hence the requirement for this proposal.

3.2.4 Establishing segregated airspace for the duration of the operation provides a clear and predictable safety barrier between the BVLOS UAS activity and other airspace users, ensuring the operation can be conducted safely while maintaining transparency and situational awareness for the wider aviation community.

4 Current Day Scenario and Airspace Environment

4.1 Location

4.1.1 The route extends from approximately 20 miles north of Aberdeen, along the north-east Scotland coastline into the Moray Firth and toward Inverness, with the principal survey area located predominantly offshore between Lossiemouth and Inverness. The wider region contains a mixed airspace environment including controlled airspace associated with civil aerodromes, a military aerodrome, military Danger Area structures, offshore helicopter operating routes, and Class G airspace supporting a wide range of users.

4.1.2 Several aerodromes located within or close to the region:

Aberdeen International Airport (EGPD)

- A major commercial airport and offshore helicopter hub serving North Sea energy installations.
- ANSP for the North Sea offshore helicopter routes.

Inverness Airport (EGPE) Operated by Highlands & Islands Airports Ltd.

- A regional commercial airport supporting scheduled passenger flights and instrument flight procedures.
- Runway 05/23 is the main instrument runway. The instrument approach chart for RWY 23 is shown at Figure 6. Instrument Approach Chart, ILS/DME/VOR Inverness RWY 23. Figure below.

RAF Lossiemouth (EGQS)

- Provider of Lower Airspace Radar Service (LARS) within 40 nm radius. Mon-Fri 0900-1700Z (0800-1600A).
- A military base with four Typhoon fast-jet combat aircraft squadrons, and three Poseidon Maritime Patrol Aircraft squadrons.

- One of two Quick Reaction Alert (QRA) stations which protect UK airspace (H24).
- Numerous national and international exercises are also supported from this location.
- Runway 05/23 is the main instrument runway. The instrument approach chart for RWY 23 is shown at 7 below.

4.1.3 The wider region also includes numerous smaller aerodromes, gliding sites and private airstrips supporting General Aviation operations.

4.1.4 Special Use Airspace within the wider region includes several military Danger Areas associated with the Tain range complex and RAF Lossiemouth activity. Locally, EGD702, EGD703 and EGD809S which are activated in accordance with the AIP or via NOTAM. These are shown at Figure 5 below.

4.1.5 Moray Firth Transponder Mandatory Zone (TMZ) is to the North of the operating area, in the Eastern end of the Moray Firth.

4.1.6 Offshore helicopter operations are a significant part of regional airspace usage, particularly associated with regular traffic operating between Aberdeen and offshore energy installations via established offshore routing structures and reporting points at Figure 5 below. An example of this traffic is captured in Figure 3 and Figure 4 below.

4.1.7 Traffic density is generally higher to the east and north-east of Aberdeen due to the offshore helicopter traffic routes. Previous Flylogix operations in this area have been carried out successfully through the provision of a SUAAIS / SUACS by Aberdeen ATC.

4.1.8 There are a number of headlands and coastal locations, popular with the GA community. In recognition of this, the corridor has been planned to be at least 5 nm offshore.

- Bullers of Buchan: Located north of Aberdeen, collapsed sea cave/ cliff feature.
- Cruden Bay and Slains Castle: Coastal area with dramatic cliffs and castle ruins.
- Moray Firth Coastline: Coastal scenery.
- Chanonry Point: Dramatic views into the Moray Firth.
- Fort George: A major landmark near Inverness, used as a regular turning point.

4.1.9 Below are some examples of traffic levels taken at various times of day and further detailed in figures 3 and 4.

- Helicopters (Offshore, NHV, Bristow) utilising the offshore helicopter routes at various altitudes.
- United airlines overflying the UK at high altitude.

Figure 3. Image of routine traffic, taken 1002 31 Mar 26. Source: FlightRadar24.

Figure 4. Image of routine traffic, taken 1201 31 Mar 26. Source: FlightRadar24.

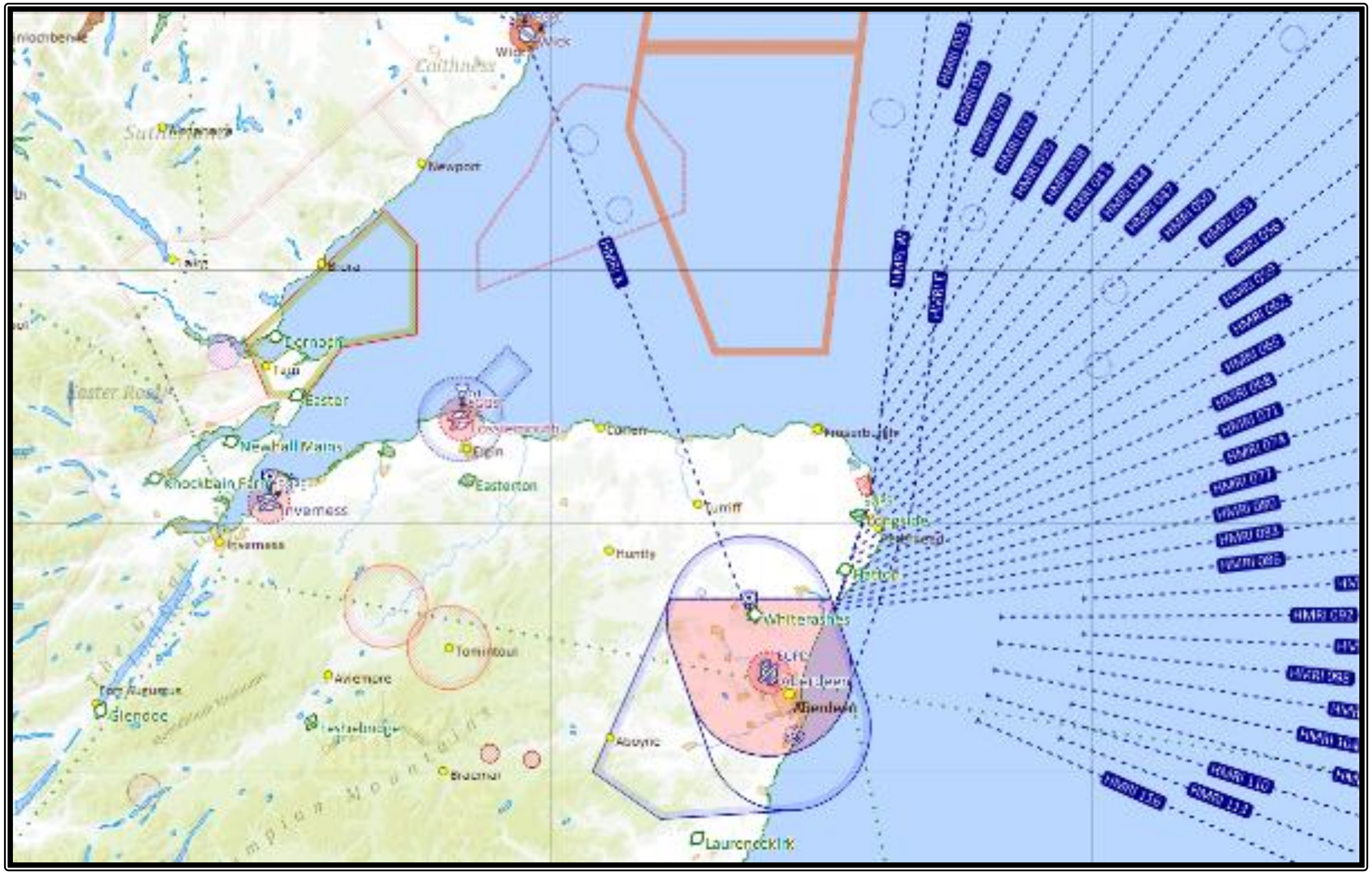

Figure 5. Image displaying airspace, helicopter routes, danger areas etc. Source: SkyDemon.

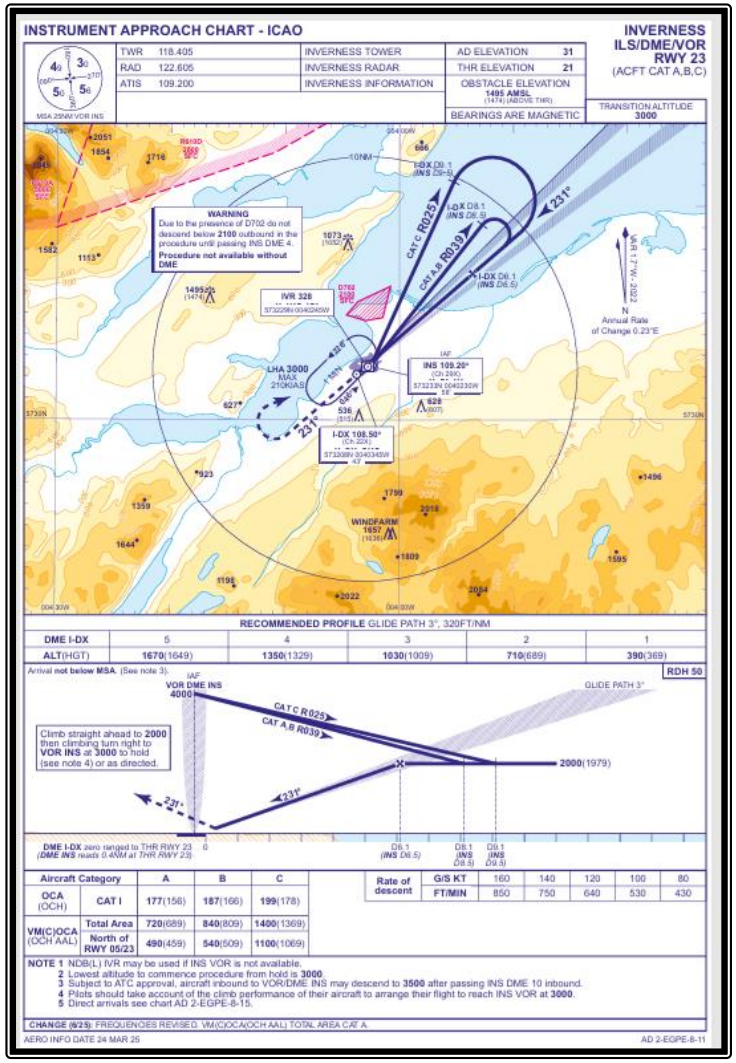

Figure 6. Instrument Approach Chart, ILS/DME/VOR Inverness RWY 23.

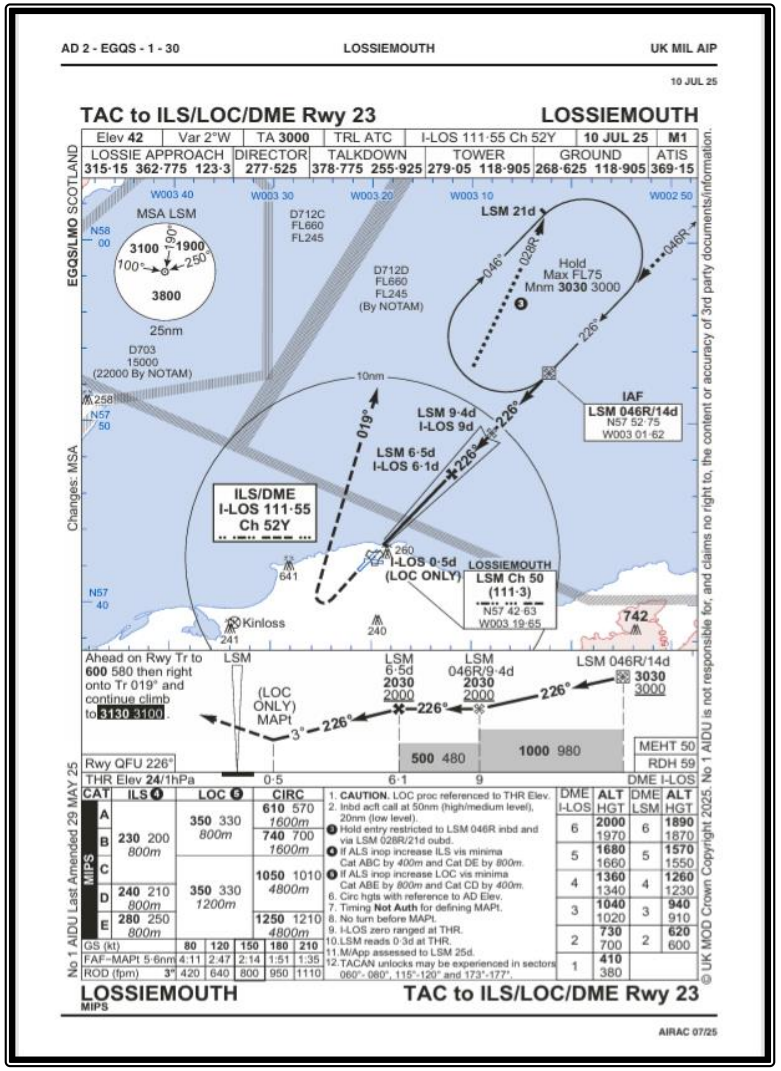

Figure 7. Instrument Approach Chart, TAC to ILS/LOC/DME RAF Lossiemouth RWY 23.

5 Design

5.1 Design Principles

5.1.1 As part of this proposal, we have developed and applied a series of Design Principles. They provide a structured framework against which Design Options can be developed and evaluated. These principles are derived from the SoN, ensuring they reflect the objectives and intended outcomes of the proposal, and establish the key criteria that inform subsequent development and assessment of design options. The following sections summarise the Design Principles used in this proposal and explain why they are relevant.

5.1.2 There are 3 Mandatory Design Principles (MDP); Safety, Policy and Environment, mandated by CAP 1616, which provides the regulatory framework for Airspace Change within the UK. Compliance with these mandatory requirements ensures Flylogix Holdings Ltd adhere to legal and procedural standards.

5.1.3 Discretionary Design Principles (DDPs) were considered to determine their applicability to the proposed Danger Area. They are derived from the operational requirement and in this instance informed by analysis of the SoN and informal pre-engagement with key aviation stakeholders. These principles have guided the development and assessment of the proposed airspace design.

5.1.4 The Sponsor considered whether additional Bespoke Design Principles (BDPs) were necessary to support the development and evaluation of design options. Following review, it was determined that the current suite of Mandatory and Discretionary Design Principles are sufficient, proportionate, robust and compliant with CAP1616 requirements and therefore no requirement for additional BDPs

Table 1. Mandatory and Discretionary Design Principles.

MDP Category	Regulation	Rationale for Inclusion
Safety	The ACP must maintain a high standard of safety and should seek to enhance any current levels of safety.	Addresses Mid-air collision risk, segregation of BVLOS operations and interaction with third-party aviation.
Policy	The ACP should not be inconsistent with relevant legislation, the CAA's Airspace Modernisation Strategy or Secretary of State and CAA policy and guidance.	Addresses consistency with CAA regulatory framework, alignment with national airspace policy and compliance with Secretary of State guidance.
Environment	The ACP should deliver the Government's key environmental objectives with respect to air navigation as set out in the Government's Air Navigation Guidance 2017.	Addresses environmental impacts, designated site protection, noise and tranquillity and consistency with Government environmental objectives.
DDP Category	Regulation	Rationale for Inclusion
Technical (Accessibility for all airspace users)	The ACP should satisfy the requirements of operators and owners of all classes of aircraft, including GA and other civilian airspace users.	This addresses the needs of the GA community and other airspace users operating in the area. Although predominantly offshore and only activated intermittently, the establishment of a permanent Danger Area introduces a potential constraint when it is active. It is necessary that this proposal maintains equitable access.
Technical (Other Aviation Stakeholders)	The ACP should consider the impacts on ANSPs and other aviation stakeholders such as nearby airports.	This addresses the operational requirements of adjacent Aviation Stakeholders.

		Previous operations from Hay Farm have been successfully coordinated through the provision of a SUACS / SUAAIS by Aberdeen ATC.
Economic (Performance)	The ACP should contribute to economic growth, development and/ or improved productivity amongst businesses, individuals, Government or third sector organisations.	Enabling offshore renewable energy development.
Environment (Local context and circumstances)	The ACP must be informed by local context and circumstances	Overlap with SPA/ SAC/ Ramsar sites.
Environment (Tranquillity)	The ACP should limit and, where possible, reduce overflight of National Parks, Areas of Outstanding Natural Beauty (AONB), National Scenic Areas (NSA), designated Quiet Areas and any other locally identified tranquillity areas below 7000 ft.	Coastal crossing and offshore wildlife sensitivity.

5.2 Design Options

5.2.1 The development of design options for this Airspace Change Proposal has focussed primarily on the mechanisms for activation, notification and management of the proposed airspace rather than on alternative airspace geometries. The lateral and vertical dimensions have been derived from the operational requirements of the BVLOS survey flights and represent the minimum volume to safely accommodate the intended activity. As a result, alternative structural configurations of airspace would not materially alter the operational requirement or significantly change the interaction with other airspace users.

5.2.2 The wildlife survey must be conducted within a defined area of the western Moray Firth to collect data required by NatureScot as part of the environmental assessment process for a proposed offshore wind development. The survey altitude is derived from the requirement to apply a meaningful comparison to the data previously obtained by a crewed system. The UAS must launch from a specific Take-Off and Landing Point located near Cruden Bay, Aberdeenshire. This location is a suitable and proven operational site with safe access to the offshore survey area.

5.2.3 The resulting options therefore represent different methods of accommodating the same operational requirement within the airspace environment.

5.3 Option 1 – Do Nothing (Baseline Scenario)

5.3.1 Under this option, no dedicated airspace structure would be established to support BVLOS survey flights. Operations would therefore continue to rely upon existing airspace arrangements and ad-hoc coordination with other airspace users.

5.3.2 Without the provision of segregated airspace, BVLOS operations of the type proposed, would not be able to take place safely and would not be compliant with the regulatory requirements for BVLOS operations within the UK. As a result, the required survey activity would not be able to proceed or would need to rely on alternative crewed aviation platforms.

This option does not meet the operational requirement identified in the Statement of Need and does not provide a structured or predictable mechanism for accommodating the required survey activity within the airspace environment. It

therefore serves primarily as a baseline against which the other options can be assessed.

5.4 Option 2 – Temporary Airspace Established for Each Survey Operation

5.4.1 This option would involve establishing temporary segregated airspace through repeated short-term arrangements for each individual survey flight. This could take the form of a Temporary Danger Area, established through the appropriate regulatory process.

5.4.2 Each survey would require a separate request for temporary airspace including coordination with the regulator and publication of the airspace activity prior to each planned operation. This approach would provide the necessary segregation for each flight, while ensuring the airspace reverts to its normal classification and is open to all other airspace users outside of the period of activity.

5.4.3 The survey programme is expected to require one flight per month, for a period of up to two years. This option would require repeated applications for temporary airspace and repeated publication of airspace restrictions and notifications. This introduces an additional administrative burden and may reduce the predictability for other airspace users who would need to monitor multiple temporary airspace notifications over time.

5.4.4 While this option could support the operational requirement, it is considered less efficient than a permanent airspace structure which can be activated when required. While the Sponsor considers this to be an acceptable solution, it is not the preferred option.

5.5 Option 3 – Permanent Danger Area Activated by NOTAM

5.5.1 Under this option, a Permanent Danger Area would be established to provide the necessary segregation for BVLOS survey operations. The airspace would only be activated when required, via NOTAM. The anticipated operational frequency of once per month would coincide with the planned survey flights.

5.5.2 Outside periods of activation, the airspace would remain available for routine use by other airspace users. Advance notification through the NOTAM system would allow airspace users to plan flights above, around or through the airspace as appropriate.

5.5.3 The proposed airspace structure has been designed with a limited geographic footprint and is located predominantly offshore, reducing the potential for impact with typical General Aviation traffic patterns.

5.5.4 While there may be areas where the survey is required to operate overland, these will be kept to a minimum and the potential application of sectorisation will reduce the impact to other airspace users.

5.5.5 When active, the provision of SUACS or SUAAIS, subject to operational requirements, would further support situational awareness and enable aircraft to request clearance to transit the airspace when safe to do so.

5.5.6 This approach provides a predictable and transparent framework for accommodating recurring BVLOS survey operations while minimising administrative burden and maintaining reasonable accessibility for other airspace users. It is therefore considered the most proportionate and operationally efficient option for meeting the requirements identified in the Statement of Need

5.6 Preferred Approach

5.6.1 Based on the evaluation of these options against the agreed design principles, the establishment of a permanent Danger Area activated only when required by NOTAM during survey operations (Option 3) has been identified as the most appropriate and proportionate solution. It reduces the need to track multiple temporary airspace notifications, provides a predictable structure and minimises administrative churn for airspace users. Stakeholders are invited to provide feedback on this preferred option.

5.7 Proposed Airspace Design

5.7.1 The proposal seeks to establish a Permanent Danger Area to meet the Operational Requirement which can be found at section 2.1Operational Requirement. The proposed structure would be permanently charted and published within the UK Aeronautical Information Publication. The exact dates and times of activation will be notified in advance by NOTAM, with further details available in an AIP SUP document.

5.7.2 The proposal involves the UAS launching from the TOLP near Cruden Bay, a site successfully used by Flylogix for a previous project. Once airborne, the UAS will climb to a minimum of 400 ft AGL up to 700 ft AGL, initially VLOS. Once established within the lateral and vertical limits of the Danger Area, the flight will then be subject to BVLOS rules, proceed offshore and transit along the centreline of a corridor 3 NM wide, to the survey area. The launch area and corridor are expected to extend from SFC 1300 ft AMSL, which includes the addition of a safety buffer. To establish operations within the survey area, the aircraft will climb to the survey altitude of 396 m (approximately 1300 ft AMSL) and then commence the survey activity. The addition of a safety buffer will mean the survey area section of the Danger Area is potentially from SFC to 1500 ft AMSL. Following completion of the survey, the aircraft will descend and then return to the TOLP via the same corridor used for the outbound flight.

5.7.3 The proposed airspace would be activated for survey operations on one day per month, including weekends. Each activation is expected to last between six and eight hours total duration. Flights will take place during daylight hours only, avoiding the period within one hour of dawn and dusk.

5.7.4 The proposed structure may be sectorised. This would allow the potential ANSPs to manage the airspace more efficiently and, where possible, enable aircraft to be procedurally deconflicted from the survey activity.

5.7.5 Previous airborne surveys of this area have been conducted at 396 m; to build a database of comparable results, the survey must take place at the same altitude. Over time this altitude may be reviewed and refined, but this is not guaranteed. The survey area extends close to the coastline as the target bird populations predominantly nest and feed within approximately 1–2 km of the shoreline and

therefore monitoring activity must include this coastal zone to collect the required environmental data.

5.7.6 The design aims to use the smallest volume of airspace necessary to safely support the operation while minimising impact on other airspace users.

5.7.7 **Error! Reference source not found.**(above) and Figure 8 below have been produced to show the required survey area (red), bounded by a safety buffer to create the lateral representation of the proposed danger areas.

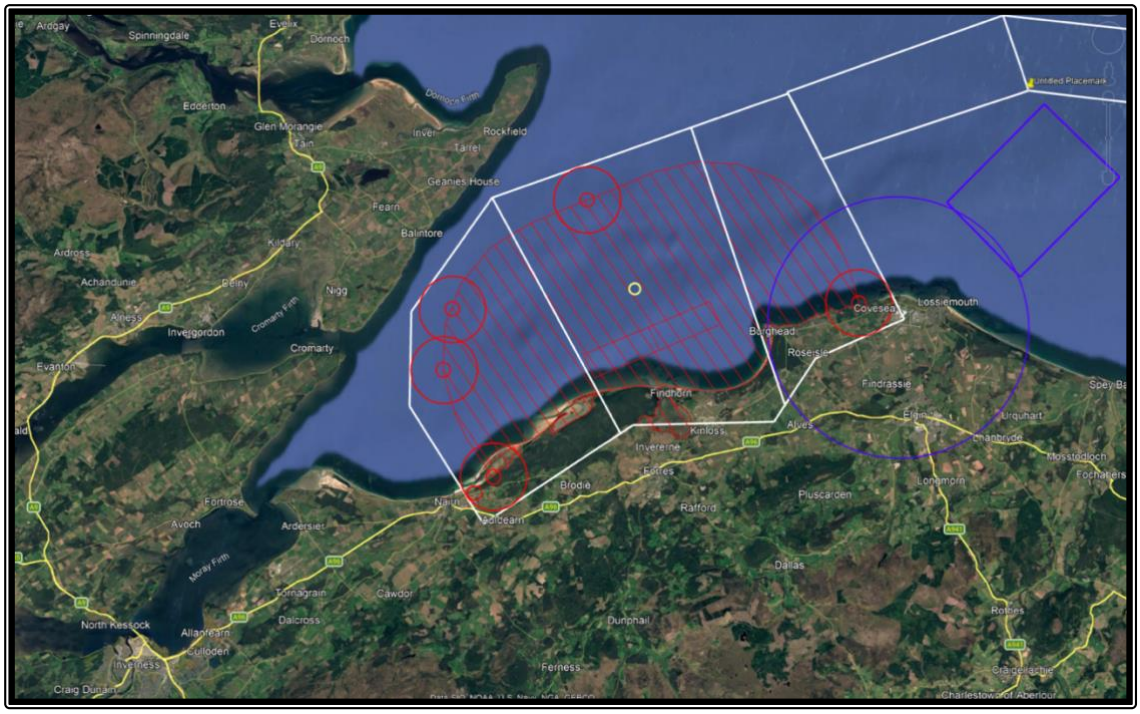

Figure 8. Image of proposed survey area (red) and danger area (white).

6 Considerations

6.1 General Aviation and Emergency Services

6.1.1 General Aviation aircraft operate throughout the Moray Firth region from local aerodromes, flying clubs and private airstrips. The proposed airspace will only be activated one day per month over a two-year period, equating to a very small proportion of annual airspace availability. The majority of activity is offshore, and the upper limit is below typical GA transit altitudes. The design will seek to minimise disruption to GA operations where possible.

6.1.2 Cat A aircraft (Air Ambulance, SAR, Police) may require access to the airspace at short notice. Flylogix will provide a contact number for the Remote Operator. It will be included on the NOTAM and the AIP SUP, providing these high priority flights with a direct point of contact for access. It is proposed that, and subject to agreement, a SUACS/SUAAIS will be provided by adjacent ANSPs, acting as the SUA authority, to facilitate Cat A flight access where required.

6.1.3 ANSPs and aerodrome operators are also being consulted to ensure that operational considerations are appropriately addressed.

6.2 Safety Considerations

6.2.1 Safety is the primary driver for this Airspace Change Proposal.

6.2.2 The proposed operation incorporates several safety measures including electronic conspicuity through Mode-S and ADS-B, visual conspicuity through aircraft lighting including strobes, communication with ANSPs and established operational procedures for offshore BVLOS operations. SSR Code 0077 will be utilised in accordance with UK SSR Code Allocation Plan.

6.2.3 Flylogix have used this aircraft for previous operations. They have experience and evidence of their ability to operate safely over long distances and for extended durations in maritime environments.

6.2.4 In 2025, Flylogix achieved the following:

- 50 BVLOS flights
- 111 hours 25 minutes of BVLOS flight
- A total distance of 6579 nm.

6.2.5 The Flylogix FX2 has a Maximum Take-Off Weight of 50 kg and a wingspan of 3 metres.

6.2.6 The Flylogix FX2 series adheres to the following operational limitations:

- Visibility: VFR Day only (5 km visibility)
- Cloud base: Clear of cloud and in sight of the surface.
- Weather: Day VMC only, no lightening forecast or observed within the danger area, no snow.
- Temperature: Above 0 degrees C and below 40 degrees C. Below the freezing layer (FMET105)
- Windspeed at Hay Farm: Headwind <25 kts. Crosswind limit 10 kts.
- Windspeed for transit and survey: Headwind <30 kts.
- Rain / Snow: >1.5 mm of rain per hour. No snow.

Figure 9. The Flylogix FX2 UAS.

6.3 Environmental Considerations

6.3.1 The use of uncrewed aircraft for aerial survey operations is expected to offer environmental benefits when compared with conventional crewed aircraft. UAS are expected to consume significantly less fuel and produce lower emissions, supporting wider Government objectives relating to sustainable aviation and the transition to Net Zero.

6.3.2 The survey itself supports environmental monitoring associated with renewable energy development within the Moray Firth.

6.3.3 NatureScot have been consulted for advice due to the proximity of several Special Protection Areas (SPAs) and have confirmed the launch and recovery profile, and the proposed offshore corridor are unlikely to have a significant effect on any qualifying interests either directly or indirectly. This is based on the low number of flights, and the previously agreed commitment to:

- Take-off and land at least 100 m from the coastal edge.
- Climb to 400 ft prior to crossing the coast.
- No flights within one hour of dawn or dusk or at night.

6.4 Habitats Regulations Assessment

6.4.1 This assessment has been prepared and submitted to the CAA for review in accordance with the Level 3 ACP described in CAP1616 and follows the CAA's Early Screening Criteria (CAP1616i paras 9.8-9.10 and CAP1616g paras 4.21-4.23).

6.4.2 The HRA identified 5 x Special Protection Areas (SPA), 3 x Special Areas of Conservation (SAC), 8 x Sites of Specific Scientific Interest (SSSI), and 4 x Ramsar sites.

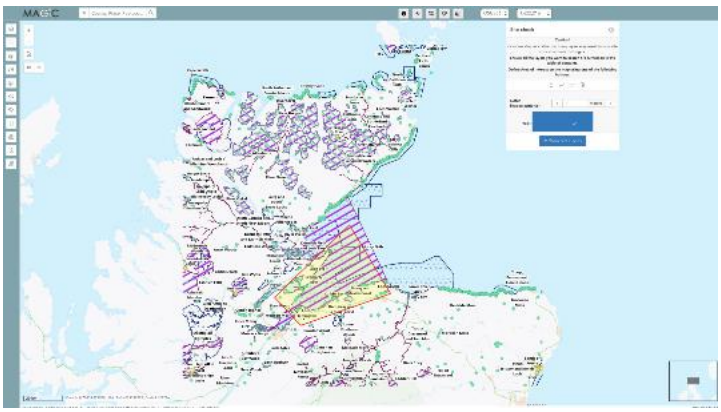

Figure 10. Screenshot showing 'designated areas' identified during the HRA. Source MagicMaps

6.4.3 The Sponsor sought advice from NatureScot in respect to the proximity of potential UAS flights to the designated areas. The profile for launch and recovery has been previously used by Flylogix for operations from Hay Farm. The profile remains relevant and has been included in the process for this application. Further advice relating to the survey area is to follow in due course.

6.4.4 Full details of the HRA, once formal review by the CAA is complete, will be available on the CAA's Airspace Change Portal.

6.5 Noise Data

6.5.1 The mean maximum sound pressure level (LASmax) of the UAS when cruising at a height of 400 ft AMSL is ≤45 dB, virtually undetectable from the ground. The most audible part of the flight, i.e., take-off and landing will take place at Hay Farm, near Cruden Bay. The number of uninvolved persons is negligible, the location has good all-round visibility, and the aircraft will launch and transit directly out over the shoreline, not below 400 ft AGL (between 500 ft and 700 ft AMSL) then proceed into the Danger Area complex. Hay Farm is approximately 160 ft AMSL. The noise impact for such a short span of time, and small noise footprint, is negligible.

7 Consultation

7.1 Stakeholder Consultation

7.1.1 Consultation is being conducted in accordance with CAP1616 to ensure that both aviation and non-aviation stakeholders have the opportunity to understand the proposal and provide informed feedback.

7.1.2 Stakeholders have been identified based on known and potential users of the airspace within and around the Moray Firth region, and include:

- ANSPs
- Aerodrome operators
- Military operators
- Offshore helicopter operators
- General Aviation representative organisations
- Local aerodromes and flying clubs
- Emergency Aircraft operators
- NatureScot
- Other relevant organisations identified through the NATMAC list.

7.1.3 Flylogix will continue to engage with additional stakeholders identified through the consultation period. Stakeholders not listed above are encouraged to make contact using the details provided in this document. We welcome your input.

7.2 Consultation Period

7.2.1 The formal consultation period will run for eight weeks, commencing on 20 April 2026 and closing on 14 June 2026.

7.2.2 This duration has been selected to provide sufficient time for stakeholders to review the proposal and submit feedback. Given the limited scale of the proposed change, its predominantly offshore location, and the intermittent nature of operations, this period is considered proportionate to the potential impact of the proposal.

7.2.3 Early engagement has been ongoing since publication of the Statement of Need on the CAA Airspace Change Portal in October 2025, and input received to date has been taken into account.

7.3 Briefings

7.3.1 Two online stakeholder briefing sessions will be held via Microsoft Teams to provide an overview of the proposal and an opportunity for discussion:
Stakeholder Briefing Session 1 Monday 11 May 2026 at 1100
Stakeholder Briefing Session 2 Tuesday 26 May 2026 at 1400

7.3.2 These sessions will outline the operational requirement, the CAP 1616 process and the design options considered. A record of discussions will be maintained, and relevant feedback will be included within the consultation evidence submitted to the CAA.

7.3.3 The sessions will be recorded and transcribed electronically.

7.3.4 Attendees, by providing their email address in advance, will have the opportunity to review the minutes from the session prior to submission to the CAA.

8 Feedback

8.1 Scope of Feedback

8.1.1 Feedback is sought to ensure that the proposed airspace design appropriately considers the needs of all the stakeholders.

8.1.2 In particular, Flylogix welcomes input from:

- General Aviation pilots (IFR/ VFR)
- Local flying clubs and associations
- Offshore helicopter operators
- Nearby aerodromes and ANSPs
- Military airspace users
- Any other interested aviation or non-aviation stakeholders.

8.1.3 Stakeholders are invited to provide feedback on:

- **Operational considerations**, including existing routes, training areas, routine flight paths, activities or constraints.
- **Airspace design**, including location, dimensions, and activation arrangements
- **Safety considerations,** including any identified risks or mitigations.
- **Environmental considerations**, where relevant.
- **General observations**, including any other comments or suggestions.

8.1.4 All feedback received will be reviewed and taken into account during the refinement of the proposal, prior to submission to the CAA.

8.2 How and when to Respond

8.2.1 Stakeholders are invited to submit feedback by **14 June 2026**.
Responses, including comments, suggested changes, or operational considerations can be provided via:

Email: engagement@blackswansl.com

Stakeholders are requested to respond to confirm they have reviewed the proposal and have no objection or concerns.

Or,

Respond with a request for further discussion.

Meetings or calls can be arranged on request to discuss the proposal. Notes of discussions will be recorded and included as part of the consultation evidence submitted to the CAA.

8.2.2 A summary of consultation responses and how they have been addressed will be included within the final submission.

8.2.3 Where feedback cannot be accommodated within the final design, a clear rationale will be provided.

9 Summary

This consultation has been undertaken to provide stakeholders with the opportunity to review and comment on the proposed establishment of a Permanent Danger Area to support BVLOS UAS operations in the Moray Firth.

9.1 Impact on Airspace Users

9.1.1 For airspace users, if successful, this ACP would result in:

- A new Danger Area established and depicted on aeronautical charts.
- The airspace that is **not permanently active** but only activated when required.
- Activation occurring approximately **once per month** to support survey flights for two years.
- Periods of activation notified in advance by **NOTAM**.
- The airspace remains available for normal use outside notified activation periods.
- When active, the ability for pilots to plan to avoid the area, or (subject to agreement) obtain **SUAAIS or SUACS**.
- An airspace design that is as **small as practicable** and **located predominantly offshore**.

9.1.2 This proposal therefore introduces a temporary, infrequent and finite constraint on access rather than a permanent restriction of the airspace.

9.2 Final Comments

9.2.1 Flylogix welcomes feedback from all stakeholders and appreciates the time taken to review and respond to this consultation.