



FLYLOGIX 

The word "FLYLOGIX" is written in a large, bold, black, sans-serif font. To the right of the text is a logo icon consisting of a black shape that resembles a stylized letter 'F' or a wing, with a small yellow square at its base.

**Habitat Regulation
Assessment
ACP-2025-043**

MORAY FIRTH

DATE: 06 March 2026

VERSION: 1.0

Authorship and Revision History

Document	Version	Date Submitted to CAA/ Effective Date
HRA	1.0	06 March 2026

Table of Contents

1	Introduction	2
2	Description of Airspace Change Proposal	3
3	Identification Habitats Regulations Assessment – Early Screening Criteria (CAP1616i)	3
4	Identification of European Sites	4
4.1	Offshore and Marine Sites	4
4.2	Coastal Sites Adjacent to the TOLP	6
5	Screening for Likely Significant Effects (LSE)	6
5.1	Direct Physical Effects	6
5.2	Noise and Disturbance – UAS Operations	7
5.3	Displacement of Third-Party Aviation	7
5.4	In-Combination Effects	8
6	NatureScot Engagement	8
7	Screening Conclusion	8
8	Engagement with NatureScot	9

Table of Figures

Figure 1.	Image of Moray Firth Operating Area. Source: Magic Maps	5
Figure 2.	Image of Moray Firth Operating Area, specified by NatureScot for bird survey.	5
Figure 3.	Image of Take-Off and Landing Point at Hay Farm. Source: Magic Maps ..	6

List of Tables

Table 1.	Site Check Report. Source Magic Maps	5
Table 2.	Site Check Report. Source: Magic Maps (18km search based on Hay Farm)	6

1 Introduction

This Habitats Regulations Assessment (HRA) has been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017. Under these Regulations, the Civil Aviation Authority (CAA), must determine whether the proposed Airspace Change Proposal (ACP) is likely to have a significant effect on any European site (Special Protection Area (SPA), Special Area of Conservation (SAC), or Ramsar site), either alone or in combination with other plans or projects.

This assessment has been prepared in accordance with the Level 3 airspace change process described in CAP1616 and follows the CAA's Early Screening Criteria (CAP1616i paras 9.8-9.10 and CAP1616g paras 4.21-4.23).

2 Description of Airspace Change Proposal

This ACP proposes the establishment of a series of Permanent Danger Areas (DA) consisting of a survey area within the Moray Firth connected to a TOLP located at Hay Farm, Aberdeenshire, via a connecting corridor.

The Danger Area will:

- Be permanently established in the UK AIP.
- Be activated by NOTAM.
- Be active for approximately one day per month.
- Support one BVLOS UAS survey flight per activation.
- Operate over a two-year survey programme.

The UAS (subject to further consultation) will:

- Launch from Hay Farm (OSGR NK 07683 35035 / 57°24.20'N 001°52.27'W).
 - Climb to a minimum of 400ft AGL up to 700ft AGL prior to crossing the coastline.
- 2.1.1 Operate Beyond Visual Line Of Sight (BVLOS) between 600ft and 800ft AMSL within the confines of the Transit Danger Area.
- 2.1.2 Operate up to 1300ft AMSL within the survey area.

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

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.

3 Identification Habitats Regulations Assessment – Early Screening Criteria (CAP1616i)

Q1 – Are there any changes to air traffic patterns or number of movements expected below 3000ft due to the airspace change proposal? **YES / NO**

A1. There may be minor changes to air traffic patterns or the number of movements expected below 3000ft due to this ACP. Aircraft requiring to cross the Danger Area may obtain a SUACS or SUAAIS from the appropriate controlling authority, subject to location. No significant changes to the traffic pattern or number of movements are anticipated ivo Hay

Farm, along the corridor leading or within the survey area other than the temporary addition of the UAS associated with this proposal. Any changes are expected to be minimal due to the limited duration and altitude of activation.

Q2A – Are there any European Sites within a radius of 18km of each runway end? **YES / NO**

A2A. An assessment using DEFRA's Magic Maps has revealed a number of European Sites. A breakdown of these sites can be found within table 1 and table 2 below.

Q2B – Are any European sites identified in Q2A overflowed (ie plane passing directly overhead or within 2655ft of boundary of a European site at 3000ft or below) by proposed flight routes? **YES / NO**

A2B. The European sites identified below will be overflowed below 3000ft while the UAS is operating BVLOS. This will be taken into consideration and mitigations put in place, in conjunction with advice from NatureScot and captured within this document and the final ACP Submission.

Q3A – Will the ACP reduce the number of movements overflying one or more European sites, while not increasing them over another? **YES / NO**

A3A. There is no reason to believe there would be a reduction in aircraft overflying the identified sites. The situation is expected to remain the same.

Q3B – Will the ACP increase the altitude of aircraft overflying one or more of the European sites, whilst not decreasing altitude over another? **YES / NO**

A3B. This ACP is unlikely to significantly alter the height of any transiting traffic, either higher or lower. The Danger Area may cause a temporary increase in height for transiting traffic, when it is activated, however this isn't expected to influence altitudes flown over other sites.

4 Identification of European Sites

A search was undertaken using DEFRA Magic Maps for:

- The offshore operating area within the Moray Firth.
- An 18km radius from the Take-Off and Landing Point (Hay Farm).

The following European sites were identified within or adjacent to the proposed operational area.



4.1 Offshore and Marine Sites

The following designations include qualifying features such as seabird assemblages, wintering waterfowl, and marine mammals (including the bottlenose dolphin).

Figure 1. Image of Moray Firth Operating Area. Source: Magic Maps

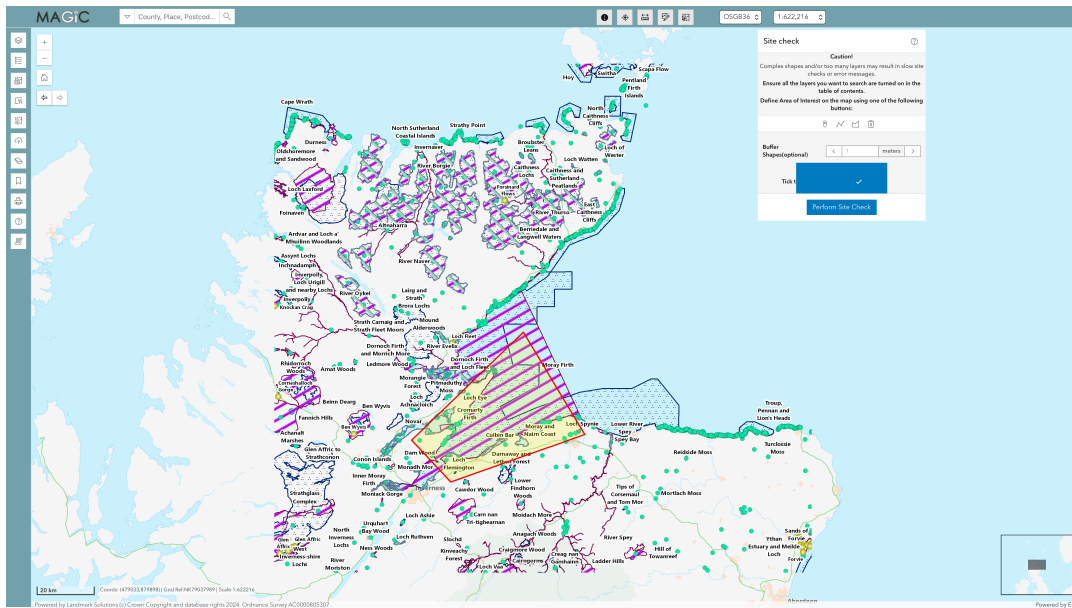


Figure 2. Image of Moray Firth Operating Area, specified by NatureScot for bird survey.

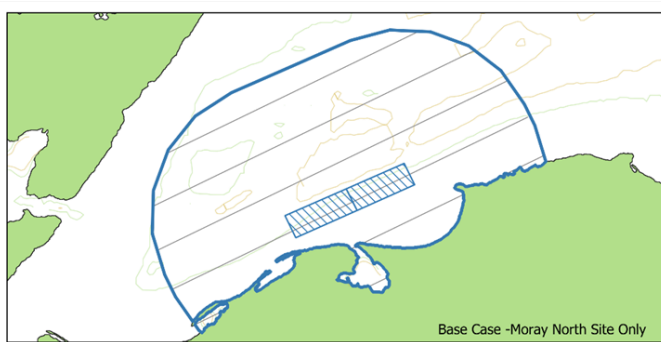


Table 1. Site Check Report. Source Magic Maps

<p>Site Check Report generated on Mon 09 Feb 2026 The following features have been found in your search area: You selected the location: Centroid Grid Ref: NH98807799</p>	
Special Protection Areas (SPA) Scotland	Status
Moray Firth	Current
Moray and Nairn Coast	Current
Inner Moray Firth	Current
Special Areas of Conservation (SAC) Scotland	
Culbin Bar	Current
Moray Firth	Current
Sites of Specific Scientific Interest (SSSI) Scotland	
Ardersier Glacial Deposits	Geological
Clashach – Covesea	Geological
Culbin Sands, Culbin Forest and Findhorn Bay	Mixed
Lossiemouth Shore	Geological
Masonshaugh	Geological
Whiteness Head	Mixed
Ramsar Sites Scotland	
Cromarty Firth	Current
Dornoch Firth and Loch Fleet	Current
Inner Moray Firth	Current
Moray and Nairn Coast	Current

Biosphere Reserves Scotland	No features found
National Nature Reserves Scotland	No features found

4.2 Coastal Sites Adjacent to the TOLP

These are primarily designated for breeding seabirds and coastal habitats.

Figure 3. Image of Take-Off and Landing Point at Hay Farm. Source: Magic Maps

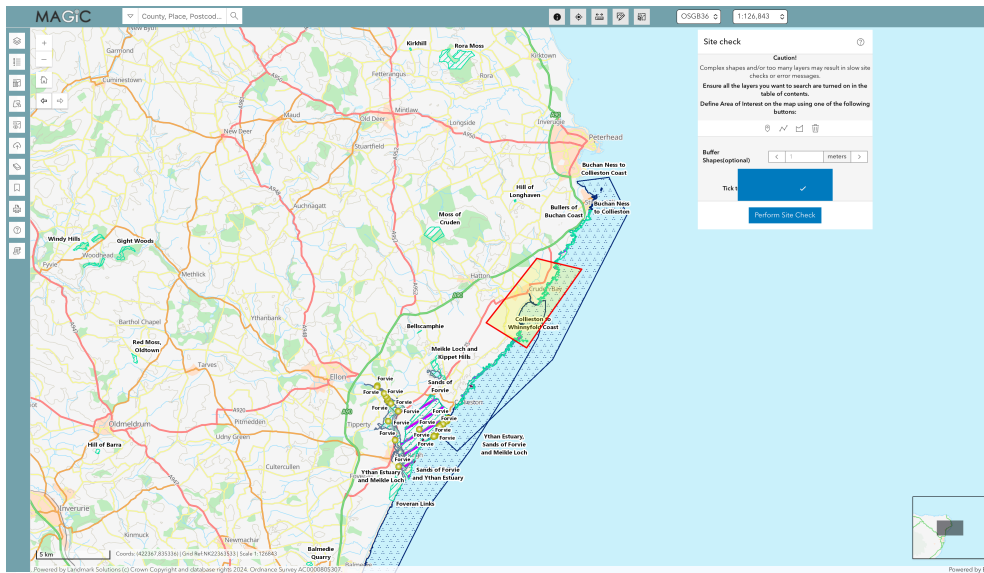


Table 2. Site Check Report. Source: Magic Maps (18km search based on Hay Farm)

Site Check Report generated on Mon 09 Feb 2026	
The following features have been found in your search area:	
You selected the location: Centroid Grid Ref: NK09523559	
Special Protection Areas (SPA) Scotland	Status
Buchan Ness to Collieston Coast	Current
Ythan Estuary, Sands of Forvie and Meikle Loch	Current
Special Areas of Conservation (SAC) Scotland	
Buchan to Collieston	Current
Sites of Specific Scientific Interest (SSSI) Scotland	
Bullers of Buchan Coast	Mixed
Collieston to Whinnyfold Coast	Mixed
Ramsar Sites Scotland	No features found
Biosphere Reserves Scotland	No features found
National Nature Reserves Scotland	No features found

5 Screening for Likely Significant Effects (LSE)

The following potential impact pathways have been considered.

5.1 Direct Physical Effects

This ACP does not involve:

- Land take
- Construction
- Marine Works

- Dredging
- Anchoring
- Habitat modification
- Hydrological change.

Accordingly, no direct habitat loss, fragmentation, or physical disturbance pathways arise from the establishment of the Danger Area.

Conclusion: No direct physical effects.

5.2 Noise and Disturbance – UAS Operations

The UAS will (subject to further consultation/ operational requirements/ restrictions):

- Climb visually to 400-700ft AGL ivo Hay Farm.
- Cross the shoreline ≥ 400 ft AGL and approximately 90° to the shoreline.
- Transit between the launch site and survey area via an offshore corridor at least 5nm offshore.

5.2.1 Operate between 600-800ft AMSL within the Danger Area.

5.2.2 Operate up to 1300ft AMSL within the survey area.

Operational Frequency:

- One return flight and survey per month.
- Two coastline crossings per activation day.
- Programme duration: two years.
- No operations will occur at night, or during peak dawn/ dusk sensitivity periods.

The altitude profile, limited duration, offshore routine and low frequency constrain the potential for disturbance to SPA seabird features or SAC marine mammal features.

According to previous measurements, the mean maximum sound pressure level (LASmax) of the UAS when cruising at a height of 400ft AMSL is ≤ 45 Db', which is virtually undetectable from ground. The most audible part of the flight, i.e., take-off and landing will take place at Hay Farm, under VLOS rules and does not require the segregated airspace of a DA. However, this information has been used to produce the flight profiles above. The UAS will initially operate VLOS between 400ft and 700ft AGL. The UAS will enter the DA at between 600-800ft AMSL. It is believed that the noise impact with such a short span of time, and small noise footprint, is negligible.

Conclusion: The scale, frequency and altitude of operations are not considered sufficient to give rise to likely significant disturbance effects.

5.3 Displacement of Third-Party Aviation

When activated, the Danger Area will be notified by NOTAM. Third-party aircraft may:

- Request clearance to cross (subject to the UAS position), or
- Elect to route around or over the Danger Area.

The Danger Area is:

- Primarily Offshore.
- Has limited lateral extent.
- Is activated once per month.

- Does not introduce new permanent air routes.

No evidence suggests this proposal will increase commercial air transport below 3000ft over designated sites.

Any temporary re-routing would be limited in duration and magnitude relative to baseline aviation activity within the Moray Firth and surrounding region.

Conclusion: The proposal is not expected to materially increase low-level aviation activity over European sites.

5.4 In-Combination Effects

The Moray Firth region is subject to existing aviation activity including, but not limited to:

- Offshore helicopter traffic.
- Survey and monitoring flights
- General aviation
- Military aviation
- Commercial aviation

The incremental activity introduced by this ACP comprises:

- One additional UAS flight per month.
- Limited duration activation.
- Predominantly offshore routing.

Given the modest scale of the additional aviation activity, it is not considered capable of acting in combination with other plans or projects to produce likely significant effects.

Conclusion: No in-combination likely effects identified.

6 NatureScot Engagement

Pre-application engagement has been initiated with NatureScot via the InformedDECISION service due to the crossing of SPA designations.

Operational constraints previously agreed with NatureScot for flights from Hay Farm will continue to apply:

- TOLP located $\geq 100\text{m}$ from the coastal edge.
- Shoreline crossing $\geq 400\text{ft}$ AGL.
- No operations within one hour of dawn/ dusk.
- No night operations.

Any further advice received from NatureScot will be incorporated into the final submission.

7 Screening Conclusion

Having considered:

- The absence of physical works.
- The establishment of segregated airspace only.
- The limited frequency of activation (once per month).

- The minimum operating altitudes.
- The offshore routing profile.
- The absence of sustained change to baseline aviation patterns.
- The modest scale of incremental aviation activity.

The sponsor concludes that:

The proposed Permanent Danger Area is not likely to have a significant effect on any European site, either alone or in combination with other plans or projects.

8 Engagement with NatureScot

The Sponsor has sought pre-application advice from NatureScot via the InformedDECISION service in respect to operations crossing European Sites. The case reference number is 104669.

The procedures listed at Para 5.2 Noise and Disturbance were implemented following consultation between NatureScot, Black Swan S&L Ltd and Flylogix Holdings Ltd for ACP 2024-055 and ACP 2025-034. No negative impact was experienced throughout the operations. For this reason, they have been proposed for the current ACP 2025-043.

Any further advice received will be incorporated into the final ACP submission.