



# CAA Environmental Statement

## Temporary and Trial Airspace Change Proposals

Title of airspace change proposal	North Norfolk TRA (+TMZ) for BVLOS Onshore Cable Corridor Survey
Change sponsor	Stirling X Ltd
Project reference	ACP-2025-025
Account Manager	[REDACTED]
<p><i>Instructions</i></p> <p>In providing a response for each question, please ensure that the ‘status’ column is completed using the following options:</p> <ul style="list-style-type: none"> <li>• YES</li> <li>• NO</li> <li>• PARTIALLY</li> <li>• N/A</li> </ul> <p>To aid the decision maker, highlight each question accordingly to illustrate what is:</p> <p>resolved <span style="background-color: #90EE90;">YES</span> not resolved <span style="background-color: #FFD700;">PARTIALLY</span> not compliant <span style="background-color: #FF0000;">NO</span></p>	

**1. Introduction**

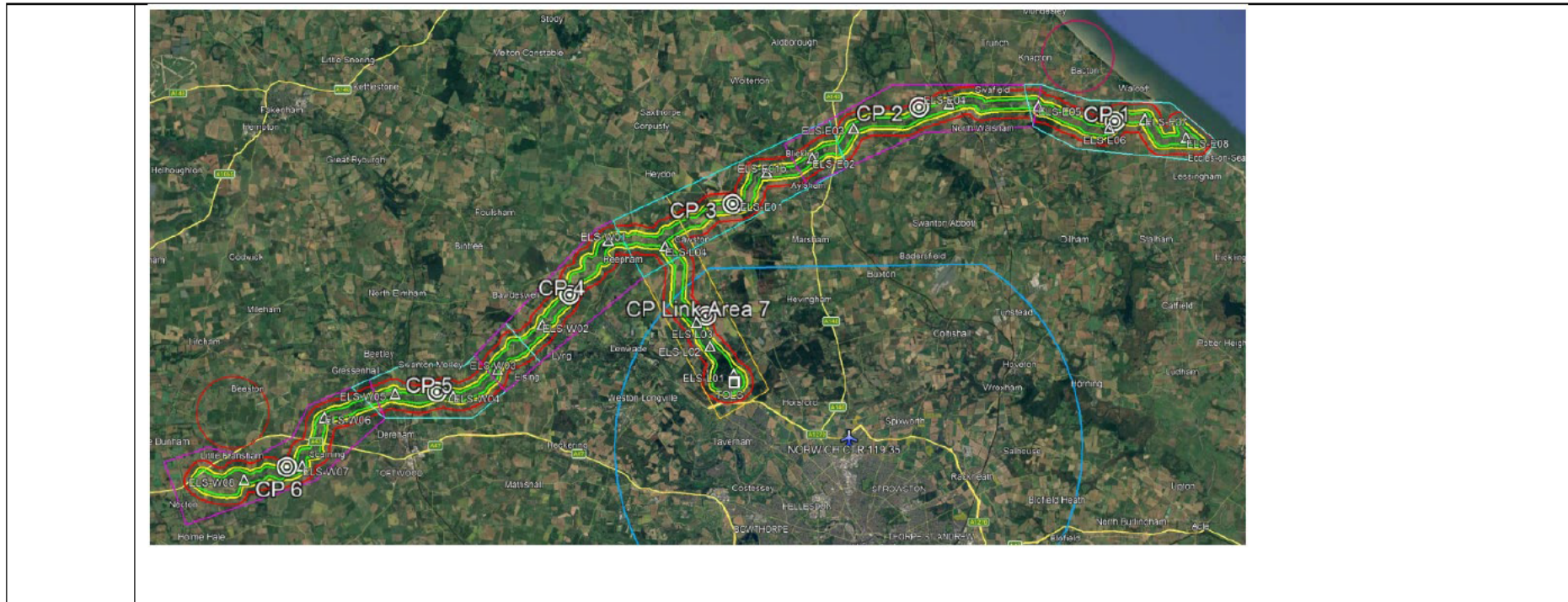
This Airspace Change Proposal (ACP) submitted by Stirling X Ltd (the ‘Sponsor’) seeks approval for a Trial Airspace Change under CAP 1616g to establish a Temporary Reserved Area (TRA) within Class G airspace in the Norfolk area. Specifically, the Sponsor seeks to establish a temporary, tactically activated TRA supported by a Transponder Mandatory Zone (TMZ), activated by NOTAM and managed in coordination with Norwich Air Traffic Control (ATC).

The ACP is to enable Phase 4 (“Accommodation”) operations of the Vanguard Beyond Visual Line of Sight (BVLOS) Sandbox to support BVLOS unmanned aircraft (UA) operations without reliance on visual observer mitigation.

The proposed TRA will seek to accommodate UA operations between 200 ft and 400 ft AGL over a corridor of land, 60km in length, to enable regular construction monitoring surveys for an onshore cable.

2. Statement of Need		Yes/No
2.1	Does the statement of need include any environmental objectives, issues or opportunities to be addressed? <i>(CAP 1616g paragraph 3.3)</i>	NO
The sponsor does not include any environmental objectives in the Statement of Need (SoN). However, the sponsor has made reference to some environmental opportunities in their assessment meeting presentation but not in their Stage 4 submission.		

3. Current-Day Scenario		Yes/No
3.1	Has the change sponsor described the current-day scenario? <i>(CAP 1616g paragraph 3.23)</i>	PARTIALLY
The Sponsor has not explicitly described the current day scenario in their main Stage 4 submission document. Appendix E: 'Airspace Design Supporting Material' provides a map of the proposed SUA to illustrate the operational volume and ground risk buffer (see below). The map identifies that the proposed SUA is predominantly within Class G airspace but that there is an extended TRA segment, denoted as 'CP Link Area 7', which extends from the identified Take Off and Landing Point within the Norwich CTR (Class C airspace) to the main TRA structure. The Sponsor has provided minimal description of the other traffic movements associated with the current day scenario.		



4. Noise Assessment		Yes/No
4.1	Has the change sponsor confirmed the effective period of the change? (CAP 1616g paragraph 4.15)	YES
	The sponsor confirmed the effective period of the change to be from May 2026 to November 2026 i.e. 6 months. The sponsor has offered that activation will be by NOTAM and managed in coordination with Norwich ATC.	
4.2	Has the change sponsor provided a qualitative description of changes to traffic patterns, supported by operational diagrams illustrating the estimated overflight of participating aircraft and other aircraft consequentially impacted as a result of the airspace change proposal? (CAP 1616g paragraph 4.15)	PARTIALLY

	<p>The sponsor has provided a description of the proposed operations and has considered feedback from stakeholders (including other airspace users) regarding the potential impact of the airspace change.</p> <p>The UA will take-off from a defined Take-off and Landing Point (TOLP) site and operate at an altitude of 200 ft to 400ft.</p> <p>The sponsor has provided detail on integration with air traffic services. The following is stated:</p> <p>Coordination with Norwich Air Traffic Control ensures that:</p> <ul style="list-style-type: none"> <li>• Activation of the TRA/TMZ is managed within established ATS procedures.</li> <li>• Traffic information and coordination can be provided during activation.</li> <li>• Emergency and state aircraft retain priority access at all times.</li> <li>• BVLOS activity can be suspended immediately if required.</li> </ul>	
4.3	<p>Has the change sponsor provided details of the frequency of flights, timings and typical altitudes of participating aircraft and other aircraft consequentially impacted as a result of the proposal?</p> <p>For airspace trials, information on the expected frequency (both absolute and as a percentage of total traffic during the airspace trial period) must be provided. (CAP 1616g paragraph 4.15)</p>	YES
	<p>The sponsor has confirmed the frequency of flights and timings. There will be 2-4 flying days per month with operations occurring Mon-Fri 0900-1700. A maximum of 6 flights per 24 hour period will occur with a duration of up to 90 mins per flight.</p> <p>Typical altitudes of the UA is provided in Appendix A. The UA is stated to operate between 200 ft and 400 ft AGL.</p> <p>The sponsor has engaged with other airspace users that may be impacted because of the trial and responded to their feedback.</p>	
4.4	<p>Has the change sponsor presented an assessment of noise impacts? (CAP 1616g paragraph 4.16 – 4.18)</p>	NO
	<p>The sponsor has carried out a very basic environmental appraisal concluding the following:</p> <ul style="list-style-type: none"> <li>• No significant environmental impacts are anticipated.</li> <li>• No material changes to noise exposure are expected.</li> <li>• No environmental or noise assessment is considered necessary for this proposal.</li> </ul>	

As such, the sponsor has not presented an assessment of noise impacts. This is acceptable based on the CAA's current position that it will not take into account the noise impact of UAS activity enabled by an airspace trial that is intended to assist with learning and the development of policy. Consequently, the sponsor is not required to assess that potential noise impact for the purpose of the CAA's decision.

5. Habitats Regulations Assessment		Yes/No																											
5.1	Has the change sponsor completed the habitats regulations assessment early screening criteria form and, where relevant, provided any additional assessments for habitats regulations assessment as specified by the CAA? (CAP 1616g paragraph 4.22)	YES																											
	The sponsor has completed the habitats regulation assessment (HRA) early screening criteria form and included it in their submission.																												
5.2	Is the airspace change proposal likely to have a significant effect - either alone or in combination with other plans or projects - on European sites? (CAP 1616g paragraph 4.21)	NO																											
	<p>The sponsor has identified 7 SSSI sites and 1 SAC site in the vicinity of the SUA. Note that 3 of the SSSI sites are also designated as SAC sites. The identified sites are presented in the table below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Location</th> <th>Designation</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Swannington Ugate Common</td> <td>SSSI</td> </tr> <tr> <td>2</td> <td>Booton Common (Norfolk Valley Fens)</td> <td>SSSI/SAC</td> </tr> <tr> <td>3</td> <td>River Wensum</td> <td>SSSI/SAC</td> </tr> <tr> <td>4</td> <td>Cawston and Marsham Heaths</td> <td>SSSI</td> </tr> <tr> <td>5</td> <td>Buxton Heath (Norfolk Valley Fens)</td> <td>SSSI/SAC</td> </tr> <tr> <td>6</td> <td>Bryant's Heath, Felmingham</td> <td>SSSI</td> </tr> <tr> <td>7</td> <td>Alderford Common</td> <td>SSSI</td> </tr> <tr> <td></td> <td>The coast at Happisburgh is part of the South North Sea SAC</td> <td>SAC</td> </tr> </tbody> </table> <p>From the table above, only 3 of the sites fall within the SUA area where there may be potential overflight from UAS operations. These sites are:</p> <ol style="list-style-type: none"> <li>1. Booton Common (Norfolk Valley Fens)</li> <li>2. River Wensum</li> <li>3. South North Sea SAC</li> </ol>		No	Location	Designation	1	Swannington Ugate Common	SSSI	2	Booton Common (Norfolk Valley Fens)	SSSI/SAC	3	River Wensum	SSSI/SAC	4	Cawston and Marsham Heaths	SSSI	5	Buxton Heath (Norfolk Valley Fens)	SSSI/SAC	6	Bryant's Heath, Felmingham	SSSI	7	Alderford Common	SSSI		The coast at Happisburgh is part of the South North Sea SAC	SAC
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	<p>The area of the above 3 sites relative to the overall area of the SUA is minimal so therefore overflight will also be expected to be minimal. Also, UAS flights will be limited to 6 flights per day up to 90min (low frequency) with 2-4 flying days per month for 6 months. They have also stated that a routine BVLOS approval will remove the requirement for take-offs and landings along the route, eliminating the necessity for ground crews to access the land, streamlining operations and minimising disruption. The proposed TOLP is also over 2 Km away from the identified European sites.</p> <p>As such, considering the information above, this ACP is not likely to have a significant effect on European sites.</p>
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6. Engagement		Yes/No
6.1	Has the change sponsor used the noise assessment to identify the affected communities that must be engaged with or informed of the airspace change if the proposal is approved? <i>(CAP 1616g paragraph 6.30)</i>	N/A
	The sponsor is not required to assess the potential noise impacts associated with the proposal and there is therefore no means to identify affected communities.	

7. Conclusion
<p>This ACP seeks to establish a SUA supported by a TMZ in the Norfolk area. The airspace change is a trial which seeks to accommodate UA operations between 200 ft and 400 ft AGL over a corridor of land to conduct construction monitoring surveys.</p> <p>The sponsor has not presented an assessment of noise impacts. This is acceptable based on the CAA’s current position that it will not consider the noise impact of UAS activity enabled by an airspace trial that is intended to assist with learning and the development of policy.</p> <p>The sponsor has completed the HRA early screening criteria form providing supporting evidence. Considering this evidence and the context of the change in terms of operations, no significant effects on European sites are considered likely.</p>

8. Recommendations/Conditions/Post Trial Report Data Requirements	Yes/No
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8.1	<p>Are there any recommendations which the change sponsor <b>should try</b> to address either before or after implementation (if approved)? (CAP 1616g paragraph 7.4)</p> <p><i>Recommendations are something that the change sponsor should try to address either before or after implementation, if indeed the airspace change proposal is approved. They may relate to an area in which the change sponsor is reliant upon a third party to actually come to an agreement and consequently they do not carry the same 'weight' as a condition.</i></p>	N/A
No Recommendations.		
8.2	<p>Are there any condition(s) which the change sponsor <b>must fulfil</b> either before or after implementation (if approved)? (CAP 1616g paragraph 7.4)</p> <p><i>Conditions are something that the change sponsor must fulfil either before or after implementation, if indeed the airspace change proposal is approved. If their proposal is approved, change sponsors must observe any condition(s) contained within the regulatory decision; failure to do so will usually result in the approval being revoked.</i></p>	YES
<p>During the implementation the following conditions must be applied:</p> <ul style="list-style-type: none"> <li>• Where safe and practicable, the sponsor must operate the UAV at the highest altitude / greatest distance from, or avoid overflight of, the European sites within the TDA.</li> <li>• The change sponsor is required to collate, monitor, and report to the CAA on the level and contents of any complaints associated with the trial throughout its period of operation.</li> </ul>		
8.3	<p>For airspace trials, are there any specific requirements in terms of the data to be collected by the change sponsor for the post-trial report (if approved)? (CAP 1616g paragraph 7.20)</p> <p><i>Post-trial report data requirements concern any specific data which the change sponsor should be instructed to collate post-implementation, if indeed the airspace trial is approved.</i></p>	YES
<ul style="list-style-type: none"> <li>• Sponsor to report flight counts, operating hours, typical altitudes, any environmental (including noise) complaints, any noise observations/events, with references to dates/times and locations.</li> </ul>		

Environmental Statement Sign-off	Name	Signature	Date
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Environmental assessment completed by Airspace Regulator (Environment)	[REDACTED]	[REDACTED]	15/04/2026
Environmental assessment approved by Principal Airspace Regulator	[REDACTED]	[REDACTED]	15/04/2026