

Design Principles Supplementary Brief

ACP Name and Stage	Space Hub Sutherland ACP DEFINE Gateway
CAA ACP Ref	ACP-2019-04
Document Ref	71270 018
Sponsor	Highlands and Islands Enterprise
Purpose of Brief	Environmental Design Principle Supplementary Note
Date of Meeting	21/11/2019

Environmental Design Principle Supplementary Note

The Space Hub Sutherland (SHS) project forms part of a wider UK Government strategy to create low cost access to space for satellites launched from the UK. The strategy is supported by the Space Industry Act (SIA) 2018 that allows the development of a regulatory framework to ensure spaceflight from UK spaceports is safe and managed responsibly. Alongside the SIA, the SHS ACP follows the guidance laid down in Civil Aviation Publication (CAP) 1616 and is the first application for airspace to support a commercial vertical launch spaceport in the UK.

Recognising the atypical nature of the proposal, when developing the Design Principles submission for the DEFINE Gateway, following stakeholder engagement the sponsor made several working assumptions. For example, without pre-judging the proposed solution, when considering the nature of the planned activity, it is thought likely that there will be a requirement for segregated Special Use Airspace (SUA).

Most segregated SUA in the UK is currently established to meet Ministry of Defence (MOD) requirements. For MOD SUA, the CAA does not consider the environmental impact of activities that are being conducted within it. Secondary Legislation associated with the SIA will include a comprehensive Assessment of Environmental Effects (AEE) of space-related activities prior to the award of a spaceport licence or a launch operator licence. The sponsor made an assumption that space-related (as opposed to traditional aviation) activities, and their environmental impact, within the likely SUA would be regulated under the secondary legislation associated with the SIA, rather than as part of the CAP 1616 process. This would mean that, as is the case with MOD SUA, the ACP would focus only on the CO₂ emissions and fuel burn associated with the re-routing of other airspace users. A Design Principle was consequently drafted to this effect.

However, the secondary legislation associated with the SIA has yet to be issued. Following the Stage 1 submission the CAA confirmed that, in the absence of SIA secondary legislation, the sponsor should conduct an environmental assessment to meet CAP 1616 requirements and not rely on the future legislation. This could have been captured in a more high-level environmental Design Principle, but it is appreciated that it is not possible to amend the documentation submitted without further stakeholder engagement. The sponsor's representative recognises the clarification of the environmental assessment requirements and accepts the CAA's advice. The sponsor will therefore ensure that the required CAP 1616 environmental assessment is conducted at Stage 2 of the process and will work with the CAA to identify and agree appropriate metrics to do so.

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