

ACP-2017-079
SHETLAND SPACECENTRE LIMITED (SAXAVORD
SPACEPORT) AIRSPACE CHANGE PROPOSAL
CAP1616 STAGE 3 (“CONSULT”)
STAKEHOLDER CONSULTATION STRATEGY

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Document Controls

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Version	Date	Status	Author	Comments
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V1.1	16 Jan 23	Issued		Revised Appendix 3. Submitted to CAA.
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V3.0	6 Apr 23	Issued		Amendment following "Decision Pending" feedback: <i>Para 7.3-7.6.</i> Revised and augmented. <i>Para 7.10 & 8.5.</i> Dates confirmed as correct with CAA. <i>Appendix 1.</i> Additional stakeholders added. <i>Appendix 2.</i> Revised stakeholder consultation materials. <i>Appendix 3.</i> Citizen Space Questionnaire revised. Repagination throughout.
V3.1	-	-		Version number not used.
V3.2	18 Apr 23	Issued		Change to consultation dates. Document renumbered to align with amendments of other Stage 3 artefacts (incorporated into Appendices 2 and 3).

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1. Introduction.

1.1. Shetland Space Centre Limited (trading and hereinafter referred to as “SaxaVord Spaceport” or “SaxaVord”) seeks to conduct vertical launch operations for orbital and sub-orbital activities from SaxaVord Spaceport on Lamba Ness, Unst. A suitable airspace reservation of defined dimensions is required to ensure the safety of other airspace users from SaxaVord launch activities and to ensure the safety of SaxaVord launch activities from other airspace users. The proposed airspace reservation would be activated for the minimum specified periods necessary to support nominated launch operations and would extend from surface (SFC) to unlimited (UNLTD).

1.2. Accordingly, SaxaVord initiated an airspace change proposal (ACP) ([ACP-2017-079](#)) through the UK Civil Aviation Authority’s (CAA’s) ACP portal on 18 October 2018. The ACP was “Paused” in August 2020, before recommencing in February 2022.

1.3. As part of the CAP1616 Stage 1 process, SaxaVord considered and engaged relevant aviation and airspace user stakeholders to discuss the outline of the proposal and establish and share the proposed airspace design principles (DPs).

1.4. At Stage 2A of the CAP1616 process SaxaVord developed the design options for the airspace change and tested them with Stakeholders. Subsequently, at Stage 2B, SaxaVord carried out an options appraisal for the designs against requirements set by the CAA in an iterative approach. SaxaVord successfully completed the Stage 2 Gateway on 7 December 2022.

1.5. Accordingly, SaxaVord acknowledges that at Stage 3 of the ACP process it must consider, engage and consult with relevant aviation and non-aviation stakeholders and identify, discuss and, where possible, mitigate any subsequent impact that activation of the airspace design might have on stakeholders and their activities and operations.

2. CAP1616 Overarching Process Requirements - Stage 3 “Consult”.

2.1. The CAP1616 Stage 3 process requires that airspace change sponsor prepares and launches its formal consultation.

2.2. At Step 3A, the change sponsor plans its stakeholder consultation and engagement, and prepares consultation documents, including the second-phase Full Options Appraisal with more rigorous evidence for its chosen option(s).

2.3. At Step 3B, the CAA reviews and, where appropriate, approves the consultation strategy. This is to ensure the strategy is comprehensive, the materials clear and appropriate and the questions unbiased. CAA signs-off the ‘Consult’ gateway on successful completion of Stage 3B.

2.4. At Step 3C, the change sponsor implements its consultation strategy agreed with the CAA and launches the consultation.

2.5. Finally, at Step 3D, consultation responses made through the online portal¹ are collated, reviewed and categorised.

1. Citizen Space platform.

3. Aim/Purpose.

3.1. SaxaVord recognises that the fundamental principles of effective consultation are targeting the right audience, communicating in a way that suits the audience and giving the audience the tools to make informed, valuable contributions to the proposal's development.²

3.2. SaxaVord's overarching principle(s) is that consultation with stakeholders will seek to address positive and potentially negative impacts on stakeholders by providing sufficient information and materials to enable informed objective responses to be received that will inform SaxaVord's airspace design application (ACP-2017-079) ("the Application").

4. Scope/Objectives.

4.1. *The Gunning Principles*. The objectives of this consultation strategy will be guided primarily by the Gunning Principles, which set out the legal expectations surrounding formal consultation and related activities. The Gunning Principles³ for effective consultation consist of four rules, which if followed, are designed to make consultation fair and a worthwhile exercise; the principles are that:

- Consultation must be at a time when proposals are at a formative stage.
- The proposer should give sufficient reasons for any proposal to permit intelligent consideration.
- Adequate time is given for consideration and response.
- The product of consultation must be conscientiously taken into account when finalising the decision.

SaxaVord, therefore, seeks to meet these principles through the delivery of this consultation strategy.

In addition, SaxaVord seeks to maintain (or, where appropriate, *establish and maintain*) an appropriate dialogue with its stakeholders, while ensuring that any new stakeholders can understand the proposal fully, in turn ensuring that appropriate feedback may be gathered, analysed and used to inform the proffered airspace design.

4.2. The objectives of the Stage 3 process are, therefore, to engage and consult with stakeholders on the potential impact of the proposed change on all identified stakeholders. The high-level objectives of this strategy and associated activities are to:

- Outline the approach and methodology for stakeholder consultation.
- Identify and, where appropriate, prioritise stakeholders likely to be impacted by the Application.
- Engage and consult with identified stakeholders and request comments on the Application.
- Record, review and analyse stakeholder responses.
- Where appropriate, consider consultation responses to inform airspace design and related activities.

2. CAP1616, CAA (2021), Appendix C, Para 32 ([online](#)) accessed on 20 Jan 23.

3. The Consultation Institute (2023) ([online](#)), accessed on 20 Jan 23.

4.3. *Supporting Objectives.* The following supporting objectives underpin the development of this strategy document; SaxaVord will ensure that:

- Accessibility. Consultation materials will be as accessible as possible for all stakeholders; this will include different types of material (i.e. accommodating different readers' requirements) and different methods of delivery and dissemination (i.e. physical and electronic copies).
- Clear and Concise language. Information will be presented using clear and concise language that can be readily understood by aviation and non-aviation audiences, alike. SaxaVord recognises that the nature of the application and proposed space launch activities therein are technical in nature; as such, SaxaVord seeks to communicate simply and effectively to ensure that the information is conveyed and can be understood with ease.
- Duration. Consultation is of sufficient duration to ensure that stakeholders have a chance to respond. This is particularly pertinent for organisations who may meet irregularly and will not be able to respond quickly.
- Communication. Regular communication updates on the progress of the consultation activity will be provided to stakeholders, to include updates to the progressing timeline and reiterating that stakeholders may contact SaxaVord to seek further clarification on the materials and information therein.

These supporting objectives seek to ensure that consultation is not only thorough and reaches the correct audience, but that it also employs the correct and most suitable methods to generate valuable feedback and contributions to support the continued development of the application.

5. Summary of Stakeholder Engagement to Date.

5.1. *Planning Application Consultation.* As part of its full planning application, SaxaVord engaged local stakeholders at public townhall and online events in May 2020 and October 2020, these events were supplemented by the availability of key site staff for face-to-face appointments with local stakeholders. SaxaVord identified and contacted a range of groups and organisations that could be impacted by the Application; SaxaVord reached out to a wider group, particularly the local population and the wider public, conducting two public sessions in Shetland in December 2019 and January 2020.

5.2. *ACP-2017-079 Stage 1.* Stage 1 of the ACP required SaxaVord to establish a statement of need and a list of design principles. These principles were developed following two-way engagement with impacted stakeholders (aviation and non-aviation). These sessions were publicised in the local press and during a radio interview with BBC Shetland and allowed SaxaVord to outline application and its processes; SaxaVord also placed corresponding announcements on their social media outlets and website, offering links to a webpage where respondents could share their views.

5.3. *ACP-2017-079 Stage 2.* At Stage 2, SaxaVord developed 2 design options and tested them with stakeholders to confirm that the proposed design options addressed the Statement of Need and aligned with the DPs from Stage 1. Corresponding engagement materials were placed on the application's ACP portal for stakeholders to access and consider. A simple questionnaire/feedback proforma was offered to allow stakeholders to submit feedback to enable SaxaVord to analyse the responses and, where appropriate, refine the design options.

5.4. *ACP-2021-090.* Additionally, SaxaVord has engaged aviation stakeholders relating to a temporary airspace design ([ACP-2021-090](#)); despite the similarities between the proposed launch operations, airspace and associated activities, engagement related to that application continues to be treated as a separate activity to stakeholder engagement associated and consultation with this application (ACP-2017-079).

5.5. *ACP-2021-058.* This application (ACP-2017-079) is also a separate to ACP-2021-058.

6. Audience - the Stakeholders.

6.1. *Context.* An activity's stakeholders can be a diverse group of individuals, businesses and organisations whose expectations must be managed to varying degrees, commensurate with their levels of interest and influence on the activity. The relationship between stakeholders and the activity works both ways: stakeholders may have a positive or negative impact on the activity, and vice versa.

6.2. It is acknowledged that stakeholders may be either internal or external to the Application. The stakeholders to whom this strategy refers are external to the Applicant's organisation; as such, they are third-party stakeholders and comprise local, national, international and government and regulatory bodies that could exert power and/or influence over the Application and its outcomes.

6.3. Relationships are the first steps in good influencing, but knowing who to invest time and energy in building good relationships with is the first part of that activity.

6.4. *Identification of Stakeholders.* Building on earlier stakeholder identification and engagement activity, SaxaVord established a list of local, national and international stakeholders likely to be impacted by the Application and its subsequent activation and operation. This activity was supplemented by data and information supplied by CAA.

6.5. Acknowledging the geographical location of the launch site relative to the UK mainland, no assumptions were made over the probability of direct impact on national UK stakeholder groups; all stakeholders were considered prior to their being prioritised.

6.6. For each stakeholder, a primary point of contact (POC) has been established and, where possible, this has included a name and email address, as a minimum. SaxaVord acknowledges that that "seldom-heard groups", by their very nature, difficult to identify and reach - see Section 7, below.

6.7. The list of the Application's stakeholders is provided at Appendix 1.

7. Consultation Approach.

7.1. At Stage 3, SaxaVord's aim is to ensure that the Application's stakeholders can participate fully in the consultation activity.

7.2. *Notification.* Notification of SaxaVord's consultation will be varied, utilising a variety of electronic means (email and SaxaVord's website and social media outlets) supplemented by local print media, radio and physical publications, to reach the maximum number of stakeholders (including those with no or limited internet access). This broad approach to consultation notification aims to meet the intent of CAP1616 and the requirement to include seldom-heard groups in the consultation.⁴ Following successful completion of the Stage 3 Gateway, SaxaVord will apply the following notification methods:

- Email Notification. For those stakeholders for whom it has a confirmed email, SaxaVord will notify the initiation of the ACP-2017-079 consultation period by email. This email will provide stakeholders with an overview of the application, consultation start and finish dates and links to consultation and reference materials and the Citizen Space online survey questionnaire. Reminder emails will be sent to all stakeholders at the mid-point of the consultation period and 2 weeks prior to its conclusion.
- Print Versions. For those stakeholders that SaxaVord has identified that cannot be reached by email, SaxaVord will send print versions of an overview of the application, consultation start and finish dates, consultation and reference materials and the survey

4. CAP1616, CAA (2021), Page 49, Para 167 ([online](#)) accessed on 20 Jan 23.

questionnaire. A subsequent reminder will be sent at the mid-point of the consultation period and 2 weeks prior to its conclusion.

7.3. *Styles and Types of Consultation.* SaxaVord acknowledges that individual stakeholders within the cohorts outlined at Para 7.1, above, will have unique consultation requirements. Broadly, SaxaVord seeks to employ the following methods of consultation:

- ***Online Consultation.*** SaxaVord believes that the main consultation route will be through the Citizen Space platform and the corresponding survey questionnaire. Email, written, website and social media correspondence will direct stakeholders to the questionnaire and related materials on Citizen Space.
- ***Virtual Meetings.*** If requested by **individual** stakeholders, virtual meetings (through either Zoom or Microsoft Teams) may be held during the consultation period. Where requested, such meetings will be recorded and a corresponding brief set of minutes produced, agreed and distributed to attendees, for all parties' records. Such artefacts would also be included in the subsequent Consultation Responses Report.
- ***Ad hoc Communications from Stakeholders.*** Where *ad hoc* communications pertinent to the application take place, SaxaVord will summarise the conversation and send a confirmatory email to the respondent seeking an acknowledgement that the email reflects the conversation accurately.
- ***Consultation Responses.*** Primarily, consultation responses (i.e. survey questionnaires) will be requested through the Citizen Space platform; the platform offers an effective means of management and collation of stakeholder responses. Direct email and written versions of the questionnaires may be submitted to the following addresses:

- **Email.** Where respondents are unable to utilise the Citizen Space platform, completed survey questionnaires may be sent to saxavordpacp@avisu.co.uk.

- **Post.** Written survey questionnaires may be sent to the following address:

SaxaVord Spaceport (FAO AVISU)
Orbital House
15 Castle Road
Grantown-on-Spey
PH26 3HN

Where responses are received through means other than the Citizen Space platform, SaxaVord will add the response to the portal so that it can be moderated (by the CAA), published and analysed with the other stakeholders' responses.

- ***Frequently Asked Questions (FAQs).*** As the consultation period progresses, it may be that a variety of different stakeholders request the same information that was not foreseen when the consultation strategy and materials were developed. Where there are common questions and requests, SaxaVord will develop an FAQs material for publication as expediently as practicable on the ACP portal, Citizen Space platform and where necessary, print versions.

7.4. *Local Stakeholder Consultation.* The significant majority of surface footprint of Design Option 3 lays over the sea and, as a result, activation of that airspace could be seen to have a negligible impact on local stakeholders. In considering the consultation strategy to be applied to the local stakeholders on the Shetland Islands, SaxaVord is cognisant of the fact that the area impacted by the airspace activation is sparsely populated.

7.5. Critically, SaxaVord has operational and management personnel on the island of Unst and the wider Shetland Islands, who would be immediately available and could respond swiftly. These personnel have an intimate local knowledge of the Unst population and the spaceport's neighbours; this knowledge will ensure that "seldom heard groups" can be reached and accommodated.

7.6. Stage 1 and Stage 2 engagement for ACP process elicited little response from local stakeholders. Thus, SaxaVord believes that the most pertinent approach to local stakeholder consultation for Stage 3 is to measure the local response to the consultation materials and survey questionnaire available on the Citizen Space platform, and then shape an appropriate response based on the extant consultation materials (see Para 7.7, below). Additional local consultation activities will include utilising the local media, as follows (and not exclusively):

- *SaxaVord Website News Update.* SaxaVord's website will include a news update highlighting the consultation activity and the availability of related materials on the CAA ACP portal and the survey questionnaire on the Citizen Space platform, with corresponding links. In addition, the update will provide email, postal and telephone contact details for those seeking printed versions of materials and questionnaire and how such stakeholders can respond accordingly with either no or limited internet access (and/or capability).
- *Print Media.* Shetland Times newspaper articles and advertising with information directing readership to the ACP portal and Citizen Space platform, via the SaxaVord Spaceport website news update. Similarly, the print media update will include email, postal and telephone contact details for those seeking printed versions of materials and questionnaire and how such stakeholders can respond accordingly either no or limited internet access (and/or capability).
- *Local Radio.* Similar to planning consultation, CEO/Dep CEO interviews to outline SaxaVord's airspace change proposal consultation, with information directing listeners to the ACP portal and Citizen Space platform, via the SaxaVord Spaceport website news update, which will provide email, postal and telephone contact details for those seeking printed versions of materials and questionnaire and how such stakeholders can respond accordingly with either no or limited internet access (and/or capability).
- *Social Media.* *Inter alia*, SaxaVord Spaceport website including "The SaxaVoice Newsletter", social media pages and local media websites with information directing readership to the ACP portal and Citizen Space platform, via the SaxaVord Spaceport website news update, which will provide email, postal and telephone contact details for those seeking printed versions of materials and questionnaire and how such stakeholders can respond accordingly with either no or limited internet access (and/or capability).
- *Focussed Local Information Activity.* Production and display of information flyers/leaflets in prominent places (such as, libraries, entertainment and retail venues). Where necessary, SaxaVord operational and management personnel will use their intimate local population knowledge to support pertinent and focussed consultation activities. Again, such information flyers/leaflets will provide email, postal and telephone contact details for those seeking printed versions of materials and questionnaire and how stakeholders can respond accordingly with either no or limited internet access (and/or capability) and will contain details of how to locate the ACP portal and Citizen Space platform, via SaxaVord Spaceport website news update.

7.7. Consultation Materials. A common set of consultation materials has been created to inform all stakeholders. These materials provide:

- Introduction - Background, Context and Location.
- Evolution of Airspace Design From Stage 2 to Stage 3.
- Stage 3 Consultation - Context & Purpose.
- Stage 3 Design - Design Option 3.
- Potential Traffic Impact Analyses.
- Stakeholder Consultation and Response.
- Conclusion.

A copy of the stakeholder consultation materials is at Appendix 2. The process for requesting a printed version of these materials will be articulated in SaxaVord's Stage 3 introductory email.

7.8. Consultation Survey Questionnaire. A copy of the Stakeholder Survey Questionnaire is at Appendix 3. The process for requesting a printed version of the survey questionnaire will be articulated in SaxaVord's Stage 3 introductory email.

7.9. Supporting Consultation Documentation and Artefacts. In addition to the consultation materials and survey questionnaire, stakeholders will be directed to this strategy document, the Stage 3 Full Options Appraisal and the ACP-2017-079 portal. Where appropriate, the strategy document and Full Options Appraisal can be provided in print versions; the process for requesting the latter will be articulated in SaxaVord's Stage 3 introductory email.

7.10. Timescales. SaxaVord will commence stakeholder consultation on **Tue 18 Apr 23**. Stakeholders' survey questionnaire responses will be requested within an **8-week** period; the consultation period will conclude on **Mon 12 Jun 23**. SaxaVord will send reminders to all stakeholders, through the most appropriate means **2 weeks into the consultation period**, at the mid-point, 2 weeks prior to conclusion **and 2 days before the conclusion date**.

8. Post-consultation Activities.

8.1. Management of Stakeholder Responses. Stakeholders have been requested to submit their completed survey questionnaire responses and, where appropriate, additional comments through the Citizen Space platform; print version will be made available on request.

8.2. Collation of Responses. Utilising the Citizen Space platform, SaxaVord will record receipt of stakeholder responses, noting stakeholder organisation, respondent, date and time of receipts and contents. This data will be used to evidence stakeholder consultation and be included in the concomitant Response Report.

8.3. Analyses of Consultation Feedback and Responses. SaxaVord will undertake an analysis of stakeholder feedback and survey questionnaire responses and a determination of any influence that these might have on the proposed airspace design.

SaxaVord will record the associated findings for inclusion in the concomitant Consultation Response Report.

8.4. Step 3D Response Report. SaxaVord will compile the corresponding Step 3D Response Report for submission to CAA.

8.5. *Stage 4 - "Update & Submit"*. In considering stakeholders' Stage 3 consultation responses, SaxaVord will consider what changes, if any, to the proposed design might need to be considered. SaxaVord will then prepare the final documentation for submission to the CAA for the Stage 4 Gateway on [Fri 30 Jun 23](#).

ACP-2017-079 STAKEHOLDER LIST

Avn/ Non-Avn	Organisation	Role/Title	Name	Email Address
Aviation	Aircraft Owners and Pilots Association (AOPA)			
Aviation	Airlines for Europe (A4E)	Generic Contact		
Aviation	Airport Operators Association (AOA)			
Aviation	Airspace Change Organising Group (ACOG)			
Aviation	Airspace4All (A4A)			
Aviation	Airtask (includes Direct Flight Ltd)	Head of Business Development and Safety		
Aviation	Association of Remotely Piloted Aircraft Systems UK (ARPAS-UK)			
Aviation	Aviation Environment Federation (AEF)			
Aviation	Avinor			
Aviation	Babcock International	Head of Flight Operations		
Aviation	Bristows Helicopters - Sumburgh			
Aviation	British Airways (BA)			
Aviation	British Balloon and Airship Club (BBAC)			
Aviation	British Business and General Aviation Association (BBGA)			
Aviation	British Glider Assoc (BGA)			
Aviation	British Hang-glider & Paraglider Assoc. (BHPA)			
Aviation	British Helicopter Association (BHA)	CEO		
Aviation	British Microlight Association (BMAA)			
Aviation	British Model Flying Association (BMFA)			

Avn/ Non-Avn	Organisation	Role/Title	Name	Email Address
Aviation	British Skydiving (BPA - Parachute Assoc)			
Aviation	CAA	Airspace Change Account Manager		
Aviation	Danish Armed Forces	Staff Officer Air Traffic Management		
Aviation	Danish Ministry of Transport			
Aviation	Eurocontrol			
Aviation	Flylogix	Ops Director		
Aviation	GAMA Aviation			
Aviation	General Aviation Alliance (GAA)			
Aviation	Helicopter Club of Great Britain (HCGB)			
Aviation	Highland & Islands Airports Limited (HIAL)			
Aviation	Honourable Company of Air Pilots (HCAP)	Generic Contact		
Aviation	Icelandic CAA			
Aviation	Isavia			
Aviation	Large Model Association (LMA)	LMA Secretary		
Aviation	Light Aircraft Association (LAA)			
Aviation	Loganair			
Aviation	MOD - Defence Airspace and Air Traffic Management (DAATM)	SO2 Airspace Plans, DAATM		
Aviation	NATO Air Comd	Static Air Defence Centre, CAOC UEDEM		
Aviation	NATS	Swanwick/Prestwick		
Aviation	Noordzee Helikopters Vlaanderen (NHV)			
Aviation	Norway CAA	Senior Inspector ATM		
Aviation	PDG Aviation			
Aviation	Qinetiq Ltd			
Aviation	Shetland Flyer			

Avn/ Non-Avn	Organisation	Role/Title	Name	Email Address
Aviation	Tingwall Airfield	AFISO		
Aviation	UK Space Agency	Intl Space Flight Policy Advisor		
Aviation	Windracers	Operations & Regulatory Specialist		
Non-Aviation	Compass Rose Charters			
Non-Aviation	Danish Ministry of Environment	Ocean Office/Mads Thelander, EU and International Office		
Non-Aviation	Govt of the Faroe Islands	Ministry of Environment, Industry and Trade		
Non-Aviation	Lamba Ness Common Grazings			
Non-Aviation	Lerwick Port Authority			
Non-Aviation	Maritime Coastguard Agency (MCA)	Station Cdr Shetland		
Non-Aviation	Met Office			
Non-Aviation	Ministry of Foreign Affairs of the Government of Greenland			
Non-Aviation	Natural Environment Research Council (NERC)	Generic Contact		
Non-Aviation	Northern Lighthouse Board	Generic Contact		
Non-Aviation	Norway - Royal Ministry of Trade, Industry and Fisheries, Research and Innovation Department (initially sole NOR POC)	Coordinator of response on future airspace and maritime activities		
Non-Aviation	Ocean Kinetics			
Non-Aviation	Offshore Petroleum Regulator for Environment & Decommissioning (OPRED)	Generic Contact		
Non-Aviation	North Sea Transition Authority (previously the Oil & Gas Authority)	Generic Contact		
Non-Aviation	Oil & Gas UK			
Non-Aviation	Police Scotland	Police Constable		
Non-Aviation	PURE Energy Centre			
Non-Aviation	RNLI	Generic Contact		

Avn/ Non-Avn	Organisation	Role/Title	Name	Email Address
Non-Aviation	RSPB	Generic Contact		
Non-Aviation	NHS Scottish Ambulance Service	Lerwick Ambulance Service		
Non-Aviation	NHS Scottish Ambulance Service (Air Ambulance)	NHS Health Scotland (Service Head of Air Ambulance)		
Non-Aviation	Scottish Govt (MSP Highland & Islands)	Wider Local MSP		
Non-Aviation	Scottish Govt (MSP Shetland)	Local MSP		
Non-Aviation	Scottish Natural Heritage			
Non-Aviation	Scottish Ornithologists' Club (SOC)	President		
Non-Aviation	Scottish Wildlife Trust			
Non-Aviation	Scottish Environmental Protection Agency (SEPA)			
Non-Aviation	Shetland Amenity Trust			
Non-Aviation	Shetland College/NAFC			
Non-Aviation	Shetland Fishermen's Association			
Non-Aviation	Shetland Islands Council	Ferries, airports and port engineering		
Non-Aviation	Shetland Oil Terminal Environmental Advisory Group (SOTEAG)			
Non-Aviation	UK Govt (MP Orkney & Shetland)			
Non-Aviation	UK Research & Innovation (UKRI)			
Non-Aviation	Unst Community Council	Clerk		
Non-Aviation	Unst Partnership Ltd	Chairman		

Table 1 - ACP-2017-079 Stakeholders

Appendix 2 to
ACP-2017-079 Stage 3 Consultation Strategy
Dated 17 Apr 23

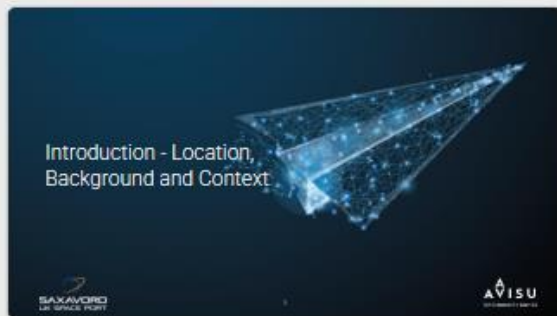
STAKEHOLDER CONSULTATION MATERIALS



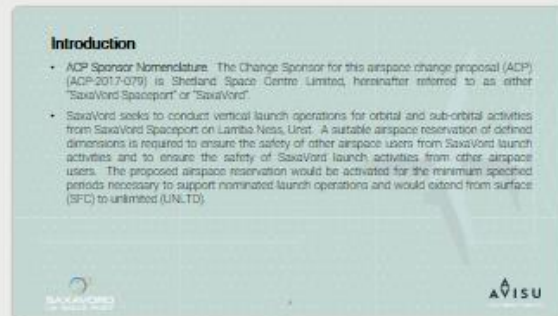
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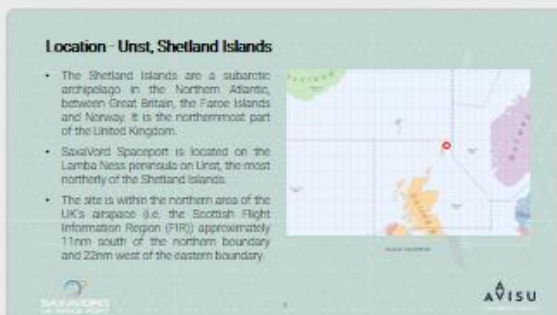
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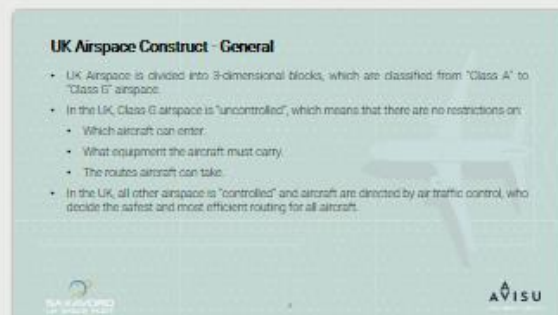
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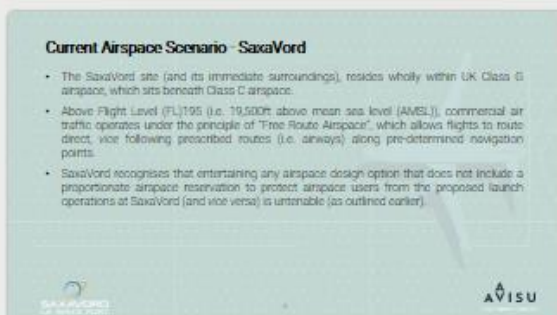
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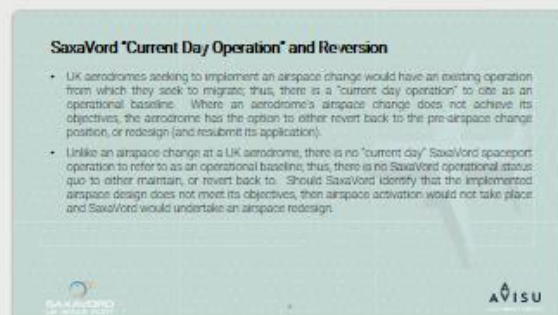
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8

SaxaVord Airspace Change - Background and Context

- Background. In 2020, as part of Stage 1 of the CAP1616 process, SaxaVord established its proposed airspace change design principles through engagement with identified stakeholders; the CAP1616 Stage 1 'Define' Gateway was passed on 29 May 20.
- In Stage 2, SaxaVord produced a list of options that addressed the ACP's Statement of Need and alignment with the Design Principles (DPs) and tested these options with stakeholders.
- Having passed the Stage 2 ('Develop and Assess') gateway on 7 Dec 22, Stage 3 is where SaxaVord undertakes the formal consultation and associated discussions with stakeholders. Additionally, SaxaVord engaged aviation stakeholders relating to a temporary ACP (ACP-2021-090). Engagement related to that application must be treated as a separate activity to stakeholder engagement associated with this application (ACP-2017-079), despite their similarities.



9


Evolution of Airspace Design From Stage 2 to Stage 3




10

Stage 2 Preferred Design Option

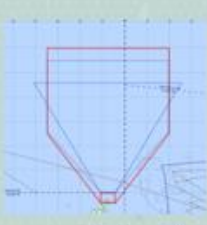
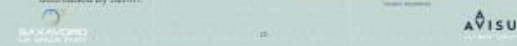
- SaxaVord recognised that conducting space launch operations in the same airspace used by commercial and other airspace users without a proportionate airspace reservation affording all airspace users 'safety by exclusion' was untenable. Consequently, a 'do nothing' option (i.e. no airspace reservation) was discounted and not presented to stakeholders, as it neither addressed the Statement of Need, nor did it align with the Design Principles from Stage 1.
- The airspace design options presented at Stage 2 were for a combined 'box and wedge' shape with 2 variations: one non-segmented (Design Option 1), the other segmented (Design Option 2). As a result of Stage 2, the preferred design option taken forward to Stage 3 was the segmented design (Design Option 2).
- The Stage 2 report also noted that the airspace design could evolve as the ACP process continued and options were measured and refined.



11

Evolution of Design

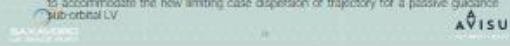
- As Stage 2 progressed, performance data for potential launch vehicles (LVs) seeking to utilise the airspace evolved; in turn, this precipitated a refinement of the airspace design being proposed at Stage 3. The design further refines the box and introduces a revised segmentation mechanism within the wedge shape.
- The red outline indicates the stage 3 Design Option 3 compared with the dashed blue outline Stage 2 ('box and wedge') design.
- The overall longitudinal dimension of the airspace has increased by 42 nautical miles (nm) and the overall latitudinal dimension has decreased by 32nm.

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Evolution of Box and Wedge Design


- Box.** The co-ordinates of the corners of the box element have been rounded for ease of use. The refinement of the co-ordinates does not materially change the location or shape of the box.
- Wedge.**
 - From the northern corners of the box, the east and west radials are now approximately $\pm 40^\circ$ from the centreline (360/True (360T)) to accommodate the new limiting case dispersion of trajectory for a passive guidance sub-orbital LV (degrees \pm True is with reference to the geographic north pole).
 - From the southern corners of the box, additional east and west radials are added to allow for sub-orbital launch azimuths to the east and west of north (main axis of the airspace).
 - Downrange, the sides of the wedge aligned north/south, instead of the previous triangular shape, to remove unnecessary airspace volume for dispersion of trajectory of a passive guidance sub-orbital LV. The downrange limit of the wedge has been extended to accommodate the new limiting case dispersion of trajectory for a passive guidance sub-orbital LV.



13

Evolution of Segmentation

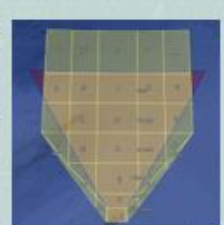

- The original segmented design concept proposed segments based on radials and range rings. Subsequently, SaxaVord determined that this could be an unnecessarily complicated solution to implement, as there would be many complex co-ordinates and some individual segments could traverse FIR boundaries.
- Consequently, SaxaVord refined the segmentation concept for Stage 3, which uses segments based on simplified lines of latitude and longitude, in turn, allowing the activated airspace to be plotted more readily.
- Latitudes and longitudes were refined to ensure that individual segments do not traverse FIR boundaries.
- The increase in internal segments enables greater granularity in selecting the most appropriate airspace volume for a given space launch operation.
- Refined latitudes of segments were selected to avoid coincidence with established FIR boundary reporting points.



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Design Option 3

- The yellow outline indicates Design Option 3 with internal segmentation compared with the red Stage 2 'box and wedge' design.
- The box element (segment 'A') remains consistent.
- Design Option 3 is, therefore, SaxaVord's preferred airspace design option to be taken forward to Stage 3 consultation.

15

Stage 3 Consultation Context & Purpose

16

CAP1616 Stakeholder Consultation - Context


- Stage 1. In CAP1616 Stage 1, design principles (DPs) for the proposed airspace change are developed through dialogue between the change sponsor and relevant stakeholders. Saxavord completed this activity in early 2022.
- Stage 2. CAP1616 Stage 2 requires airspace change sponsors to test design options with its stakeholders to ensure that assumptions are validated that the options address the statement of need, align with the LPA and that the sponsor has understood stakeholder feedback and discussion in regards to the options. Saxavord completed this activity in December 2022.
- Stage 3. In CAP1616 Stage 3, the change sponsor launches its formal consultation process, during which stakeholders are given the opportunity to provide relevant and timely feedback to the sponsor to enable the sponsor to conduct a final options appraisal (i.e. Stage 4).
 - Stage 3 consultation will begin on 18 April 2023 and last for 8 weeks.



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Purpose of CAP1616 Stage 3 Consultation

- CAP1616 Stages 3A and 3B require the change sponsors to prepare a consultation and assesses who should be consulted.
 - Stage 3 - Steps 3A and 3B. Saxavord completed this Gateway on 17 April 2023.
- Stage 3 then requires the change sponsors to consult with those interested parties, including, where appropriate, local communities.
- In the light of responses, the change sponsor may modify the proposed design(s) before making a formal submission (i.e. Stage 4) of the proposal to the CAA for a decision.
- Accordingly, these consultation materials set out Saxavord's proposed Design Option 3.



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Stage 3 Design - Design Option 3




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Design Option 3 - Overview

- Safety in the launch area will be by exclusion, and the overall level of risk of an individual launch will be set by the UK space licensing regulator (CAA) in granting a corresponding launch operator licence for an individual launch operator.
- Saxavord remains cognisant of stakeholder feedback from Stage 2. Since Stage 2, Saxavord continues to discuss and progress the following with the relevant national and international organisations:
 - Letters of Agreement (LOAs)/Memoranda of Understanding (MOUs), including airspace notification and coordination and emergency and airborne security-related short-notice access procedures.
 - Identification of suitable launch windows of the minimum duration required (typically, one hour), thereby minimising the impact on the wider airspace network.
- The notification, management and coordination of airspace-related activities are ongoing with the relevant parties and will be published in due course.



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Stage 3 Safety Statement

CAP1616 (Page 47, Para 157) states that at this stage (i.e. Stage 3) "there is no requirement for a change sponsor to undertake further safety work at this stage, where a sponsor has done so, it must include that information in the package of consultation documents." The Initial Safety Statement and Analysis provided at Stage 2, therefore, remain extant.

Safety in the launch area will be by exclusion.

Design Option 3 has been informed by representative orbital and suborbital cases that will encompass all anticipated LVs likely to use the Saxavord launch site.


Launch activities by individual launch operators will be regulated and licensed by the CAA, in accordance with the UK SAs 2018 and associated SRT. The flight safety analysis of the individual licensed launch will, therefore, dictate the need for a specific airspace reservation in the launch area. For example, comparing Examples 1-8, below (Slides 25-32, respectively), show LVs requiring different airspace reservations due to different licensing requirements.



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Design Option 3 - Anticipated Utilisation


- Saxavord Spaceport anticipates up to 30 launch operations per annum; launch windows are anticipated to be of typically one hour's duration.
- Saxavord Spaceport anticipates that the airspace will be utilised for:
 - The initial ascent phase of an orbital launch (the LV reaches earth orbit).
 - The entire flight of a sub-orbital launch (the LV follows a ballistic path and returns to the earth's surface).
- Saxavord Spaceport's airspace design seeks to support launch azimuths (the horizontal angular direction initially taken by a launch vehicle at lift-off, measured clockwise in degrees from true north) between 330T and 030T and anticipates that:
 - The most likely launch azimuth for a sub-orbital launch will be 350T.
 - The most likely launch azimuth for an orbital launch will be Sun-synchronous Orbit (SSO) or approximately 345T.



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Design Option 3 - Exemplar Airspace Utilisation


- To assist stakeholders' understanding of Design Option 3, Saxavord has included the diagrams that follow to offer illustrative argumentation for representative launch profiles to demonstrate how Design Option 3 might be tailored to provide a suitable launch area to accommodate a specific licensed LV and launch operation.
- In the diagrams that follow, launch azimuths are shown as solid black lines and proposed areas of airspace activation are shaded red.
- "Mature" and "Immature" LVs
 - A mature LV is one that has demonstrated a successful launch pedigree and the risk of unplanned trajectory variations is proven to be low.
 - An immature LV is one in the early stages of its development cycle; as such, it has yet to build a successful launch pedigree. Accordingly, a greater volume of airspace may be allocated for an immature LV to ensure that any unplanned trajectory variations remain within the protected area.



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Design Option 3 - Exemplar Airspace Utilisation

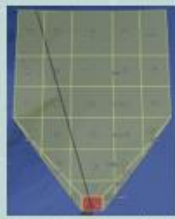
- Active and Passive Guidance
 - Active Guidance. An active guidance system uses onboard systems to control the stability and trajectory of the LV.
 - Passive Guidance. A passive guidance system uses the natural forces acting on the LV for stability and trajectory, for example, aerodynamics and gravity.
- Flight Termination System
 - A flight termination system (FTS) is a safety feature that allows the LV to be terminated in the event of an anomaly.
- Trajectory Variations. Active guidance and an FTS enable tighter control over trajectory variations, thereby allowing focused activation of the airspace.



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Example 1 - Orbital SSO (345T) Mature LV

- A small two-stage LV of mature design with active guidance and FTS.
- Launch azimuth 345T.
- Only area "A" of the airspace is required.
- UK FIR affected.




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Example 2 - Orbital SSO (345T) Immature LV

- A small two-stage LV of immature design with active guidance and FTS.
- Launch azimuth 345T.
- Areas "A, B, C, D, F, G, H, L, M, N, R, S, T, W, X and Y" of the airspace are required.
- UK and Icelandic FIRs affected.




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Example 3 - Orbital (330T) Immature LV

- A small two-stage LV of immature design with active guidance and FTS.
- Launch azimuth 330T.
- Areas "A, B, C, D, F, G, L, M, R, AB, AD and AF" of the airspace are required.
- UK and Icelandic FIRs affected.




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Example 4 - Orbital (030T) Mature LV

- A small two-stage LV of mature design with active guidance and FTS.
- Launch azimuth 030T.
- Only area "A" of the airspace is required.
- UK FIR affected.

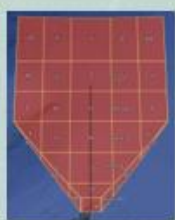


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Example 5 - Sub-orbital (360T) LV

- A single-stage sub-orbital LV with passive guidance and no FTS.
- Launch azimuth 360T and approximately 230km downrange.
- The airspace is required to contain the LV and any other items returning to surface.
- All areas of the airspace are required.
- UK, Icelandic and Norwegian FIRs affected.




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Example 6 - Sub-orbital (360T) LV

- A single-stage sub-orbital LV with active guidance and FTS.
- Launch azimuth 360T and approximately 110km downrange.
- The airspace is required to contain the LV and any other items returning to surface.
- Areas "A, B, D and H" of the airspace are required.
- UK and Icelandic FIRs affected.

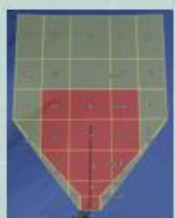


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30

Example 7 - Sub-orbital (360T) LV

- A single-stage sub-orbital LV with passive guidance and no FTS.
- Launch azimuth 360T and approximately 150km downrange.
- The airspace is required to contain the LV and any other items returning to surface.
- Areas "A, B, C, D, E, G, H, J, M, N and P" of the airspace are required.
- UK, Icelandic and Norwegian FIRs affected.




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Example 8 - Sub-orbital (345T) LV

- A single-stage sub-orbital LV with passive guidance and no FTS.
- Launch azimuth 345T and approximately 150km downrange.
- The airspace is required to contain the LV and any other items returning to surface.
- Areas "A, B, C, D, E, G, H, L, M, N, AB, AD and AF" of the airspace are required.
- UK and Icelandic FIRs affected.



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Alt	Call Sign	Original Route	Re-route	Route #	Route #
1	AV1000	1176	1186	10	10
2	AV11	1207	1207	4	4
3	AV112	1218	1241	20	20
4	AV114	1272	1282	25	25
5	AV115	1284	1287	15	15
6	AV116	1276	1272	5	5
7	AV117	1288	1288	10	10
8	AV118	1289	1289	10	10
9	AV119	1284	1284	10	10
10	AV120	1276	1276	10	10
11	AV121	1278	1288	10	10
12	AV122	1285	1285	10	10
				Total Difference	+12km

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39

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Additional Assessment Criteria - Noise

- **Indirect Noise.** In the vicinity of the spaceport, indirect noise can be understood to be the noise resulting from the displacement of air traffic (below 7,000ft AMSL) as a result of the activation of the airspace design.
- **Indirect Noise Impact.** For the sample peak day and hour, (i.e. 13 Aug 19 and 1300-1400UTC), the data shows that there were no flights below FL280. Consequently, there was no indirect noise impact associated with re-routing air traffic below 7,000ft AMSL.
- When analysing the year's traffic data solely for aircraft operating below 7,000ft AMSL within the Design Option 3 volume, the most impacted day is the 2 Aug 19 with at most 6 low level aircraft throughout over the 24-hour period. When focussing on a single operating hour, at most only 2 aircraft are impacted and these were over the sea. Consequently, there was no indirect noise impact associated with re-routing air traffic below 7,000ft AMSL.
 - This data and associated analysis - inter alia - is outlined further within the ACP-2017-079 Full Options Appraisal document UK CAA's SaxaVord ACP portal.

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Additional Assessment Criteria - Noise

- **Direct Noise.** In the vicinity of the spaceport, direct noise can be understood to be the noise resulting from the LV's launch.
- **Direct Noise Impact.** The direct impact of noise due to vertical launch spaceflight activities at SaxaVord was assessed in the SaxaVord Spaceport Assessment of Environmental Effects (AEE) V2.1 dated 30 Sep 22. The public consultation for the AEE closed on 8 Dec 22.
- For stakeholders' information, modelled noise for a SaxaVord representative LV launch from Launch Pad 1 (LP1) is presented on the next 3 Slides. The representative LV is the noisiest LV that is anticipated to be launched from SaxaVord.
- Noise contours specific to individual LVs will be determined by the individual launch operator's LV data.
 - Further detail associated with noise and environmental impacts can be found in the Full Options Appraisal document on the CAA's SaxaVord ACP portal and at the locations offered at Slide 47.

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Typical A-weighted Levels of Common Sound

- 'Decibel' (abbreviated dB) is a logarithmic unit used to represent sound levels.
- Weighting levels and curves have been developed to correspond to the sensitivity and perception of the human ear to different types of sound. The A-weighted decibel level (dBA) is commonly used to assess community sound.
- By way of context, typical A-weighted levels of common sound audible to the human ear are offered in the figure to the right.



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Noise Assessment - Launch Context

- Most of the noise associated with a launch is created by the rocket plume interacting with the atmosphere and the combustion noise of the propellants. Although rocket noise radiates in all directions, it is highly directive, meaning that a significant portion of the source's acoustic power is concentrated in specific directions. In addition, the noise of a launch falls as the LV moves rapidly away.
- The highest A-weighted sound level measured during a single event is called the Maximum A-weighted Sound Level (abbreviated as LAmax).
- The next slide (Slide 45) shows the LAmax contours for a launch from LP1 (the closest LP to the local community). This shows the highest sound level that would occur at outdoor locations during a launch. The sound level experienced would vary with time.
- At the closest dwellings the sound level would peak approximately 30 seconds after launch and reduce to typical background levels after approximately 185 seconds. Further away from the LP the launch noise would reduce to background levels more quickly.

44

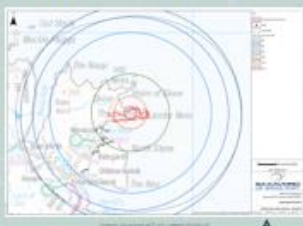
SaxaVord Spaceport LP1 Launch LAmax Noise Contours dBA



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SaxaVord Spaceport LP1 Launch LAmax Noise Contours dBA

- The diagram to the right is an extract from the SaxaVord AEE depicting LAmax one-second noise contours (to 85dB) for a representative LV from LP1 overlaid on an Ordnance Survey map.



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Further Reading - Noise & Other Assessments

Stakeholders may find further detail regarding noise and environmental assessments at the following locations:

- Assessment of Environmental Effects (AEE) (Chapter 8 Noise and Vibration): https://consultations.caa.co.uk/corporate-communications/public-consultation-appe-saxavord/supporting_documents/Volume%20of%20Volume%20of%20SaxaVord%20Spaceport%20AEE%20V2.1.pdf#page=23
- Environmental Impact Assessment (EIA) (Chapter 10 Noise and Vibration): https://ps.shetland.gov.uk/online-applications/files/1593190390060001020/7307448188A/pdf/2021_006_PRE-BIA_CHAPTER_10_NOISE%20745.pdf

47

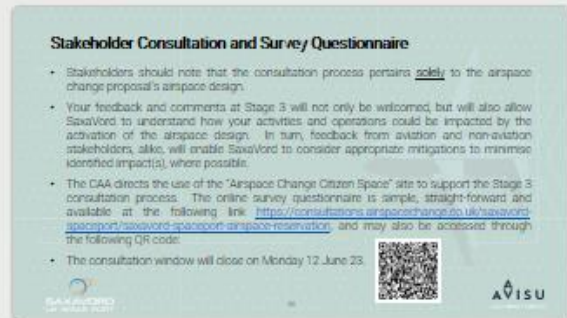
Further Reading - Other Assessments

Stakeholders are reminding that the AEE contains a wide range of assessments; these are abridged at Chapter 16, 'Summary of Environmental Effects' at the following link: https://consultations.caa.co.uk/corporate-communications/public-consultation-appe-saxavord/supporting_documents/Volume%20of%20Volume%20of%20SaxaVord%20Spaceport%20AEE%20V2.1.pdf#page=48

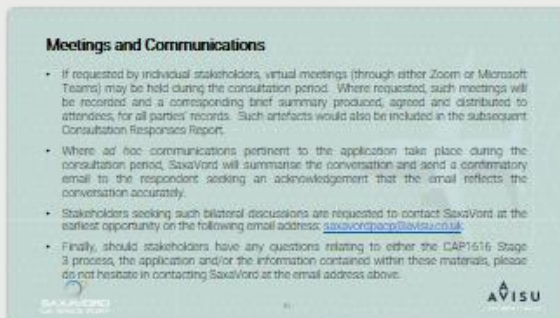
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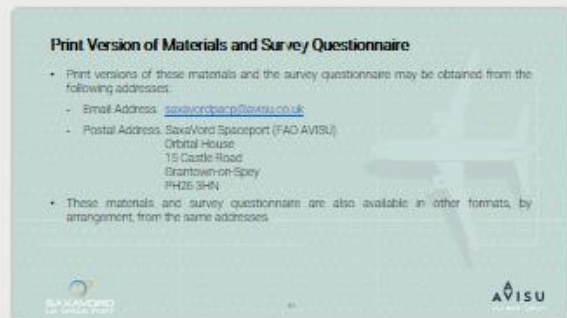
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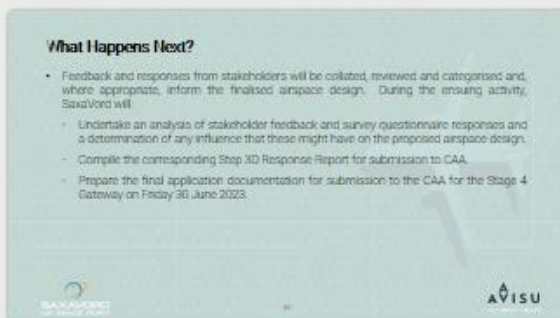
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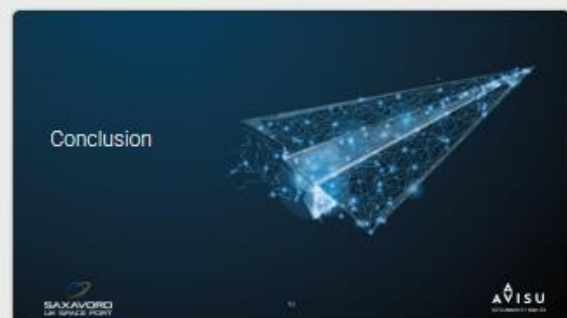
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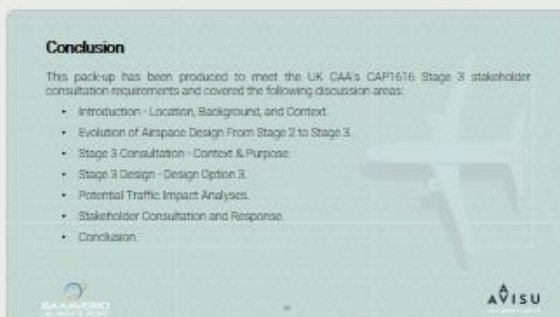
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Appendix 3 to
ACP-2017-079 Stage 3 Consultation Strategy
Dated 17 Apr 23

CITIZEN SPACE PLATFORM CONSULTATION SURVEY QUESTIONNAIRE



SaxaVord Spaceport Permanent Airspace Reservation

Overview

Shetland Space Centre Limited (trading and hereinafter referred to as "SaxaVord Spaceport" or "SaxaVord") seeks to conduct vertical launch operations for orbital and sub-orbital activities from SaxaVord Spaceport on Lamba Ness, Unst, Shetland Islands.

A suitable permanent airspace reservation of defined dimensions is required to ensure the safety of other airspace users from SaxaVord launch activities and to ensure the safety of SaxaVord launch activities from other airspace users. The proposed permanent airspace reservation would be activated for the minimum specified periods necessary to support nominated launch operations and would extend from surface (SFC) to unlimited (UNLTD).

SaxaVord Spaceport, therefore, seeks aviation and non-aviation stakeholders' feedback and comments to inform the finalisation of the airspace design to support the corresponding airspace reservation ACP application.

SaxaVord's application for this airspace change (ACP-2017-079) may be viewed on the UK Civil Aviation Authority's (CAA's) [ACP portal](#).

Closed 12 Jun 2023

Opened 18 Apr 2023

Contact

saxavordpacp@avisu.co.uk

Why your views matter

If the overall airspace change process is to function correctly, SaxaVord acknowledges that it is crucial that consultation is open, fair, transparent and effective. Similarly, stakeholders must also have confidence that the CAA is holding the change sponsor accountable, both for the way the sponsor acts on the responses it receives and for providing timely feedback on those responses.

The purpose of this consultation period is to provide all stakeholders with the opportunity to comment on the proposed permanent airspace design option.

What happens next

Feedback and responses from all stakeholders will be collated, reviewed and categorised and, where appropriate, inform the finalised airspace design. The finalised design will be submitted to CAA on 30 Jun 23.

Related

© [ACP-2017-079 ACP Portal](#)

© [SaxaVord Spaceport Assessment of Environmental Effects V2.1](#)

© [Shetland Islands Council \(2023\). "2021/005/PPF | Vertical launch space port including launch pad complex, satellite tracking station, assembly and integration hangar buildings, with associated security fencing, access, servicing and infrastructure | Land at Lamba Ness, Unst, Shetland"](#)

Page 1 of 3



Closes 12 Jun 2023

This service needs [cookies](#) enabled.

Introduction

1. What is your name?

(Required)

2. Are you responding as an individual, or do you represent an organisation?

(Required)

3. If you are responding on behalf of an organisation, what is the name of the organisation?

4. What is your email address?

(Required)

5. What is your/your organisation's postcode?

(Required)

6. If you are responding on behalf of an organisation what is your position/title?

7. SaxaVord seeks direct feedback from aviation and non-aviation stakeholders, alike. What best describes your association with this proposed permanent airspace change?

(Required)

- Aviation stakeholder
- Non-aviation stakeholder

8. To what extent do you agree that the proposed permanent airspace design provides a sufficient airspace volume to protect launch operations from other airspace users and vice versa?

(Required)

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

9. Please explain your response to Q8.

Please explain your response to Q8 in the text box below. *(Required)*

10. SaxaVord is keen to mitigate the impact of its operation on its stakeholders. What mitigations would you suggest that could ameliorate any concern(s) that you/your organisation might have?

11. Whilst Airspace Management (ASM) procedures and processes between SaxaVord and the relevant parties continued to be discussed and developed, what feedback, if any, do you have on ASM procedures for the application?

12. Whilst letters of agreement (LOAs) and memoranda of understanding (MOUs) between SaxaVord and the relevant parties continued to be discussed and developed, what feedback, if any, do you have on LOAs and MOUs for the application?

13. What feedback, if any, do you have on the operating principles of the proposed permanent airspace reservation?

14. What additional general considerations might you/your organisation like SaxaVord to consider in relation to this permanent airspace change proposal?

15. In general terms, to what extent do you/does your organisation support the proposed permanent airspace design?

(Required)

- Strongly Support.
- Support.
- Neutral.
- Object.
- Strongly Object.

16. Please explain your response to Q15.

(Required)

17. In accordance with CAP1616, consultation responses will be published on Citizen Space via the CAA Airspace Change Portal. Responses will be subject to moderation by the CAA. Please indicate below if you would prefer your response to be published anonymously (personal details will only be seen by the CAA).

(Required)

- Publish Response.
- Publish Response Anonymously.

Save and come back later...

Continue >

Page 2 of 3



Closes 12 Jun 2023

Almost done...

You are about to submit your response. By clicking 'Submit Response' you give us permission to analyse and include your response in our results. After you click Submit, you will no longer be able to go back and change any of your answers.

If you provide an email address you will be sent a receipt and a link to a PDF copy of your response.

Email address

< Back

<< First

Submit Response

Page 3 of 3



Closes 12 Jun 2023

Your response has been submitted

Your response ID is XXXX-XXXX-XXXX-X. Please have this ID available if you need to contact us about your response.

A receipt for your response has been emailed to you from the address consultations.airspacechange@mail1.citizenspace.com with the subject "Response received - Response ID: XXXX-XXXX-XXXX-X". If it doesn't appear in your inbox within a couple of minutes, please check your "spam" or "junk" folder.

Thank you very much for your response.

SaxaVord Spaceport

