QINETIQ GENERAL





ACP-2021-12

Enabling Sounding Rocket Launch from Spaceport - 1

Stage 3 – CONSULT CONSULTATION RESPONSE VERSION 2

23 July 2024

144 pages

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Administration Page

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1. Introduction

1.1 Background

1.1.1 The report is compiled as part of the Airspace Change Proposal (ACP) process prescribed in Civil Aviation Publication (CAP) 1616 edition 4¹ for a permanent airspace change. ACP-2021-12 was commenced in order to establish segregated airspace to facilitate sub-orbital rocket launch from the Spaceport 1 (SP-1) launch site on the Outer Hebrides as shown in Figure 1, by mid-2025. This ACP is for a small additional fillet of segregated airspace over the Spaceport-1 launch site, the size of which has little consequence on other stakeholders. However, it is recognised the establishment of this airspace will provide connectivity to the existing Ministry of Defence (MOD) Hebrides Range D701 Danger Areas and it is the activation of these areas for commercial rocket launch that has the greatest impact. The Sponsor has acknowledged this from the start of the ACP process and has included the activation of D701 in the engagement and consultation processes.

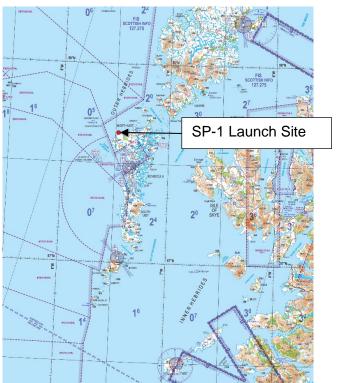


Figure 1: SP-1 Launch site location depicted on CAA 1:500000 chart

1.1.2 The aim of this document is to provide evidence that the Airspace Change Sponsor (QinetiQ Ltd) has adhered to the guidelines laid down in CAP 1616. The document demonstrates that:

¹ The CAA have directed that ACP-2021-12 shall follow the provisions prescribed in edition 4 until commencement of Stage 4 of the ACP process where edition 5 must then be followed. This report is the concluding part of Stage 3.



- the Sponsor provided sufficient materials (documentation) and commentary whilst consulting a wide stakeholder group, including non-aviation stakeholders, seldom heard groups and other interested parties; all were requested to provide feedback on the ACP ('we asked');
- the Sponsor collated and categorised responses and listened to stakeholder feedback identifying key themes ('you said'); and,
- the Sponsor took action to update the proposal as appropriate following consultation, ('we did').

1.1.3 The main aim of the consultation was to ensure anyone likely to be affected by the airspace change and associated use of existing segregated airspace structures (EG D701 Danger Areas), were consulted on the proposed airspace change to ascertain what if any impact the change would have on their operations. The objective was to gain feedback that would help inform the final airspace design and operating procedures.

1.1.4 A common set of Consultation materials were provided to enable all stakeholders, including non-aviation stakeholders, to understand the requirements for the airspace change, how the proposal had developed through the various stages of the ACP process and how it may impact on them. All materials were made available on the CAA Airspace Portal and Citizen Space platform; the latter contained a number of Frequently Asked Questions (FAQs), notes from the Public Drop in Event held on North Uist, and the online stakeholder feedback questionnaire. Supporting documents, including environmental and socioeconomic studies were made available to stakeholders via the Comhairle nan Eilean Siar (CnES)² website.

1.1.5 A single 'drop in' event was held on North Uist and flyers distributed to advertise the event as well as directing individuals to Citizen Space and the Airspace Portal. A local press and media campaign was also undertaken.

2. Consultation (We Asked)

2.1 Consultation Materials

- 2.1.1 The three main consultation documents were:
 - the 'Consultation Strategy' that included details on the scale of the consultation (which organisations and individuals will be contacted), the nature of the consultation (how we planned to perform the consultation); and, the timescale for consultation;
 - a single 'Consultation Document' that could be understood by stakeholders without technical aviation knowledge or experience; the document explained the ACP process and how the SP-1 airspace design had developed through the various stages. Furthermore, the document aimed to help stakeholders understand the impact the airspace change may have on them; and,

² Comhairle nan Eilean Siar (CnES) are the SP-1 Project Board lead authority.



 an 'Options Appraisal (Phase II-Full³), which described in more technical detail how the airspace change had evolved from the initial statement of need, design principles and initial options appraisal. This document provided the information on potential environmental impacts both direct and indirect as well as monetising them where appropriate. Moreover, the document contained information on the preferred airspace solution and associated safety assessment process used in the airspace design.

2.1.2 Other consultation materials included the production and distribution of 'flyers' to both advertise the 'drop in' event and how to provide feedback through the Citizen Space platform or Airspace Portal.

2.1.3 A limited number of hard copies of the three consultation documents were made available at the CnES Council Offices and at the 'drop in' event, as well as being available to stakeholders on request.

2.1.4 One request for hard copies of all three documents was received on the 22nd March and these were subsequently dispatched a few days later.

2.2 Consultation Approach

2.2.1 The consultation period ran for nine and a half weeks commencing 20th March 2024 and concluding on the 24th May 2024. Due to the relatively small size of the actual airspace change and limited number of affected stakeholders, it was considered proportional to reduce the consultation period from the 'normal'⁴ 12 weeks to 8 weeks however this was extended by a week and a half to account for the Easter holidays.

2.2.2 In creating a comprehensive list of stakeholders the Sponsor considered all stakeholders previously engaged in Stage 1 and 2 of the ACP process, this included all members of the National Air Traffic Management Advisory Committee (NATMAC), other aviation stakeholders and some local Additionally, other local community groups/interested parties, local authorities and aroups. environmental groups were contacted along with locally elected members of parliament plus additional representatives who may be impacted by the airspace change or have an interest in or be influenced by the SP-1 activity. It was recognised that there had been extensive consultation activities as part of the planning process for the launch site at Scolpaig and many of the stakeholders involved in the planning process were contacted again as part of the ACP process. However, this was considered important in order to target those 'seldom heard' groups as well as those not directly impacted (positively or negatively) by the airspace change but who nevertheless have an interest. In targeting certain groups the lead point of contact was identified with the expectation that the information was cascaded amongst the group such that everyone had the opportunity to digest the consultation material and provide feedback/questions as appropriate. The number of stakeholders contacted, by category, is detailed in Table 1 below. A full list of stakeholders contacted is contained at Appendix F.

³ Options Appraisal Phase I 'Initial', was completed under Stage 2 Step 2B of the ACP process; full details can be found at: <u>Airspace change proposal public view (caa.co.uk)</u>.

⁴ CAP 1616 specifies the normal consultation duration to be 12 weeks.



| Aviation Stakeholders | |
|--|----|
| NATMAC | 41 |
| Local Aviation Operators | 7 |
| Other Aviation Stakeholders | 4 |
| MOD | 2 |
| Airports | 3 |
| Air Navigation Service Providers (ANSPs) | 3 |
| Non-Aviation Stakeholders | |
| Authorities | 23 |
| Other Local Stakeholders | 6 |
| Members of Parliament (MPs) | 2 |
| Environmental Organisation | 5 |
| Stakeholder Total | 96 |
| | |
| Media Organisations Contacted | 30 |
| | |

Table 1: Stakeholder category and numbers contacted directly

2.2.3 The consultation 'launch email' contained a high level overview of the process, the purpose of the consultation and the necessary details on how to respond including links to the CAA airspace portal, Citizen Space platform and the Comhairle nan Eilean Siar (CnES) Council⁵ web-site for supporting documents.

2.2.4 To assist stakeholders in providing feedback the three main consultation documents detailed at 2.1.1 were uploaded to the Citizen Space platform on 20th March 2024 together with a list of FAQs and details of the public drop in event on North Uist. The consultation documents were similarly uploaded to the CAA airspace portal.

2.2.5 The single drop in event at Hosta Hall North Uist was held on 17th April 24. This event was facilitated by CnES SP-1 project board with a representative from QinetiQ, the latter providing the airspace and aviation safety Subject Matter Expertise (SMEs) while the former fielded any non-airspace related questions. These individuals were available to assist people with the feedback questionnaire and providing responses as well as being on hand to answer any questions relevant to the airspace change. A short Power Point Presentation was projected onto the wall of the small meeting room. A record was kept of key airspace related questions raised, these were summarised and published on the Citizen Space platform along with responses. The general consensus from the attendees was that they felt they had been kept well informed on the airspace change process and were comfortable that it was being handled correctly – there was general appreciation that the Sponsor had made the effort to travel to the Outer Hebrides and be available to answer questions and explain the process. The choice of location for the event was driven by local residents who had previously suggested Hosta Hall as an appropriate consultation venue given its proximity to the SP-1 launch site.

2.2.6 Commencement of the consultation process saw a total of 30 local press and media (TV and radio) agencies being notified of the ACP consultation process through a press release. The press release provided information on how the consultation documentation could be accessed electronically, where to obtain hard copies and how to provide feedback via the Citizen Space portal, emailing the Sponsor or sending written copies (for those unable to use electronic means) to the CnES Council

⁵ The Council are the lead for the SP-1 Project Board.



offices Benbecula. Furthermore, details of the Public Drop in Event at Hosta Hall on Wednesday 17th April were also promoted. The press release was reissued on 16th April and 22nd May (the latter removing details of the drop in event that occurred on 17th April), to act as a reminder to stakeholders to provide feedback. Evidence of the press release items and flyer are contained at Appendix D.

2.2.7 **Consultation Reassessment** – This was conducted at the end of week 6 of the consultation period. From the responses received on Citizen Space, it was evident that a broad cross section of stakeholders had been reached including both aviation and individual stakeholders, and a variety of different organisations. The press release had been picked up by one of the main local papers, the 'Am Paipears' that ran a detailed article on the SP-1 project and ACP including a copy of the flyer promoting feedback and the public drop in event. The success of the media campaign was further evidenced by the number of people (22) who attended the public drop in event (given the very sparse population of North Uist), and their feedback concerning how they had discovered the event (and ACP consultation process) through various media outlets.

| Date | Activity | Remarks |
|-----------------------|---|--|
| 20 Mar 24 | Commenced formal consultation | 9½ week period (covering Easter weekend) |
| 20 Mar 24 | Documents uploaded to Citizen Space | Consultation Strategy; Consultation Document & Options Appraisal Phase II (Full) |
| 20 Mar 24 | Emails Sent | Email contained an overview of the ACP process, consultation period and how to provide feedback, with links to Citizen Space and the ACC Airspace Portal. Distribution to all NATMAC members; previously identified aviation stakeholders; non-aviation stakeholders; local Councils; members of Parliament and other political organisations; and, environmental organisations. |
| 20 Mar 24 | Press release | Sent to media (30) |
| 20 Mar – 24 May 24 | FAQ updated on Citizen Space | |
| 21 Mar 24 | Sponsor sent email to all stakeholders | Additional non-aviation stakeholders identified and emailed accordingly with an overview of the ACP process, consultation timeline and how to provide feedback with links to Citizen Space and the Airspace Portal |
| 10 Apr 24 | Sponsor sent email reminder to stakeholders | All previous email addresses sent a reminder of the ACP consultation timeline and how to provide feedback |
| 16 Apr 24 | Council sent email reminder to media | All 30 media contacts sent a press release reminder that included details of the drop in event for the following day |
| 17 Apr 24 | Public Drop in Event | One day event held at Hosta Hall from 1300- 1930. Presentation provided, Question and Answer (Q&A) session and hard copies of Consultation Documentation made available |
| 7 May 24 | Progress Assessment | Evaluation of responses |

2.2.8 **Consultation Activities** – The main consultation activities are detailed in Table 2 below.



| 8 May 24 | Public Drop in Event Q&A | Public Drop in Event Q&A uploaded to Citizen Space together with power point presentation |
|----------------|--|--|
| 8 May 24 | Sponsor sent second email reminder to all stakeholders | All previous email addresses sent a reminder of the ACP consultation, closing date and how to provide feedback |
| 22 May 24 | Council sent email reminder to media | All 30 media contacts sent a press release reminder that consultation would end on 24 May 24 |
| 24 May 24 | Consultation ends | 33 responses collated and categorised |
| 20 Mar – 9 Jul | Sponsor sends email response | Sponsor responds to Stakeholders whom |
| 24 | to feedback received | provided any detailed feedback where appropriate |

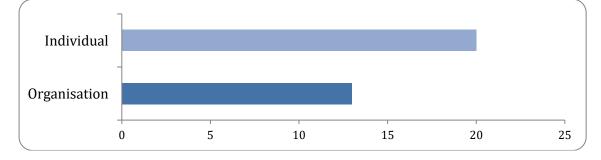
Table 2: Consultation activity

3. Summary of Consultation Responses (You Said)

3.1 Feedback from Questionnaire on Citizen Space

3.1.1 There were a total of 33 completed questionnaires on Citizen Space; it should be noted that one individual did respond twice using a slightly different title but retaining the same feedback information/statements (Unique ID 1021977268 & 779096160). Furthermore, Highlands and Islands Airports Limited (HIAL) also responded twice, firstly from SATCO Benbecula Airport, and secondly from HIAL 'ATM Professional Support/ACP Authority'; both responses were identical (Unique IDs 609581498 and 720073399). It is determined therefore, that a total of 31 different responses were received. Moreover, the Icelandic ANSP Isavia, response was evidently in response to the SaxaVord consultation and not SP-1 as the airspace areas detailed in their response were well outside the Area of Interest (AOI) for SP-1 (but very relevant to SaxaVord). Isavia did not update their response despite being contacted by the Sponsor to point out their error. It is worth noting that, during Stage 2 of the ACP process, Isavia did state⁶ that: "The area doesn't affect the Reykjavik FIR/CTA so we feel that we shouldn't have an opinion on the option to choose". Full details of the feedback received and the Sponsor's response and categorisation is contained at Appendix B.

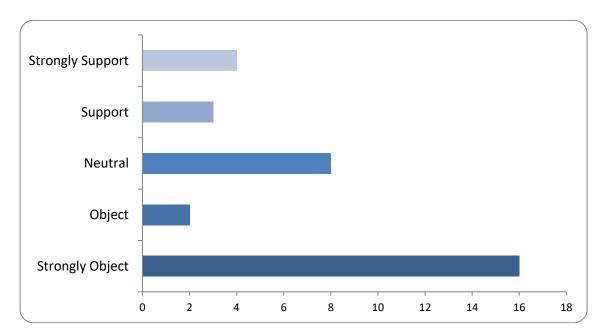
3.1.2 From the 33 completed questionnaires 20 were from individuals and 13 from organisations. An overview of the feedback received is contained in Table 3 with a full summary report at Appendix A.



⁶ As evidenced at Appendix C.



| Option | Total | Percent |
|--------------|-------|---------|
| Individual | 20 | 60.61% |
| Organisation | 13 | 39.39% |
| Not Answered | 0 | 0.00% |



| Option | Total | Percent |
|------------------|-------|---------|
| Strongly Support | 4 | 12.12% |
| Support | 3 | 9.09% |
| Neutral | 8 | 24.24% |
| Object | 2 | 6.06% |
| Strongly Object | 16 | 48.48% |
| Not Answered | 0 | 0.00% |

Table 3: Summary of Citizen Space Questionnaire Feedback

3.1.3 As determined in paragraph 3.1.1 above, there were two duplicates from the 33 responses received therefore the actual total number of different responses was 31. There were 12 different responses from 'organisations'; one 'strongly supported'; one 'supported'; seven were neutral; one 'objected'; and, two 'strongly objected' to the airspace change. The 'strongly objected' feedback was the Fisherman's federation who voiced concern about the risk to fishermen and marine pollution (but not specifically airspace related), and the chair of 'Scottish Rural Action' whose concern was based on the risk to indigenous cultural practice and further militarisation of the Outer Hebrides; again this respondent did not offer any suggested changes to the proposed airspace design. The 'objection' was

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from 'Spacewatch UK' where the concern was focused on the environmental impact, militarisation of space, validity of the Environmental Impact Assessment (EIA) and, orbital operations and associated space debris (despite the ACP only covering sub-orbital launches); there were no concerns directly related to the proposed airspace design.

3.1.4 From the 19 'individuals' who responded, over 73% objected to the airspace change. The majority of those objecting were residents from the North Uist community who strongly oppose the development of a Spaceport at Scolpaig. They voiced concerns primarily based on the potential environmental impact, the safety of local people, perceived further militarisation of the islands and disturbing the regional equilibrium. These objections also included criticism of the planning process undertaken, the EIA, Supplementary Environmental Information (SEI) and socioeconomic reports. However, these objections did not provide any constructive feedback on the proposed airspace design or suggest any changes to the airspace. The remaining respondents (those who supported the airspace change or were neutral) similarly did not offer any feedback that would suggest the proposed airspace design (Option 3) should be altered or that a different Option should be taken forward.

3.2 Other Feedback

3.2.1 The Sponsor received three 'no comment' emails from different organisations which declined to complete the questionnaire. No hard copy responses or formal responses via email were received. It is therefore determined that all feedback is contained in the Citizen Space questionnaire as detailed above at paragraph 3.1 and at Appendix 6.B.

3.3 Common Themes

3.3.1 **Safety** – The main objectors had safety concerns regarding local populous living in the vicinity of the launch site, the proximity of the main (and only) road to the North of the Island as well as access to the area during launch preparations and launch windows. Several of those objecting referenced Federal Aviation Authority (FAA) documents regarding ground safety distances and suggested that the launch site at Scolpaig would exceed those distances detailed. No concerns were raised regarding aviation safety or size of the proposed airspace.

3.3.2 **Environmental** – A strong theme amongst those who objected to the airspace change was the perceived environmental impact that rocket launch would have on the local area as well as the potential increase in Carbon Dioxide (CO_2) emissions caused by any rerouting of transatlantic air traffic. The main environmental concerns centre on disturbance of the local wildlife, in particular rare birds, and aquatic creatures where the rocket launch results in marine deposits of material or harmful chemicals. Several feedback comments challenged the EIA and SEI, claiming that there had been insufficient consultation regarding the development of these documents, their findings and proposed mitigations. The CO_2 emissions stated in the EIA were also challenged as they did not include the impact on the North Atlantic (NAT) air traffic flow as revealed during the ACP process and detailed in the consultation documentation.

3.3.3 **Disruption to North Atlantic air traffic** – The increase in CO₂ emissions caused by rerouting NAT traffic was a concern of several respondents and was the main focus for NATS (the ANSP most affected by the airspace change). NATS consider any increase in use of D701 as a further impact on the NAT air traffic flow and UK Air Traffic Control (ATC) network.

3.3.4 NATS also raised additional points including the question over prioritisation of spaceflight, resourcing the UK Airspace management Cell (AMC), impact on their 'environmental score' due to



rocket launches and the lack of a commercial space launch descriptor in the Aeronautical Information Publications (AIP), to name a few. Most of these issue are out with the gift of the Sponsor to rectify especially those actions targeting the CAA; full details of the NATS feedback and the Sponsor's responses can be found at Appendix B (Unique ID 115026295).

3.3.5 **Airspace Management and Letters of Agreement (LoA)** – Both NATS and HIAL emphasised the importance of careful coordination, communication and consideration of existing operations. It was identified that the correct airspace management agreements and LoAs will need to be in place before the airspace can be implemented.

3.4 Suggested 'alterations' to Improve the Airspace Change Proposal

3.4.1 At question 8 stakeholders were asked; *"If you support this proposal, please provide any alterations that would further improve it for you?"* There were 7 respondents who supported the proposed airspace change however, none of them provided any suggested changes to the proposed airspace design.

3.5 **Proposed Mitigations or Alterations to the Proposal**

3.5.1 At question 10; "While ensuring SP-1 has the necessary airspace to safely enable sub-orbital rocket launch the Sponsor is keen to minimise the impact on other airspace users. Can you suggest any mitigation or alterations that would resolve your oppositions whilst achieving this?" The Sponsor received very few suggestions regarding any additional mitigations other than the need for close coordination with Benbecula airport, consideration given to establishing a 'common maximum usage days' framework for D701, and launch timings to be carefully coordinated and deconflicted from peak traffic flows.

3.6 Other General Considerations

3.6.1 Question 11 invited stakeholders to consider; "any other general considerations that you would like the Sponsor to consider in relation to this airspace change proposal?" There were a number of requests for the Spaceport-1 project to be cancelled or moved to an alternate location away from the Outer Hebrides. Other common themes included the appropriate LoAs and other agreed processes and procedures to be developed with key stakeholders, namely MOD, NATS and HIAL.

Categorisation of Consultation Responses (We Did)

4.1 CAP 1616 Requirements

4.1.1 CAP 1616 stipulates that during Stage 3 Step 3D the change Sponsor categorises the consultation results into the following:

• **Responses which may impact the final proposal** – these are the responses that have the potential to impact the final airspace change submission and are divided into two further elements namely:



- Impacted A proposal from a stakeholder that would impact the management of airspace or alter the size, shape or construct of the final design that has not already been considered; and,
- Not Impacted A proposal from a stakeholder that would impact the management of airspace or alter the size, shape or construct of the final design that has already been considered, discounted or implemented at an earlier stage of this ACP
- **Responses that do not change the final airspace proposal** This category is for those responses that did not include new information or ideas that could lead to an adaptation in the airspace design option or a new design option.

4.2 Responses Which May Impact the Final Proposal

4.2.1 **Impacted** – There were no responses in this category.

4.2.2 **Not Impacted** - There was only one response placed in this category and this was from NATS with regard to several issues related to the additional activation of D701 to accommodate commercial rocket launch from SP-1:

- Prioritisation of Spaceflight "The CAA has yet to determine the prioritisation of Spaceflight. Therefore, any other activity which requires this airspace or adjacent airspace that impacts the availability to book this airspace will take precedence. When agreement is reached, the overall impact on the UK network will need to be considered when launch dates are agreed." The Sponsor recognises that this remains a key concern for ANSPs and Airline Operators (AOs) alike and will need to be appropriately addressed prior to approving rocket launch. However, this is known by the regulator (CAA) but is out with the gift of the Sponsor to resolve.
- UK AMC NATS & MOD Joint and Integrated Function "Without agreement from the MoD to fully and continuously support commercial use of Special Use Airspace (SUA), the AMC may not have the resource to manage the airspace on behalf of SP1. Furthermore, the commercial use of SUA is not catered for in the Joint and Integrated agreement, which underpins UK ASM policy. Without the appropriate governance and authority to segregate airspace for commercial use, the AMC will have to defer the decision for each request to the CAA." The Sponsor acknowledges that this issue which has previously been identified, remains an ongoing matter not just for SP-1 but all other Spaceports and 'New Entrants' who need access to airspace. The Sponsor stands by to collaborate on the development of the appropriate governance and authority to segregate airspace for commercial use but would argue that this has to be Government authority led.
- Tactical Airspace Management "Further refinement is needed in tactical management, as the traffic management assessment lacks consideration for additional time and separation buffers. Typically, this would extend activity by a minimum of 30 minutes and require a 30nm lateral expansion within Shanwick." The Sponsor is conscious that ANSPs apply time and lateral separation Buffers to any SUA. The impact analysis conducted by the Sponsor did consider the lateral separation criteria of 30nm around the D701 areas as detailed at paragraph 3.5.7 and Figure 22 (shaded red area outside the D701 areas) of the Options Appraisal Phase



II (full) report⁷. Time buffers were not considered as these tend to vary depending upon the size of the SUA restriction and it was considered that there were too many variables to accurately assess this. Notwithstanding, the Sponsor would be fully supportive in enabling any refinement of the tactical management of the airspace whether this were more precise launch windows or, a reduction in the time and/or lateral separation buffers applied by ANSPs which, in their current form, appear overly restrictive.

- Updating LoA and Impact on NATS 'Environmental Performance' Score "The Sponsor, NATS and the CAA will need to agree on an update to the D701 LoA as to how the Airspace will be activated and deactivated. This may result in an increased (i.e. worse) 3Di (environmental performance) score, Oceanic Condition 11 KPIs and possible delays or regulations applied. NATS and the CAA will need to agree as to how these increased 3Di scores or attributable delays will be applied against the already agreed NERL performance targets." The Sponsor acknowledges that an update to the existing LoA is integral to the airspace management processes associated with SP-1 launches – the Sponsor is keen to work with NATS, CAA, MOD and AirNav Ireland to agree changes to the existing LoA. However, the Sponsor has no remit over NATS' performance targets and this is considered a matter wholly for the CAA.
- D701 UK AIP Entry for Rocket Launch "EG D701 is currently allocated in the UK AIP for use by "Target Towing / Unmanned Aircraft System (VLOS/BVLOS) / High Energy Manoeuvres / Ordnance, Munitions and Explosives / Para Dropping / Balloons / Electronic/Optical Hazards". Commercial space launch is not within the current permitted uses and will need to be added via an ACP before it can be used by Spaceport 1." It is recognised that there is no descriptor in the UK AIP for space/rocket launch therefore D701 cannot have such a descriptor where one does not exist. The Sponsor has highlighted this discrepancy to the CAA who have responded by suggesting that until such time there is a suitable descriptor for space/rocket launch in place then commercial space/rocket launch will be considered as 'Ordnance, Munitions and Explosives' (OME) as is the current practice for MOD sponsored rocket launches from the MOD Hebrides Range.
- Space Launch Descriptor UK AIP "Space launches are not listed as an activity type in ENR 1.1. The safety case for the size of associated FBZ for each Danger Area is based on the level of risk associated with each of these activities. The CAA would need to update the UK AIP and determine the appropriate FBZ required to mitigate any risk." As highlighted in the bullet above, this omission had already been flagged to the CAA whom it is believed are working on developing a suitable descriptor.

4.2.3 The issues highlighted above will be considered and appropriate actions taken as part of the final proposal at Stage 4B.

4.3 Responses That Do Not Change the Final Airspace Proposal

4.3.1 This category applies to all responses that do not have a relevance to the final airspace proposal either in terms of the airspace design or the airspace management procedures pertaining to the operation of the airspace or that of the existing D701 Danger Areas. There were 30 responses in this category. Where feedback comments have been received, the airspace change Sponsor will

⁷ Available at: <u>Airspace change proposal public view (caa.co.uk)</u>



provide a response thereby ensuring all comments received have been appropriately considered. Any feedback response that did not provide comments, regardless of whether they support the ACP or not, also fall into this category.

4.3.2 While categorising the responses the Sponsor conducted a qualitative assessment using the approach 'we asked, you said, we did'. We considered each response in turn to ascertain whether it impacted or suggested any refinement to the airspace design; full details of each response to the ACP questionnaire can be found at Appendix 6.B together with the Sponsor's remarks and categorisation justification. As detailed at 3.3 above the most common themes included:

- Safety Although the safety of aviation was not raised as a concern by respondents, there were many comments relating to the safety of individuals on the ground and operating on the water in the vicinity of the launch site. Several respondents focused on FAA safety guidelines and safety distances and suggested that the SP-1 launch site, given its proximity to the main road and some dwellings/public access areas, would be unable to comply. The Sponsor would suggest that the FAA and CAA approach to safety distances is different. The UK regulator does not currently specify blanket distances, preferring instead to licence launches and locations on the basis of the data of each bespoke Launch Vehicle (LV) and propellant composition data. This is considered a more accurate approach given the need to scrutinise every launch. If the LV provider cannot adequately demonstrate that their LV (in a worst-case catastrophic failure event), will be contained within this ground (and sea) and airspace safety areas, then they will not receive an approval or licence to operate from the Spaceport-1 launch site.
- SUA and Ground Safety Footprint With regard to safety of persons on the ground beneath • the proposed new SUA, the Sponsor would reiterate that⁸: "the process to determine the size of airspace necessary to ensure no additional risk to other airspace users is different to that regarding the 'land safety footprint' and risk to 3rd parties on the ground, and to the process used to establish the risk to maritime 3rd parties. The airspace safety requirements consider a large aircraft with a high number of passengers travelling at high speed therefore, to reach an acceptable level of risk, the segregated airspace area has to be significantly bigger than the land or sea space safety areas. The airspace area therefore does not denote an area of risk to personnel on the ground; there are many UK Danger Areas over land that are there to safeguard aviation and do not indicate that a threat to personnel on the ground exists. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace users; the risk to 3rd parties on the ground is evaluated differently and restrictions/warnings are put in place accordingly. In effect, any additional risk caused by SP-1 activities to 3rd parties on the ground has to be contained well within the SP-1 site area." It should be further noted that the ground safety footprint (and that over the sea space) is not evaluated under the ACP process; this is addressed separately by the CAA through the Spaceport and Rocket/LV Operators licences and approvals. Here both the Spaceport operator and the rocket LV provider will need to satisfactorily demonstrate to the CAA that they have a robust safety case, safety management processes and evidence to show the operation is safe and risk to 3rd Parties on the ground or sea is tolerable and within the regulated safety margins - the CAA will only issue the respective licences/approvals when these strict safety criteria are met.

⁸ Extract from Options Appraisal Phase II (Full) available at: <u>Airspace change proposal public view</u> (caa.co.uk)



- Items Jettisoned into the Sea and Safety of Fishermen Regarding concern over items jettisoned into the sea; this will be covered by the Marine Management Organisation (MMO) who may decide the LV operator will need to obtain a marine licence prior to launch, this is a requirement detailed in the Space Industry Act 2018 and in supporting guidance documentation. The safety of anyone operating on the sea will fall under the 'Clear Range'' procedures for each launch. This is where those responsible for the launch will need to ensure that the LV or components thereof, poses no additional risk to those operating in the adjacent sea areas. These 'Clear Range' procedures will not be dissimilar to those successfully operated at the MOD Hebrides Range over many years. 'Clear Range' procedures will also be subject of scrutiny by the CAA Space Team.
- Environmental Many local respondents were concerned about the potential environmental impact rocket launch could have on individuals living close to the launch site and wildlife in the local area including marine wildlife. Concern was also raised that the EIA had not fully considered the CO₂ emissions associated with the potential rerouting of transatlantic aircraft around the D701 areas when active for rocket launch. The Sponsor would argue that at the time of the EIA development the airspace options were not known or understood as the ACP process followed the planning process and as such the EIA was based on the best and most up to date information available at the time. Furthermore, there are distinct licensing processes for spaceports, launch operators and range operators under the Space Industry Act (SIA) 2018. Safety and environmental impact are fundamental considerations in determining whether licences are granted and when assessing environmental impact. In summary, the EIA and ACP environmental assessments are just some of the building blocks, (with more to follow) needed to satisfy the regulatory processes before the first launch can occur.
- Consideration of Other Spaceports & Danger Areas One respondent questioned whether the impact of the activation of other adjacent Danger Areas, such as D712 or the Cape Wrath Air Weapons Range area had been considered. The Sponsor is fully cognisant with the potential impact the activation of several coincident SUAs can have on the UK's Air Traffic Management (ATM) network. For this reason the Sponsor is proposing to use the same airspace management arrangements that are in place for D701, for the SP-1 airspace and associated D701 activations – these existing arrangements take into account adjacent SUA activity. Moreover, separate agreements will need to be implemented for all 'New Entrant' airspace users with the appropriate protocols defined for all Spaceports (as highlighted by NATS (see para 4.2.2)).
- Use of D701 for Commercial Use One respondent raised the question regarding the use of D701 for commercial rocket launch, this point has also been raised by NATS in the past. The Sponsor has engaged at length with the MOD on this topic and the MOD are content for D701 to be utilised for commercial use under certain conditions/agreements. These conditions/agreements will be negotiated under the QinetiQ/MOD Long Term Partnering Agreement (LTPA) and contained in the appropriate LoA. It should be noted that commercial use of MOD sponsored Danger Areas is not unusual and the precedent has already been set at MOD Aberporth (D201).

⁹ Clear Range procedures are part of the overall safety processes adopted prior to and during the launch. Personnel conducting 'Clear Range' activities employ any number of resources and methods to ensure the Range safety area where a hazard may exist due to rocket launch, is clear of 3rd Parties.



- Liaison with the UK Space Operations Centre SpOC The requirement to liaise with the UK SpOC is well understood and is a mandatory requirement pertaining to the LV licence/approval to operate.
- **Benbecula Airport Operations** During Stage 2 of the ACP process it was acknowledged that the new additional 'fillet' of airspace is unlikely to have a negative impact on Benbecula Airport operations. The Sponsor recognises that the activation of certain D701 areas such as D701Y/C/E can impact on some types of approaches however, this is largely mitigated through the maintenance of established lines of communication between Benbecula Air Traffic Service (ATS) and Range Control and the ability to coordinate air traffic against Range activity. Further details can be found in the Options Appraisal Phase II (Full) at paragraph 3.9¹⁰. Furthermore, it is anticipated that the current arrangements for access to D701 as contained in the relevant LoA, will be mapped across for SP-1 use.
- **Militarisation of SP-1** Several responses raised concerns that SP-1 would be used by the military thereby expanding the military footprint on the Outer Hebrides. The SP-1 Project board confirmed that regardless of which company becomes the SP-1 operator, the Spaceport will remain a Commercial Spaceport.

5. Post Consultation Summary & Next Stage

5.1 Consultation Summary

5.1.1 The Change Sponsor advocates that the Consultation period was a success and met the objectives it aimed to achieve by reaching a broad range of stakeholders and enabling timely feedback on the airspace change proposal. Feedback was received from a diverse representation of stakeholder groups demonstrating that the media launch and public drop in event were a success with the consultation material providing the necessary information to enable all stakeholders to understand the process and why the airspace change is needed.

5.1.2 Despite nearly 55% of respondents objecting to the ACP, overall the majority of feedback comments were related to the perceived environmental impact of rocket launch and associated safety concerns; none of the objections were specifically airspace related. It is evident that most of those objecting to the airspace change are from the local community and strongly object to the Spaceport project in its entirety. Responses from aviation groups either supported, or were neutral towards the airspace change and most of the issues raised have already been addressed as part of the consultation material and ongoing engagement. However, several wider concerns were raised and although known to the Sponsor, they are largely out with the Sponsor's remit as they cover all 'New Entrants' access to airspace and necessitate governmental decisions and CAA/Department for Transport(Dft) input.

5.1.3 The following actions will be taken forward for further consideration in Stage 4 and the final proposal:

- Addressing the LoAs with NATS, HIAL and MOD
- Formalising use of D701 under the LTPA

¹⁰ Available at: <u>Airspace change proposal public view (caa.co.uk)</u>



Working collaboratively with ANSPs, UK AMC, MOD and CAA to establish airspace protocols

5.1.4 As a result of the Consultation feedback, the airspace change Sponsor has determined that the airspace design proposed at Stage 3 (Option 3), does not require refinement and no further Consultation on the airspace design is necessary.

5.2 Next Stage

5.2.1 The next Stage of the ACP process is Stage 4 'Update & Submit'; this is where the Sponsor completes the Final Options Appraisal that will take into account considerations at paragraph 4.2. The airspace change Sponsor will seek confirmation from the CAA as to whether another Consultation is required and that the appraisal has not fundamentally changed. Should this be the case, the ACP will progress to the last Step in Stage 4 and the final ACP will be submitted to the CAA for their process overview and assessment during Stage 5. It is during Stage 5 that the CAA will make their decision whether to approve the airspace change or not.



6. Glossary of Terms

| Acronym | Meaning | | |
|-----------------|--|--|--|
| ACP | Airspace Change Proposal | | |
| AIP | Aeronautical Information Publication | | |
| AMC | Airspace Management Cell | | |
| ANSP | Air Navigation Service Provider | | |
| AOI | Area Of Interest | | |
| ASM | Airspace Management | | |
| ATC | Air Traffic Control | | |
| ATS | Air Traffic Service | | |
| CAA | Civil Aviation Authority | | |
| CAP | Civil Aviation Publication | | |
| CnES | Comhairle nan Eilean Siar | | |
| CO ₂ | Carbon Dioxide | | |
| Dft | Department for transport | | |
| EG D | UK Segregated Airspace Designator and Danger Area | | |
| EIA | Environmental Impact Assessment | | |
| FAA | Federal Aviation Authority | | |
| FAQs | Frequently Asked Questions | | |
| FBZ | Flight planning Buffer Zone | | |
| HIAL | Highlands & Islands Airports Ltd | | |
| HIE | Highlands & Islands Enterprises | | |
| km | Kilometre | | |
| LoA | Letter of Agreement | | |
| LTPA | Long Term partnering Agreement | | |
| LV | Launch Vehicle | | |
| MMO | Marine Management Organisation | | |
| MOD | Ministry of Defence | | |
| NAT | North Átlantic | | |
| NATMAC | National Air Traffic Management Advisory Committee | | |
| NLB | Northern Lighthouse Board | | |
| NM | Nautical Mile | | |
| NOTAM | Notice To Aviation | | |
| OEPs | Oceanic Entry Points | | |
| OME | Other Munitions & Explosives | | |
| OWAs | Other Works Approvals | | |
| Q&A | Questions and Answers | | |
| RSPB | Royal Society for the Protection of Birds | | |
| SEI | Supplementary Environmental Instruction | | |
| SIA | Space Industry Act | | |
| SMEs | Subject Matter Experts | | |
| SUA | Special Use Airspace | | |
| SP-1 | Spaceport 1 | | |



A Appendix A – Citizen Space Consultation Summary Report

Spaceport-1 ACP Stage 3 Consultation

https://consultations.airspacechange.co.uk/qinetiq-ltd/spaceport-1-acp-stage-3-consultation

This report was created on Tuesday 11 June 2024 at 08:44 The activity ran from 20/03/2024 to 24/05/2024 Responses to this survey: $\mathbf{33}$

1: What is your name?

Name

There were 33 responses to this part of the question.

2: What is your email address? (by entering your email address you will receive an acknowledgement email)

Email

There were 33 responses to this part of the question.

3: What is your post code (most relevant to your response e.g. home / work / organisation etc)

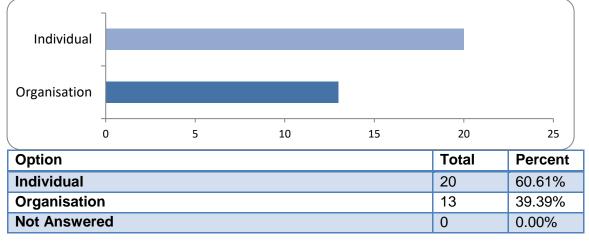
Post Code

There were 32 responses to this part of the question.

4: Are you responding as an individual or do you represent an organisation? (Please select one)

individual/organisation

There were 33 responses to this part of the question.





5: Name of organisation (if applicable)

Name of organisation (If required)

There were 18 responses to this part of the question.

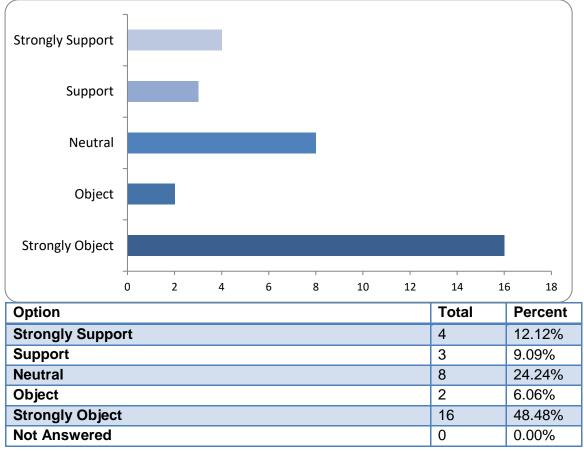
6: If you are responding on behalf of an organisation, what is your position/title?

What is your position or title

There were 21 responses to this part of the question.

7: Do you support the airspace change? Please range your response (Please select only one) Range your response to the airspace design

There were 33 responses to this part of the question.



8: If you support this proposal, please provide any alterations that would further improve it for you.

Please provide any alterations that would further improve it for you There were 11 responses to this part of the question.

9: If you oppose this proposal, please explain why



If you oppose this proposal, please explain why

There were 25 responses to this part of the question.

10: While ensuring SP-1 has the necessary airspace to safely enable sub-orbital rocket launch the Sponsor is keen to minimise the impact on other airspace users. Can you suggest any mitigation or alterations that would resolve your opposition whilst achieving this?

Can you suggest any mitigation or alterations that would resolve your opposition whilst achieving this?

There were 26 responses to this part of the question.

11: Are there any other general considerations that you would like the Sponsor to consider in relation to this airspace change proposal?

Are there any other general considerations that you would like the Sponsor to consider in relation to this airspace change proposal?

There were 22 responses to this part of the question.

12: In accordance with the UK Civil Aviation Authority's CAP 1616 airspace change process, consultation responses will be published on Citizen Space via the Airspace Change Portal. Responses will be subject to moderation by the Civil Aviation Authority (CAA). If you wish your response to be published anonymously your personal details (Name, Address & Position) will be redacted and only be seen by the CAA.

Consent Question

There were 33 responses to this part of the question.

| Yes - I want my response to be published with my details. No - I want my response to be published anonymously. | | | | | | | | | | | |
|---|-----|-------|------|------|-------|------|----|------|----|-----|-------|
| | 0 | 2 | 4 | 6 | 8 | 10 | 12 | 14 | 16 | 18 | 20 |
| Option | | | | | | | Тс | otal | | Pe | rcent |
| Yes - I want my response to be publ | ish | ed w | /ith | my c | leta | ils. | 14 | | | 42. | 42% |
| No - I want my response to be publis | she | ed an | ony | mοι | ısly. | | 19 |) | | 57. | 58% |
| Not Answered | | | | | | | 0 | | | 0.0 | 0% |



B Appendix B - Summary of Stakeholder Consultation Responses

B.1 Feedback Questionnaire

The questionnaire contained at Table 4 was made available on the Citizen Space platform in electronic format; in both the main consultation and consultation strategy documents and, as hard copies held at the Council offices on North Uist and at the public drop in event.

| Q1 | What is your name? (Required) | Q2 | What is your email address? (Required) | Q3 | Please enter your postcode (home / work / organisation / etc.) (Required) | | | | |
|-----|--|--------|---|--------|--|--|--|--|--|
| Q4 | Are you responding as an individual or do you represent an organisation? (Required) | Q5 | Name of organisation | Q6 | If you are responding on behalf of an organisation, what is your position/title? | | | | |
| Q7 | Do you support the proposed airspace change proposal? (Required) | | | | | | | | |
| Q8 | If you support this proposal, please | provid | de any alterations that would furt | her im | prove it for you | | | | |
| Q9 | If you oppose this proposal, please explain why | | | | | | | | |
| Q10 | While ensuring SP-1 has the necessary airspace to safely enable sub-orbital rocket launch the Sponsor is keen to minimise the impact on other airspace users. Can you suggest any mitigation or alterations that would resolve your oppositions whilst achieving this? | | | | | | | | |
| Q11 | Are there any other general considerations that you would like the Sponsor to consider in relation to this airspace change proposal? | | | | | | | | |
| Q12 | In accordance with the UK Civil Aviation Authority's CAP 1616 (Airspace Design), consultation responses will be published on Citizen Space via the Airspace Change Portal. Responses will be subject to moderation by the Civil Aviation Authority (CAA). If you wish your response to be published anonymously, please indicate below and your personal details (Name, Address & Position) will be redacted and only be seen by the CAA. (Please select only one) (Required) | | | | | | | | |

Table 4: Stakeholder Questionnaire

QINETIQ/UKD/EMEA/AS/TR240045

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B.2 Feedback Received and Sponsor Response

| Unique ID 267222459 | Q1 | | Q2 | | Q3 | | Q4 | Organisation | Q5 | British Helicopter Association | Q6 | CEO | Q7 | Strongly Support |
|------------------------|-------|--|--------|---------|--------------------|--------|----------|-----------------------------|---------|--|-------------------|----------------------------------|-------------------|-------------------------------------|
| Feedback | Q8 | Nil | | | | | | | | 1 | | | | • |
| Number | Q9 | NA | | | | | | | | | | | | |
| (FN) 1 | Q10 | You ha | ive ca | tered t | for eme | ergeno | cy helio | copter entry duri | ing act | ivation so the BHA is content | | | | |
| | Q11 | Nil | | | | | | | | | | | | |
| | Spons | sor Cate | gorisa | ation, | Asses | smen | t and | Response/Con | nment | S | | | | |
| | Resp | onse Mig and | | | Propose nission | ed Des | sign | Response Do Not Impact A | | Spon | sor Re | marks/Respons | e | |
| | | Impact | | | | mpact | | | | Categorisation: R | espon | se does not imp | act AC | Р |
| | | | | | | | | + | | Respondent strongly supports access to the airspace, as use be suitable for the new airspace | the AC d for E | CP and is conter G D701 MOD H | nt SAR lebride | requirements and s Range, will also |
| | | | | | | | | | | additional mitigations or chang deemed that this response doe | es to t | he proposed air | | |
| | | deemed that this response does not impact ACF. | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |

QINETIQ/UKD/EMEA/AS/TR240045

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| Unique ID 944890624 | Q1 | | Q2 | C | Q3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object | | | |
|------------------------|-------|-------|---|-----------|-------------|---------|-----------------------------|--------|---|------------------|------------------------------------|-----------|----------------------|--|--|--|
| | Q8 | Nil | | | | | | | | | | | | | | |
| FN 2 | Q9 | Lond | on in o | rder to b | be right ne | kt door | | I am n | and safety grounds. I live 6km fr ot convinced despite considera strophic failure. | | | | | | | |
| | Q10 | Nil | | | | 0 | | | | | | | | | | |
| | Q11 | | | | | | | | ⁻ carbon target, and war is in the km from where I live. | e air - | we have no crec | lible as | surances the | | | |
| | Spons | | or Categorisation, Assessment and Response/Comments | | | | | | | | | | | | | |
| | Resp | | | npact Pro | | esign | Response Do Not Impact A | | Spon | sor Re | marks/Respons | е | | | | |
| | | Impac | | | No Impac | ct | | | Categorisation: R | espon | se does not imp | act AC | P | | | |
| | | | | | | | + | | Respondent strongly objects to North Uist due to the proximity Q9 and Q11 are noted but a | , to the | eir home. The i | respon | dents' comments at | | | |
| | | | | | | | • | | proposed airspace design and | assoc | iated consultatio | n. | | | | |
| | | | | | | | | | The respondent makes referent explored in some detail during SEI document set available of contained in the Consultation I | the pla n the | nning process a Council website | nd cap | tured in the EIA and | | | |
| | | | | | | | | | The safety aspects of rocket la not pose a risk to those living licencing and/or approvals pro- | unch a close | nd assurances t to the launch s | ite, will | be captured in the | | | |
| | | | | | | | | | operator. The respondent of airspace design should chang ACP. | fers n | o actionable fe | edback | that suggests the | | | |



| Unique ID 608539646 | Q1 | | Q2 | | Q3 | | Q4 | Organisation | Q5 | MET Office | Q6 | Upper Air Observations | Q7 | Neutral |
|------------------------|-------|--------|--------------------|---------|-------|-------|--------|-----------------------------|-------|---|--------|---------------------------|---------|-------------------|
| | Q8 | Nil | | | | | | I | | | | | | |
| FN 3 | Q9 | Nil | | | | | | | | | | | | |
| | Q10 | Nil | | | | | | | | | | | | |
| | Q11 | | | | | | | | | om 6 locations in the UK. None vices derived from them. | of the | se are in the vici | nity of | the spaceport and |
| | Spons | sor Ca | tegoris | sation, | Asses | ssmer | nt and | Response/Con | nment | ts | | | | |
| | Resp | | vight In nd ACF | | | | sign | Response Do Not Impact A | | Spon | sor Re | marks/Respons | е | |
| | | Impa | ct | | No I | mpac | t | | | Categorisation: R | espon | se does not impa | act AC | Р |
| | | | | | | | | + | | Respondent is neutral as the p MET office radiosonds launche does not impact ACP. | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |

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| Unique ID 749185324 | Q1 | 0 | 22 | Q3 | | Q4 | Individual | Q5 | NATS | Q6 | Safety Assurance Manager | Q7 | Object | | |
|------------------------|-----------------|--|---|--|--|---------------|---|-------------------------------------|--|--|--|--|--|--|--|
| FN 4 | Q8 Q9 Q10 | include only aff may be My con flows. | s massi ect this reache cerns a This is p | ive re-route disruption ed. are to ensu particularly | es for c more. re we r import | How retain | ercial traffic durin ever that said th the necessary a hen the NAT tra | ng D7(rough access cks ar | rth Atlantic (Shanwick) I see h 01 activity. Therefore any addi proper negotiation and consul to airspace we currently have e northerly. The mitigation wo nically as small as safely possi | tional a tation a e, parti uld invo | activations of the and with the corr cularly around th blve tightening th | dange ect ass ne main e activ | er area complex can surance, agreement n east & west traffic ation times to avoid | | |
| | Q11 Spons | also he Nil | lp mitig | ate the dis | ruption | • | Response/Con | 0 1 | | | | | | | |
| | Resp | Response Might Impact Proposed Design and ACP Submission Response Does Not Impact ACP Sponsor Remarks/Response Impact No Impact Categorisation: Response does not impact ACP | | | | | | | | | | | | | |
| | | Impact | | INO I | mpact | | + | | The points raised by the respo acknowledged in detail within | ndent he AC | are widely under P documentatior | rstood n conta | by the Sponsor and ined in all Stages of | | |
| | | | | | | | | | | | | | | | |

Page B-5



| Unique ID 914225199 | Q1 | | Q2 | Q | 3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Support |
|------------------------|-------|--------|----------|-----------|----------|--------|--------------|-------|---|--------|---------------|------------|---------------------|
| | Q8 | Nil | | | | | | | | | | | |
| FN 5 | Q9 | Nil | | | | | | | | | | | |
| | Q10 | Nil | | | | | | | | | | | |
| | Q11 | Nil | | | | | | | | | | | |
| | Spons | sor Ca | tegorisa | ation, As | sessme | nt and | Response/Con | nment | ts | | | | |
| | Resp | | | | posed De | esign | Response Do | | Spons | sor Re | marks/Resp | onse | |
| | | | | Submiss | | | Not Impact A | CP | | | | | |
| | | Impac | ct | 1 | No Impac | ct 📃 | | _ | | | se does not i | | |
| | | | | | | | + | | The respondent strongly supp | | | | |
| | | | | | | | | | actionable feedback on the pro impact ACP. | posec | airspace de | sign. This | s response does not |
| | | | | | | | | | • | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
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| | | | | | | | | | | | | | |

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| Unique ID 983238351 | Q1 | Q2 | Q3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object | | |
|------------------------|--------------|---|---|---|---|--|---|-----------------------------|--|--------------------------------|---|--|--|
| | Q8 | Nil | | | | | • | | | | • | | |
| FN 6 | Q9 Q10 | I oppose this proposal on environmental and safety grounds. ENVIRONMENTAL: Based on the information in the Options Appraisal the CO ₂ emissions associated with Spaceport 1 are 50 times higher than stated in the approved planning application, which neglected the impact of rerouting high level air traffic. Annual CO ₂ emissions were originally stated as 14 tonnes, equivalent to 8 typical cars, or a 0.3% increase in the Western Isles' CO ₂ reduction targets. The figure now presented is 704.4 tonnes of CO ₂ , equivalent to over 400 cars, or a 15% increase in the Western Isles' reduction target. The environmental impact of Spaceport 1 is therefore significant, and directly at odds with CnES' published aims "to minimise the carbon footprint associated with our assets and services to work towards becoming a Carbon Neutral Comhairle and reduce our contribution to climate change as much as possible." The airspace impact of Spaceport 1 also appears to be much greater than that of the SaxaVord launch facility. In documents elsewhere on the ACP portal, airliner re-routing for SaxaVord is estimated to result in CO ₂ emissions of 341 tonnes/year, or less than half those at Spaceport 1. The SaxaVord figure furthermore corresponds to 30 high-value satellite launches, while the Spaceport 1 figure is based on 9 suborbital flights. When environmental impact is monetised Spaceport 1 looks like poor value. I have commented on the safety case below in Item 11. | | | | | | | | | | | |
| | Q11 Spons | PUBLIC SAFE proposal. FAA guided rocket, domestic prop the developer permitted on th | TY: The imp regulations f or 1.8km (1. erty, and the states the roa ne grounds o | lications o for suborb 0 nautical re are sev ad will rem f public sa | ital rocket launch mile) for an ungu eral houses withi nain open to traffi | iction les stij uided in 2.4 ic duri | immediately post-launch are n pulate a safety clearance radiu one. In contrast the Spaceport cm of the site; in addition the d ng launches. If FAA regulation | s of 2. 1 Iaun stance | 4km (8000ft) rou ch site is only 90 to the nearest p | ind the 00m fro oublic r | launch point of a om the nearest oad is 750m, yet | | |
| | Resp | onse Might Impa | act Proposed | Design | Response Do | es | Spor | sor Re | marks/Respons | ۵ | | | |
| | Resp | and ACP S | | Design | Not Impact AC | | Орог | 00110 | | 0 | | | |
| | | Impact | No Im | pact | | | Categorisation: R | espon | se does not imp | act AC | P | | |
| | | + Respondent strongly objects to the principle of a Spaceport being developed at North Uist and raises concern regarding CO ₂ emissions figures that are different | | | | | | | | | | | |

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| to those in the EIA. The Sponsor would argue that at the time of the EIA |
|---|
| development the airspace options were not known or understood as the ACP |
| process followed the planning process and as such the EIA was based on the |
| best and most up to date information available at the time. Furthermore, there |
| are distinct licensing processes for spaceports, launch operators and range |
| operators under the SIA. Safety and environmental impact are fundamental |
| considerations in determining whether licences are granted and when assessing |
| environmental impact. In summary, the EIA and ACP environmental |
| assessments are just some of the building blocks, (with more to follow) needed |
| to satisfy the regulatory processes before the first launch can occur. |
| With regard to the concern relating to safety distances, it should be noted that |
| the ground safety footprint is not part of the airspace change requirements so is |
| not evidenced in the airspace change consultation documentation. However, |
| safety distances will form part of the LV operator's licencing/approval and that of |
| the Spaceport. It is however worth noting that the FAA and CAA approach to |
| safety distances is different. The UK regulator does not currently specify blanket |
| distances, preferring instead to licence launches and locations on the basis of |
| the data of each bespoke LV and propellant composition data. This is |
| considered a more accurate approach given the need to scrutinise every launch. |
| If the launch vehicle provider cannot adequately demonstrate that their LV (in a |
| worst-case catastrophic failure event), be contained within this ground (and sea) |
| and airspace safety areas, then they will not be permitted or licenced to operate |
| from the Spaceport-1 launch site. This response makes no reference to the |
| airspace design, instead focussing on concerns relating to the location of a |
| Spaceport on North Uist, it is therefore considered that this response does not |
| impact ACP. |



| Unique ID 984759435 | Q1 | Q2 | | Q3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object | | |
|------------------------|--|--|---|---|---------------------------------|---|-----------------------------|--|---------|--------------------|--------|----------------------|--|--|
| | Q8 | Nil | | | | | | | | | | | | |
| FN 7 | Q9 My objections, are based on environmental grounds. I believe that this ill thought out proposal will destroy much of the special nature North Uist creating unnecessary traffic movement, road damage, pollution, noise and general disturbance. Considering the non orbital nat of the proposals there is no necessity for Scolpaig to be chosen as the most appropriate site. Proper, less damaging alternatives sho have been considered. The newly revealed CO₂ emissions associated with Spaceport 1 are 50 times higher than stated in the plann application that was approved by local Councillors and the Scottish Government. This indicates the true vision of the proposal. There I never been a proper business plan considering that the Council is the lead applicant. Why not? They used our money to purchase the so The damage to the wildlife is unacceptable and outrageous considering the so called policies that relevant parties exist around clim change, conservation and sustainability. The justification for additional jobs is highly speculative and very insubstantial. The weather the year alone would ensure that most launches take place in the busy summer months, ruining the tourist industry and creating havoc. Th can be no justification for such a poorly considered initiative. Q10 Clearly, the proposals affect other movements of aircraft to such an extent that all of the predicted consequences of launching sub orb rockets were nonsense. Q11 See Q9. There are serious safety considerations. Scolpaig is a favourite place for recreational use. The site is far too close to the island to the site of the predicted consequences of the island to the island to the place for recreational use. The site is far too close to the island to the place for recreational use. | | | | | | | | | | | | | |
| | Q11 | See Q9. Th only main r impassable special and | nere are oad an . There I unique | e serious sa d to nearby could easil e place for e | proper y be a t ever. Ple | ties. Rocket firin errible accident. ease consign the | gs, by The pr ese pro | any measurements are unpre- obability is that if this proposal oposals to where they belong, | dictabl | e. The site will b | e seal | ed off and the roads | | |
| | Spons | sor Categori | sation, | Assessme | ent and | Response/Con | nment | S | | | | | | |
| | Resp | onse Might li and AC | | | esign | Response Do Not Impact A | | Spon | sor Re | marks/Respons | e | | | |
| | | Impact | | No Impa | ct | | | Categorisation: R | espon | se does not imp | act AC | P | | |
| | | | | | | + | | The objections to the airspace process and associated enviro | | | | | | |



| rather than the airspace design. Concern is raised regarding environmental |
|--|
| impact on wildlife and potential impact on tourism in the area. These areas have |
| already been explored in some detail during the planning process and captured |
| in the EIA and SEI document set that are available on the Council web-site; |
| summaries of which are contained in the Consultation Documents. Furthermore, |
| tourism and job creation are contained within the Socioeconomic report also |
| available on the Council website and summarised in the Consultation Document. |
| Regarding the safety concerns of rocket operations, these do not appear to |
| include the airspace element, rather the ground/surface safety aspects. |
| Although not specifically part of the airspace change it should be noted that |
| safety will be an integral part of the Spaceport licence and the LV operator's |
| licence/approval; both of which must satisfy the civil regulator that their |
| respective operations are safe. |
| This response does not make any reference to the airspace design or change, |
| focussing instead on issues out with the ACP process such as the planning |
| process/consent, EIA/SEI and Socioeconomic report. Therefore it is determined |
| that this response does not impact the ACP. |



| Unique ID 495496083 | Q1 | Q2 | | Q3 | | Q4 | Organisation | Q5 | SaxaVord Spaceport | Q6 | Operations Director | Q7 | Neutral | | | |
|------------------------|-------|---------------|--------|---------|---------|---------|------------------|----------|---|---------|------------------------|----------|----------------------|--|--|--|
| | Q8 | Nil | | | | | | 1 | | | | | | | | |
| FN 8 | Q9 | Nil | | | | | | | | | | | | | | |
| | Q10 | Nil | | | | | | | | | | | | | | |
| | Q11 | A few questi | ons: | | | | | | | | | | | | | |
| | | 1. Is the use | of the | D701 | comple | ex in a | accordance with | its orig | ginal purpose? In October 2016 | the H | ebrides D701 P | ost Imp | elementation Review | | | |
| | | | | | | | | | to safely accommodate currer | | | is syste | ems tests within its | | | |
| | | | | | | | | | et operators allowed under this | | | | | | | |
| | | | | | | | | | Dispersion Areas of the rocket | | | | | | | |
| | | | | | | | | | r areas, eg D712 or the Cape V | Vrath / | Air weapons rar | nge are | a been considered? | | | |
| | | | | | | | of the suggested | | | hotwo | an than two AC | יר-חר | | | | |
| | Snone | | | | | | Response/Con | | ange, will there be any conflict | Derme | en inese two Ac | JPS? | | | | |
| | Shous | sor categoris | ation, | A2263 | Silleli | l anu | Response/Con | mem | .5 | | | | | | | |
| | Resp | onse Might Im | pact F | ropose | ed Des | ign | Response Do | bes | Spon | sor Re | marks/Respons | se | | | | |
| | | and ACP | Subm | nission | | | Not Impact A | CP | | | | | | | | |
| | | Impact | | No I | mpact | | | | | | se does not imp | | | | | |
| | | | | | | | + | | Regarding the use of D701; (| | | | | | | |
| | | | | | | | | | matter and they are satisfied t | | | | | | | |
| | | | | | | | | | spaceport operations where the | | | | | | | |
| | | | | | | | | | other activities. The use of a pre-existing airspace structure with tried and tester airspace management processes and procedures and familiarity by Range and | | | | | | | |
| | | | | | | | | | ANSP staffs alike, is consider | | | | | | | |
| | | | | | | | | | comparison to a new independ | | | | | | | |
| | | | | | | | | | be found in the Options Apprai | | | | | | | |
| | | | | | | | | | D701 will be contained in the | | | | | | | |
| | | | | | | | | | stakeholders. It should be | | | | | | | |
| | | | | | | | | | conducted in other MOD Dang | | | | | | | |
| | | | | | | | | | It is confirmed that the propo | | | | | | | |
| | | | | | | | | | Impact Dispersion Areas of the | | | | | | | |
| | | | | | | | | | With regard to consideration of | | | | | | | |
| | | | | | | | | | Danger Areas, e.g. D712 or the | Cape | wrath Air weap | ons rar | ige area, these have | | | |

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| been considered. SP-1 are cognisant of adjacent Danger Areas and the impact |
|--|
| coincident activation could potentially have on the ATM network, for this reason |
| we are keen to use the existing airspace procedures and protocols for D701 as |
| they already have deconfliction considerations defined. |
| With regard to Spacehub Sutherland, we do not envisage any direct conflict |
| between these two ACPs as the airspace requirements, to the best of our |
| knowledge, do not overlap. As with all airspace activity, including SaxaVord, |
| Spaceport, operators will need to have a clear set of airspace protocols for the |
| region defined and agreed by all parties – it is suggested that these protocols |
| will need to be decided at governmental level. |
| As there is no actionable feedback on the airspace design it is considered that |
| this response does not impact on the ACP. |



| Unique ID 319129839 | Q1 | Q2 | Q3 | Q4 | Individual | Q5 | CoDeL, Uist Beo, Chair of Scottish Rural Action | Q6 | Chair Director | Q7 | Strongly Object |
|------------------------|---------------------------|---|---|---|--|--|--|--|---|---|--|
| | Q8 | Nil | | | | | | | | 1 | |
| FN 9 | Q9 Q10 Q11 Spons | world's biodive The Gaels an islands underr Community, w every week. W etc. Uist is one same people of Gaza. Uist of contributing to I do not want I have already | ersity which is d their stewa mines that wh ho without ex /e are Not sho e of 6 designa who went on t does not need a more circu war machiner outlined ther | s left, it is n rdship of ich is mos ception ar ort of jobs. ation popu the peace this. If yo lar econol y in my co n | managed by 6% the land are the st precious. Furth e against any mo We cannot fill th lation zones, wh March and the le ou have the econo- my and import su | of the close nermo ore mil e recru ere we eaflets omic u ubstitu | | ndigen ural pr ine pla s anyth PS, tea young lood sp | ous peoples- se actice. The incr tform delivered hing from 30 to 5 achers, social ca er demographic olat because of | e OEC easing by you o jobs re, aqu to live our role | D. militarisation of the ng adults in the Uist across every sector, a culture, hospitality and work here. The in the killings fields |
| | Resp | onse Might Imp | | Design | Response Do | | Spon | sor Re | marks/Respons | e | |
| | | and ACP S | No Imp | nact | Not Impact A | | Categorisation: R | 00000 | se does not imp | | D |
| | | Impact | | paci | + | | Respondent strongly objects to North Uist and is concerned a would argue that SP-1 will be | the p about 1 | rinciple of a Spa militarisation of | aceport the isla | being developed at ands. The Sponsor |
| | | | | | | | company/business manages the stated that this will be a wholly The other points raised are options presented or the prefe- to the airspace change is focu- of the respondent. Therefor impact the ACP. | ne site comm not sp rred fir sed on | The SP-1 Pro nercial operation ecifically releva nal airspace des wider socioecc | ject Boa int to the ign solution onomic | ard have repeatedly he airspace design ution. The objection issues and opinions |



| Unique ID 1059437383 | Q1 | | Q2 | | Q3 | | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Support |
|-------------------------|-------|--------|-----------|---------|---------|-------|--------|--------------|-------|-------------------------------|---------|-----------------|----------|--------------------|
| | Q8 | Nil | | | | | | | | | | | | |
| FN 10 | Q9 | Nil | | | | | | | | | | | | |
| | Q10 | Nil | | | | | | | | | | | | |
| | Q11 | Nil | | | | | | | | | | | | |
| | Spons | or Ca | tegoris | sation, | Asses | ssmer | nt and | Response/Con | nment | S | | | | |
| | Resp | onse N | /light Ir | npact F | Propos | ed De | sign | Response Do | bes | Spor | isor Re | marks/Respons | е | |
| | | a | nd ACF | Subr | nission | l | | Not Impact A | CP | | | | | |
| | | Impac | ct | | No | Impac | t | | | Categorisation: F | lespon | se does not imp | act AC | Р |
| | | | | | | | | + | | Respondent strongly supports | | | | |
| | | | | | | | | | | feedback that suggests any ch | | should be made | e to the | airspace proposal. |
| | | | | | | | | | | This response does not impac | t ACP. | | | |

| Unique ID 134434350 | Q1 | | Q2 | | Q3 | | Q4 | Individual | Q5 | Sollas Beach Fly-in Group | Q6 | Organiser of the annual Sollas Beach Fly in | Q7 | Support |
|------------------------|-------|---------|----------|---------|---------|-------|--------|------------|--------|--|----------|--|--------|---------|
| | Q8 | Nil | | | | | | | | | | | | |
| FN 11 | Q9 | Nil | | | | | | | | | | | | |
| | Q10 | None | | | | | | | | | | | | |
| | Q11 | No | | | | | | | | | | | | |
| | Spons | sor Cat | egoris | sation, | Asses | ssmer | nt and | Response/C | omment | S | | | | |
| | Resp | onse N | light Ir | npact F | Propos | ed De | sign | Response | Does | Spo | onsor Re | emarks/Respons | е | |
| | | ar | nd ACF | Subn | nission | | - | Not Impact | ACP | | | | | |
| | | Impac | t | | No I | Impac | t | | | Categorisation: | Respon | se does not imp | act AC | Р |
| | | | | | | | | + | | Respondent supports the airs suggests any changes shoul response does not impact A | d be ma | | | |

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| Unique ID 720073399 & 609581498 | Q1 | Q2 | Q3 | Q4 | Organisation | Q5 | HIAL | Q6 | SATCO & ATM Professional Support/ACP Authority | Q7 | Support | | | |
|---|-----|--|---|--|--|------------------|-----------------------------------|-----------|--|--|----------------|--|--|--|
| FN 12 FN 13 | Q8 | continue to be The proposed impacted by a If the new segu | available to coo segregated airs ctivity in those a | ordinate pace b reas as e was e | e air traffic agains orders D701Y/C s well as D701A. | st Ran /E anc | the rarely activated D704. Mu | ultiple I | nstrument Appro | bach P | rocedures | | | |
| | Q9 | NA | | | | | | | | | | | | |
| | Q10 | Not opposed. Airport. | Good communi | cation | and coordination | is ess | sential for the safe operation of | air trat | fic at and in the | vicinity | y of Benbecula | | | |
| | Q11 | Nil | | | | | | | | | | | | |
| | • | onse Might Impa and ACP S | act Proposed De | | Response/Com Response Do Not Impact A0 | es | nts Sponsor Remarks/Response | | | | | | | |
| | | Impact | No Impa | ct | | | Categorisation: R | espons | se does not impa | act AC | P | | | |
| | | | | | + | | | HAAL | ATM Profession | does not impact ACP ses exactly the same, one from SATCO TM Professional Support/ACP Authority'; ombined. | | | | |
| It is acknowledged in the ACP documentation that activation of certa areas can potentially impact on certain approaches to Benbecul however, this impact is greatly reduced and mitigated through procedures and agreements between MoD Hebrides Range and HI intention is to use these extant procedures for SP-1 use of D701 in ex same manner. As the feedback does not contain any suggestions to change the design it is considered that this response does not impact the ACP. | | | | | | | | | | | | | | |

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| Unique ID 276355460 | Q1 | Q2 | Q3 | Q4 | Organisation | Q5 | Isavia ANS | Q6 | Manager ATS Procedures | Q7 | Neutral |
|------------------------|-----|---|--|---|---|---|--|--|---|---|--|
| | Q8 | Nil | | | | | | | | | |
| FN 14 | Q9 | Nil | | | | | | | | | |
| | Q10 | Nuuk (BGC The area i percentage impact 76 to fly south all cases, f increase in route. The levels align Another ite aircraft on October, a Financial I For an ave 49.500 GE | GL) and Reykj mpacted withi e of aircraft er flights, and ow of the launch this would men flight time an e impact on income with current er of consider a busy day. H re among the mplications: R age day in Ju SP for 3 days) ustry that has ally more sign ndations: Isav | avik (BIRD n BIRD FIF itering the i rer 230 fligh n position a an a reduct d fuel burn creased wo projections ration is that lowever, the busiest mo egarding the uly, estimated depending suffered tree ificant to out |) flight information the is one of the most impacted area is 1 hts over a 3-day p and to enter Reykja ion in revenues for and greenhouse rkload for air traff the traffic volum his number could h onths of the year v the financial part, I ed financial impact on airlines decision emendous financial ar operations. As | a region st frequ 6% of eriod. 1 avik CT or Isavia gas en ic contri e depe be a gr vith reg savia A ct on th ons on al losse a resul | n Service Provider for the Re- ns (FIR) and the impacted are rently used air traffic gateway all total traffic flying within BI These aircraft would have to A later or not at all, thereby, a ANS, increased workload for hissions for those airlines need ollers and safety must be as nds on forecasted high level eat deal higher with favourab ard to traffic. | ea. Effect vs into the RD FIR. reroute of flying scoor those eding to sessed a winds le winds ed using h 4,000 eir fleet. ic, there ern to us | cts on operations ne Reykjavik CT/ On an average either north of th outh of Shetland FIR's taking on operate on a lor and could be cor These numbers a s. The time perio g flown kilometre GBP – 16.000 G efore, any negati s and viewed wit | s/traffic A. The day it o e impa and inf the ext and in ext ger an are, on d in qu s within BP (12 ve fina h the u | : estimated can be expected to cted area or decide o another FIR. In ra traffic and an d less optimum ble should traffic average, over 400 estion, August to n Reykjavik CTA. 2,000 GBP – ncial impact will be ttmost severity. |
| | GII | Within the upper fligh | impacted area t level of 8500 |) feet. This | | d to se | alled the North Sea Area wit rve helicopters travelling to a be affected. | | | | |
| | | Regulator: | The regulator | r for Reykja | vik FIR is the Icel | andic 1 | ransport Authority (ICETRA) | https:// | www.icetra.is/. | | |

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| S | ponsor Categorisati | on, Assessment and | Response/Commer | nts | |
|---|-----------------------------------|--------------------|---------------------------------|---|---|
| F | Response Might Impa and ACP Si | | Response Does Not Impact ACP | S | Sponsor Remarks/Response |
| | Impact | No Impact | | Categorisation: | Response does not impact ACP |
| | · | · · · · · | + | Spaceport-1 area of intere | everal references to airspace that lies well outside the est and upon further examination it is determined that he same as the one sent to the SaxaVord Spaceport |
| | | | | team during their Stage 3 this response is relevant Spaceport-1. Isavia were suggestion that they ma declined to do so. Further were clear that they did n their operations and state we feel that we shouldn't h therefore assumes the res | formal consultation period. The wording contained in to SaxaVord however, it has little or no relevance to contacted and this error highlighted to them with a ay need to resubmit their response however, they more, based on Stage 2 engagement with Isavia, they not believe the SP-1 ACP would have any impact on d: <i>"The area doesn't affect the Reykjavik FIR/CTA so</i> <i>have an opinion on the option to choose"</i> . The Sponsor sponse was mistakenly filed and it is does not provide in the SP-1 final airspace proposal. This response does |



| Unique ID 248555094 | Q1 | | Q2 | | Q3 | | Q4 | Organisation | Q5 | Directflight Ltd T/A Airtask | Q6 | Head of Flight Operations | Q7 | Neutral | | | |
|------------------------|------------------|--------|----------|--------|--------------------|-------|-------|-----------------------------|-------|--|----|---------------------------------|----|---------|--|--|--|
| | Q8 | NA | | | | | | L | | | | | | | | | |
| FN 15 | Q9 | NA | | | | | | | | | | | | | | | |
| | Q10 | NA | | | | | | | | | | | | | | | |
| | Q11 | NA | | | | | | | | | | | | | | | |
| | Spons | sor Ca | tegoris | ation, | Assess | smen | t and | Response/Con | nment | S | | | | | | | |
| | Resp | | Might Im | | Propose hission | d Des | sign | Response Do Not Impact A | | Sponsor Remarks/Response | | | | | | | |
| | | Impa | ct | | No In | npact | | | | Categorisation: Response does not impact ACP | | | | | | | |
| | Impact No Impact | | | | | | | + | | The respondent who now operates the recently introduced Hebridean Air services operating between Stornoway and Benbecula, has provided a neutra response without any feedback on the airspace design final proposal. It is | | | | | | | |
| | | | | | | | | | | therefore deemed that this resp | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |



| Unique ID 865601655 | Q1 | Q2 | Q3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object | | | |
|------------------------|-------|--|--------------|-----------|--------------|-------|---|-------|-----------------|--------|-----------------|--|--|--|
| | Q8 | NA | | - | - - | | | | · | | • | | | |
| FN 16 | Q9 | 1 object on safety and environmental grounds. The Civil Aviation Authority website describes spaceflight activity as high risk and therefor never completely safe. Worldwide news over the last year has seen rocket failures in Texas, USA, and Japan lead to explosions, disper of rocket fuel over land and fire. Presumably these are some of the reasons an area with low population density is chosen for such an activity, however, let it be remembered that people do still live nearby and some attempt to continue an increasingly rare lifestyle in the form of crofting. To me the risks of contaminating this fragile landscape are too high to pursue this kind of activity. An RSPB nature rese is less than 5 miles away from the site, providing a sanctuary for rare birds like the corncrake, but the area is at risk from rocket failure fallout. The UNESCO World Heritage Site of St Kilda, home to nearly 1 million seabirds and the UK's largest puffin colony is also at risk fallout from the spaceport could become a target during times of war eg. Putin attacking Ukraine and those who assist her. There seem inevitable disruption to island life with the transportation of rocket fuel and rockets to the site. The current exhibit at the Lochmaddy museum about Caledonian MacBrayne ferries describes residents of Lochmaddy having to move out of their homes when rocket fuel w being delivered for the South Uist rocket range for safety reasons. North Uist has only single-track roads across the fragile peatlands, which are hardly suitable for transporting oversized vehicles with dangerous loads. How will people continue their journeys on the now popular "Hebridean Way" when deliveries are being made to the site and rocket launches are underway? How will this affect the local economy? Where will the necessary personnel for the project be housed when housing is already so tight on the island? The island environment is simply too fragile to survive what you are proposing. Perhaps try it in your own backyard. | | | | | | | | | | | | |
| | Q10 | Don't fire any | | | | | | | | | | | | |
| | Q11 | Do not pursu | | | - | | | | | | | | | |
| | Spons | sor Categoris | ation, Asses | sment and | Response/Com | nment | S | | | | | | | |
| | Resp | sponse Might Impact Proposed Design and ACP Submission Response Does Not Impact ACP | | | | | | | | | | | | |
| | | Impact | No I | mpact | | | Categorisation: R | espon | se does not imp | act AC | P | | | |
| | | | | | + | | The respondent's objections to issues of a Spaceport on North | | | | | | | |



| airspace design. Concern is raised regarding the safety aspects of rocket operations, these do not appear to include the airspace element, rather more generic ground/surface safety aspects. Again these elements are not specifically part of the airspace change but will be an integral part of the Spaceport licence and the LV operator's licence; both of which must satisfy the civil regulator that their respective operations are safe. |
|---|
| The respondent also has concern regarding local bird populations, impact on marine life and damage to roads. These wider issues are outside the ACP process and have already been considered as part of the planning process. As the respondent does not provide any actionable feedback on the airspace design then it is deemed that this response does not impact the ACP. |



| Unique ID 46170538 | Q1 | | Q2 | G | 23 | Q4 | Organisation | Q5 | Northern Lighthouse Boa | ard | Q6 | Navigation Officer | Q7 | Neutral | | |
|-----------------------|-------|----------|----------|--------------------|------------------|-----------|-----------------------------|--------|--|-------|------------------------------|-----------------------|--------|---------|--|--|
| | Q8 | Not a | oplicabl | le, as w | e are loc | al Air Sp | ace users we a | re con | tent to observe the propos | ed AC | P if a | nd when imple | mented | • | | |
| FN 17 | Q9 | NA | | | | | | | | | | | | | | |
| | Q10 | NA | | | | | | | | | | | | | | |
| | Q11 | | | | | | | | | | | | | | | |
| | Spons | sor Cate | egorisa | ation, A | ssessm | ent and | Response/Cor | nment | S | | | | | | | |
| | Resp | | | pact Pro Submis | oposed D sion | esign | Response Do Not Impact A | | Sponsor Remarks/Response | | | | | | | |
| | | Impact | t | | No Impa | ict | | | Categorisation: | Re | Response does not impact ACP | | | | | |
| | | | | | | | + | | Respondent has a neutral position on the airspace change but offers no actionable feedback that suggests any changes should be made to the airspace proposal. Therefore, the response does not impact ACP. | | | | | | | |
| | | | | | | | | | | , _ | | | | | | |

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| Unique ID 34655990 | Q1 | Q2 | | Q3 | Q4 | Organisation | Q5 | Ministry of Defence (MOD) | Q6 | DAATM SO2 Airspace Operations | Q7 | Neutral | | | |
|-----------------------|-----|---|---|---|---|---|---------------------------------------|--|--|--|--|--|--|--|--|
| | Q8 | NA | | | | | | | | | | | | | |
| FN 18 | Q9 | NA | | | | | | | | | | | | | |
| | Q10 | See Belo | w | | | | | | | | | | | | |
| | Q11 | repeated Use of D the Spon Access to | here for 701 wou sor. Liais the DA | ease and Id need to son with to s for national | d transpa o be nego the UK S onal secu | rrency. Activation otiated under a Lo pace Operations urity reasons rema | of the ong Te Centre ains ex | n military operations overall. P two proposed new Danger Are rm Partnering Agreement as d SpOC would be required for a tant, which has been suitably a or with any further information | as has iscusse ny spa address | been assessed ed and has alrea ice launch activit sed by the Spon | to hav dy bee ies. | re negligible impact. en acknowledged by | | | |
| | | onse Might | risation | n, Assess Propose | sment ar | d Response/Co | nment oes | Sponsor Remarks/Response | | | | | | | |
| | | Impact | | No In | npact | + | | Categorisation: F Although the MOD are neutra the ACP will have negligible ir established to facilitate use of between stakeholders in draft continue to work with the MOI with other key aviation stakeh response does not impact AC | in thei npact c D701 form re D to esi olders. | on MOD operatic under the LTPA eady for comment tablish the neces | ACP thons. W proces nt. The ssary a | ney recognise that 'ork is well ss with a LoA e Sponsor will greements along | | | |



| Unique ID 713239047 | Q1 | | Q2 | Q3 | | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object | | | | |
|------------------------|-------|---|---------|--------------------------|-----------|----------|-----------------------------|---------|--|---------|-------------------|--------|---------------------|--|--|--|--|
| | Q8 | Nil | | | | | • | | | | • | | | | | | |
| FN 19 | Q9 | feelu | incerta | in that the (| Council | who pr | esently own the | site a | lieve that there are employmer re in a position to grant unbiase roposed activity. | | | | | | | | |
| | Q10 | I belie | eve the | project is l | better su | uited to | an alternate loc | cation. | | | | | | | | | |
| | Q11 | Nil | | | | | | | | | | | | | | | |
| | Spons | Sponsor Categorisation, Assessment and Response/Comments Response Might Impact Proposed Design Response Does Sponsor Remarks/Response | | | | | | | | | | | | | | | |
| | Resp | | | npact Propo Submissio | | sign | Response Do Not Impact A | CP | | | | | | | | | |
| | | Impac | ct | N | o Impac | t | | | Categorisation: R | espon | se does not imp | act AC | Р | | | | |
| | | | | | | | + | | This response does not suggest any changes to the airspace or makes reference to airspace; the objection focusses on perceived generic environmental damage, contesting the socioeconomic benefits and the | | | | | | | | |
| | | | | | | | | | Council's planning process. It ACP. | is dete | ermined that this | respor | nse does not impact | | | | |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |



| Unique ID 390600567 | Q1 | G | 22 | Q3 | G | 14 Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object |
|------------------------|--|---|----|---------------------------------|---|------------------------------------|----|----|---|--|---|---|
| FN 20 | Q9 I am particularly concerned about the growing problems associated with the militarisation of space and the overcrower in Low Earth Orbit. Space has become essential for the US and UK military and the US has a stated aim of dominating environment. This space port is more than likely to become involved in launching military satellites associated with the effects on areas surrounding the launch sites and on the upper atmosphere, in particular on the ozone layer. There are environmental effects on the atmosphere due to satellites burning up on re-entry at the end of their lifetime. Q10 No satellites with a military purpose should be launched. Any launches should not be made until sufficient scientific measurement have been made that allow realistic estimate environmental damage due to launches on the ground and upper atmosphere can be made. Any satellites launched should include an end of life plan that removes them from orbit without involving re-entry and Earth's atmosphere. Q11 Nil Sponsor Categorisation, Assessment and Response/Comments | | | | | | | | | | | |
| | Resp | | | ct Propose ibmission No I | | n Response Do Not Impact A + | | • | espon: the a and the onsor re ther the pro | e detrimental env would contest th re will not be any oject is for a com edback that sug | act AC based vironm at SP- satelli mercia gests a | upon their objection ental impact upon 1 is only launching tes or other objects al Spaceport, not a any changes should |

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| Unique ID 798539565 | Q1 | | Q2 | Q3 | (| Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object |
|------------------------|-------|----------|----------|--------------------------|----------|-----|------------------------------|-------|--|-----------------|------------------|---------|-------------------|
| | Q8 | Nil | | | | | | | | | | | |
| FN 21 | Q9 | l oppo | se the S | Spaceport p | proposal | Ι. | | | | | | | |
| | Q10 | Nil | | | | | | | | | | | |
| | Q11 | Nil | | | | | | | | | | | |
| | Spons | sor Cate | egorisa | tion, Asses | ssment | and | Response/Com | nment | S | | | | |
| | Resp | | | act Propos Submission | | gn | Response Do Not Impact A0 | | Spons | sor Re | marks/Respon | se | |
| | | Impact | : | No | Impact | | | | Categorisation: Re | espon | se does not imp | bact AC | P |
| | | | | | | | + | | Respondent strongly objects to to a Spaceport at Scolpaig. Ho suggests any changes should be | owevei be ma | r, they offer no | actiona | ble feedback that |
| | | | | | | | | | the response does not impact A | ACP. | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |



| Unique ID 347977918 | Q1 | | Q2 | | Q3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object |
|------------------------|-------|--------|--------------------|---------|-----------------------|-----------|-----------------------------|---------|---|--------|--------------------|---------|-------------------|
| - | Q8 | Nil | | | | | | | | | | | |
| FN 22 | Q9 | l obj | ect to th | ne enat | oling of sub | o-orbital | rockets in North | n Uist. | | | | | |
| | Q10 | Nil | | | | | | | | | | | |
| | Q11 | Nil | | | | | | | | | | | |
| | Spons | sor Ca | tegoris | ation, | Assessm | ent and | Response/Co | mment | ts | | | | |
| | Resp | | Might In nd ACF | | Proposed E hission | esign | Response De Not Impact A | | Spon | sor Re | marks/Respons | se | |
| | | Impa | ct | | No Impa | act | | | Categorisation: R | espon | se does not imp | act AC | ;P |
| | | | | | | | + | | Respondent strongly objects to to a Spaceport at Scolpaig. He suggests any changes should | oweve | r, they offer no a | actiona | ble feedback that |
| | | | | | | | | | the response does not impact a | ACP. | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |
| | | | | | | | | | | | | | |



| Unique ID 595527799 | Q1 | | Q2 | | Q3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Neutral |
|------------------------|-------|--|--------|----------------------|-------------------|---------|-----------------------------|-------|--|----------|-----------------|---------|--------------------|
| | Q8 | Nil | | | | | | | | | | | |
| FN 23 | Q9 | See C | Q10 | | | | | | | | | | |
| | Q10 | 10 I am totally opposed to there being a spaceport at Scolpaig both from an environmental and cost benefit to the local community standpoints. | | | | | | | | | | | |
| | Q11 | See C | 210 | | | | | | | | | | |
| | Spons | sor Cate | egoris | ation, A | Assessm | ent and | Response/Cor | nment | ts | | | | |
| | Resp | | _ | npact Pr 9 Submis | oposed D ssion | esign | Response Do Not Impact A | | Spor | nsor Re | emarks/Respons | se | |
| | | Impac | t | | No Impa | act | | | Categorisation: F | Respon | se does not imp | act AC | Р |
| | | | | | | | + | | Respondent has a neutral p opposed to a Spaceport be environmental impact and ne | ing de | veloped on No | rth Uis | t due to perceived |
| | | | | | | | | | the respondent offers no actio be made to the airspace pro ACP. | nable fe | eedback that su | ggests | any changes should |
| | | | | | | | | | | | | | |



| Unique ID 739364149 | Q1 | Q2 | Q3 | Q4 | Organisation | Q5 | Spacewatch UK | Q6 | Nil | Q7 | Object |
|------------------------|----------|---|--|---|---|--|---|---|---|---|--|
| FN 24 | Q8 Q9 | socioecond findings fro burn cause that launch emissions a order to pro we permit of The consul (9.2.14), al disturbance The consul recover sur pollution. The EIA str of objects a site, and the lifetime. Ro and on the end of thei limited und Each of thei We would a prepared b such as thi developer) We are also non-technic | omic issues ass m the Environn d by air traffic es themselves associated with event catastrop developments of tation document of potentially to protected st tation document ch debris, or if udy does not a and debris in e- iere does not a ocket launches upper atmosp r lifetime result erstanding. The se factors on if also like to expri- y consultants to is the EIA sho to address issi- o disappointed cal summary to | acciated with mental Impa diversions r will genera this develophic climate which further int accepts t significant species (9.2 int also state f so, how. appear to ac arth orbit is appear to ac arth orbit is appear to be have been here, with p its in the accept ts own repri- ress concer- to the remit uld be concer- ues raised to that the lice o guide the | the development of the development equired to accorr te additional car opment would be change we need a radd to net carl hat there will be effects on other .20). The developes that rocket de As a result the dress space implies a growing proble any intention to shown to have of optential to dama cumulation of m rt 1 proposal wo esents strong gr n about the qual of the develope ducted by a trus by local commun- | nt. Env EIA), a nmoda bon er highe d to ui con dic impac rimpo opmer bris wi propos pacts, em. Ir prence detrime age the etal re uld add ounds ity of the r withous ted, ne ities a s for th gh key | a projected environmental imp ironmental objections: The corr accepts that carbon dioxide em ite launch arrangements (para nissions (9.2.33), and there ap r than those benchmarked by or gently reduce greenhouse ga oxide emissions. Its on Special Protection Areas rtant ecological features, incl it will have a negative impact of Il be jettisoned into the sea (9. sed development can be expe particularly cumulative effects in due course there are plans to ve these satellites from orbit i ental effects in terms of chemic e ozone layer. Re-entry and b sidues in the atmosphere with d to such impacts. for refusing to permit the prop the Environmental Impact Asse out community input. We con- geutral, third party (for example ind environmentalists as well an is application did not appear to points of the application, and e applications. | sultati issions graph (opears other p s emis intenc uding on biod 2.22) a ected t , assoc o launo n a sus al pollu urn-up n enviro osed d ssmen sider the e a loc s by th o incluc | on document for s will increases a 5.3.6). It is also to be some que roposed space I sions. We will n led to protect bin the degradation iversity. and it is unclear o have an impa- ciated with the p ch satellites into stainable manne- ution on areas si of space object onmental effects evelopment and t for the propose nat for potentiall al university, wi e developer and le an easily acce | the pro- as a res- accept stion a aunch s- not suc of va whethe or va whethe act on r roposa orbit fr er at the urrounces in the for wh airspa d deve y signif th cost regula | oposal, summarising sult of additional fuel ed by the developer s to whether carbon sites in Scotland. In ceed in doing this if alations and habitats luable habitats and er there are plans to marine ecology and I. The accumulation om the Spaceport 1 e end of their useful ding the launch sites e atmosphere at the hich we as yet have the changes. elopment, which was ficant developments s paid in full by the tors. and understandable |

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| 0 | 210 211 Spons | | | | | | | |
|---|---------------------|-------------------------------|---------------------------------|---------------------------------|--|--|--|--|
| | Respo | onse Might Impa and ACP Si | ct Proposed Design ubmission | Response Does Not Impact ACP | Sponsor Remarks/Response | | | |
| | | Impact | No Impact | + | Categorisation:Response does not impact ACPRespondent objects to the airspace change based on a number of concerns not the least the environmental impact the Spaceport will have in particular the predicted increase in carbon emissions (due to redirection of some high level air traffic). It is accepted that these figures may appear higher than stated by other Spaceports however, the Sponsor would guard against making such like for like comparisons as the metrics used are often widely different especially when it comes to the duration that the airspace is required for. Unlike other Spaceports, the Sponsor has the knowledge and experience of launching similar rocket systems from the MOD QinetiQ managed Hebrides Range and it is from this data that the worst case scenarios have been assessed using a protracted three hour window for the launch. The Sponsor would suggest other Spaceports are being extremely optimistic in only considering a one hour launch window – this in isolation decreases their perceived impact by a third when compared to SP- 1. | | | |
| | | | | | Regarding concern over items jettisoned into the sea; this will be covered by the Marine Management Organisation (MMO) who may decide the LV operator will | | | |

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| need to obtain a marine licence prior to launch, this is a requirement detailed in the Space Industry Act 2018 and in supporting guidance documentation. With regard to the safety concerns for local residents, the Sponsor would offer the following detail from the Consultation Document: "It is important to note that the process to determine the size of airspace necessary to ensure no additional risk to other airspace users is different to that regarding the 'land safety footprint' and risk to aft parties on the ground, and to the process used to establish the risk to maritime 3rd parties. The airspace safety requirements consider a large aircraft with a high number of passengers travelling a high speed therefore, to reach an acceptable level of risk, the segregated airspace area has to be significantly bigger than the land or sea space safety areas. The airspace area therefore does not denote an area of risk to personnel on the ground; there are many UK Danger Areas over land that are there to safeguard aviation and do not indicate that a threat to personnel on the ground exists. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace user; the risk to 3rd parties on the ground is evaluated differently and restrictions/warnings are put in place accordingly. In effect any additional risk caused by SP-1 activities to 3rd parties on the ground has to be contained well within the SP-1 site area. It should be further noted that the ground safety footprint (and that over the sea space) is not evaluated under the ACP process; this is addressed separately by the CAA through the Spaceport operator and the rocket launch provider will need to satisfactorily demonstrate to the CAA that they have a robust safety case, safety management processes and evidence to show the operation is safe and risk to 3rd Parties on the surface is tolerable and within the regulated safety margins – the CAA will only issue the respective licences when these strict safety criteria |
|---|
| Other points regarding socioeconomic issues and concern over the EIA are noted and have been recorded but as they do not impact the airspace change proposal the Sponsor is unwilling to comment further on these matters. The responder does not offer any actionable feedback on the proposed airspace design therefore it is considered that this response will not impact the ACP. |

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| Unique ID 102197726 8 779096160 | Q1 | Q2 | Q3 | Q4 | Individual /Organisation | Q5 | NA | Q6 | masters in biology from Uiniversität Bern, Switzerland | Q7 | Strongly Object |
|--|--|--|----------|---------|-----------------------------|-------|------|---------|--|----|-----------------|
| | Q8 | Nil | | | • | | • | | • | | |
| FN 25 FN 26 | Q9 Q10 Q11 | North Uist, as our Hebridean Islands, attract many visitors over the year because of its still (relatively) beauty and wildness. Such visitors I meet don't come here to find a Spaceport area but almost desperately look for (relatively) untouched areas; they ask me where to find such and such plants, where they may see such and such birdthey leave crowded towns to find quiet, maybe even silence (very rare to find nowadays!), unspoilt beaches, natural heath, birds lost for ever in other places but still found on the islands I could name many such precious attributes, including heritage, traditional crofting etc. I personally am convinced that it is a great and irreparable mistake to bring Spaceport (and all the connected changes) into the Uists. Even if I understand that it would offer (a few!) new jobs to locals, long term it will be a big loss in and for tourism! The planning of a spaceport area also shows a disrespect towards the life, traditions and uniqueness of this landscape and its people. I support fully the opinion of shared in this consultations. Nil | | | | | | | | | |
| | | of Oategorisat | | int and | Response/Con | micin | 3 | | | | |
| | Resp | onse Might Impa and ACP S | | esign | Response Do Not Impact A | | Spor | isor Re | marks/Respons | е | |
| | | Impact | No Impac | ct | | | | | se does not imp | | |
| | + This respondent provided the same response twice, once as an organisation and secondly as an individual therefore, these two responses have been combined. Respondent strongly objects to the airspace change based primarily on a concern that the Spaceport will adversely affect the current equilibrium of the Islands and deter visitors who seek tranquillity. However as the respondent offers no actionable feedback that suggests any changes should be made to the airspace proposal it is determined that this response does not impact ACP. | | | | | | | | | | |

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| Unique ID 925933822 | Q1 | Q2 | Q3 | Q4 | Individual | Q5 | Friends of Scolpaig | Q6 | Member | Q7 | Strongly Object |
|------------------------|----------|--|--|--|--|---|---|---|--|--|--|
| FN 27 | Q8 Q9 | and safety (ENVIRONM endorse all Responses ANS) (neut already, "m and greenh considerabl Response S than that sta of misinform and misinfo objective as experienced requiremen information, CONSULT organisation will be invite The expect and the ma airspace ch SAFETY: T only cater for comment in ground is c progressing | grounds, and IENTAL: The of these. Plea 749185324 (i ral) have put assive re-rout ouse gas em e ", and on 83238351 (s ated in Space hation or error rmation given s it should ha d Planning C t only for sor nor included - CONSULT is have been ed to provide f ation of the D jority, if not a ange were we he safety dist or risks in action answer to Quo onsidered as with airspace | on lack of a general en ase note spe object) from forward ver es for comm issions", "T very signifi trongly obje port 1's Env in the detai within the ave been. T onsultant. ` me addition I in the env ATION ST engaged du further feed rop-in even II, of the att cance given ivities in rela- uestion 2 of part of the e change in | dequate public c vironmental con ecifically; NATS and 2763 ry strong argume nercial traffic dur he impact on inc cant financial im ect) highlights in of vironmental impa I within the EIA a EIA which is not Fhis is undoubte You appear, an al information. I ironmental and/of RATEGY - 3.2 uring Stage 1 and back to the form t at Hosta Hall (endees on the d there was no rep in the planning ation to preparat the Record of Ke licensing proces relation to a pro | consulta cerns a 355460 ents ag ing D7(creased plicatio detail th ct Asse gainst v only fa dodly in d not v Friends or cons .3 Env d Stage al cons 17/04/2 ay wer resenta applica ion for ey Airsp s for th posal v | are already well articulated in from the Air Navigation Servic gainst rocket launch from Scol D1 activity", and Isavia ANS on d workload for air traffic contro ns which are " viewed with the reality of CO2 emissions wh essment (EIA) provided for plan which planning consent was gr actually incorrect in places but part due to its preparation no unreasonably, to have generate of Scolpaig have not, howe servation organisations invited vironmental Organisations - a 2 of the process as well as due | respor ce Prov paig; I the ba illers a he utm nich ar nning p anted, is subj ot havi ally ac ver, b to col A num iring th enviror enviror or radiu n relation he Dro ere se nces in | vider for the Rey NATS on the basis asis of, "increase nd safety must nost severity." e now assessed but it is not the of ective in its con ng been manage cepted the EIA een party to the ntribute against nober of enviror e planning active mental issues a rest the former. Inmental impacts s around the ce on to early inflig op-in event that, ems to be little relation to laun | bmitted kjavik asis of be in fligh be ass d at a le n itself only sig clusion ged by clusion ged by a in go e natur the fol menta ity. For as well Whilst s. ntre of ht failur "The ris or no p ch of su | A and I/we generally Control Area (Isavia further disruption to nt time and fuel burn essed and could be evel 50 times higher is a staggering level nificant shortcoming s rather than wholly a professional and od faith with some re of this additional lowing: "Stage 3 – I and conservation completeness, they as airspace change the technicalities of the launch pad can re. Whilst noting the sk to persons on the purpose whatever in uborbital rockets (as |



| | is to generally remain open under the consent granted. Against the FAA regulations, therefore, the reality must be that any launch from Scolpaig would pose very significant risk to third parties on the ground outside the launch area boundary, and is not, therefore, viable. The 430m maximum safety clearance (radius) around the launch pad is as given in the EIA for the sub-orbital launch proposal. That circumference, however, cuts through Loch Scolpaig, with the land to the south partly in separate ownership. Whilst riparion owners can control and restrict bank fishing on any body of water from the land in their ownership, both riparian owners here will have the legal right to fish the entire body of water from a boat. CnES, therefore, as the owner of Scolpaig Farm do not have full control over all of this particular safety area as part of the south western section of the loch falls within it. A 1.85Km safety clearance radius is given in the FAA's 'Supplemental Application for Unguided Suborbital Launch Vehicles (USLV's)', (2001). (So, for unguided launch vehicles.) This area covers several residential properties as well as a significant section of the public road. A 2.4Km safety clearance radius is given in the FAA's 'Licensing and Safety Requirements for Operation of a Launch Site', 14 CFR Parts 401,417, and 420 (2000). (For guided launch vehicles.). This area covers numerous residential properties as well as a greater section of the public road. In respect of current activity in the UK, and according to your website, Hylmpulse is currently applying for a launch license for the SR75 sub-orbital launch vehicle at Shetland Spaceport (SaxaVord). The launch weight of the SR75 is listed as 2.5 tonnes – which is the same as the maximum weight quoted by Spaceport 1 for similar launches from Scolpaig. Hylmpulse are advising a 1.8km safety radius round the launch pad as part of their license application. I/we don't know whether they have used 1.8km because (a) it corresponds with the site ownership boundary at SaxaVord |
|-----|---|
| Q10 | No. The implications of sub-orbital rocket launch from Scolpaig as regards safety and environmental impacts are so significantly greater than advised and considered at planning stage that the entire project should be scrapped. Safe launch of sub-orbital launch vehicles from Scolpaig simply cannot be achieved. |
| Q11 | "Yes. 1) - In relation to the Record of Key Airspace Related Questions from the Drop-in event: Q &A - 1; At the particular presentation I attended, the answer given was that any proposed increase in launch numbers would require a new ACP, this without qualification. This is now qualified, but as drafted seems ambiguous? Q&A - 2; Covered above. Q&A - 7; You correctly note "own microclimate" which is particularly relevant around Scolpaig. MOD Hebrides Range staff will certainly have significant experience of wind issues around Range head and from the beaches and flat hinterland also sometimes utilised, but not at Scolpaig. Scolpaig has a particularly turbulent wind environment at times given the relationship of the hill with the open ocean, and this is a matter of concern that has been made known to CnES and its consortium from the very outset. Q&A - 15: The answer given does not reflect personal experience from living on Uist. (Refer also the response from Isavia ANS.) |

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| | I asked a ques with more than boat in the rang etc., but that an There has bee very outset of th hidden agenda engagement). When the initia the north, this we similar, but sep many more site A reasonable of trajectory is sin | a sufficient leeway withing ge area, etc. The answinswer is not credible gin n a level of secrecy an the initial orbital launch a surrounding it, and drive a surrounding it, and drive was against an apprais bet planning requireme barate, exercise should es would be potentially conclusion, therefore, is nply there not for any p in any direction)." | ific trajectory to the minimum in the western directiver given was that it r iven the extent of lau an absence of ade a project to the extent iving it (vis-a-vis, for anch was being progress al of suitable sites in ents. When that initial thave been undertaker available. This was s that there is either a obysical purpose but | a hidden agenda in respect of retaining a launch trajectory to the north, or that as an excuse for not undertaking appropriate site selection for sub-orbital launch |
|---|---|--|--|--|
| - | Response Might Impa | | Response Does | Sponsor Remarks/Response |
| - | and ACP S | No Impact | Not Impact ACP | Categorisation: Response does not impact ACP |
| - | Impact | No impact | + | In reply to the Responders extensive feedback the Sponsor would offer the |
| | | | | following: It should be noted that Response 749185324 (object) from NATS is from an |
| - | | | | individual and this is NOT the NATS position, the latter is 'Neutral' and can be found at ID 115026295. With regard to response ID 276355460 from the Air Navigation Service Provider for the Reykjavik Control Area (Isavia ANS). The Isavia response is exactly the same as that sent to SaxaVord despite SP-1 operating in entirely different airspace and in airspace that does not encroach the Icelandic Flight Information Region (FIR); unlike the majority of saxaVord |

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| an updated response therefore the points they highlight are not considered significant or relevant to the SP-1 ACP. Regarding the CO ₂ emissions being assessed as 50 times higher than those stated in the EIA, it is important to note that at the time of the EIA development the airspace options were not known or understood and as such the EIA was based on the best and most up to date information available at the time to inform the planning process. Furthermore, there are distinct licensing processes for spaceports, launch operators and range operators under the SIA. Safety and environmental impact are fundamental considerations in determining whether licences are granted and when assessing environmental impact. Regarding the additional environmental information requested by the CAA, this was around certain metrics for sonic boom. The former was evidenced through the rerunning of the original noise modelling programme and the latter was accepted by the CAA. |
|--|
| Considering the drop in event at Hosta Hall not covering the environmental issues; the Sponsor can confirm that the environmental impact associated with re-routing civil air traffic crossing the North Atlantic, was covered in some detail and this information can be found in the Consultation Documentation. The options appraisal phase II (full) contains a most detailed explanation of the methodology used and potential increase in CO ₂ emissions. It is acknowledged that the EIA and SEI commissioned by the Council in support of the planning process was not covered as this is not explicitly part of the ACP process as prescribed in in Civil Aviation Publication (CAP) 1616 (Ed 4). A summary of certain environmental elements of the EIA/SEI were included in the Consultation Document. The drop in event was clearly publicised as pertaining solely to the proposed Airspace Change. |
| With regard to the 'safety distances' in the context of the airspace change, it is important to note that the airspace change ONLY considers the risks to aviation and as previously stated, there are other regulatory bodies and licencing processes (which will be initiated at a future stage of development) that ensure the risk to 3 rd parties on the ground are minimised. Moreover, the regulations |

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| | used to determine safety distances are at the discretion of, and prescribed by, the CAA. The Sponsor is unable to comment on safety distances for specific LV types such as Hylmpulse however it should be noted that if the safety parameters for a particular LV cannot be contained within the SP-1 site and associated segregated airspace, then that LV operator will not receive the necessary licence/approval to operate from SP-1. Notes on the 'public drop in event' were provided on Citizen Space following the event. With reference to whether an increase in launch numbers would necessitate a new ACP, the Sponsor offers the following: An ACP is required if the use of the airspace is changed – whether an increase in numbers of launches would be deemed a 'change in airspace use' would be a matter for the CAA who may, if they wished, call for an ACP to be raised. The Sponsor offers no further comment regarding microclimate or the reference to the Isavia response that is not relevant to Spaceport-1. With regard to trajectories, the ACP Consultation documentation states that the trajectories will be contained within an arc of 225 to 315 degrees. Decision on trajectory for a particular launch will be subject to many elements not least environmental, impact on the air traffic network and the 'clear range' to name a few. The Sponsor is unable to comment on the other points raised regarding consultation not relating to the airspace change and the suitability of Scolpaig for rocket launch. As the respondent offers no actionable feedback on the airspace design it is determined that this response does not impact on the ACP. |
|--|---|
|--|---|



| Unique ID 72918170 | Q1 | | Q2 | Q3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object | |
|-----------------------|------|---|---|-------------|--------|--------------|----|------------------------------------|--------|-----------------|----|-----------------|--|
| | Q8 | Nil | | | | | | | | | | - | |
| FN 28 | Q9 | I have agricu dange refers this m upper exper I am a This i I am o touris I am o numb but it | I have concerns about noise pollution and the impact on wildlife, not to mention nearby settlements. I have concerns about pollution from fuel emissions and its impact on the surrounding land and sea. This area is used for fishing and agriculture, and many people grow their own produce to consume as well as grains for animals. In the following article the reality of the dangerous pollutants is outlined: <u>https://www.bbc.com/future/article/20220713-how-to-make-rocket-launches-less-polluting</u> . The article refers to rockets launched in uninhabited wildernesses, but in North Uist some of the population lives within a mile of the site. Why doesn't this matter to the developers or the local council? Rockets emit a great deal of carcinogenic pollutants at ground level, as well as in the upper atmosphere. North Uist is unspoilt natural environment with clean air and seas which increasing numbers tourists travel far to experience, but it's much too small and populated to be considered a wilderness. I am also concerned about the debris from rockets breaking up and polluting a wide area of the ocean and possibly falling on the island. This is also a real hazard to life. I am concerned about the impact on our frail infrastructure, especially the roads which are single track, increasingly congested in the tourist season and in a poor state of repair in many places. I am concerned that the disruption and negative effects are what we, the islanders, will have to put up with little or no material returns. The number of jobs this development will provide has previously been posited at around six. The income from the land sale benefits the council but it seems doubtful that any of it will trickle back to the communities in North Uist who will have to live right next to this development. | | | | | | | | | | |
| | Q10 | Nil | | | | | | | | | | | |
| | Q11 | | | | | | | e spending is set to rise steadily | | | | | |
| | Spon | | could well be reactivated and any changes to airspace use reversed. While this could bring similar drawbacks, I could see the point of it. sor Categorisation, Assessment and Response/Comments | | | | | | | | | | |
| | Resp | | | pact Propos | | | | Spon | sor Re | marks/Respons | e | | |
| | | | | Submission | | Not Impact A | CP | 0.1 | | | | D | |
| | | Impac | t | No | Impact | _ | - | 0 | | se does not imp | | | |
| | | | + Respondent is strongly opposed to the airspace change based mainly on the perceived environmental impact on the local area, pollution of the land and sea | | | | | | | | | | |



| | areas around the launch site as well as a sensed safety hazard to residents living |
|--|--|
| | in close proximity. Moreover, the respondent expresses concern regarding local |
| | infrastructure, tourism and challenges the socioeconomic report findings |
| | (presented as part of the planning process). The Sponsor would suggest that |
| | these areas of concern have been thoroughly investigated as part of the planning |
| | process and details can be found in the EIA, SEI and Socioeconomic reports |
| | available on the Council web-site and as summarised in the Consultation |
| | documentation. Concern is raised regarding the safety aspects of rocket |
| | operations, these do not appear to include the airspace element, rather more |
| | generic ground/surface safety aspects. Again these elements are not |
| | specifically part of the airspace change but will be an integral part of the |
| | Spaceport licence and the LV operator's licence/approval; both of which must |
| | satisfy the civil regulator that their respective operations are safe. |
| | As the respondent does not offer any actionable feedback on the airspace |
| | proposal it is considered that this response does not impact the ACP. |
| | |



| Unique ID 115026295 | Q1 | Q2Q3Q4OrganisationQ5NATS NERL plcQ6Manager NATS Operational PolicyQ7Neutral | | | | | | | | | | | |
|------------------------|-----|---|--|--|--|--|--|--|--|--|--|--|--|
| | Q8 | Nil | | | | | | | | | | | |
| FN 29 | Q9 | Nil | | | | | | | | | | | |
| | Q10 | ven the disruptive nature of D701 on the overall network, consideration should be given to establishing a common maximum usage days a mework. While the proposal suggests a maximum of 10 launches per year, each with two contingency dates, this translates to 30 days at necessitate careful consideration, deconfliction and potential disruption. | | | | | | | | | | | |
| | Q11 | Whilst NATS NERL plc considers that the ACP itself will have minimal impact on its operation, the additional activation of D701 will. This will cause further issues which will need to be resolved between the Sponsor, NATS and the CAA before any activation of D701 takes place. These issues include, The CAA has yet to determine the prioritisation of Spaceflight. Therefore, any other activity which requires this airspace or adjacent airspace that impacts the availability to book this airspace will take precedence. When agreement is reached, the overall impact on the UK network will need to be considered when launch dates are agreed. The AMC UK is a Joint and Integrated (NATS and MoD) function. Without agreement from the MoD to fully and continuously support commercial use of SUA, the AMC may not have the resource to manage the airspace on behalf of SP1. Furthermore, the commercial use of SUA is not catered for in the Joint and Integrated agreement, which underpins UK ASM policy. Without the appropriate governance and authority to segregate airspace for commercial use, the AMC will have to defer the decision for each request to the CAA. Further refinement is needed in tactical management, as the traffic management assessment lacks consideration for additional time and separation buffers. Typically, this would extend activity by a minimum of 30 minutes and require a 30nm lateral expansion within Shanwick. The Sponsor, NATS and the CAA will need to agree on an update to the D701 LoA as to how the Airspace will be activated and deactivated. This may result in an increased (i.e. worse) 3Di (environmental performance) score, Oceanic Condition 11 KPIs and possible delays or regulations applied. NATS and the CAA will need to agrees as to how these increased 3Di scores or attributable delays will be applied against the already agreed NERL performance targets. EG D701 is currently allocated in the UK AIP for uses by "Target Towing / Ummanned Aircraft System (VLOS/BVLOS) | | | | | | | | | | | |

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| | | rth noting that while so affected, are absent fr | | | cholder list, major US carriers, and notably IATA, who | | |
|------|---|---|--|---|---|--|--|
| Spon | Section 6.3.3 h will take place, air traffic route every three. Air but nowadays of 6.3.4 is also ina could be drawn Using the same impact, a total tracks (NATS of less than 30% where traffic is | ighlights the following, the air traffic impact w out over Scotland two traffic will be impacted only 30% traffic operat accurate. Using the set that it is likely that the process for winter the of 9 activations per year annot fully ascertain the | 'This means during vill only be felt one da days out of three.' The d on the vast majority es on the core OTS, asonal variation data a 12 airspace activations at are used in the ana nat without the full da 24-hour period. The c via the NOTA or 10 | y in every three days. This his is inaccurate as it calls of days (if not all), The as with the remainder operat that NAT air traffic will rou ons occurring in the summ the 8 will impact on the N alysis. These assumption ta analysis). OTS tracks a remainder of the traffic op W on random routes." | nticipated 60% of rocket launches (circa 6 launches) s variation reverses during the winter months meaning out that air traffic impact will only be felt one day in ssessment has looked at where the core traffic flow is, ing random routes, including daily flights through 10W. ute over Scotland one day from three, an assumption her will only affect the NAT air traffic on 4 occasions. AT air traffic. Therefore, when considering the annual s may be based on evidence on location of the OTS are only an indication of core traffic flows and capture berates on random routings, and it is rare to see days | | |
| Resp | onse Might Impa and ACP Si | ct Proposed Design | Response Does Not Impact ACP | | Sponsor Remarks/Response | | |
| | Impact | No Impact | | Categorisation: | Response does not impact proposed airspace design or ACP submission | | |
| | | + | | out with the gift of the Sp - The need for the | | | |
| | | | | The need for the CAA to determine the prioritisation of spacefligh subsequent impact launches may have on the UK network. Appropriate governance and authority to segregate airspace commercial use needs to be ratified and integrated into the UK policy such that the UK AMC is appropriately resourced to ma airspace on behalf of Spaceports Refinement in tactical management of airspace where time separation buffers are imposed. The Sponsor would however su a more collaborative approach to the application of buffers both tim airspace volume to improve the efficiency of airspace management | | | |

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| is considered that a more dynamic approach could be achieved with improved co-operation. The need for NATS and the CAA to agree how increased 3Di scores or attributable delays will be applied against the already agreed NERL performance targets. The CAA to update the UK AIP to include commercial space launch and determine the appropriate FBZ to mitigate risk. Note: the Sponsor has identified this issue with the CAA and it is understood that until such descriptors are in place then rocket launch from SP-1 into the D701 areas will be carried out under the 'Other Munitions and Explosives (OME)' descriptor in the ENR 1.1. |
|--|
| The Sponsor acknowledges that there is a pressing requirement to update the existing LoA pertaining to D701 to include SP-1 activities and how the airspace will be activated/deactivated. This is considered a priority task by the Sponsor who is eager to engage with NATS, MOD and other signatories on this matter. The Sponsor further notes that not all North Atlantic operators had been given the opportunity to respond to the ACP at the beginning of the consultation period. However, the International Aviation Transport Association (IATA) were contacted later in the consultation window and were offered the opportunity to provide formal feedback – no feedback or comments have been received at time of writing. With regard to the assumptions that NATS consider are incorrect, the Sponsor would offer the following: It is recognised that some air traffic will be impacted on the vast majority of the days of the year and it is now more common for traffic to operate on random routings vice the Organised Track Structure (OTS). However, the Sponsor would argue that at the time of the data sample (2019), there were less 'random tracks' and the OTS was the most accurate indicator to assess peak traffic flows, especially during the period of expected rocket launch. Furthermore the comment that: "OTS tracks are only an indication of core traffic flows and capture less than 30% traffic in Shanwick in a 24-hour period", is considered misleading as the analysis conducted only focused on a 'worst case' three hour period, that is 12.5% of the Swanwick 24-hour |

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| period so the 'other' traffic is irrelevant. It should also be noted that the |
|---|
| methodology used considers the busiest day of the year (arguably all other |
| days' traffic levels will be less and in some cases, far less) and does not take |
| into account the ability to reroute traffic far earlier than the FIR boundary and |
| thus prevent/reduce any increase in fuel consumption. Furthermore, the |
| worst case scenario does not account for the later launches in the summer |
| that may be possible due to the longer days; it is widely accepted that a |
| launch after 1600 UTC will have far less impact on the network than the |
| |
| predictions (using the core traffic flow) that the consultation report suggests. |
| Moreover there may be occasions where coincident activity might be |
| possible, i.e. where SP-1 activity can occur in D701 areas already active for |
| MOD use. Therefore, when all these factors are taken into consideration the |
| worst case estimate for the year is probably close to and certainly no worse |
| than, the actual impact once a full and accurate assessment can be made |
| following a realistic period of operations. It should be noted that the |
| Sponsor's analysis of traffic impact does consider lateral buffers/FBZs as |
| applied by ANSPs; these are detailed at paragraph 3.5.7 and Figure 22 |
| (shaded red area outside the D701 areas) of the Options Appraisal Phase II |
| (full) report. Furthermore, it is also considered that a maximum of 20 |
| airspace activations per year is an accurate assumption (rather than the 30 |
| suggested by NATS); this is explained in the Options Appraisal Phase I |
| (Initial) at paragraph 3.4.4.1 and is based on experience of operating similar |
| |
| systems from the MOD Hebrides Range. |
| It is accepted that there are several important areas that need further work |
| before the first rocket launch can take place however, several of these are |
| out with the gift of the Sponsor to resolve and require regulatory |
| input/decision making. The main areas to be addressed by the Sponsor |
| include the update of LoAs; formalising use of D701 under the LTPA; and, |
| working collaboratively with ANSPs, UK AMC, MOD and CAA to establish |
| airspace protocols. |
| As there are no suggested refinements to the proposed airspace design and |
| the majority of the points raise are known and in some cases partly |
| addressed, it is determined that this response does not impact the proposed |
| airspace design or ACP submission. |
| |

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| Unique ID 44357788 | Q1 | Q2 | Q3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object | | |
|-----------------------|------|---|---|--------|------------|----|--|--------|----------------|---------|------------------|--|--|
| | Q8 | Nil | | | • | | · | | | | | | |
| FN 30 | Q9 | reserve a Spacepor unpredicta irreversibl mitigate a enough d sub-orbita There is a closed off (I am awa | The proposed airspace change now covers a substantial residential area alongside areas significant to local wildlife, such as the RSPB reserve at Balranald, which have previously been identified in past consultations. I have grave environmental concerns for the impact of Spaceport-1 on the health and safety of said wildlife and the impact that this will have for future generations. It is indicative that unpredictable sonic disturbances can cause major impacts on birdlife. With the proposed Spaceport-1 this impact could have sever irreversible effects and it is my belief that the Environmental Impact Assessment of the proposal has not gone far enough to access and mitigate against any potential impact on species, which depend on our support to continue to survive and thrive. There has also not been enough done to address concerns on the impacts to marine life. In the recent consultation it was noted that some fallout material from the sub-orbital rockets may not be recoverable. Meaning that potential harmful materials could end up in our marine environment. There is also the continued question of access to the Scolpaig site for visitors (considering the potential 20 weeks that the site could be closed off to visitors due to launches i.e. 10 launches with 2 week site closures as previously proposed). With the extension of the airspace (I am aware that this has been slightly altered in response to some aircraft) this also inhibits the freedom of locals and visitors to pursue activities such as paragliding in the area, again this would be in the spring/summer months which are more suitable also for launches. | | | | | | | | | | |
| | Q10 | Re-site S | paceport-1. | | | | | | | | | | |
| | Q11 | Nil | | | | | | | | | | | |
| | Spon | sor Catego | sor Categorisation, Assessment and Response/Comments | | | | | | | | | | |
| | Resp | sponse Might Impact Proposed Design Response Does Sponsor Remarks/Response ACP | | | | | | | | | | | |
| | | Impact | No | Impact | | | Categorisation: | Respon | se does not im | pact AC | P | | |
| | | • | | | + | | Respondent strongly objects airspace coving residential ar | to the | e airspace cha | ange ba | sed the volume o | | |



| wildlife and marine life. the Sponsor would offer the following detail from the |
|--|
| Consultation Document: |
| "It is important to note that the process to determine the size of airspace |
| necessary to ensure no additional risk to other airspace users is different to that |
| regarding the 'land safety footprint' and risk to 3rd parties on the ground, and to |
| the process used to establish the risk to maritime 3rd parties. The airspace |
| safety requirements consider a large aircraft with a high number of passengers |
| travelling at high speed therefore, to reach an acceptable level of risk, the |
| segregated airspace area has to be significantly bigger than the land or sea |
| space safety areas. The airspace area therefore does not denote an area of risk |
| to personnel on the ground; there are many UK Danger Areas over land that are |
| there to safeguard aviation and do not indicate that a threat to personnel on the |
| ground exists. EG D704 over Benbecula airport is a good local example. This |
| airspace is activated when there is a risk to other airspace users; the risk to 3rd |
| parties on the ground is evaluated differently and restrictions/warnings are put |
| in place accordingly. In effect any additional risk caused by SP-1 activities to 3rd |
| parties on the ground has to be contained well within the SP-1 site area. It |
| should be further noted that the ground safety footprint (and that over the sea |
| space) is not evaluated under the ACP process; this is addressed separately by |
| the CAA through the Spaceport and Rocket/Launch Operators licences and |
| approvals. Here both the Spaceport operator and the rocket launch provider will |
| need to satisfactorily demonstrate to the CAA that they have a robust safety |
| case, safety management processes and evidence to show the operation is safe |
| and risk to 3rd Parties on the surface is tolerable and within the regulated safety |
| margins – the CAA will only issue the respective licences when these strict safety |
| criteria are met." |
| The respondent also questions the validity of the EIA associated with the |
| planning application and associated mitigations. It is recognised that any |
| changes to the airspace design will not influence or lessen these concerns |
| however, the Sponsor would highlight that there are distinct licensing processes |
| for Spaceports, LV Operators and Range Operators under the SIA. Safety and |
| environmental impact are fundamental considerations in determining whether |
| licences are granted and, when assessing environmental impact, there will be a |

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| | period of public consultation. The Sponsor is unable to comment on public access to the Scolpaig site. As the respondent offers no actionable feedback to suggest that changes should be made to the airspace proposal, it is therefore considered that this response does not impact ACP. |
|--|--|
|--|--|

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| Unique ID 398842546 | Q1 | Q2 | Q3 | Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Object | | |
|------------------------|-------|---|--|---|--|---|---|---|---|------------------|-----------------|--|--|
| | Q8 | Nil | | | | | | | | | | | |
| FN 31 | Q9 | This is an u Adequate Is having been a Noting that Aware of in Important (Risk to loca | unnecessary aunch facilit llowed to sti Scotland vo nportant Sco in a global s al human po | v further int ies are ava II be linked oted agains ottish Satel sense) wild pulation wi | rusion on the live ilable as part of with ESA. It Brexit. lite industry but a life sanctuaries in nen things go wr | ed envi EU (re adequa n the v ong - f | essary for Scottish and UK s ironment of the Western Isles elevant to a future independer ate launch facilities are curren ricinity. first and only UK launch lies o and activities during construct | s. nt Scotla ntly avai on the se | nd) or in curren able. abed somewhe | t situati re. | | | |
| | Q10 | Spaceport-1 s | hould not go | o ahead. | | | | | | | | | |
| | Q11 | Spaceport-1 should not go ahead. | | | | | | | | | | | |
| | Spons | or Categorisation, Assessment and Response/Comments | | | | | | | | | | | |
| | Resp | onse Might Imp and ACP S | | d Design | Response Do Not Impact A | | Spo | onsor Re | emarks/Respons | se | | | |
| | | Impact | No In | npact | | | Categorisation: | Respon | se does not imp | act AC | Р | | |
| | | | | | + | | The respondent strongly objects to the airspace change proposal on the ground that, in their opinion, the SP-1 development should not go ahead and is in needed in the Western Isles. The points raised are mostly outside the scope the ACP process therefore the Sponsor is unable to comment on; oth adequate launch facilities in the EU; BREXIT; the first UK rocket launch; of disturbance to transport, fishing and other important island activities durin construction and operation. The Sponsor would highlight the fact that there a distinct licensing processes for Spaceports, LV Operators and Range Operato under the SIA. Safety and environmental impact are fundamental consideration in determining whether licences are granted and when assessing environment impact, there will be a period of public consultation. As the respondent offers to | | | | | | |

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| | actionable feedback that suggests any changes should be made to the airspace proposal it is determined that the response does not impact ACP. |
|--|---|
| | |
| | |
| | |

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| Unique ID 23026838 | Q1 | Q2 | Q3 | Q4 | Organisation | Q5 | Scottish Fisherman's Federation | Q6 | Offshore Energy Policy manager | Q7 | Strongly Object | | |
|-----------------------|-------|--|----------------|----------|--------------|-------|---|--|--|---|---|--|--|
| | Q8 | Nil | | | • | | • | | | | | | |
| FN 32 | Q9 | the proposed spaceport will disrupt the fishing activities in the area and results in loss of income to fishermen. Secondly, the rocket launch will deposit debris on the seabed that create snagging hazard to fishing gears as well as safety issues for fishers. In addition, the deposited debris destroy the catch in fishing gear if their size are not significant. Lastly, the rocket launch from the spaceport could pose some potential safety risk to the safety of fishers who operate out with the exclusion zone in case the debris/shrapnel of rackets lands outside of the exclusion borders due to wind or other factors. | | | | | | | | | | | |
| | Q10 | Nil | | | | | | | | | | | |
| | Q11 | See Q9. | | | | | | | | | | | |
| | Spons | or Categorisat | ion, Assessm | nent and | Response/Con | nment | S | | | | | | |
| | Resp | onse Might Impa | act Proposed I | Design | Response Do | bes | Sponsor Remarks/Response | | | | | | |
| | | and ACP S | ubmission | - | Not Impact A | CP | · | | | | | | |
| | | Impact | No Imp | act | | | Categorisation: Response does not impact ACP | | | | | | |
| | | | | | + | | It is recognised that airspace Danger Area is often superimposed over the sea as a maritime Danger Area and notified accordingly. However, dependant on the results of the safety analysis conducted for a particular LV, this safety area can | | | | | | |
| | | | | | | | frequently be reduced in size; vessels in the vicinity via marines sea space necessary to ensur- risk to those operating in the vi- account all variables including on debris. The other 'marine' concerns ran MMO who may decide the LV of to launch, this is a requirement guidance documentation at of objects to the airspace change suggests any changes should response does not impact ACF | ne rad e the r cinity. environ ised b operato t deta Chapte es they be ma | io. The Range ocket launch do Such sea spac nmental conditio y the responder or will need to of iled in the SIA 2 er 5. Although y do not offer an | operato es not e safety ons suc nt will bo btain a 2018 ar this r y actio | or will only clear the pose any additional y areas will take into h as wind and effect e covered under the marine licence prior nd in the supporting espondent strongly nable feedback that | | |

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| Unique ID 436985770 | Q1 | Q2 | | Q3 | (| Q4 | Individual | Q5 | NA | Q6 | NA | Q7 | Strongly Support | |
|------------------------|--|---|--|----|-----------|----|------------------------------|----|--|-------|------------------|--------|------------------|--|
| FN 33 | Q8 The airspace change has little if any implication for islanders. If anything the skies will be slightly emptier of planes during the launch windows (whether the launch goes ahead or not), meaning fewer contrails and possibly less noise, although transatlantic flights are shigh as not to make noticeable noise on the islands. The spaceport is a much needed investment in hi-tech jobs and industry on the Hebrides, fully matching the Scottish and UK Govt aims at arresting island de-population and enhancing the island economy. | | | | | | | | | | | | | |
| | Q9 | NA | | | | | | | | | | | | |
| | Q10 | NA | | | | | | | | | | | | |
| | Q11 | The accompanying documents to the consultation indicate that the Sponsor has taken into account all relevant considerations, including emergency access for Coastguard and Air Sea Rescue aircraft. | | | | | | | | | | | | |
| | Spons | Sponsor Categorisation, Assessment and Response/Comments | | | | | | | | | | | | |
| | Resp | Response Might Impact Proposed Design and ACP Submission | | | | | Response Do Not Impact A0 | | Sponsor Remarks/Response | | | | | |
| | | Impact | | | No Impact | | | | Categorisation: | Respo | nse does not imp | act AC | P | |
| | | | | | • | | + | | Respondent strongly supports the proposed airspace change and offers no suggested changes to the proposal therefore, the response does not impact ACP. | | | | | |
| | | | | | | | | | | | | | | |

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C Appendix C – Stakeholder Engagement Record

A Stakeholder Feedback Form – ACP-2021-12

A.1 Do you assess that the presented design options achieve the Design Principles (DPs); please complete the Proforma below accordingly and consider if they are 'Met', 'Partially Met' or 'Not met' in your opinion. Add your rationale in free text as appropriate.

Name:

Representing: Isavia ANS Address: Nautholsvegi 60-66, IS-102 Reykjavik, Iceland

A.1 Which design option do you believe best delivers the DPs?

The area doesn't affect the Reykjavik FIR/CTA so we feel that we shouldn't have an oppinion on the option to choose.

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| | Wed 20/03/2024 08:12 |
|---|--|
| 4 | SP1 ACP |
| | UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation |

You forwarded this message on 20/03/2024 12:09. This message was sent with High importance.

| 9 | Spaceport-1 | ACP | Stage | 3 | Consultation qrcode (1).png | 2 | |
|---|-------------|-----|-------|---|-----------------------------|---|--|
| | 17 KB | | | | | | |

Good Morning,

QinetiQ, as the airspace change Sponsor for Spaceport-1 (SP-1), has previously contacted you with regard to Airspace Change Proposal (ACP) pertaining to the sub-orbital rocket launch site at Scolpaig, North Uist on the Outer Hebrides. We are reaching out to you again as part of the formal consultation requirements.

Background - The ACP has successfully progressed through Stages 1 & 2 of the ACP process. You may recall that we asked you for feedback on the Design Principles (DPs) and later requested that you consider the six original airspace options, providing feedback on whether you thought they aligned to the DPs and met the statement of need. We also notified you that the airspace requirements had been significantly reduced following the decision to remove orbital rocket launch from the ACP design. SP-1 is therefore seeking only to establish sufficient segregated airspace to safely contain sub-orbital rocket operations.

CAP1616 Stage 3 'Consult' - Stage 3 of the ACP process is where formal consultation with stakeholders is undertaken. As part of its Stage 3 Consultation Strategy, SP-1 has planned its stakeholder consultation and developed a series of related documents and materials; these include: the Consultation Strategy; Consultation Document, and, Options Appraisal Phase II (Full). The CAA reviewed and approved the SP-1 consultation documents on 15th March 2024 and, accordingly, the consultation strategy is now being implemented. This strategy will enable all stakeholders (both aviation and non-aviation) to consider the preferred airspace design option and understand how it may affect them, and will provide a platform for timely feedback — this techscave in the ACP process.

Consultation Documents - All three consultation documents can be found on the CAA Airspace Portal at: <u>Airspace change proposal public view (caa.co.uk</u>). This link also provides access to all previous documents associated with this airspace change.

Feedback Survey Questionnaire - The preferred method of providing feedback is through the 'Airspace Change Citizen Space' platform. The Stage 3 questionnaire can be located here along with Frequently Asked Questions (FAQs) and other consultation documentation. The link to 'Citizen Space' can be found at: https://consultations.airspacechange.co.uk/ginetig-td/spaceport-1-acp-stage-3-consultation or, scan the QR code attached.

Questionnaires may also be emailed to the Sponsor using SP1ACP@QinetiQ.com or hard copies sent to:

For attention of the: SP-1 Airspace Change Manager Comhairle nan Eilean Siar Balivanich Council Offices Isle of Benbecula HS7 5LA

Please note that a stamped addressed envelope should be attached if a response is required by post.

Your feedback is welcomed as it is considered an essential part of the ACP process in helping to develop the final airspace design and associated procedures. Furthermore, it enables the Sponsor to gain a better understanding of your operations and how they might be impacted by this airspace change. Any impact will be considered and appropriate mitigations developed to minimise any identified adverse impact(s). Stakeholders should only consider the impact of the airspace design and feedback should be focused solely on this area, not on any wider aspects of rocket launch.

Timeline – The consultation period will commence on Wednesday 20th March 2024 and remain open for just over 9 weeks, concluding on Friday 24th May 2024 after which the survey questionnaire will no longer be available. This scaled consultation period is considered proportionate to the size of the airspace change and the engagement activities conducted to date.

Please Note:

1. Your response will be managed in the strictest confidence and in accordance with UK Data Protection guidance - the guestionnaire facilitates those who wish to keep their feedback private.

2. This consultation is purely for the permanent airspace solution and not the temporary airspace change contained in ACP-2021-37, which is currently paused.

Kind Regards

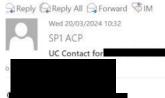




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^

Hopefully you will have received notification this morning of the formal consultation for the SP-1 rocket launch site at Scolpaig with directions on how to provide feedback. I have tried to send the same email to whom we previously liaised regarding Sollas, unfortunately the email I have no longer seems to work, do you have an alternative by chance?

You will note from the Citizen Space platform (where the consultation documents, FAQs and questionnaire are facilitated), that there is a public drop in event to held at Hosta Hall North Uist on 17th Apr from 1pm until 7.30pm; I hope you ca make it.

Kind Regards



Q 🖬 🖬 🖪 😹

QINETIQ/UKD/EMEA/AS/TR240045

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Spaceport-1 ACP Stage 3 Consultation grcode (1) (002).png 17 KB

From: SP1 ACP <SP1ACP@qinetiq.com> Sent: 20 March 2024 07:50

Subject: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION

Good Morning

QinetiQ, as the airspace change Sponsor for Spaceport-1 (SP-1), is reaching out to you with regard to the formal consultation process pertaining to the Airspace Change Proposal (ACP) for the sub-orbital rocket launch site at Scolpaig, North Uist on the Outer Hebrides.

Background - The ACP has successfully progressed through Stages 1 & 2 of the ACP process where the Sponsor was required to engage with certain key (mainly aviation) stakeholders to assist in the development of the airspace Design Principles (DPs) and later, to review six original airspace options. Stakeholders were also notified that the initial airspace requirements had been significantly reduced following the decision to remove orbital rocket launch from the ACP design. SP-1 is therefore seeking only to establish sufficient segregated airspace to safe) contain sub-orbital rocket operations.

CAP 1616 Stage 3 'Consult' – Stage 3 of the ACP process is where formal consultation with stakeholders is undertaken. As part of its Stage 3 Consultation Strategy, SP-1 has planned its stakeholder consultation and eveloped a series of related documents and materials; these include: the Consultation Strategy; Consultation Document, and, Options Appraisal Phase II (Full). The CAA reviewed and approved the SP-1 consultation documents on 15th March 2024 and, accordingly, the consultation strategy is now being implemented. This strategy will enable all stakeholders (both aviation and non-aviation) to consider the preferred airspace design and associated operating procedures.

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Questionnaires may also be emailed to the Sponsor using SP1ACP@QinetiQ.com or hard copies sent to:

For attention of the: SP-1 Airspace Change Manager Comhairle nan Eilean Siar Balivanich Council Offices Isle of Benbecula HS7 6LA

Please note that a stamped addressed envelope should be attached if a response is required by post.

Your feedback is welcomed as it is considered an essential part of the ACP process in helping to develop the final airspace design and associated procedures. Furthermore, it enables the Sponsor to gain a better understanding of your operations and how they might be impacted by this airspace change. Any impact will be considered and appropriate mitigations developed to minimise any identified adverse impact(s). Stakeholders should only consider the impact of the airspace design and feedback should be focused solely on this area, not on any wider aspects of rocket launch.

Timeline – The consultation period will commence on Wednesday 20th March 2024 and remain open for just over 9 weeks, concluding on Friday 24th May 2024 after which the survey questionnaire will no longer be available. This scaled consultation period is considered proportionate to the size of the airspace change and the engagement activities conducted to date.

Please Note

1. Your response will be managed in the strictest confidence and in accordance with UK Data Protection guidance - the questionnaire facilitates those who wish to keep their feedback private.

2. This consultation is purely for the permanent airspace solution and not the temporary airspace change contained in ACP-2021-37, which is currently paused.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



QINETIQ/UKD/EMEA/AS/TR240045

Page C-4





From: SP1 ACP





Subject: UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation Importance: High

Good Morning,

QinetiQ, as the airspace change Sponsor for Spaceport-1 (SP-1), has previously contacted you with regard to Airspace Change Proposal (ACP) pertaining to the sub-orbital rocket launch site at Scolpaig, North Uist on the Outer Hebrides. We are reaching out to you again as part of the formal consultation requirements.

Background - The ACP has successfully progressed through Stages 1 & 2 of the ACP process. You may recall that we asked you for feedback on the Design Principles (DPs) and later requested that you consider the six original airspace options, providing feedback on whether you thought they aligned to the DPs and met the statement of need. We also notified you that the airspace requirements had been significantly reduced following the decision to remove orbital rocket launch from the ACP design. SP-1 is therefore seeking only to establish sufficient segregated airspace to safely contain sub-orbital rocket operations.

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QINETIQ/UKD/EMEA/AS/TR240045

Page C-5



Wed 20/03/2024 10:03 SP1 ACP

UC FW: UC FW: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION

To vesternisleslibdems@gmail.com

Follow up. Completed on 09 April 2024. You forwarded this message on 10/04/2024 08:10. This message was sent with High importance.

Spaceport-1 ACP Stage 3 Consultation qrcode (1) (002).png 17 KB

From: SP1 ACP Sent: 20 March 2024 10:01

Subject: UC FW: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION

From: SP1 ACP

Sent: 20 March 2024 07:50



Subject: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION

Good Morning

QinetiQ, as the airspace change Proposal (ACP) for the sub-orbital rocket launch site at Scolpaig, North Uist on the Outer Hebrides.

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QINETIQ/UKD/EMEA/AS/TR240045

Page C-6



Subject: UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation Importance: High

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QINETIQ/UKD/EMEA/AS/TR240045

Page C-7



| Wed 20/03/2024 09:25 |
|--|
| SPI ACP |
| UC FW: UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation |
| To |
| 1 This message was sent with High importance. |
| Spaceport-1 ACP Stage 3 Consultation qrcode (1).png 17 KB |
| Originally sent to your old email address thus forwarded accordingly. Lassume you can cascade to appropriate recipients including Shannon and any others you see as potential stakeholders |
| Kind Regards |
| |
| |
| |
| |
| Email: <u>SP1ACP@Qinet/Q.com</u> |
| QINETIQ |

Connect with us:

From: SP1 ACP
Sent: 20 March 2024 08:12
Subject: UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation

Importance: High

Good Morning,

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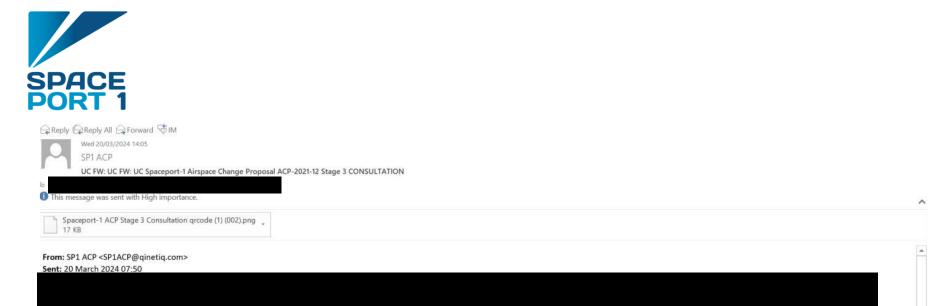
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QINETIQ/UKD/EMEA/AS/TR240045

Page C-8



Subject: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION

Good Afternoon,

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Questionnaires may also be emailed to the Sponsor using SP1ACP@QinetiQ.com or hard copies sent to:

For attention of the: SP-1 Airspace Change Manager

*

QINETIQ/UKD/EMEA/AS/TR240045

Page C-9



Thu 21/03/2024 10:53 SP1 ACP RE: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION To O'North Uist Community Coundif O Follow up. Start by 29 May 2024. Due by 29 May 2024.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

From: North Uist Community Council <northuistcommunitycouncil@gmail.com> Sent: 21 March 2024 10:02 To: SP1 ACP <SP1ACP@qinetiq.com> Subject: Re: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION

Good morning.

The North Uist Comminity Council have noticed that there may have been some stakeholders omitted from your previous email.

Can we suggest that you share this with the following, if you haven't already done so:

- Berneray Community council: berneraycommunitycouncil@gmail.com



@cne-siar.gov.uk

Kind regards,

- Cllr

Secretary North Uist Community Council Visit our <u>facebook page</u> for updates

QINETIQ/UKD/EMEA/AS/TR240045

Page C-10



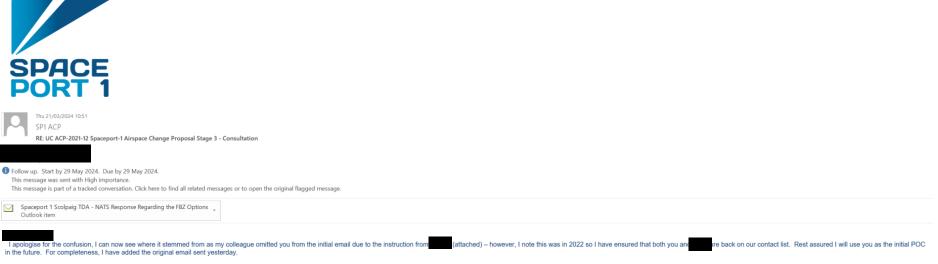
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QINETIQ/UKD/EMEA/AS/TR240045

Page C-11



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For attention of the: SP-1 Airspace Change Manager Comhairle nan Eilean Siar Balivanich Council Offices Isle of Benbecula HS7 5LA

Please note that a stamped addressed envelope should be attached if a response is required by post.

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QINETIQ/UKD/EMEA/AS/TR240045

Page C-12



Thank you for contacting us. We will reply to you as soon as we can, this will normally be within 20 working days.

Our listing, scheduling and their associated consents have their own response times and you can find more details about this on our website here in our Planning Service Standard.

Heritage Directorate

Historic Environment Scotland - Scottish Charity No. SC045925 Registered office: Longmore House, Salisbury Place, Edinburgh, EH9 1SH Historic Environment Scotland Enterprises Ltd – Company No. SC510997 Registered office: Longmore House, Salisbury Place, Edinburgh, EH9 1SH Scran Ltd – Company No. SC163518 Registered office: John Sinclair House, 16 Bernard Terrace, Edinburgh, EH8 9NX

This e-mail does not form part of any contract unless specifically stated and is solely for the intended recipient. Please inform the sender if received in error.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-13



Reply Reply All Groward The IM



Tue 26/03/2024 11:38 SP1 ACP **RE: UC Contact**

() Follow up. Start by 29 May 2024. Due by 29 May 2024.

Good Morning

Thank you for your email and confirming **the second** email. Unfortunately this is the same one I have and the emails repeatedly come back as undeliverable. If you could source an alternative for them that would be very much appreciated.

We will look forward to receiving details of this year's 'Sollas fly in event and thank you for your ongoing engagement and support.

Kind Regards



Email: SP1ACP@QinetiQ.com



QINETIQ/UKD/EMEA/AS/TR240045

Page C-14





QINETIQ/UKD/EMEA/AS/TR240045

Page C-15



UC Spaceport-1 Scolpaig North Uist Airspace Change Proposal - Formal Consultation

To imarinescotland@gov.scot'; imarinePlanning@gov.scot' Follow up. Start by 29 May 2024. Due by 29 May 2024.

This message was sent with High importance.

Wed 27/03/2024 13:12

Good Afternoon,

QinetiQ, as the airspace change Sponsor for Spaceport-1 (SP-1), is reaching out to you with regard to the formal consultation process pertaining to the Airspace Change Proposal (ACP) for the sub-orbital rocket launch site at Scolpaig, North Uist on the Outer Hebrides.

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- 1. Your response will be managed in the strictest confidence and in accordance with UK Data Protection guidance the questionnaire facilitates those who wish to keep their feedback private.
- 2. This consultation is purely for the permanent airspace solution and not the temporary airspace change contained in ACP-2021-37, which is currently paused.

Kind Regards

QINETIQ

QINETIQ/UKD/EMEA/AS/TR240045

Page C-16





This message was sent with High importance.

Spaceport-1 ACP Stage 3 Consultation qrcode (1).png

Good Morning,

Your email has been returned as undeliverable so resending.

QinetiQ, as the airspace change Sponsor for Spaceport-1 (SP-1), has previously contacted you with regard to Airspace Change Proposal (ACP) pertaining to the sub-orbital rocket launch site at Scolpaig, North Uist on the Outer Hebrides. We are reaching out to you again as part of the formal consultation requirements.

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Please Note:

QINETIQ/UKD/EMEA/AS/TR240045

Page C-17



Reply Reply All Groward Star



Tue 02/04/2024 12:49

UC Contact for Logan Air - SP-1 ACP consultation

To BenbATC'

1 This message was sent with High importance.

Good Afternoon,

Hopefully you have received my invitation to provide feedback on the SP-1 ACP as part of the consultation process. You will note that we are holding a public drop in event at Hosta Hall North Uist on 17th May 1300-1930. As I will be travelling to the Hebs' for this event and arriving the previous day I wondered if there would be any value in meeting beforehand in case you have any questions or issues you would like to raise? I fully understand if you do not consider this necessary but just thought I would mention it as I am in the area. I wonder if you would also be kind enough to confirm the best correct contact for Logan Air; is it still

Kind Regards



Email: SP1ACP@QinetiQ.com



- ...

QINETIQ/UKD/EMEA/AS/TR240045

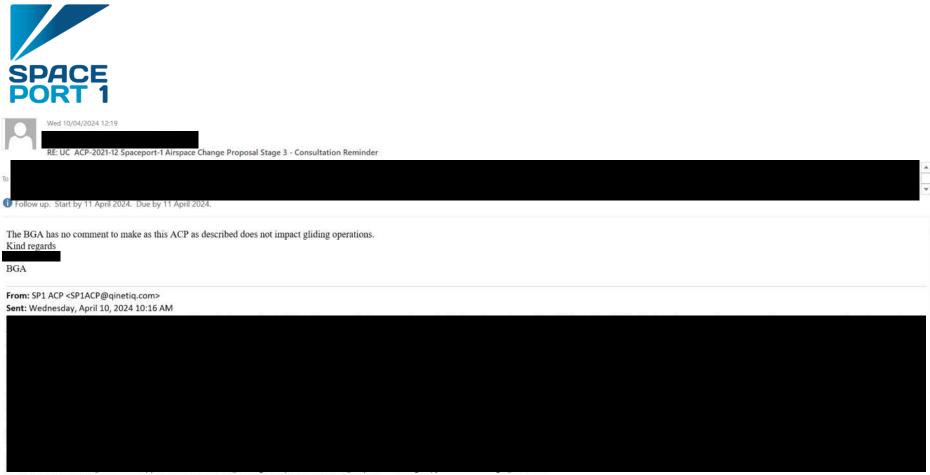
Page C-18



| Mon 08/04/2024 11:41 |
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| |
| RE: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION |
| To SP1 ACP |
| 🚯 Follow up. Start by 09 April 2024. Due by 09 April 2024. |
| You replied to this message on 09/04/2024 09:26. |
| |
| Hi, |
| |
| Following on from your email to RYA Scotland Planning and Environment Officer, as this application only relates to |
| airspace, Royal Yachting Association Scotland has no comment to make on the proposal. |
| |
| Kind Regards |
| |
| |
| |
| |
| |
| Senior Administrator |
| Mob: |
| Parel Veckting Association Contland |
| Royal Yachting Association Scotland |
| |
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QINETIQ/UKD/EMEA/AS/TR240045

Page C-19



Subject: UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation Reminder

Good Morning,

Thank you to those whom have already responded and completed the questionnaire relating to the Spaceport-1 airspace change proposal. Stakeholders are politely reminded that the consultation window for this airspace change proposal will close on Friday 24th May 2024 and we would appreciate your feedback. Details on how to respond are contained in the original email below.

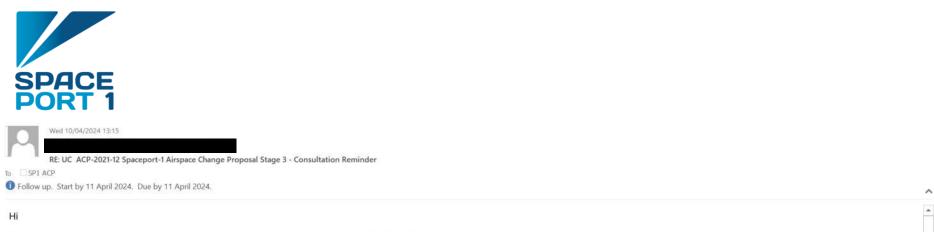
Please further note that there will be a 'public drop in event' held at Hosta Hall, North Uist from 1300 to 1930 on Wednesday 17th April 2024 where there will be the opportunity to ask questions and discuss the airspace change proposal; all are welcome to attend.

Thanking you in anticipation.

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



Page C-20



The MCA has no concerns relating to this airspace change. As noted in the document, SAR is difficult to predict but we will have contact numbers available for the spaceport and any concerns of active launches will be discussed at the time.

Cheers



From: SP1 ACP <SP1ACP@qinetiq.com>



Subject: UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation Reminder

QINETIQ/UKD/EMEA/AS/TR240045

Page C-21



Subject: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION Reminder Importance: High

Good Morning,

Thank you to everyone who has already responded and completed the questionnaire relating to the airspace change proposal for Spaceport-1. For those whom have not yet responded but wish to do so, you are politely reminded that the formal consultation period ends on Friday 24th May 2024. Details on how to respond are contained in the original email below.

There will be a 'public drop in event' held at Hosta Hall, North Uist from 1300 to 1930 on Wednesday 17th April 2024 where there will be the opportunity to ask questions and discuss the airspace change proposal; all are welcome to attend.

Thanking you in anticipation.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:

SPACE Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

Original Email:

QINETIQ/UKD/EMEA/AS/TR240045

Page C-22



Wed 10/04/2024 10:16 SP1 ACP

UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation Reminder

You replied to this message on 08/05/2024 09:16.

Good Marring. Thank you to hose whom have already responded and completed the questionnaire relating to the Spaceport-1 airspace change proposal. Stakeholders are politely reminded that the consultation window for this airspace change proposal will dose on Friday 24th May 2024 and we would appreciate your feetback. Details on how to respond are contained in the original email below

Please further note that there will be a 'oublic drop in event' held at Hosta Hail. North Uist from 1300 to 1930 on Wednesday 17th April 2024 where there will be the opportunity to ask questions and discuss the airspace change proposal; all are welcome to attend

Thanking you in anticipation.

QINETIQ hange Sponsor on behalf of



Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

Good Moming_ Ginet(0, as the singuace change Sponsor for Spaceport 1 (SP-1), has previously contacted you with regard to Airspace Change Proposal (ACP) pertaining to the sub-orbital rocket launch site at Scolpaig, North Uist on the Outer Hebrides. We are reaching out to you again as part of the formal consultation requirements.

Background - The ACP has successfully progressed through Stages 1 & 2 of the ACP process. You may recall that we asked you for feedback on the Design Principles (DPs) and later requested that you consider the six original airspace options, providing feedback on whether you thought they aligned to the DPs and met the statement of need. We also notified you that the airspace requirements had been significantly reduced following the decision to remove orbital rocket launch from the ACP design. SP-1 is therefore seeking only to establish sufficient segregated airspace to safely contain sub-orbital rocket operations. CAP1616 Stage 3 'Consult' - Stage 3 of the ACP process is where formal consultation with stakeholders is undertaken. As part of its Stage 3 Consultation Strategy, SP-1 has planned its stakeholder consultation and developed a series of related documents and materials; these include: the Consultation Strategy Consultation Document, and, Options Appraisal Phase II (Full). The CAA reviewed and approved the SP-1 consultation documents on 15th March 2024 and, accordingly, the consultation strategy is now being implemented. This strategy will enable all stakeholders (both aviation and non-aviation) to consider the preferred airspace design option and understand how it may affect them, and will provide a platform for timely feedback will inform the 'Final Options Appraisal' in Stage 4 of the ACP process.

Consultation Documents - All three consultation documents can be found on the CAA Airspace Portal at: Airspace change proposal public view (caa.co.uk). This link also provides access to all previous documents associated with this airspace change

Feedback Survey Questionnaire - The preferred method of providing feedback is through the 'Airspace Change Citizen Space' can be found at: https://consultations.airspacechange.co.uk/qinetiq-ltd/spaceport-1-acp-stage-3-consultation or, scan the QR code attached.

Questionnaires may also be emailed to the Sponsor using SP1ACP@QinetiQ.com or hard copies sent to

For attention of the: SP-1 Airspace Change Manage Comhairle nan Eilean Siar Balivanich Council Offices Isle of Benbecula HS7 5LA

Please note that a stamped addressed envelope should be attached if a response is required by post.

Your feedback is welcomed as it is considered an essential part of the ACP process in helping to develop the final airspace design and associated procedures. Furthermore, it enables the Sponsor to gain a better understanding of your operations and how they might be impacted by this airspace change. Any impact will be considered and appropriate mitigations developed to minimise any identified adverse impact(s). Stakeholders should only consider the impact of the airspace design and feedback should be focused solely on this area, not on any wider aspects of rocket launch.

Timeline - The consultation period will commence on Wednesday 20th March 2024 and remain open for just over 9 weeks, concluding on Friday 24th May 2024 after which the survey questionnaire will no longer be available. This scaled consultation period is considered proportionate to the size of the airspace change and the engagement activities conducted to date

Please Note:

1. Your response will be managed in the strictest confidence and in accordance with UK Data Protection guidance - the questionnaire facilitates those who wish to keep their feedback private.

2. This consultation is purely for the permanent airspace solution and not the temporary airspace change contained in ACP-2021-37, which is currently paused.

Kind Regards QINETIQ

Change Sponsor on behalf of

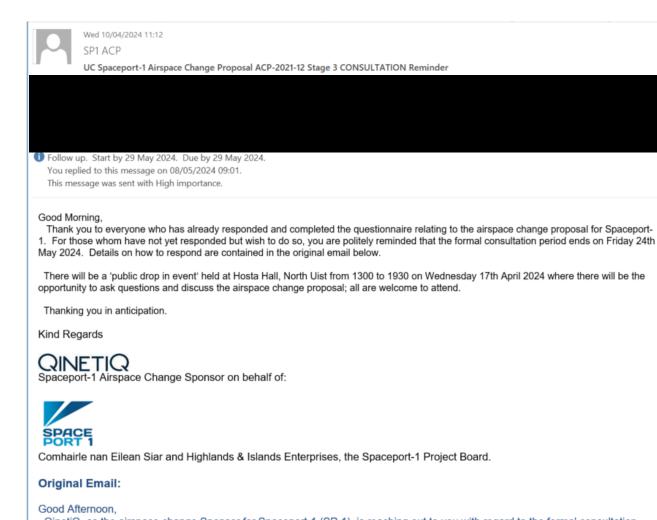


Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-23





QINETIQ/UKD/EMEA/AS/TR240045

Page C-24





QINETIQ/UKD/EMEA/AS/TR240045

Page C-25





Hi

PSB email sent out at the beginning of the consultation last month – the consultation runs until 24 May. You may be interested to know that we have engaged with Loganair and other operators in the local Uist area and during the earlier stages of the ACP process they were content that the extant procedures with the MOD Hebs Range (whom will be controlling authority for this new small airspace 'fillet'), when read across to the new airspace will enable the appropriate access (when safe) and notification. Any questions please drop me a line

Sent: 20 March 2024 08:12



Subject: UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation Importance: High

Good Morning,

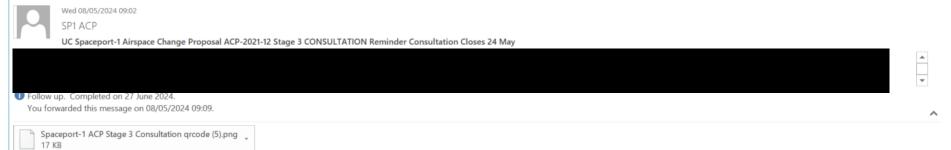
QinetiQ, as the airspace change Sponsor for Spaceport-1 (SP-1), has previously contacted you with regard to Airspace Change Proposal (ACP) pertaining to the sub-orbital rocket launch site at Scolpaig, North Uist on the Outer Hebrides. We are reaching out to you again as part of the formal consultation requirements.

Background - The ACP has successfully progressed through Stages 1 & 2 of the ACP process. You may recall that we asked you for feedback on the Design Principles (DPs) and later requested that

QINETIQ/UKD/EMEA/AS/TR240045

Page C-26





Good Morning,

Thank you to everyone who has already responded and completed the questionnaire relating to the airspace change proposal for Spaceport-1. For those whom have not yet responded but wish to do so, you are politely reminded that the formal consultation period ends on Friday 24th May 2024. Responses can be made via the Citizen Space questionnaire located at: https://consultation.airspacechange.co.uk/ginetig-ltd/spaceport-1-acp-stage-3-consultation or scan the QR code attached.

Thanking you in anticipation.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:

SPACE Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-27





UC FW: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION Reminder Consultation Closes 24 May

J Follow up. Start by 19 June 2024. Due by 19 June 2024.

Spaceport-1 ACP Stage 3 Consultation grcode (5).png 17 KB

nina kegaras

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

From: SP1 ACP Sent: 08 May 2024 09:02

Subject: UC Spaceport-1 Airspace Change Proposal ACP-2021-12 Stage 3 CONSULTATION Reminder Consultation Closes 24 May

Good Morning,

Thank you to everyone who has already responded and completed the questionnaire relating to the airspace change proposal for Spaceport-1. For those whom have not yet responded but wish to do so, you are politely reminded that the formal consultation period ends on Friday 24th May 2024. Responses can be made via the Citizen Space questionnaire located at:

https://consultations.airspacechange.co.uk/qinetiq-ltd/spaceport-1-acp-stage-3-consultation or scan the QR code attached.

Thanking you in anticipation.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



QINETIQ/UKD/EMEA/AS/TR240045

Page C-28



| | Wed 08/05/2024 09:17 | |
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| Follow | up. Start by 19 June 2024. Due by 19 June 2024. | |
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| Thank | you to everyone who has already responded and completed the questionnaire relating to the airspace change proposal for | |
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| ttps://co | onsultations.airspacechange.co.uk/qinetiq-ltd/spaceport-1-acp-stage-3-consultation or scan the QR code attached. | |
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| Thankir | ng you in anticipation. | |
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QINETIQ/UKD/EMEA/AS/TR240045

Page C-29





1 Follow up. Start by 19 June 2024. Due by 19 June 2024.

Dea

Thank you kindly for your email below that my colleague kindly responded to in my absence. The incorrect date on Citizen Space has now been rectified (thank you for your observation) and I can confirm the consultation period extends until 24th May 2024. With regard to your question regarding commercial flights over North Uist during Spaceport-1 rocket launch periods, you are correct insomuch that such flights will deviate from their normal flight path directly over North Uist during Spaceport-1 rocket launch periods, you are correct insomuch that such flights will deviate from their normal flight path directly over North Uist during Spaceport-1 rocket launch periods, when the altitude of their aspect (the prior bar activate) to be overhead of someone on the ground that the flights are continuing to flight should not be seen <u>directly</u> overhead during verhead durin

If you have any further questions please do not hesitate to contact me.

Kind Regards



QINETIQ

Connect with us:

Q 🖬 🖬 🚺 😹



To: SP1 ACP <SP1ACP@qinetiq.com> Subject: Scolpaig

Hello,

I have two small queries regarding the air-space consultation in relation to Scolpaig spaceport.

Firstly, would I be right in thinking that, when the proposed air-space segments are closed for the resultant diversions will mean marginally less commercial flight activity over North Uist than normal (excepting the rocket)?

Secondly, in the last paragraph of the blurb on page 2 of the online consultation it says "The consultation period is from 4th December 2023 to 12th February 2024" (see also attached screenshot). Assuming this is erroneous (it says it closes 24th May in the top left of the page), could this be corrected or removed so as not to potentially put people off completing the survey if they think it is already over?

Many thanks,

Best wishes,



Why not plan your visit in advance: order "A Guided Tour of Uist" from Amazon today.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-30



🕞 Reply 🕞 Reply All 🕞 Forward 🌾 IM

| | Tue 14/05/2024 08:46 | |
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| То | UC: FW: UC ACP-2021-12 Spaceport-1 Airspace Chang | ge Proposal Stage 3 - Consultation Reminder |
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PSB link to the Spaceport -1 airspace change (at bottom of email) or via QR code attached here you can access all the necessary documents I highlighted yesterday. There is also a consultation questionnaire that you can complete if you desire. Please note the consultation and access to this site ends on Friday 24th May

Kind Regards

Sent with BlackBerry Work (www.blackberry.com)

| From: SP1 ACP < <u>SP1ACP@qinetiq.com</u> > | | | |
|---|--|--|--|
| Date: Wednesday 08 May 2024 at 10:16 AM | | | |
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QINETIQ/UKD/EMEA/AS/TR240045

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| | Wed 15/05/2024 12:57 |
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| \sim | SP1 ACP |
| | UC SP-1 ACP Consultation Response |
| ío - | |
| Bec | |
| This me | ssage was sent with High importance. |
| | |
| | |
| Thank y | ou for your response to the SP-1 ACP questionnaire. You posed a few questions that I have answered inline below: |
| aim was airspace Spacepo Manager currently 2. Does 3. Has th potential potential they hav 4. Space conflict b SaxaVor | use of the D701 complex in accordance with its original purpose? In October 2016 the Hebrides D701 Post Implementation Review said ""The to amend the DA complex in order to safely accommodate current and future weapons systems tests within its boundaries,"". Is the use of the by commercial rocket operators allowed under this purpose? Although slightly surprised by this question (and relevance this has to SaxVord t), in essence this is a matter for the MOD and we suggest you contact them with your question through the Defence Airspace Air Traffic nent (DAATM) organisation and/or MOD Danger Area Airspace Manager (DAAM). You may also wish to note that commercial activities are conducted in other MOD Danger Areas so a precedent has already been set. he suggested airspace contain all possible Impact Dispersion Areas of the rockets that are intended to launch from Spaceport 1? Yes. e impact of the activation of other adjacent danger areas, eg D712 or the Cape Wrath Air weapons range area been considered? Will this y restrict activation of the suggested airspace? Yes, we are cognisant of adjacent Danger Areas and the impact coincident activation could y have on the Air Traffic Management network, for this reason we are keen to use the existing airspace procedures and protocols for D701 as a deconfliction considerations defined. hub Sutherland is also undertaking an airspace change, will there be any conflict between these two ACPs?" There should not be any direct etween these two ACPs as the airspace requirements, to the best of our knowledge, do not overlap. As with all airspace activity, including 4, Spaceport operators will need to have a clear set of airspace protocols for the region defined and agreed by all parties – it is suggested that tocols will need to be decided at governmental level. |
| Kind Reg | ards |
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| Spacepo | rt-1 Airspace Change Sponsor on behalf of: |
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| | e nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board. |
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QINETIQ/UKD/EMEA/AS/TR240045

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| | Thu 16/05/2024 10:36 |
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| | SP1 ACP |
| | UC SP-1 response to consultation feedback questionnaire |
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| | |
| | 20240417_Drop_In_Event_Hosta_Hall_17Apr24_NOTES_v1.3.pdf |
| PDF | 584 KB |

Dear

Thank you for completing the online airspace change response questionnaire where you raise a number of concerns several of which, not the least the CO2 emissions figures, were raised at the public drop in event. These issues and other points have been captured in the attached which summarises the key questions asked along with the airspace Sponsors response.

With regard to you concern relating to safety distances it should be noted that the ground safety footprint is not part of the airspace change requirements so is not evidenced in the airspace change consultation documentation. However, safety distances will form part of the Launch Vehicle (LV) operator's licencing and that of the Spaceport. It is however worth noting that the FAA and CAA approach to safety distances is subtly different. The UK regulator does not currently specify blanket distances, preferring instead to licence launches and locations on the basis of the data bespoke vehicle and propellant composition data. This is considered a more accurate approach given the need to scrutinise every launch. If the launch vehicle provider cannot adequately demonstrate that their LV (in a worst-case catastrophic failure event), be contained within this ground (and sea) and airspace safety areas, then they will not be permitted or licenced to operate from the Spaceport-1 launch site.

We do hope this helps provide you with some clarification on the points your raise.

Kind Regards

Spaceport-1 Airspace Change Sponsor on behalf of:

SPACE Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-33



To acc.office@isavia.is'

This message was sent with High importance.

To Whom it May Concern,

Thank you for completing the UK CAA Citizen Space platform questionnaire relating to the proposed airspace change necessary to support a vertical launch Spaceport.) on North Uist, Outer Hebrides, Scotland. We note from your response that you make several references to airspace that lies well outside the Spaceport.1 area of interest and upon further examination we have determined that your response is exactly the same as you sent to the SaxaVord Spaceport team during their Stage 3 formal consultation period. The wording contained in your response is relevant to SaxaVord however, we do not see any relevance to Spaceport.1. You may wish to amend your response or email us if you do indeed have any concerns relating to the Spaceport.1 airspace change proposal. Please note the formal consultation and the Citizen Space site will close on Friday 24th May 2024.

Kind Regards





Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-34



Reply Reply All Groward SIM



Tue 21/05/2024 14:55 SP1 ACP

UC ACP-2021-12 Spaceport-1 Stage 3 Consultation - Sponsor response to Citizen Space feedback

Dear

Thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. Having considered you response we have determined that the points you raise are not specifically relevant to the airspace design options presented or the preferred final airspace design solution. Your objections to the airspace change appear to be focused on wider issues of a Spaceport on North Uist rather than the airspace change and airspace design; as airspace Sponsor we are therefore unable to comment further on these aspects. Although you also refer to the safety aspects of rocket operations, these do not appear to include the airspace element, rather more generic ground/surface safety aspects. Again these elements are not specifically part of the airspace change but will be an integral part of the Spaceport licence and the Launch vehicle (LV) operator's licence; both of which must satisfy the civil regulator that their respective operations are safe.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-35



Reply Reply All Forward IM



To

SP1 ACP

UC ACP-2021-12 Spaceport-1 Stage 3 Consultation - Sponsor response to Citizen Space feedback

Dear

Thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. Having considered you response we have determined that the points you raise are not specifically relevant to the airspace design options presented or the preferred final airspace design solution. Your objections to the airspace change appear to be focused on wider issues of a Spaceport on North Uist rather than the airspace change and airspace design; as airspace Sponsor we are therefore unable to comment further on these aspects.

1

Kind Regards





Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-36



Reply Reply All Groward



To

Tue 21/05/2024 14:34

UC Spaceport-1 Airspace Change proposal Stage 3 Consultation - Feedback received via Citizen Space, Sponsor response

Thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. Having considered you response we have determined that the points you raise are not specifically relevant to the airspace design options presented or the preferred final airspace design solution. Your objections to the airspace change appear to be focused on the planning process and associated environmental assessments and socioeconomic reports rather than the airspace design; as airspace Sponsor we are therefore unable to comment further on these aspects. Although you also refer to the safety aspects of rocket operations, these do not appear to include the airspace element, rather the ground/surface safety aspects. Again these elements are not specifically part of the airspace change but will be an integral part of the Spaceport licence and the Launch vehicle (LV) operator's licence; both of which must satisfy the civil regulator that their respective operations are safe.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-37



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Thank you for your response to the Spaceport-1 ACP Stage 3 consultation, your points are duly noted and we offer the following in way of a response.

Points you raise are widely understood by the Sponsor and acknowledged in detail within the ACP documentation contained in all Stages of the process. It is recognised that it is the activation of D701 that will cause the impact on the NAT ATM network and for this reason launches will be in the afternoon (post 1400 where OEPs are impacted), trajectories will be selected such that they minimise the number of OEPs affected and notification/agreement on use of airspace in accordance with current MOD Hebrides Range procedures - our aim is to use this current 'best practice' operated at the MOD Hebrides Range to minimise the impact on the ATM network using the procedures contained in the extant LoAs. We will either add an appendix to the existing LoA that includes rocket launch from SP-1 or, map across the current agreements to a standalone LoA. MOD Hebrides Range staff, whom will be managing SP-1 activities, have an excellent working relationship with NATS, AirNav Ireland and the UK AMC.

Thank you again for taking time to complete the questionnaire.

Kind Regards

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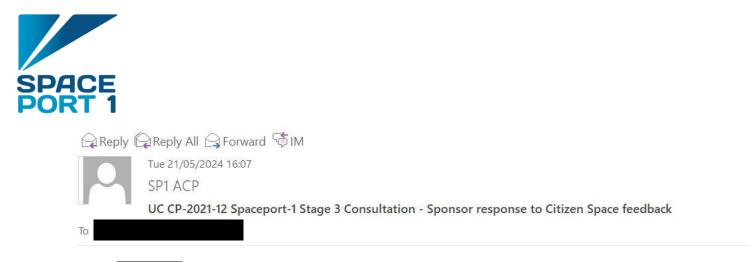
QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-38



Dear

Thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. Having considered you response we have determined that the points you raise are not specifically relevant to the airspace design options presented or the preferred final airspace design solution. Your objections to the airspace change appear to be focused on wider issues of militarisation of space, the more generic environmental effects in the immediate vicinity of the launch site and upper atmosphere, and orbital launch (satellites), rather than the airspace design. As the points you raise fall outside the airspace change process we, as airspace change Sponsor, are unable to comment further on these aspects.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-39



Reply Reply All Groward TM

Tue 21/05/2024 15:56 SP1 ACP

UC ACP-2021-12 Spaceport-1 Stage 3 Consultation - Sponsor response to Citizen Space feedback

Dear

Thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. Having considered you response we have determined that the points you raise are not specifically relevant to the airspace design options presented or the preferred final airspace design solution. Your objections to the airspace change appear to be focused on wider issues of a Spaceport on North Uist rather than the airspace change and airspace design; as airspace Sponsor we are therefore unable to comment further on these aspects.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-40



Reply Reply All Sorward The

Wed 22/05/2024 15:33 SP1 ACP

RE: UC ACP-2021-12 Spaceport-1 Stage 3 Consultation - Sponsor response to Citizen Space feedback



We regret that you feel we have dismissed your comments, I can assure you they have been recorded and will feature in the airspace Consultation Response Report that will be available to the public on the CAA airspace portal in about a month. However, we must stress that the airspace change consultation is exactly that, a consultation on the proposed airspace design. As the airspace subject matter experts we are only really qualified to comment on airspace related issues not the wider impact a Spaceport might have on communities or the planning processes involved. We apologise if the airspace consultation has failed to meet your expectations but reiterate the fact your response will be formally recorded and included in the Consultation Report.

Kind Regards





Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

From

Sent: 21 May 2024 14:58 To: SP1 ACP <SP1ACP@qinetiq.com> Subject: Re: UC ACP-2021-12 Spaceport-1 Stage 3 Consultation - Sponsor response to Citizen Space feedback

Dear nameless person at Qinetiq

Thank you for you email which acknowledges that you have at least read the comments on the questionnaire.

Your dismissal of them so that you mindlessly persue your own agenda irrespective of the wider indigenous community in which you propose locating the space port. A place with no underemployment, a place of deep culture legacy, environmental custodianship.

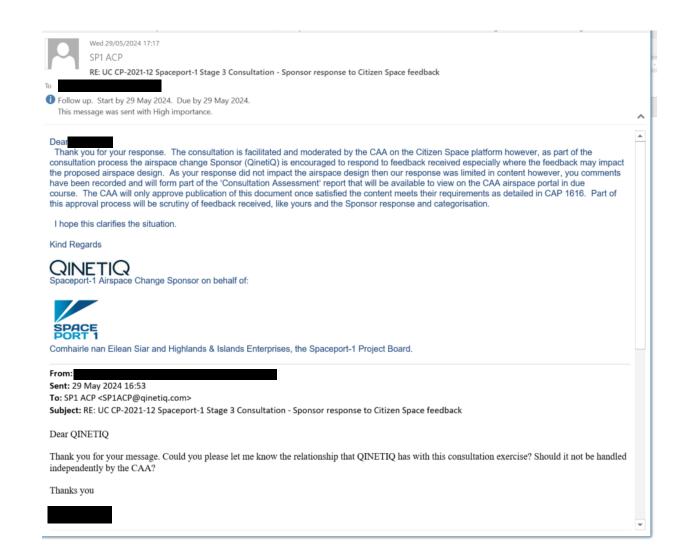
How else is the community going to share its voice. The questionnaire was a vehicle. Your so called 'consultation' at Hosta, in a dimmly lit room, overload of scientific jargon - hardly a meaningful engagement.

Look to your plan and think of those who are deeply unhappy with what you propose.

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SP1 ACP

Thu 30/05/2024 08:26

UC ACP-2021-12_Spaceport-1_Stage_3_Consultation - Sponsor Response to Feedback Received

Follow up. Start by 30 May 2024. Due by 30 May 2024.

Dear .

Thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. Having considered you response we have determined that the points you raise are not specifically relevant to the airspace design options presented or the preferred final airspace design solution. As they do not offer any actionable feedback on the airspace design, we as the airspace Sponsor and airspace subject matter experts, are unable to provide any further comments. However, your feedback will be recorded in the Consultation Review Document that will be available on the CAA airspace portal in due course.

1

Kind Regards





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Page C-43



Thu 30/05/2024 08:27

SP1 ACP UC SP-1 ACP Consultation - Sponsor Response

Follow up. Start by 30 May 2024. Due by 30 May 2024.

Dear

Thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. Having considered the three points you raise we have determined that these are not specifically relevant to the airspace design options presented or the preferred final airspace design solution. The concerns you raise will be covered under the marine licence that the Launch vehicle (LV) operator will need to obtain as detailed in the Space Industry Act 2018 and in the supporting guidance documentation at Chapter 5. Furthermore, the holder of the Space Range licence will need to ensure the appropriate marine safety areas are clear of vessels before launch can occur, such safety areas will take into account all variables including environmental conditions such as wind and effect on debris. Your objections to the airspace change have however been noted and will be included in the Consultation Review Document that will be available on the CAA airspace portal in due course.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

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Dear

Thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. With regard to your concern over the size of the airspace and the fact it sits above residential properties and areas of significant wild life habitats, we would wish to reiterate the fact that this does not mean there is a risk to persons or wild life in this area, this is explained in the Consultation Document as follows:

"It is important to note that the process to determine the size of airspace necessary to ensure no additional risk to other airspace users is different to that regarding the 'land safety footprint' and risk to 3rd parties on the ground, and to the process used to establish the risk to maritime 3rd parties. The airspace safety requirements consider a large aircraft with a high number of passengers travelling at high speed therefore, to reach an acceptable level of risk, the segregated airspace area has to be significantly bigger than the land or sea space safety areas. The airspace area therefore does not denote an area of risk to personnel on the ground; there are many UK Danger Areas over land that are there to safeguard aviation and do not indicate that a threat to personnel on the ground exists. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace users; the risk to 3rd parties on the ground has to be contained well within the SP-1 site area. It should be further noted that the ground safety footprint (and that over the sea space) is not evaluated under the ACP process; this is addressed separately by the CAA through the Spaceport and Rocket/Launch Operators licences and approvals. Here both the Spaceport operator and the rocket launch provider will need to satisfactorily demonstrate to the CAA that they have a robust safety case, safety management processes and evidence to show the operation is safe and risk to 3rd Parties on the surface is tolerable and within the regulated safety management processes and evidence to show the operation is safe and risk to 3rd Parties on the surface is tolerable and within the regulated safety management processes and evidence to show the operation is safe and risk to 3rd Parties on the surface is tolerable and within the regulated safety management processes and evidence to show the operation is safe and risk to 3rd Parties on the surface is tolerable and within the regulated safety management processes a

Your additional points have also been noted and recorded, these anonymous comments will be included in the Consultation Review Document that will be available on the CAA airspace portal in due course. As these additional points do not offer any actionable feedback on the airspace design, we as the airspace Sponsor and airspace subject matter experts, are unable to provide any further comments.

Kind Regards





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Thu 30/05/2024 09:58 SP1 ACP UC ACP-2021-12_Spaceport-1_Stage_3_Consultation - Sponsor Response to Feedback Received

Dear

Thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. We note that you do not offer any actionable feedback on the proposed airspace design but do raise other points and concerns.

With regard to the predicted increase in carbon emissions (due to redirection of some high level air traffic), it is accepted that these figures may appear higher than stated by other Spaceports however, we would guard against making such like for like comparisons as the metrics used are often widely different especially when it comes to the duration that the airspace is required for. Unlike other Spaceports, we have the knowledge and experience of launching similar systems from the MOD QinetiQ managed Hebrides Range and it is from this data that we have calculated our worst case scenarios using a protracted three hour window for the launch. We would suggest other Spaceports are being extremely optimistic in only considering a one hour launch window – this in isolation decreases their perceived impact by a third when compared to Spaceport-1.

The concern you raise regarding items jettisoned into the sea will be covered by the Marine management Organisation (MMO) who may decide the Launch vehicle (LV) operator will need to obtain a marine licence prior to launch, this is a requirement detailed in the Space Industry Act 2018 and in supporting guidance documentation.

With regard to your safety concerns for local residents, we offer the following detail from the Consultation Document:

"It is important to note that the process to determine the size of airspace necessary to ensure no additional risk to other airspace users is different to that regarding the 'land safety footprint' and risk to 3rd parties on the ground, and to the process used to establish the risk to maritime 3rd parties. The airspace safety requirements consider a large aircraft with a high number of passengers travelling at high speed therefore, to reach an acceptable level of risk, the segregated airspace area has to be significantly bigger than the land or sea space safety areas. The airspace area therefore does not denote an area of risk to personnel on the ground; there are many UK Danger Areas over land that are there to safeguard aviation and do not indicate that a threat to personnel on the ground exists. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace users; the risk to 3rd parties on the ground has to be contained well within the SP-1 site area. It should be further noted that the ground safety footprint (and that over the sea space) is not evaluated under the ACP process; this is addressed separately by the CAA through the Spaceport and Rocket/Launch Operators licences and approvals. Here both the Spaceport operator and the rocket launch provider will need to satisfactorily demonstrate to the CAA that they have a robust safety case, safety management processes and evidence to show the operation is safe and risk to 3rd Parties on the surface is tolerable and within the regulated safety rmargins – the CAA will only issue the respective licences when these strict safety criteria are met."

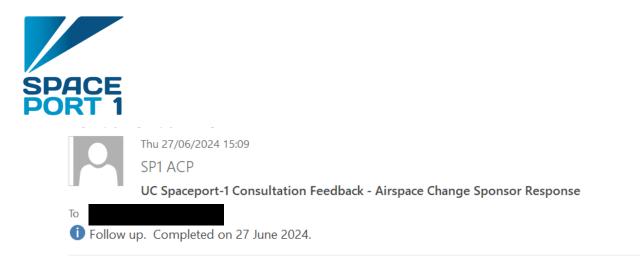
Your other points regarding socioeconomic issues and concern over the EIA are noted and have been recorded but as they do not impact the airspace change proposal we are unable to comment further on these matters. However, they are noted, along with your objection to the airspace change and will be captured in the Consultation Review Document that will be available on the CAA airspace portal in due course.

Kind Regards



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Dear

We would like to thank you for taking the time to complete the online questionnaire regarding the proposed airspace change in support of the Spaceport-1 project. You objection and comments have been noted; these will be included anonymously in the Consultation Assessment Report that will be published on the CAA airspace portal in due course. With regard to your safety concerns, we would like to offer the fact that the airspace change process is just one element of the safety process; here the CAA are primarily focused on aviation safety. There are other elements to rocket launch that will provide the necessary assurances that catastrophic failure will not pose a risk to those living close to the launch site. These will be captured in the licencing and/or approvals process for both the Spaceport Operator and the Launch Vehicle (LV) operator. Both will need to meet strict safety criteria to satisfy the regulator before licences/approvals are forthcoming. Furthermore, these licencing processes will also include further environmental assessments.

Kind Regards



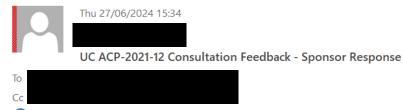


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Reply Reply All Groward To IM



1 This message was sent with High importance.

Thank you for your response to the Spaceport-1 ACP consultation. Your points are noted regarding potential impact on certain approaches to the airport in particular when D701Y/C and/or E are activated, and the need for close coordination between Range and airport. These points, identified earlier in the process, have been captured in the Stage 2 documentation. As previously discussed, our mitigation to reduce any potential impact on Benbecula operations, is to extend the current airspace management procedures for MOD Hebrides Range so they include the new SP-1 airspace fillet and use of D701 for SP-1 use. Ideally we would like to amend the current LoA to satisfy this requirement and a meeting in the near future to discuss this way ahead would be welcomed.

Kind Regards



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Reply Reply All G Forward The



UC ACP-2021-12 Spaceport-1 Airspace Change Proposal Stage 3 - Consultation Feedback

This message was sent with High importance

Thank you for the NATS feedback on the above titled, as Sponsor we offer the following in response:

It is noted that several of the key points raised, although important, are out with the gift of the Sponsor to resolve these include:

1. The need for the CAA to determine the prioritisation of spaceflight and subsequent impact launches may have on the UK network.

2. Appropriate governance and authority to segregate airspace for commercial use needs to be ratified and integrated into the UK ASM policy such that the UK AMC is appropriately resourced to manage airspace on behalf of Spaceports. 3. Refinement in tactical management of airspace where time and separation buffers are imposed. The Sponsor would however suggest a more collaborative approach to the application of buffers both time and airspace volume to improve the efficiency of airspace management. It is considered that a more dynamic approach could be achieved with improved co-operation.

4. The need for NATS and the CAA to agree how increased 3Di scores or attributable delays will be applied against the already agreed NERL performance targets.

5. The CAA to update the UK AIP to include commercial space launch and determine the appropriate FBZ to mitigate risk. Note: the Sponsor has identified this issue with the CAA and it is understood that until such descriptors are in place then rocket launch from SP-1 into the D701 areas will be carried out under the 'Other Munitions and Explosives (OME)' descriptor in the ENR 1.1.

The Sponsor acknowledges that there is a pressing requirement to update the existing LoA pertaining to D701 to include SP-1 activities and how the airspace will be activated/deactivated. This is considered a priority task by the Sponsor whom is eager to engage with NATS, MOD and other signatories on this matter.

The Sponsor further notes that not all North Atlantic operators had been given the opportunity to respond to the ACP at the beginning of the consultation period. However, the International Aviation Transport Association (IATA) were contacted later in the consultation window and were offered the opportunity to provide formal feedback – no feedback or comments have been received at time of writing.

With regard to the assumptions that NATS consider are incorrect, the Sponsor would offer the following:

- It is recognised that some air traffic will be impacted on the vast majority of the days of the year and it is now more common for traffic to operate on random routings vice the Organised Track Structure (OTS). However, the Sponsor would argue that at the time of the data sample (2019), there were less 'random tracks' and the OTS was the most accurate indicator to assess peak traffic flows, especially during the period of expected rocket launch.
- The comment that: "OTS tracks are only an indication of core traffic flows and capture less than 30% traffic in Shanwick in a 24-hour period", is considered slightly misleading as the analysis conducted only focused on a 'worst case' three hour period, that is 12.5% of the Swanwick 24-hour period so the 'other' traffic is irrelevant. It should also be noted that the methodology used considers the busiest day of the year (arguably all other days' traffic levels will be less and in some cases, far less) and does not take into account the ability to reroute traffic far earlier than the FIR boundary and thus prevent/reduce any increase in fuel consumption. Furthermore, the worst case scenario does not account for the later launches in the summer that may be possible due to the longer days; it is widely accepted that a launch after 1600 UTC will have far less impact on the network than the predictions (using the core traffic flow) that the consultation report suggests. Moreover there may be occasions where coincident activity might be possible, i.e. where SP-1 activity can occur in D701 areas already active for MOD use. Therefore, when all these factors are taken into consideration the worst case estimate for the year is probably close to and certainly no worse than, the actual impact once a full an accurate assessment can be made following a realistic period of operations.
- It should be noted that the Sponsor's analysis of traffic impact does consider lateral buffers/FBZs as applied by ANSPs; these are detailed at paragraph 3.5.7 and Figure 22 (shaded red area outside the D701 areas) of the Options Appraisal Phase II (full) report. Furthermore, it is also considered that a maximum of 20 airspace activations per year is an accurate worst case assumption (rather than the 30 suggested by NATS); this is explained in the Options Appraisal Phase I (Initial) at paragraph 3.4.4.1 and is based on experience of operating similar systems from the MOD Hebrides Range.

Thanks again for your response. Although we recognise that there are important factors to be considered by the CAA before the first launch next year, we would nonetheless wish to actively pursue agreeing and updating the current LoA to reflect SP-1 operations. Therefore, a meeting to discuss this with the appropriate NATS SMEs would be most welcome. Thereafter it is assumed the UK Ireland Airspace Management Operations Group (ASMOG) might be the best forum to advance this work.

We look forward to your response.

Kind Regards



QINETIQ/UKD/EMEA/AS/TR240045

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Dear

We would like to thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. We note that you do not offer any actionable feedback on the proposed airspace design but do raise other points and concerns. Unfortunately the majority of the points raised are outside the scope of the Airspace Change Proposal (ACP) process therefore the Sponsor is unable to comment on; other adequate launch facilities in the EU; BREXIT; the first UK rocket launch; or, disturbance to transport, fishing and other important island activities during construction and operation. With regard to safety concerns we offer the following as described in the Consultation Documentation:

"It is important to note that the process to determine the size of airspace necessary to ensure no additional risk to other airspace users is different to that regarding the 'land safety footprint' and risk to 3rd parties on the ground, and to the process used to establish the risk to maritime 3rd parties. The airspace asfety requirements consider a large aircraft with a high number of passengers travelling at high speed therefore, to reach an acceptable level of risk, the segregated airspace area has to be significantly bigger than the land or sea space safety areas. The airspace area therefore does not denote an area of risk to personnel on the ground; there is a risk to other airspace users; the risk to many UK Danger Areas over land that are there to safeguard aviation and do not indicate that a threat to personnel on the ground exists. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace users; the risk to 3rd parties on the ground as to be contained well within the SP-1 site area. It should be further noted that the ground safety footprint (and that over the sea space) is not evaluated under the ACP process; this is addressed separately by the CAA through the Spaceport and Rocket/Launch Operators licences and approvals. Here both the Spaceport operator and the regulated safety mangins – the CAA will only issue the respective licences/approvals when these strict safety criteria are met."

Please note that all the points you raised have been recorded and will feature in the Consultation Assessment Report that will be available to view on the CAA Airspace Portal in due course.

Kind Regards



SPACE Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

Page C-50



Dear

We would like to thank you for finding the time to complete the questionnaire on the CAA Citizen Space platform regarding the airspace change proposal for the Spaceport-1 launch site at Scolpaig North Uist. We note that you do not offer any actionable feedback on the proposed airspace design but do raise other points and concerns. With regard to your environmental concerns, these have been covered extensively in the Environmental Impact Assessment (EIA) and Supplementary Environmental Instructions (SEI) developed as part of the planning process for the Spaceport-1 site and are available on the Council web-site to view. Furthermore, there are distinct licensing processes for spaceports, launch operators and range operators under the Space Industry Act (SIA) 2018. Safety and environmental impact are fundamental considerations in determining whether licences are granted and when assessing environmental impact.

Regarding your concern over items jettisoned into the sea; this will be covered by the Marine Management Organisation (MMO) who may decide the LV operator will need to obtain a marine licence prior to launch, this is also a requirement detailed in the SIA 2018 and in supporting guidance documentation.

With regard to the safety concerns for local residents, the Sponsor would offer the following detail from the Consultation Document:

"It is important to note that the process to determine the size of airspace necessary to ensure no additional risk to other airspace users is different to that regarding the 'land safety footprint' and risk to 3rd parties on the ground, and to the process used to establish the risk to maritime 3rd parties. The airspace safety requirements consider a large aircraft with a high number of passengers travelling at high speed therefore, to reach an acceptable level of risk, the segregated airspace area has to be significantly bigger than the land or sea space safety areas. The airspace area therefore does not denote an area of risk to personnel on the ground exists. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace users; the risk to 3rd parties on the ground exists. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace users; the risk to 3rd parties on the ground exists. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace users; the risk to 3rd parties on the ground at the ground exist. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace users; the risk to 3rd parties on the ground at the ground attent to personnel on the ground exists. EG D704 over Benbecula airport is a good local example. This airspace is activated when there is a risk to other airspace users; the risk to 3rd parties on the ground attent to there is a risk to other airspace area. It should be further noted that the ground safety footprint (and that over the sea space) is not evaluated under the ACP process; this is addressed separately by the CAA through the Spaceport and Rocket/Launch Operators licences and approvals. Here both the Spaceport and the rocket launch provider will need to satisfactorily demonstrate to the CAA that they have a robust safety crae, safety mana

Other points regarding socioeconomic issues, impact on tourism, fragile infrastructure and other non-airspace related concerns are noted and have been recorded and will feature in the 'Consultation Assessment Report' that will be available on the CAA Airspace Portal in due course.

Kind Regards





Comhairle nan Eilean Siar and Highlands & Islands Enterprises, the Spaceport-1 Project Board.

QINETIQ/UKD/EMEA/AS/TR240045

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SP1 ACP

UC ACP-2021-12 Stage 3 Consultation Feedback - Response

Dear

Thank you for completing the online questionnaire and providing comprehensive feedback in relation to the proposed airspace change pertaining to the Spaceport-1 project. Your points have been recorded and will feature in the 'Consultation Assessment Report' that will be available on the CAA Airspace Portal in due course. In the meantime, as the airspace change Sponsor, we would offer the following in response to your feedback:

- It should be noted that Response 749185324 (object) from NATS is from an individual and this is NOT the NATS position, the latter is 'Neutral' and can be found at ID 115026295.
- With regard to response ID 276355460 from the Air Navigation Service Provider for the Reykjavik Control Area (Isavia ANS). The Isavia response is exactly the same as that sent to SaxaVord despite SP-1 operating in entirely different airspace and in airspace that does not encroach the Icelandic Flight Information Region (FIR); unlike the majority of saxaVord airspace change that is almost entirely within Iceland's FIR. Isavia have been contacted to highlight the error in their response but have declined to resubmit an updated response however, during Stage 2 of the ACP process they did state that the SP-1 ACP was 'outside their area of interest and therefore did NOT impact them'.
- Regarding the CO2 emissions being assessed as 50 times higher than those stated in the EIA, it is important to note that at the time of the EIA development the airspace options were not known or understood and as such the EIA was based on the best and most up to date information available at the time to inform the planning process. Furthermore, there are distinct licensing processes for spaceports, launch operators and range operators under the SIA. Safety and environmental impact are fundamental considerations in determining whether licences are granted and when assessing environmental impact.
- Regarding the additional environmental information requested by the CAA, this was around certain metrics used for noise modelling and an explanation on the use of different metrics for sonic boom. The former was evidenced through the rerunning of the original noise modelling programme and the latter was accepted by the CAA.
- Considering the drop in event at Hosta Hall not covering the environmental issues; the Sponsor can confirm that the environmental impact associated with re-routing civil air traffic crossing the North Atlantic, was covered in some detail and this information can be found in the Consultation Documentation. The options appraisal phase II (full) contains a most detailed explanation of the methodology used and potential increase in CO2 emissions. It is acknowledged that the EIA and SEI commissioned by the Council in support of the planning process was not covered at the event and this is because they are not explicitly part of the ACP process as prescribed in Civil Aviation Publication (CAP) 1616 (Ed 4). The drop in event was clearly publicised as pertaining solely to the proposed Airspace Change.
- With regard to the 'safety distances' in the context of the airspace change, it is important to note that the airspace change only considers the risks to aviation and as previously stated, there are other regulatory bodies and licencing processes (which will be initiated at a future stage of development) that ensure the risk to 3rd parties on the ground are minimised. Moreover, the regulations used to determine safety distances are at the discretion of, and prescribed by, the CAA.
- Notes on the 'public drop in event' were provided on Citizen Space following the event. With reference to whether an increase in launch numbers would necessitate a new ACP, the Sponsor offers the following: An ACP is required if the use of the airspace is changed whether an increase in numbers of launches would be deemed a 'change in airspace use' would be a matter for the CAA who may, if they wished, call for an ACP to be raised.
- The Sponsor offers no further comment regarding microclimate or the reference to the Isavia response that is not relevant to Spaceport-1. With regard to trajectories, the ACP Consultation documentation states that the trajectories will be contained within an arc of 225 to 315 degrees. Decision on trajectory for a particular launch will be subject to many elements not least environmental, impact on the air traffic network and the 'clear range' to name a few.
- The Sponsor is unable to comment on the other points raised that are not directly related to the airspace change.

Again, thank you for your most detailed feedback.

Kind Regards

QINETIQ Spaceport-1 Airspace Change Sponsor on behalf of:



QINETIQ/UKD/EMEA/AS/TR240045

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D Appendix D – Media Record

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| rmal consultation on the proposed airspace change associated with Spaceport 1, Scolpaig, North Ulst will commance on 20 March and close on 24 May 2024. The airspace change application is ing managed by 'change sponsor' QinetiQ on behalf of Combarle nan Elaan Size. | Formal consultation on the proposed airspace change associated with Spaceport 1, Scolpaig, North Ulst will commence on 20 March and close on 24 May 2024. The airspace change application being managed by change approach QuestiQ on behalf of Contrainte and Taleon Sar. |
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| trop in event will be held at Hosta Hait, North List on Wednesday 17 April from 1pm to 7.30pm. All are welcome to attend and members of the QinetiQ team will be there to answer any queries on proposal. | A drop-in event will be held at Hosta Hall, North Ulat on Wednesday 17 April from 1pm to 7.30pm. All are welcome to attend and members of the QinetQ feam will be there to answer any queries the proposal. |
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Subject: FW: PRESS RELEASE: Spaceport 1 Airspace Change Consultation

Distribution list that the below email was sent to.



From Sent: Wednesday, March 20, 2024 4:31 PM

Subject: PRESS RELEASE: Spaceport 1 Airspace Change Consultation

Press Release Comhairle nan Eilean Siar 20 March 2024

Spaceport 1 Airspace Change Consultation

Formal consultation on the proposed airspace change associated with Spaceport 1, Scolpaig, North Uist will commence on 20 March and close on 24 May 2024. The airspace change application is being managed by 'change sponsor' QinetiQ on behalf of Comhairle nan Eilean Siar.

As rocket launch poses a risk to aviation, it is necessary to separate launch from all other aviation activity, through the establishment of Special Use Airspace in the form of a Danger Area. The new Danger Area will be activated around the time of launch with other airspace users notified to ensure that they remain clear of the area for their own safety and the safety of others. The airspace change process is the mechanism through with Danger Areas can be established.

All documents associated with the airspace change application can be viewed on the Civil Aviation Authority's airspace portal

A drop-in event will be held at Hosta Hall, North Uist on Wednesday 17 April from 1pm to 7.30pm. All are welcome to attend and members of the QinetiQ team will be there to answer any queries on the proposal.

Feedback is welcomed and is an essential part of the airspace change process, as it helps to develop the final airspace design and associated procedures. It also enables the Sponsor to gain a better understanding of stakeholders' operations and how they might be impacted by the proposed airspace change. Any impacts will be considered and mitigations developed as appropriate to minimize any identified adverse impact(s).

The CAA's preferred method of providing feedback on airspace change proposals is via the Citizen Space platform. Interested parties can ask questions and provide feedback via the 'feedback questionnaire'.

Hard copies of the consultation documents and the feedback questionnaire may be requested from the Airspace Change Manager - SP1ACP@QinetiQ.com. Copies are also available for collection from Comhairle nan Eilean Siar, Balivanich Council Offices, Isle of Benbecula, HS7 SLA.

Completed questionnaires may be returned by email or post to the Spaceport 1 Airspace Change Manager at the Comhairle Offices in Balivanich.

ENDS.

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Press Release Comhairle nan Eilean Siar 16 April 2024

Spaceport 1 Airspace Change Consultation Reminder

Comhairle nan Eilean Siar is reminding members of the public that the Spaceport 1 Airspace Change Consultation remains open until 24 May 2024.

As part of the consultation a drop-in event will be held at Hosta Hall, North Uist tomorrow, Wednesday 17 April from 1pm to 7.30pm. All are welcome to attend and members of the QinetiQ team will be there to answer any queries on the proposal.

Feedback is welcomed and is an essential part of the airspace change process, as it helps to develop the final airspace design and associated procedures. It also enables the Sponsor to gain a better understanding of stakeholders' operations and how they might be impacted by the proposed airspace change. Any impacts will be considered and mitigations developed as appropriate to minimise any identified adverse impact(s).

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Completed questionnaires may be returned by email or post to the Spaceport 1 Airspace Change Manager at the Comhairle Offices in Balivanich.

All documents associated with the airspace change application can be viewed on the Civil Aviation Authority's airspace portal.

ENDS.

British Sign Language (BSL) users can contact us directly by using contactSCOTLAND-BSL

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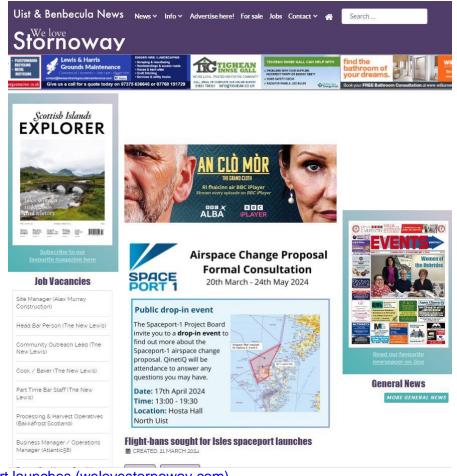




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Flight-bans sought for Isles spaceport launches (welovestornoway.com)

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Appendix E – Public Drop in Event

E.1 Drop in Event Q&A





Spaceport-1 (SP-1) Airspace Change Consultation - Public Drop in Event Hosta Hall North Uist 17th April 2024

Record of Key Airspace Related Questions & Answers

The above titled event was open from 1300 until 1930. A total of 22 individuals attended over the course of the day with a late flurry of individuals (6) arriving around 1845. A short power point presentation was provided, a copy of which has been uploaded to the Citizen Space Platform. Airspace Related Questions:

1. If planning was reviewed and an increase in launch numbers beyond the current 10 was approved would the airspace change process have to be reviewed or will the current Airspace Change Proposal (ACP) be adequate.

ANS: A new ACP is required where there is any change to the airspace design/volume or the activities that are notified as occurring within them; in principle the number of launches should be able to be increased without necessitating an ACP however, the Civil Aviation Authority (CAA) would have a view on this and would need to be notified accordingly.

2. The boundary of the new Danger Area covers a number of dwellings why does this therefore not pose a risk to people living beneath the Danger Area.

ANS: Please see FAQs – In sum, the metrics used to calculate the risk to aviation are different to those ascertaining the risk to individuals/dwellings on the ground. The aviation risk considers a large number of people within a commercial airliner travelling at high speed therefore the consequence is far higher thus the parameters also has be far higher. The risk to persons on the ground is defined through a different safety process and will come within the licencing process for the Spaceport operator whom will need to demonstrate to the regulator (CAA Space Team) that there is no risk to third parties on the ground outside the SP-1 launch area/boundary. Moreover, the Launch Vehicle (LV) operator will also have to demonstrate to the regulator through modelling, evidence and safety assessments, that their LV will not pose a risk to 3rd parties on the ground.

3. What if the airspace is found to be of insufficient volume to contain a specific type of rocket?

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ANS: If the safety trace of the LV cannot be contained within the new proposed airspace then the LV will not be permitted to launch.

4. How long will the airspace remain in place, is it time limited or forever?

ANS: The airspace will only be put in place once approved by the CAA during Stage 5 of the ACP process and then there will be constant monitoring of the use of the airspace and data collected. Following a typical 12 month period of operation of the new airspace, the Sponsor is required to conduct a Post Implantation Review (Stage 7 of the ACP process). If it is discovered that unforeseen issues have arisen and/or the airspace is not meeting the requirements of the statement of need (SoN), then the CAA may ask for the airspace design to be reconfigured and if this still does not meet the objectives then the airspace may have to be reverted to its original status. Providing the airspace does meet the SoN and no new significant issue have arisen, then the airspace change will remain in place for as long as it is needed for the purpose of launching sub-orbital rockets.

5. While considering the need of 'other airspace users' does the CAA include birds? ANS: While the CAA do not directly consider birds during the ACP process, they do, as part of this process, require environmental evidence that may include any potential impact on birds. For the SP-1 ACP elements of the Environmental Impact Assessment (EIA) used during the planning process have been referenced/replicated to provide the necessary evidence to the CAA.

6. Is there potential for an extension to the 3-hour window on the day, i.e. could 3 hours become 9 hours because of delays?

ANS: Because of the potential impact on transatlantic air traffic it is unlikely that an extension on the day will be granted (as airlines will have already planned the day before to route through the area post activation). However, where the SP-1 airspace requirements do not impact on transatlantic air traffic, such as for a short range rocket launch using only a few of the 'inner D701 Danger Areas', then it may be possible to extend the airspace period on the day. This will be subject to agreement and approval by the necessary organisations and authorities. Where a launch is unsuccessful/delayed, for whatever reason, then a spare/contingency day will be planned for and normally used.

7. Have we considered the weather and particularly, the wind at Scolpaig?

ANS: Yes, although different areas of the islands have their own microclimate the Outer Hebrides wind issues are well understood by Ministry of Defence (MOD) Hebrides Range staff – wind limitations will be placed on all launches but these will vary significantly between LVs.

8. The worst-case-scenario CO₂ emissions figure in the ACP documents is being read as the actual figure, is this correct?

ANS: This is not an actual figure but is what is perceived to be a worst possible case scenario figure where we have assumed: all aircraft are the higher fuel burn type (Boeing 777); majority of launches are long range immature rockets that require the maximum number of D701 areas to be activated; and, transatlantic civil air traffic levels are consistent as for the busiest day of the year. It is highly anticipated that the actual figure following 12 month period of operation will be significantly less than that quoted. As there are so many variables, it is not possible to quote an exact figure but we are confident it will not be worse than that quoted.



9. Will there be any impact on new Stornoway flight by 'Hebridean Air Services' (operated by Airtask).

ANS: The routes flown between Benbecula and Stornoway will not alter regardless of aircraft operator and we have already confirmed with Loganair that the Stornoway route will not be impacted by the SP-1 operation and activation of the new proposed airspace fillet. It is acknowledged and captured in the ACP reports that certain approaches to Benbecula airport could potentially be impacted by the subsequent activation of specific D701 areas however, procedures are already in place to mitigate and minimise any such impact. Furthermore, Hebridean Air Services (through Airtask) have been asked for comment on the ACP.

10. 'Who owns the airspace?'

ANS: Airspace is a national asset not owned by any one organisation; it is regulated by the CAA who in turn delegate different authorities to 'manage' the airspace accordingly to meet user's needs. In essence, airspace need/requirements are arbitrated by the CAA through the UKs Airspace Management Cell (AMC) which is a joint civil military airspace management organisation.

11. How do we coordinate with international airlines?

ANS: This is done through the International Civil Aviation Organisation (ICAO) sponsored North Atlantic Operators user group. The majority of airlines are represented, this may be through the International Aviation Transport Association (IATA) who work on their behalf.

- 12. How will SP-1 operations interact/deconflict with Shetland Space Centre activity? ANS: It is anticipated that the airspace protocols and letters of agreement between spaceport operators, air navigation service providers and the UK AMC will define how deconfliction between different spaceports and MOD activity will be managed. These protocols are still to be designed and agreed at Governmental level.
- 13. Shetland only have 1 hour airspace closure for orbital launch why is SP-1 so much 'worse' and requiring 3 hours.

ANS: With many years of experience launching similar type systems from the MOD Hebrides Range we (QinetiQ) fully understand the challenges of achieving a successful launch. Our familiarity with launching rockets enables us to probably judge with more accuracy the required time windows as we know many things can delay a launch (examples; a fishing boat in the range area; minor malfunction of the LV; and, environmental issues such as wind speed and direction). We therefore are proposing a 3 hour window as this is probably realistic; our worst case scenario is based on this assumption. Adopting a one hour window will inevitably reduce the 'apparent' impact the launch has on air traffic (and associated fuel burn CO2 emissions by a factor of 3) however, limiting a LV operator to such a small time window will, in our view, place an unacceptable risk on the ability to launch. We therefore consider this unrealistic and as such these figures should be treated with caution.

14. Does use of MoD D701 complex mean that SP1 is actually to be used for military / defence activity?

ANS: No, SP-1 activity is strictly a commercial operation, it will be run and managed by a commercial entity.



15. It is assumed that there are more transatlantic flights crossing the area in the summer as this is when flights are often observed overhead so won't we disrupting more flights by launching in the summer?

ANS: It is anticipated that there will be more launches in the summer due mainly to the weather factor but also because in reality there are less commercial flights over Scotland in the summer months than in winter months. Following a study of 12 months flight details (as captured in the Options Appraisal Phase II (FULL) report), it is evident that during a 3 day period in the summer, flights only route over Scotland on one day; the other two days they route south over southern UK and Ireland.

16. For SP-1 rocket launches will this necessitate closure of whole of D701?

ANS: No. Only those areas necessary to contain all hazards associated with rocket launch are activated; this could be a few as two or three for short range launches with the maximum or 8-10 anticipated for longer range rockets.

17. What is a 'fillet'?

ANS: The new proposed airspace volume between the existing Danger Areas D701 and D704 (over Benbecula airport) is being referred to as a 'fillet' of airspace as it fills the gap between the two existing Danger Areas thereby providing connectivity to this existing airspace structure.

- 18. Is there a body that takes a holistic view of space activity? ANS: Yes, the UK government through the Department for Transport (Dft).
- 19. Why is space regulated in silos / by layers of regulation?

ANS: In the first instance planning is required and this has a very particular and complex process. Beyond this the CAA on behalf of the Dft provide the regulation oversight and approval of the associated airspace change process as well as the Space element of the CAA providing regulation and inspection of spaceport and LV operators through their newly created licensing processes as determined by the Space Industry Act (SIA) 2018 and subsequent space regulations.

- 20. With regard to the number of launches per annum, could all 10 be launched in a day? ANS: The number of launches is restricted to 10 per year; it is highly unlikely (virtually impossible to have more than one launch in a day) therefore, 10 launches in one day simply would not happen.
- 21. Will we be launching at night? ANS: No.
- 22. What is the ACP timeline?

ANS: ACP timeline governed by CAA and ACP process. At the moment, and if remaining on track, the airspace should be in place by late April 2025. The first launches might not take place immediately due to a number of factors not least the licensing requirements for both Spaceport and LV operator.

There was a general consensus from the majority of attendees that they were comfortable with the airspace change process and the ACP was being handled well/thoroughly.

There were a number of other questions and discussion points that were not airspace related, these largely related to the planning process and were directed to the SP-1 Project Board representative.

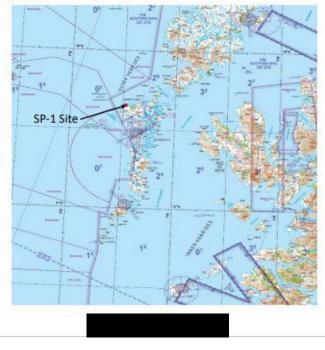


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Public Drop in Event Presentation



Spaceport-1 (SP-1) Location - Outer Hebrides

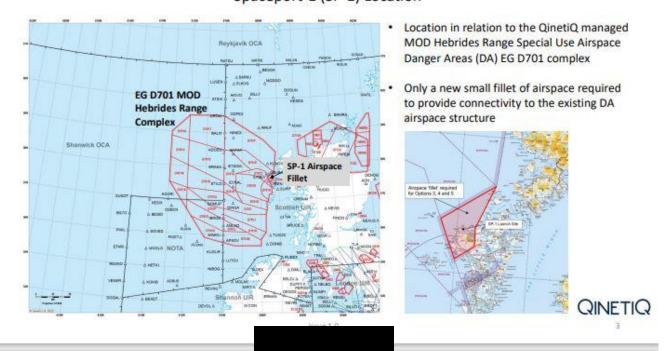


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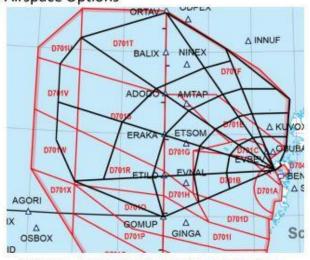
Spaceport-1 (SP-1) Location



Short Listed Airspace Options



Option 3 – (Preferred Option) New Airspace Fillet Providing Connectivity to EG D701 Complex, Maximising use of Existing Airspace Structure & ASM Procedures



Option 4 – Design New Bespoke Airspace Structure including Airspace Fillet

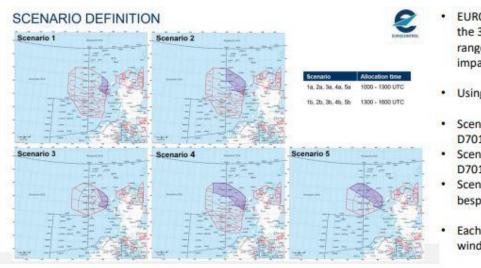
...and overlaid on existing EG D701 QINETIQ



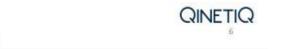


Option 5 – New Airspace Fillet Providing Connectivity to EG D701 'Modified' with either New Sub-Divisions or Reconfiguration of Inner Areas (potentially benefits short range rocket launch as uses less airspace)



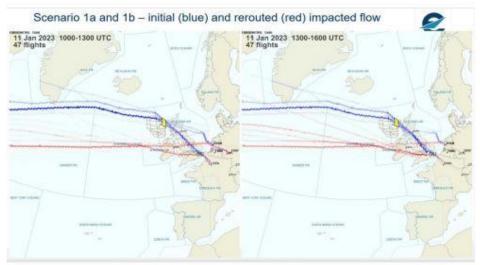


- EUROCONTROL were tasked to consider the 3 Options for both short and long range rocket launch, providing traffic impact assessment for each.
- Using 2023 data for busiest day 11th Jan
- Scenario 1 is Option 5 (re-profiling EG D701)
- Scenario 2 & 4 is Option 3 (use EG D701)
- Scenario 3 & 5 is Option 4 (new bespoke)
- Each scenario considered for two windows 1000-1300 and 1300-1600

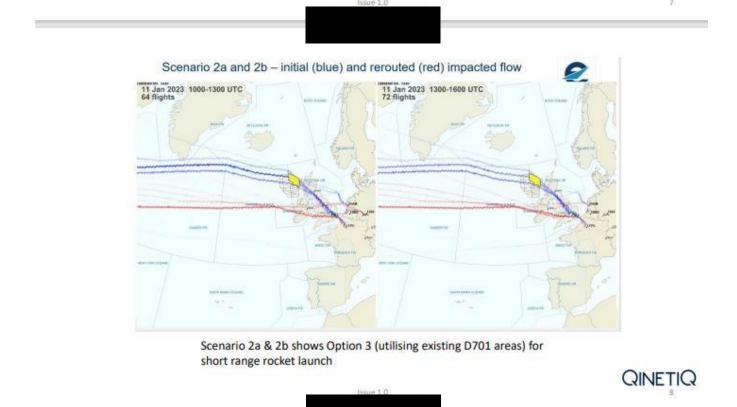




EUROCONTROL Analysis of Short Listed Airspace Options



Scenario 1a & 1b shows Option 5 (EG D701 'Modified' with either New Sub-Divisions or Reconfiguration of Inner Areas) short range rocket launch





EUROCONTROL Findings

| | Total number of flights | Length | (NM) | Fuel (kg) | | |
|----------|-------------------------------|------------|----------|------------|----------|--|
| Scenario | | Nb flights | Total | Nb flights | Total | |
| 1a | 47 | 45 | 1751.921 | 20 | 9992.51 | |
| 1b | 47 | 37 | 1007.908 | 12 | 6023.64 | |
| 2a | 64 | 45 | 1784.305 | 20 | 9992.51 | |
| 2b | 72 | 37 | 1007.908 | 12 | 6023.64 | |
| За | 48 | 46 | 1786.479 | 20 | 9992.51 | |
| 3b | 48 | 37 | 1007.908 | 12 | 6023.64 | |
| 4a | 69 | 45 | 1784.305 | 20 | 9992.51 | |
| 4b | 83 | 42 | 1435.055 | 16 | 8968.93 | |
| 5a | 73 | 49 | 2027.348 | 23 | 12401.91 | |
| 5b | 89 | 52 | 1880.241 | 19 | 11346.03 | |

Evident that north/south expansion of D701 or bespoke areas has far greater impact than any westerly extension

For Short Range Rocket Launch:

- Despite scenario 1a & 1b (Option 5 modification D701) affecting less flights than scenario 2a & 2b (use existing D701), the number of flights required to fly additional miles is the same for both
- The same applies for scenario 3a & 3b (Option 4 new bespoke areas)

For Long Range Rocket Launch:

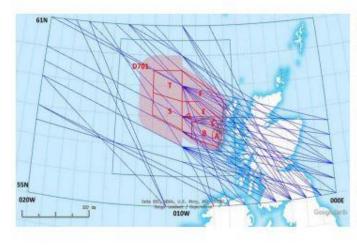
 Scenario 4a & 4b (Option 3 – use existing D701) and scenario 5a & 5b (Option 4 – new bespoke areas), the number of flights required to fly additional track miles largely the same – no advantage to use Option 4

Conclusion:

- Option 3 preferred option as:
- Smallest change, to maps, charts, equipment, training, processes and procedures. Known, understood, tired & tested. Considered the safest option



Traffic Impact Analysis – Option 3



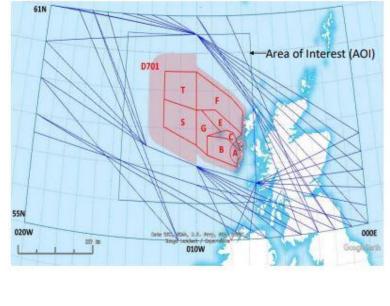
Assumptions:

- · SP-1 limited to a maximum of 10 launches per year
- One contingency day per launch = 20 airspace activations
- Jetstream in summer favours NAT track southerly flow circa 2 days every 3. Reversed in winter months
- 6 launches expected in summer (12 activations) of which a third likely to impact NAT tracks = 4 airspace activations
- 4 launches in winter (8 airspace activations) of which 5 airspace activations likely to impact NAT tracks
- Circa 9 airspace activations will impact NAT tracks per annum
- Activations likely to consist of 6 long range rockets & 3 short range rockets (based on a ration 2:1 in favour of long range)
- Most common aircraft type B777 all variants burns
 9.61kg per km flown





Traffic Impact Analysis



Findings:

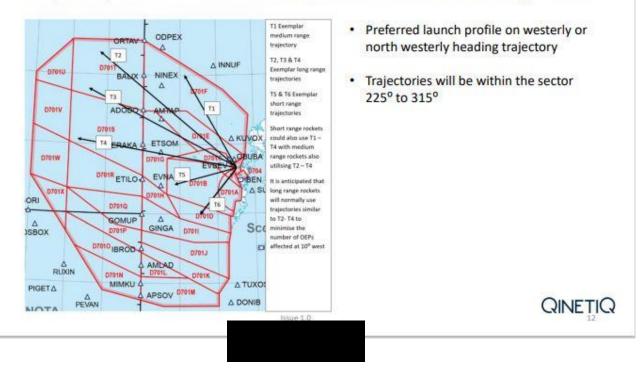
Analysing 12 months data (2019) of actual tracks across the AOI (green outline) gave following:

- Using the busiest day 29th Sep 2019
- Period 1300-1600 (launch window) 113 flights affected for long range rocket, average flight deviation 22.8 km
- 71 flights affected for short range (same deviation used)
- (6x113)+(3x71) = 1011 affected flight = 23,052km extra/year
- Equates to an additional 221.5 tonnes of fuel burn
- Consider B777 Dubai to Houston flight, extra fuel burn about 0.17% of total
- NOTE: Analysis assumed track deviations at Scottish FIR boundary – in reality deviations can be made much earlier

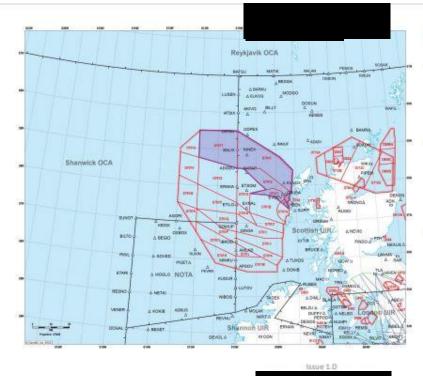


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Exemplar Trajectories – All Contained Within EG D701 MOD Hebrides Danger Areas





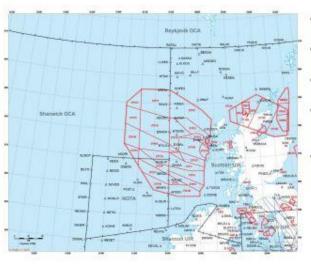


Exemplar Long Range Rocket Launch

- An example of the EG D701 areas needed for a long range rocket launch at steady state (not immature system) using Option 3 (preferred option)
- Might use more airspace than the other two options but as EUROCONTROL analysis shows, there is little or no difference on impact to NAT traffic
- Analysis suggests extension to the west has little impact on NAT traffic while expansion north/south has a significant impact



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Summary

- Preferred option is Option 3 only new airspace is a small fillet around launch site providing connectivity to EG D701
 All sub-orbital launches can be contained within existing EG
- D701 complex
- Expansion west/north west has less impact on NAT than north/south expansion of areas.
- Max 10 launches per year (roughly 20 airspace activations), estimate only 9 activations will impact NAT traffic due Jetstream, time of year/day
- Launch window circa 3 hrs in the afternoon affecting circa 184 flights on busiest day of the year using worst case launch scenario – immature long range rocket system

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Any Questions?



QINETIQ/UKD/EMEA/AS/TR240045

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Appendix F Stakeholder List & Media Contacts

| Aviation Stakeholders | Other Stakeholders |
|--|--|
| ZExcel AviationAircraft Owners and Pilots Association (AOPA)Airfield Operators Group (AOG)Airport Operators Association (AOA)Airspace Change Organising Group (ACOG)Airspace Change Organising Group (ACOG)Babcock AviationBAE SystemsBenbecula and Barra Airport ATCBritish Balloon and Airship ClubBritish Business and General AviationAssociation (BBGA)British Balloon and Airship ClubBritish Hang Gliding and ParaglidingAssociation (BHPA)British Microlight Aircraft Association (BMAA)British Model Flying Association (BMFA)British Model Flying Association (BMFA)British SkydivingDrone MajorGama AviationGeneral Aviation Alliance (| Other StakeholdersPotentially Impacted:CnES PlanningCommunity Land Outer HebridesFisheries Management ScotlandFisheries Management ScotlandFisheries Management ScotlandFisheries Management ScotlandFisheries Management ScotlandFisheries Management ScotlandFisheries Management ScotlandMarine Scotland Enterprise Innse Gall (HIE)Historic Environment ScotlandMarine Scotland Compliance (local fisheriesoffice)Marine Scotland MSLOTNational Trust for Scotland Western IslesNature ScotlandOuter Hebrides IFGOuter Movement Rural Payments &Inspectorate Division (SGRPID)Scottish Government Rural Payments &Inspectorate Division (SGRPID)Scottish Water |
| British Helicopter Association (BHA) British Microlight Aircraft Association (BMAA) British Model Flying Association (BMFA) British Skydiving Drone Major Gama Aviation General Aviation Alliance (GAA) General Aviation Safety Council (GASCo) Guild of Air Traffic Control Officers (GATCO) | Scottish Water Sealladh Hiort/St Kilda view point centre SEPA Sollas Fly In Coordinator Sporsnis Storas Uibhist Uist Council of Voluntary Organisations UKHO |
| Helicopter Club of Great Britain (HCGB) Highlands and Islands Airports Ltd (HIAL) | Alasdair Allan MSP All councillors CnES |
| Met Office Military Aviation Authority (MAA) | |



| Ministry of Defence - Defence Airspace and Air | |
|--|--|
| Traffic Management (MoD DAATM) | |
| NATS | |
| Navy Command HQ | |
| Northern Lighthouse Board (NLB) | |
| PDG Aviation Services | |
| PPL/IR (Europe) | |
| Reykjavik ANSP | |
| SaxVord Spaceport | |
| UK Airprox Board (UKAB) | |
| UK AMC | |
| UK Flight Safety Committee (UKFSC) | |
| UK Irish Airspace Management stakeholder | |
| group | |
| United States Air Force Europe (3rd Air Force- | |
| Directorate of Flying (USAFE (3rd AF-DOF)) | |
| | |

