Petitioner submission of 3 December 2023

PE2054/B: Establish an independent review into the proposed Spaceport 1 development at Scolpaig Farm in North Uist

Background

I was frankly astonished when I first heard of the Comhairle nan Eilean Siar (CnES) plans to develop a spaceport at Scolpaig, a location I know very well as a long-term visitor to North Uist. I formally objected to the proposals on environmental grounds, as did over 600 others from on and off the island. Many of them wrote detailed and well-informed letters of objection, the gist of which was that the proposal was highly inappropriate and insensitive, and the level and quality of objection indicated that many islanders and visitors placed a high value on the environment at Scolpaig. Formal objections outnumbered support by a factor of over 45:1.

Despite this the Comhairle continued to pursue the spaceport proposal on the grounds that it would create local jobs, and that economic benefit would outweigh environmental harm. They continued to do so even after Scolpaig was rejected as a polar satellite launching site, the original justification for the location. The manner in which the Comhairle subsequently progressed the project, however, suggested they acted precipitately at times; public scrutiny was unfairly limited; the planning department seemed on occasions less than impartial; and the economic benefits of the project were apparently taken for granted, requiring no evidence. Requests were made to the Scottish Government to call in the proposal, but it was approved almost without comment, and in a very short time.

Conflict of interest/land purchase

1. The public were not consulted on the plans to develop Scolpaig as a spaceport until after the Comhairle had purchased the land and submitted their initial planning application. These actions were in direct contravention of <u>PAN 82 guidelines</u> regarding public consultation, e.g. that an authority's intentions should be "clearly

- known from the outset, allowing for any necessary public debate and scrutiny of local authority proposals".
- 2. When the Comhairle's original plan to launch satellites from Scolpaig was shelved they continued to pursue the site for suborbital rocket work, but with no rigorous justification. Scolpaig has no unique attributes for suborbital rocket launching. The Comhairle's actions again contravene PAN 82, e.g. site selection "must be rigorous and transparent, so that it can be clearly demonstrated that choices have been made solely in the interests of proper planning."
- 3. The Comhairle reissued an amended planning application in 2022 as a 'new' proposal, although the works described were very similar in scope to the previous version. As a consequence, the 600+ formal objections to the original proposal were nullified, and the accompanying written submissions removed from the CnES online portal. This meant that the true strength of public objection to the spaceport was not fairly represented when the 'new' proposal was considered; and despite the voluminous EIA (running to many hundreds of online pages) that accompanied the proposal the public were given only 1 month to formally respond. There were nonetheless 244 written objections, and only 6 letters of support.

Errors and omissions in the Environmental Impact Assessment (EIA)

- 4. The Comhairle's EIA understated the CO2 emissions associated with the spaceport by a factor of 30, as it neglected the impact of rerouting transatlantic air traffic. When this was pointed out to the planners their response was "the resulting effect on climate change would not alter significantly", and they declined to pass on the revised information to the Planning Committee. The spaceport impact, however, increases the Comhairle's annual CO2 reduction obligations by 9% and in their response the planners seemingly changed the definition of 'significance' from *local* to *global* impact, contravening CnES policy "to achieve zero direct emissions from our own assets and services and reduce the Comhairle's carbon footprint as much as possible". The planners' actions did not seem properly impartial.
- 5. In response to the EIA, the RSPB recommended that, in order to protect vulnerable species, rocket launching should not be carried out at Scolpaig during the bird breeding season. This condition was,

however, rejected by the CnES planners on the grounds that it would adversely affect the spaceport business case. The RSPB were publicly unhappy about the outcome, and the planners' action again seemed less than impartial.

Scottish Government submission

- 6. The Government advised that "Ministers gave full and proper consideration to the case". This might lead the public to believe that there was a significant level of scrutiny of the proposal among relevant Ministerial departments. In fact, only one Minister was involved in the review, and no committees; and despite the huge volume of information accompanying the EIA, the Minister approved the Comhairle's plans less than one month after receiving them.
- 7. Remarking on errors in the EIA (see above) the Government submission noted "the planning authority can only take into account the information available to it at the time." Ministers, however, were given the opportunity to review the proposal in detail, at which point the EIA should have been properly scrutinised to protect the public interest, particularly on issues as important as ecology and climate change impact.

The economic case

- 8. The Government submission states that it is supportive 'in principle' of space projects that will deliver local economic benefits. Neither they nor the Comhairle, however, have provided evidence of a credible economic case for Scolpaig. The Comhairle is seeking £3.3M of public funds, but despite repeated requests for information the business plan remains confidential. No private investment has been reported.
- 9. Recent comments by Spaceport 1 participants are not encouraging regarding the economic benefits, e.g., "the suborbital market is not a market where you can get big profits" (Rhea Talk Webinars 28/06/2022); "It is extremely difficult to predict at this juncture the demand for the Spaceport over the next 10 years." (QinetiQ, in submission to the CAA, 11/05/23). In the absence of any firm information from CnES these statements paint a different picture to that presented in the planning application.

In summary, there is little evidence that the economic case for the spaceport outweighs the environmental harm; and the process that led

to its approval fell far short of what the public expect in terms of transparency at either local or central government level. Remarkably, the Scolpaig proposal – to develop a tranquil rural location into a facility to launch rockets into space – was never considered as a major planning application, with the higher level of public consultation that entails. I would invite the Petitions Committee to consider all these points.

As a final point, the Government submission states that the Comhairle have "offered to facilitate a meeting to provide an overview on the Spaceport 1 Project." While this is welcome, I am not aware of this offer or to whom it has been made.