

Comhairle nan Eilean Siar submission of 12 December 2023

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

Comhairle nan Eilean Siar ('the Comhairle') has led the development of Spaceport 1 (SP1) since 2017. From the outset, project delivery has been supported by a diverse team of consultants with extensive knowledge and expertise in a variety of fields including space launch and environmental impact assessments.

'Conflict of Interest'

As per Planning Advice Note 82, the application was assessed impartially and with the same level of scrutiny as would be afforded to an application by any other applicant. Planning officers are bound by relevant professional codes of conduct in this regard.

The application was the subject of consultation with a significant number of specialist and statutory bodies, and independent advice from consultants was also obtained by the Planning Service.

The application was subject to a notification direction. As such, Scottish Ministers were notified that the Comhairle was minded to approve the application and had the option to 'call in' the application for their determination.

It was considered that the proposal did not raise any issues that required a decision to be taken at a national level. Subsequently, the application was cleared back to Comhairle nan Eilean Siar for its determination.

Purchase of Scolpaig Farm

At the meeting of the Comhairle's Policy & Resources Committee on 12 December 2018, it was agreed 'to purchase the Scolpaig Farm site, as per the decision of the Comhairle in February 2018, on such terms as the Chief Executive shall determine'. Advice was provided throughout by the [District Valuer Service](#) of the Valuation Office Agency. At that time, failing to secure the land was one of the key risks to the success of the SP1 project and to realising the economic benefits space launch activity will bring.

The Economic Case

The business case was developed with input from space launch companies with which the Comhairle has non-disclosure agreements and as such, is commercially confidential and sensitive. Disclosure would prejudice the commercial interests of these companies and would be detrimental in terms of their future use of SP1.

A Socio-Economic Impact Assessment (SEIA) – informed by elements of the business case and financial forecasts - was submitted as part of the planning submission. The Planning Authority had the SEIA independently reviewed and consequently, it was revised and resubmitted in February 2023 for further consideration.

The Comhairle has clear policies and procedures in place for the effective scrutiny of its activities, this includes Audit Scotland, the national auditor.

The petitioner references a statement by QinetiQ from a document which had been submitted to the Civil Aviation Authority (CAA) as part of stage two of the seven-stage Airspace Change Proposal (ACP) process:

“It is extremely difficult to predict at this juncture the demand for the Spaceport over the next 10 years”.

This statement, in the context of airspace, is correct. It is indeed impossible for us to predict at this stage when airspace will be required, by whom and under what parameters.

However, applying this statement to suggest that there is no economic justification for taking the project forward is erroneous and misleading. Business development activity has been ongoing for several years to secure a credible pipeline of business for SP1. Market research has also been conducted and revisited as part of the iterative refinement of the business plan.

Potential errors & omissions in the Environmental Impact Assessment

Space launch activity is regulated by a number of regimes, each of which has its own information requirements, assessment stages and procedures. Planning Permission is but one such regulatory regime and in determining an application, the planning authority can only consider the information available to it, at the time. The Environmental Impact Assessment (EIA) and Supplementary Environmental Information report

submitted as part of the planning application, were the subject of extensive consultation with specialist and statutory bodies.

The planning assessment acknowledged that the proposal would contribute to greenhouse gas emissions and that this would therefore have an adverse effect in terms of climate change. Significant weight was given to that harm in the overall 'planning balance' that informed the recommendation to the Planning Applications Board.

The ACP options appraisal report referenced contains an initial high-level, 'worst case' estimate of possible climate change impacts, based on a range of assumptions. It was produced as part of stage two of the seven-stage ACP process. The report suggests a possible increase in CO₂ of 413 tonnes per-annum, caused by the re-routing of Commercial Air Transport (CAT). Based on this, the increase referred to for the re-routing, would equate to that of about 236 cars per-annum. The high-level assessment contained in the report anticipates that the impacts due to the re-routing of CAT are likely to be low, for the reasons set out within that report.

A full assessment, supported by rigorous evidence, has been submitted to the CAA as is required under stage three of the ACP process. Stakeholder and community consultation on this assessment begins in January 2024. Concerns on potential impacts can be made to the CAA who will scrutinise the proposed airspace design and operation to ensure best use and minimum impact.

While the figures in the initial appraisal report vary from those in the EIA, the Planning Authority has stated that the resulting effect on climate change would not alter significantly and these figures would not have changed the planning assessment of the issue, the significant weight given to the harm identified, or alter the overall assessment in the planning balance.

'There is already a rocket launching site at the Hebrides Range'

[MOD Hebrides Range](#) is a military facility, owned by the Ministry of Defence (MOD) and operated by QinetiQ under the terms of the Long-Term Partnering Agreement (LTPA). The facility has specific functions relating to defence and neither MOD nor QinetiQ wish to facilitate commercial space launch activity from Hebrides Range.