

Angus MacNab submission of 13 December 2023

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

I am a resident of North Uist, and our family home is the nearest residential property to the proposed spaceport development at Scolpaig Farm (870m from the proposed launch pad). In relation to Petition No. PE2054, I draw your attention to the following:

BACKGROUND

CnES first applied, as Developer, on 27th June 2019, for consent to develop a spaceport at Scolpaig Farm, North Uist. This application was for Phase 1 of a multi-phase development, Spaceport 1, ultimately intended for the orbital launch of small satellites. Phase 1 covered the launch of sub-orbital (sounding) rockets.

The application was submitted without any public consultation, although this had been promised by CnES in the preceding months, and was missing an Environmental Impact Assessment (EIA) – a statutory requirement. The application was also submitted after CnES had purchased Scolpaig Farm for the purposes of the spaceport. It was evident that CnES did not intend to comply with the planning requirements that they would necessarily, and properly, impose on others. In a public representation a Chartered Town Planner described it as the worst application he had ever seen.

A substantial number of representations were submitted by the public in objection to the proposal, forcing CnES to hold public meetings through August and September 2019. Given their timing, these were essentially informative rather than consultative. The application remained extant, but stalled, until withdrawn on 7th February, 2022, when a new application was submitted, this time with EIA. The new application was effectively for the same change of land use and infrastructure provision as the original application, and stated use again the launch of sub-orbital (sounding) rockets.

LACK OF CONSULTATION

The first meaningful liaison by CnES with the public was at a North Uist Community Council (NUCC) meeting in January 2019, when CnES gave a presentation, noting that full public consultation would be held before Easter that year. At a (restricted) meeting in April 2019 attended by CnES, Highlands and Islands Enterprise (HIE), and the Spaceport 1 Project Manager, they advised that “the intended public consultation meetings had been delayed due to the Easter holiday period, but were to be organised and held soon.” At an NUCC meeting on 24 June there was no update in respect of Spaceport 1; three days later CnES submitted the first planning application. This despite the NUCC chairperson being a Local Councillor (and other Councillors being on the NUCC Committee).

PLANNING APPLICATION DEFICIENCIES

The initial planning drawings included a “red line” boundary keeping the area below the 2ha threshold for Major Development, which would have triggered a 12-week public consultation period. CnES gave only 21 days in which to submit representations. Before the second planning application there was again very little consultation: one short online presentation, with Q&A session, was held in November 2021, primarily to disseminate information. It was poorly advertised and consequently relatively poorly attended.

BIAS

There are indications that the consent for this proposed development was effectively a “done deal” from the outset:

- CnES first applying for consent without going through due process, in significant breach of the requirements of PAN 82 (Local Authority Interest Developments).
- CnES spending borrowed money to purchase Scolpaig Farm before submitting a planning application, and presumably spending considerable sums on consultancy fees since: it is hard to believe the application could be determined in-house without an element of bias, conscious or otherwise.
- CnES stating that representations against their first application would not be considered in respect of the second application, as it was wholly new; conversely, that issues such as site selection (see below) were already covered in the original application so required no new information.
- The absence of a professional Planning Consultant’s input to the planning process and management of the EIA, which would have

picked up on the numerous anomalies and errors (some serious) in the EIA Report.

- Before the determination of the application, the Scottish Government publishing NPF4 (February 2023): “*This includes plans for an Outer Hebrides Spaceport 1 in Scolpaig, North Uist*”. And [Richard Lochhead’s 27 April statement](#) that spaceports in Sutherland and Shetland, “*...will be followed by substantial suborbital activity in the Western Isles*”.

FAILURE TO CONSIDER ALTERNATIVE SITES

The 2017 Sceptre Report considered six satellite launching sites including Scolpaig, but commented unfavourably on the latter: “*it is not possible to launch to Sun–Synchronous Orbits while meeting the FAA–AST casualty rate requirement...and the trajectories to polar orbit are highly constrained resulting in lower payload mass.*”

- With Scolpaig rejected as a satellite launching site a completely new search should have been carried out for sub-orbital launch sites. Many sites in Scotland are suitable, with launch trajectory nominally to the west.
- When the second planning application was submitted in February 2022 for sub-orbital launch only, it still included the original trajectories. QinetiQ later claimed to the CAA that “*Although the requirement for orbital launch to the North has been removed, there remains a requirement to be able to conduct certain sub-orbital launches to the North*”. No explanation was given.

SECRECY

There has been significant secrecy around CnES’s intentions for Scolpaig. Their Local Development Plan (LDP) was published in November 2018, only 7 months before the first planning application, but makes no reference to spaceport development in the Western Isles. This despite:

- At least three Economic Impact Assessments from 2015 onwards being prepared for HIE (a CnES Consortium member) for such use of the Scolpaig site.
- A “Feasibility Study of Orbital Launch Trajectories from Scolpaig” prepared by Commercial Space Technologies Ltd. (CnES Consortium member) in 2016.

- The Sceptre Report (2017) prepared for HIE by DEIMOS, to assess potential small satellite vertical launch sites, including Scolpaig.
- A Scoping Report commissioned and prepared by professional consultancy Atkins (2018) for CnES.
- In summer 2022, an American visiting QinetiQ on business commented that Spaceport 1 “would be going ahead” (or words to that effect) and that planning consent would not be a stumbling block.

CONCLUSIONS

It is reasonable to conclude that CnES failed to properly follow the democratic planning process. This development should be reviewed, and the planning application/consent reconsidered. As well as issues of bias and lack of adequate consultation, secrecy remains around the project. For a controversial development in a rare and environmentally sensitive site, and one of historical importance, this is unacceptable; if it involves foreign interests, it is absolutely unacceptable.