



**REPORT TO: PLANNING AND REGULATORY SERVICES COMMITTEE ON
19 DECEMBER 2023**

SUBJECT: KEITH GREEN ENERGY AND INFRASTRUCTURE FRAMEWORK

**BY: DEPUTE CHIEF EXECUTIVE (ECONOMY, ENVIRONMENT AND
FINANCE)**

1. REASON FOR REPORT

- 1.1 This report asks the Committee to note the representations received to the draft Keith Green Energy and Infrastructure Framework, agree the Council's response to these and approve the final Framework.
- 1.2 This report is submitted to Committee in terms of Section III (E) (2) of the Council's Scheme of Administration relating to the review and preparation of Local Development Plans.

2. RECOMMENDATION

2.1 It is recommended that the Committee agree to:

- (i) note the representations received to the public consultation on the draft Keith Green Energy and Infrastructure Framework and agrees the Council's response to these, as set out in Section 4 of the report; and**
- (ii) approve the final Keith Green Energy and Infrastructure Framework, as set out in Appendix 1, and agrees that this be used as a material consideration in the development management process and to inform the development of the new Local Development Plan.**

3. BACKGROUND

- 3.1 In November 2022, the Moray Just Transition Masterplan received £881,000 from the Scottish Government's North East Just Transition Fund. Consisting of five interlinked projects – Buckie Harbour Feasibility; Blackhillock Masterplan; Hydrogen Feasibility Study; Carbon Offset Feasibility Study and

Vacant Land Development Feasibility – the Masterplan seeks to support the area’s transition towards a zero-carbon economy.

- 3.2 The Keith and Blackhillock areas are coming under increasing development pressure, on a piecemeal basis, from development that supports the National Grid and there is no forward planning to identify necessary infrastructure or development potential, which undermines the plan-led system advocated by the Government.
- 3.3 With national developments promoted in National Planning Framework 4 (NPF4), including Strategic Renewable Electricity Generation and Transmission Infrastructure, a development framework was proposed for the Keith and Blackhillock areas in order to make best use of surrounding land and appropriately control the opportunities arising from renewables associated with the grid infrastructure and energy systems/storage.
- 3.4 The draft Keith Green Energy and Infrastructure Framework was approved for an 8-week public consultation by this Committee at its meeting on 15 August 2023 (para 12 of the minute refers). The Framework provides a strategic framework for grid infrastructure and energy systems/storage associated with renewable energy in and around Keith.

4. PUBLIC CONSULTATION

- 4.1 The 8-week public consultation commenced on 21 August and ended on 16 October 2023. The draft Framework was published on the Council's website and the consultation advertised as widely as possible via social media, press release and emails. A drop-in exhibition for the Local Development Plan was held on 9 September 2023 in the Longmore Community Hall, Keith, at which the draft Framework was displayed for people to comment on.
- 4.2 3 responses were received to the consultation and a summary of the representations received is provided below along with the Council's response:

Organisation	Comment	Response
Strathisla Community Council	Welcome strategy as a sensible and positive approach.	Support is noted.
SEPA	Support proposals for riparian planting and note that fluvial flood risk is adequately considered.	Support is noted.
Transportation (Moray Council)	Corrections to figure numbers.	Accepted.
	Keith NE Study Area: Maps make reference to the A96 instead of the A95.	Accepted.
	Utilities Implications: Recent work identified underground utilities in	List and map of utilities are not extensive and report is caveated that

	the vicinity of Keith NE Study Area which aren't identified on map.	further investigations for constraints would be required. Wording updated to reinforce this requirement.
	Constraints and Opportunities: Concern that local roads are not covered in sufficient detail.	Additional wording added to first bullet point under subsection 'Transport Implications.
	Transport Implications (Bullet point 4): Include the potential need to provide/extend service routes to within walking distances of developments.	Accepted.
	Transport Implications: Incorrectly makes reference to speed limit for HGVs on A96 as being 40mph.	Remove reference as relates to temporary speed limit in place at Whitehillock.
	Transport Implications (Bullet point 12): Query data source used in relation to high accident rates within Keith as not aware.	Bullet point removed.
	Transport Implications: The specifics of potential A96 corridor routes and improvements are unknown.	References updated to generalise the requirement to take account of the position at the time of application.
	Access & Movement: Include reference to the local road network in consideration of transport improvements for any potential development.	Accepted.
	Planning Applications: Highlights a number of recent, pending applications.	No change. Contents of Framework is a snapshot at the time of production and applications highlighted are still to be determined.

- 4.3 The proposed changes have been incorporated into the revised Framework which is provided as **APPENDIX 1** to the report. The final Framework is considered to be an appropriate tool to guide development to the most suitable locations in and around Keith.

- 4.4 A copy of the Framework's appendix has been uploaded to CMIS along with the agenda, as an additional meeting document.

5. **SUMMARY OF IMPLICATIONS**

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP))

Whilst promoting economic development, growth and diversity, the Framework seeks to balance this with maintaining Moray's landscape and biodiversity by guiding development to the most appropriate locations in and around Keith.

(b) Policy and Legal

The Framework will become a material consideration for development management purposes and will be used to inform the new Local Development Plan.

(c) Financial implications

None.

(d) Risk Implications

Without the Framework, there is a risk that there is continued unplanned energy infrastructure related development in the Keith area resulting in piecemeal development which has no forward planning to identify necessary infrastructure or development potential and unacceptable landscape and visual impacts (including cumulative).

(e) Staffing Implications

Work on the Framework has been carried out within existing staff workloads of the Strategic Planning and Development team, with input and review of documents by Transportation.

(f) Property

None.

(g) Equalities/Socio Economic Impact

The purpose of the Framework, as a strategic document, is to facilitate the planning process. Following screening, a full Integrated Impact Assessment (IIA) is not required.

Future development proposals should have an assessment to see how benefits can be distributed fairly and in particular how they can assist in alleviating fuel poverty.

(h) Climate Change and Biodiversity Impacts

National Planning Framework (NPF) 4 and Moray Local Development Plan (MLDP) policies also seek to ensure that development proposals reduce carbon emissions and enhance biodiversity. The Framework provides opportunities for renewable energy development in the Keith area.

(i) Consultations

The Depute Chief Executive (Economy, Environment and Finance), the Chief Financial Officer, the Head of Economic Growth and Development, the Development Management and Building Standards Manager, the Legal Services Manager, the Principal Climate Change Officer, the Senior Engineer (Transportation), the Equal Opportunities Officer and Lissa Rowan, Committee Services Officer have been consulted and comments received have been incorporated into the report.

6. CONCLUSION

- 6.1 As part of the Moray Just Transition Masterplan, the Keith Green Energy and Infrastructure Framework seeks to guide development proposals for grid infrastructure and energy systems/storage associated with renewable energy to the most appropriate locations in and around Keith.**
- 6.2 This report asks Committee to approve the final Framework, as set out in Appendix 1, which has been updated to reflect the representations received to the public consultation.**

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Background Papers:

Ref: