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**REPORT TO: PLANNING AND REGULATORY SERVICES COMMITTEE ON 15  
AUGUST 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 agree the draft Keith Green Energy and Infrastructure Framework for public consultation.
- 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:**

- (i) the draft Keith Green Energy and Infrastructure Framework, as set out in Appendix 1, for an 8-week public consultation;**
- (ii) to note that comments received to the consultation and the Council's response to these, along with the final Framework will be reported back to a future meeting of this Committee for approval; and**
- (iii) that the draft Keith Green Energy and Infrastructure Framework is used as a material consideration in the determination of planning applications.**

**3. BACKGROUND**

- 3.1 In May 2022, the Scottish Government announced a £500m Just Transition Capital Fund to assist the North East and Moray economy to diversify away from carbon-intensive industries.
- 3.2 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.

- 3.3 In recent years, the Council has experienced an increasing number of preliminary enquiries and planning applications submitted for sites in the immediate vicinity of Blackhillock - and subsequently Keith - Substations for development that will support the National Grid. As a result, the surrounding area is coming under increasing development pressure, on a piecemeal basis, and there is no forward planning to identify necessary infrastructure or development potential, which undermines the plan-led system advocated by the Government.
- 3.4 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 Blackhillock area 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.
- 3.5 The Blackhillock Masterplan – renamed the Keith Green Energy and Infrastructure Framework – has been prepared by Collective Architecture, on behalf of the Council, and provides a strategic framework that focuses on energy and infrastructure around Keith. The Design Team have engaged with stakeholders including SSEN Transmissions, Transportation (Moray Council) and the Keith and Strathisla Community Councils.
- 3.6 The draft Framework is provided as **APPENDIX 1**. A copy of the Framework's appendix has been uploaded along with the agenda, as an additional meeting document.

#### **4. DRAFT KEITH GREEN ENERGY AND INFRASTRUCTURE FRAMEWORK**

- 4.1 The draft 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.
- 4.2 During consultation with SSEN Transmissions about their growth needs at Blackhillock Substation, the Design Team were advised that there were no plans for a substantial expansion of Blackhillock Substation due to the requirement for a new 400kV substation to service the proposed Beauly - Blackhillock - New Deer - Peterhead 400kV transmission line. SSEN advised that a preferred site had been identified on Banff Road, Keith based on criteria including access, connectivity, footprint requirements, hazards and environmental conditions. SSEN carried out public consultation on the proposed transmission lines and substation, which closed on 30 June, and they are currently considering responses and alternative sites based on these.
- 4.3 In response to proposed substation on Banff Road, the scope of the Framework was expanded to include a second study area at Keith North East to respond to the potential substation and any associated developments that could potentially follow.

- 4.4 The Framework uses two scenarios to reflect the different scales of development that are being experienced or may be proposed in the study areas:
- Type 1 – Electricity substations/converter stations, representing large-scale industrial-style development, in the form of large buildings, outdoor electrical infrastructure and associated road infrastructure. Development will potentially occupy a larger footprint than Type 2; and
  - Type 2 – Battery Energy Storage Systems (BESS) / solar farms, representing industrial style development of more modest scale, in the form of ‘shipping container’ size buildings and / or solar arrays and associated road infrastructure. Development will potentially occupy a smaller footprint than Type 1 (unless it relates to a larger scale solar farm).
- 4.5 Based on a landscape sensitivity assessment, the Framework identifies potential development sites for a range of uses and associated landscape mitigation required. Landscape sensitivity to Types 1 and 2 is significantly higher in the Keith North East study area compared to Blackhillock. This is reflected in the potential sites identified.
- 4.6 As part of the development of the Framework, a briefing was held with Keith and Cullen Ward Members and the Chair and Depute Chair of this Committee. Briefings were also held with the Keith and Strathisla Community Councils.
- 4.7 Keith Community Council expressed concern regarding fire risk associated with BESS and the cumulative impact of development. Unrelated to the Framework, comments were also raised about the use of the name Blackhillock 2 by SSEN and the confusion this caused. Strathisla Community Council had no specific comments to make in response to the briefing.

## **5. NEXT STEPS**

- 5.1 It is recommended that an 8-week consultation period is undertaken for the draft Framework. The consultation period will commence on 21 August and end on 16 October 2023. The draft Framework will be published on the Council’s website and the consultation advertised via social media, press release and emails. A drop-in exhibition for the Local Development Plan, due to be held on 9 September 2023 in the Longmore Community Hall, Keith, will also highlight the consultation on the draft Framework.
- 5.2 As part of the public consultation, the Health and Safety Executive (HSE), Scottish Fire and Rescue Service (SFRS) and Police Scotland will be notified and invited to comment on the Framework.
- 5.3 Following the consultation, responses will be reported back to a future meeting of this Committee to consider, along with the final Framework for approval. The Framework will be a material consideration for development management purposes and will be used to inform the new Local Development Plan.

## 6. **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**

Once approved, 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.

**(e) Staffing Implications**

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

**(f) Property**

None.

**(g) Equalities/Socio Economic Impact**

The proposed public consultation will feed into the Equality Impact Assessment (EIA). The focus will be on ensuring that the benefits of economic development, growth and diversity will be distributed fairly.

**(h) Climate Change and Biodiversity Impacts**

NPF4 and MLDP policies also seek to ensure that development proposals reduce carbon emissions and enhance biodiversity. The Frameworks 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 the Democratic Services Manager have been consulted and comments received have been incorporated into the report.

## **7. CONCLUSION**

- 7.1 As part of the Moray Just Transition Masterplan, the draft 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.**
- 7.2 The draft Framework will be subject to an 8-week public consultation. The responses will be reported to a future meeting of this Committee for consideration along with the final Framework for approval.**

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Background Papers:

Ref: