Hagshaw Long Duration Electricity Storage

Planning Statement

3R Energy

May 2025

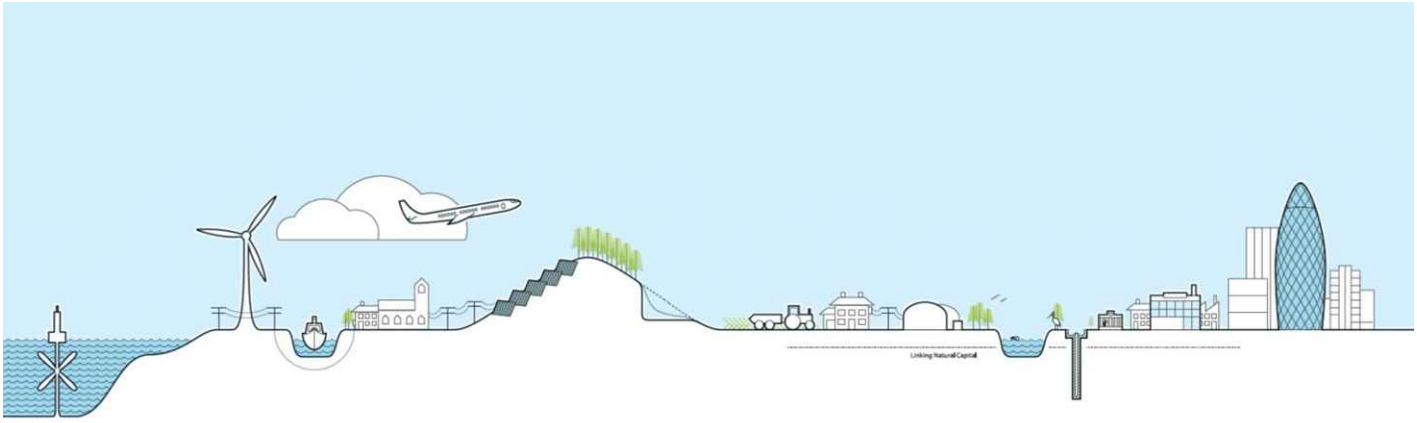
PLANNING STATEMENT

HAGSHAW LONG DURATION ELECTRICITY STORAGE SCHEME LAND ON THE M74 HEAT AND POWER PARK (NOW KNOWN AS CONEXUS WEST), WEST OF JUNCTION 11 OF THE M74, COALBURN, LANARK, ML11 0RL

May 2025

Prepared By

aardvark
environment matters



Project Quality Control Sheet

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Location: Land at Conexus West, Coalburn, Lanark, ML11 0RL

Grid Co-ordinate: X 282936 Y 632476

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1 Introduction

1 This Planning Statement (PS) has been prepared on behalf of Hagshaw LDES Ltd (the 'Applicant'), part of the 3R Energy group of companies, to accompany a full planning application (the Application) for:

"The installation of a Long Duration Electricity Storage Scheme ('LDES'), with a storage capacity of up to 6 Gigawatt hours (GWh), a substation, underground cabling, access tracks, landscaping, biodiversity enhancements and ancillary infrastructure".

2 This Planning Application is submitted under Section 36 of the Electricity Act 1989 (as amended) to the Energy Consents Unit of the Scottish Government and is within the administrative boundary of South Lanarkshire Council (SLC).

1.1 Summary of Development

3 The Proposed Development is for a Long Duration Electricity Storage (LDES) scheme (minimum 8-hour discharge duration) which includes:

- 500MW of capacity;
- Up to 6 Gigawatt hours (GWh) of electricity storage and export capability;
- Enough electricity to power approximately 1.3m homes for a continuous period of up to 12 hours (discharge duration), significantly more than standard lithium-ion batteries (BESS) which operate for shorter periods of time.

4 LDES will make an important contribution to ensuring a stable, clean and reliable electricity system in the UK. By storing energy when demand is low and releasing it over periods of extreme demand, the Proposed Development will help the energy sector cope with the peaks in supply and demand that the electricity grid in the UK faces on a daily basis.

5 This balance of supply and demand is vital to the drive towards Net Zero and a cleaner electricity grid based on renewable, low carbon generation sources where the supply of the energy does not always match the peak demand periods.

6 The Scottish Government has set a target within The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, to achieve net-zero emissions by 2045. As part of the drive towards Net Zero, the Government has recognised the need to decarbonise the energy system, confirming that renewable energy generation and storage have a vital role in this transition.

7 The provision of LDES will play a crucial role in supporting the continued decarbonisation of the electricity network in line with the UK Government's Clean Power 2030 Action Plan (CP30 Plan). The UK Government Department of Energy Security and Net Zero (DESNZ) stating that:

"Long duration electricity storage (LDES) is a key enabler to a secure, cost-effective and low carbon energy system".

8 South Lanarkshire Council, Sustainable Development and Climate Change Report (2022-2027), confirms that South Lanarkshire are fully committed to achieving Net Zero highlighting the importance of local action in the transition to a low carbon economy and society.

9 In addition to the LDES, it is proposed that the land surrounding the infrastructure will be enhanced to provide landscaping and biodiversity improvements to contribute towards the reversal of the biodiversity crisis.

1.2 Development Location

10 The Site is located on land at the M74 Heat and Power Park (now known as Conexus West), west of Junction 11 of the M74, Coalburn, Lanark, ML11 0RL within the Hagshaw Energy Cluster and has planning permission in principle (outline consent) for Class 4 (Business), 5 (General Industry) and 6 (Storage & Distribution) uses (SLC ref: P/20/0772 extending the time of consent CL/17/0157).

11 The Hagshaw Energy Cluster is a leading example of a model for a Just Transition—transforming a former coal mining area into a renewable energy hub. 3R Energy is a founding partner of the award-winning Hagshaw Energy Cluster Development Framework (HECDF), adopted by South Lanarkshire and East Ayrshire Councils to guide sustainable development, community engagement, maximising benefits for the local area and a range of environmental goals. The Cluster includes onshore wind farms projected to generate over 584 MW, with potential for an additional 1 GW from repowering, energy storage and solar PV. It aligns with regional and national energy strategies, promoting economic growth, job creation, and skills development.

1.3 The Applicant

12 The Proposed Development will be owned and operated by Hagshaw LDES Ltd, part pf the 3R Energy group of companies. Established in 2009, 3R Energy has developed over 330MW of onshore wind and 80MW of energy storage projects in the Hagshaw Energy Cluster, significantly contributing to local and national renewable energy and decarbonisation goals.

13 The Group owns and manages 3,500 acres of land in the Douglas Valley, where it has farmed for over 120 years, generating an annual turnover of around £6 million and employing 15 people through its energy and farming operations within the Hagshaw Cluster. The Proposed Development is expected to add an additional £17.1 million GVA to South Lanarkshire and £770 million GVA to Scotland's economy.

14 As a Lanark-based company, 3R Energy is committed to working with the local communities closest to its sites, and to the local sourcing of contracts wherever possible to maximise local economic benefits and support Scotland's clean energy transition.

1.4 Structure of this Planning Statement

15 The subsequent sections of this Planning Statement are organised into:

- **Section 2: Site & Surrounds**: Overview of Site and its context.
- **Section 3: The Proposed Development**: Summary of technology and layout (see Design and Access Statement, Ref: R003).
- **Section 4: Consultation**: Summary of stakeholder engagement and its impact on the proposal (see Pre-Application Consultation Report, Ref: R004).
- **Section 5: Policy Context:** Relevant national and local planning policies and other material considerations.
- **Section 6: Business Case & Statement of Need**: Justification and business case for the Proposed Development.
- **Section 7 Planning Appraisal**: Assessment of the proposal against key planning policies.
- **Section 8: Conclusions**: Consideration of planning balance.

1.5 Accompanying Documentation

16 Accompanying the Application is a comprehensive suite of documents listed in Table 1.1 below:

Document	Author	Reference
Planning Application Drawing Pack	CADmando Design and Draughting Solutions Ltd	R001
Planning Statement (this document)	Aardvark EM Ltd	R002
Design and Access Statement	Aardvark EM Ltd	R003
Pre Application Consultation Report	Alpaca Communications Ltd	R004
Ecological Impact Assessment	Western Ecology	R005
Biodiversity Net Gain Strategy	Western Ecology	R006
Noise Assessment	Inacoustic Ltd	R007
Flood Risk Assessment (FRA) & Drainage Strategy	RMA Environmental Tumu Consulting	R008
Transport Statement and Construction Traffic Management Plan (CTMP)	Transport Planning Associates	R009
Landscape & Visual Impact Assessment	Landscape Visual Ltd	R010
Battery Safety Management Plan (BSMP)	Aardvark EM Ltd	R011
Contaminated Land Statement	DRM Consulting Engineers	R012
Socio Economic Report	Biggar Economics	R013

Table 1.1: Documents Comprising the Application

17 The planning application drawings submitted in the Application Drawing Pack (see Document Ref: R001) are set out in Table 1.2 below:

Drawing Number	Drawing Title
R001 SP 01 05	Site Location Plan
R001 SP 02 01	Site Location Plan (Ariel view)
R001 PL 00 05	Existing Site Plan
R001 PL 01 10	Indicative Site Layout Plan
R001 SD 01 03	400kV Substation (Plan)
R001 SD 02 03	400kV Substation (Elevation)
R001 SD 04 03	Customer Switchgear Building

Drawing Number	Drawing Title
R001 SD 03 04	LDES Triple Stacked Container (Scale Comparison)
R001 SD 05 03	PCS Inverter Double
R001 SD 06 03	PCS Inverter Single
R001 SD 07 03	String Control Unit
R001 SD 08 03	Indicative DC Combiner
R001 SD 09 03	Indicative AV Distribution Panel
R001 SD 10 03	20ft Energy Management System
R001 SD 11 03	40ft Spare Parts Container
R001 SD 12 03	40ft Welfare Container
R001 SD 13 03	120,000L Water Tank
R001 SD 14 03	240,000L Water Tank
R001 SD 15 03	CCTV Security Pole
R001 SD 16 03	Palisade Fence & Gate
R001 SD 17 03	Access Track
R001 1986 TUM PL XXX 0200 Rev B	Overall Drainage Strategy
R001 1363/7	Landscape Proposals
R001 SD 18 01	Triple Stacked Flow Battery Units
R001 2412-021 dated 26.03.25	Construction Vehicle Route (contained within outline CEMP)
R001 EL 05 01	Contextual Elevation AA
R001 EL 06 01	Contextual Elevation BB
R001 EL 07 01	Contextual Elevation CC
R001 EL 08 01	Contextual Elevation DD

Table 1.2: Planning Application Drawings

2 Site & Surrounds

2.1 Site Location

18 The Application Site is located to the southwest of Junction 11 of the M74, approximately 1.5km to the south of Coalburn and approximately 1.5km to the north of Douglas.

19 The Red Line Boundary extends to approximately 46.6 hectares of restored land which was part of the former Dalquhandy Opencast Coal Site. The area was not subject to coal extraction but principally used for coal stocking and associated coal dispatch operations.

20 The Site now forms part of the Hagshaw Energy Cluster, an established strategic location for large scale renewable energy projects.

21 The Site sits wholly within the South Lanarkshire Council administrative area ('the Planning Authority') and within the Douglas Community Council area, close to the boundary with Coalburn Community Council.

22 The boundary of the Site is shown edged with a red line on Plan SP 01 Site Location Plan (R001 Drawing Pack).

2.2 The Development Site

23 The Site is accessed from the M74 motorway which joins the B7078 (Carlisle Road) roundabout at Junction 11 (Poniel). Access to the Site is gained directly from the Junction 11 roundabout via an existing circa 2km long private road which continues through the Proposed Development Site providing access to the wind farms and forestry plantations beyond.

24 A biomass Combined Heat and Power (CHP) facility operated by 3R Energy is located to the west of the access road and will be retained within the development footprint.

25 There are two development areas split by the access road; the total developable area is approximately 17 hectares.

26 The northern area undulates from approximately 224.5mAOD in the northwest to 234.5mAOD in the southwest, dropping to approximately 231mAOD along the access road which runs along its southern boundary.

27 The southern area ranges from approximately 254mAOD in the south to 239mAOD in the northeast dropping to approximately 231mAOD along access road which runs along its northern boundary.

28 The land includes a combination of hardstanding, along with restored land associated with the Dalquhandy Opencast Coal Mine which is currently rough grassland.

29 The Site currently (during 2025) includes temporary construction compounds for the surrounding wind farms which are under construction/repowering.

30 A dismantled railway line runs along the southeastern section of the site, this is within an escarpment to the south and raised approximately 244mAOD to the north. The bund includes a number of bridges and arches which allow water to flow into the site.

31 Overhead powerlines run north south along the Site's eastern boundary and across the access road to the north.

Core Paths

32 There are a number of Paths on the Site and wider area as follows:

- Core Path CL/5735 crosses the northern part of the Site, grant-aided upgrades to the route have recently started (some of these within the Site).
- Aspirational Core Path CL/5728 follows the existing wind farm access road through the Site.
- Aspirational Core Path CL/5729 follows the disused railway line within the Site.
- Core Path CL/3457 runs north-west from Douglas West to Arkney Hill and the conifer plantation to the north of Burnt Rig outside the Site.
- Wider Network Path CL/5171 runs north from towards West Toun and then Nethertown outside the Site.

33 As part of the extant planning permission for the Site (SLC ref: P/20/0772 extending the time of consent CL/17/0157), ACP CL/5729 would be diverted from the disused railway line to follow the edge of the woodland along the eastern and south-eastern edge of the Site. CP CL/5735 would be partly realigned towards the northern boundary of the Site. ACP CL/5728 would be retained on the existing alignment, following the existing wind farm access road.

34 Maps associated with these routes are provided within the Landscape and Visual Impact Assessment Ref 010.

Waterbodies & Drainage

35 The Site includes a number of small, isolated areas of surface water ponding located at the Site entrance and within centre of the developable area. A larger pond is located to the southwest of the site.

36 The existing drainage arrangements on site were in place to serve the previous opencast use. This drainage arrangement includes the collection of water in a perimeter channel which is then routed to the west (two culverts are present under the existing access road). The channel is then connected to a tributary of the Poniel Water which runs northwards to meet the Poniel Water at the northern redline boundary.

Ecology

37 The site comprises a number of different habitats, including those created by previous mineworking and associated with existing and ongoing developments.

38 The semi-natural habitats include:

- Small watercourses and a pond (as identified above);
- A strip of immature birch woodland along a raised bank;
- Marshy grassland; and,
- Rush pasture.

Utilities

39 In addition to the overhead power lines as referenced in paragraph 31 of this Planning Statement, the Site includes a number of underground utilities which include:

- Unground electricity lines which transfer electricity from the nearby windfarms which will be diverted if necessary;
- A SPT power cable which runs north south through the site and has been protected in the Proposed Development Layout.
- A water pipe to the north of the site (this does not extend into the developable area).

2.3 The Surrounding Environment

40 The surrounding area's topography is undulating and characterised by drains, hard standing and rough grassland from the restored mine workings.

41 To the north, a number of small woodland blocks of coniferous trees are located along the minor road which runs from Nethertown of Poniel to Craigend surrounded by semi-improved grassland which is generally used for grazing.

42 The western boundary is made up of the Douglas West Windfarm which is currently operational and the Douglas West Windfarm Extension which is under construction.

43 To the east and southeast is the Long Plantation which is a designated ancient woodland.

44 The wider area has been subject to a number of large-scale renewable energy projects which form part of the Hagshaw Energy Cluster as illustrated in Figure 2.1 below:

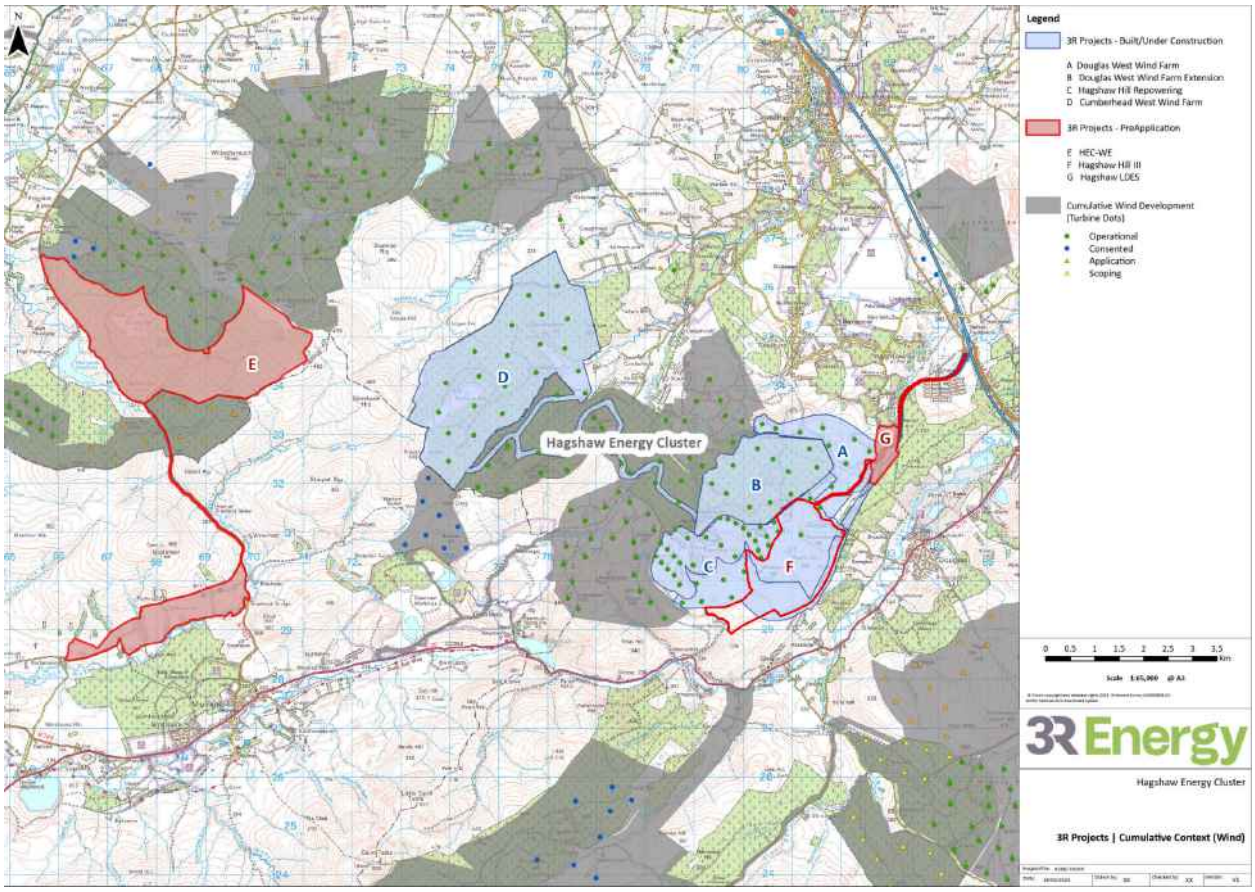

Figure 2.1: Hagshaw Energy Cluster Developments

2.4 Environmental Designations

45 The Site does not lie within any National or Local Designations, the nearest designations are identified below:

- **National Park:** The Loch Lomond and Trossachs National Park is located approximately 65km to the north- west of the Site.
- **Special Landscape Areas:** The Douglas Valley SLA adjoins the southern boundary of the Site.

- **Scheduled Ancient Monument**: St. Bride's Chapel in Douglas, is located approximately 1.5km to the south of the Site and Thorril Castle is located approximately 3.6km to the southeast of the Site.
- **Registered Parks and Gardens/Country Parks**: There are no Registered Parks and Gardens or Country Parks within 5km of the Site.
- **Conservation Areas**: Douglas is located approximately 1.5 km to the south of the Site.
- **Listed Buildings**: The majority of the listed buildings are associated with Douglas to the south and Millbank and Uddington to the east. The nearest listed building is associated with West Town Statue, at West Toun, approximately 600m to the north of the Site.
- **Special Protected Areas (SPA):** Muirkirk and North Lowther Uplands Special Protected Area is located approximately 6.8km to the southwest of the Site.
- **Special Area of Conservation (SAC)** Coalburn Moss Special Area of Conservation is located approximately 2.7km to the north of the Site.
- **SSSI:** Coalburn Moss SSSI is located approximately 2.7km to the north and Millers Wood SSSI is located approximately 3.2km to the southwest of the Site.
- **Local Nature Reserve**: Clyde Valley Woodland NNR is located approximately 9.8km to the northeast of the Site.

2.5 Residential Receptors

46 The closest settlements are Coalburn and Douglas approximately 1.5km to the north and south respectively.

47 There are scattered isolated dwellings within proximity to the Site, the nearest includes:

- Westerhouse - Approx Distance to development infrastructure: 500m.
- Gardens House - Approx Distance to development infrastructure: 950m.
- Douglas Estate - Approx Distance to development infrastructure: 1,400m.
- Edgewood - Approx Distance to development infrastructure: 1,150m.
- Station House - Approx Distance to development infrastructure: 1,300.

2.6 Planning History

48 The Site and its wider surroundings were part of the Dalquhandy opencast coal site which operated between 1988 and 2004 and has since been restored. The Site itself was not mined but used for coal washing, stocking and transportation. Figure 2.2 provides a plan and aerial photograph of the previous mining infrastructure at the Site:

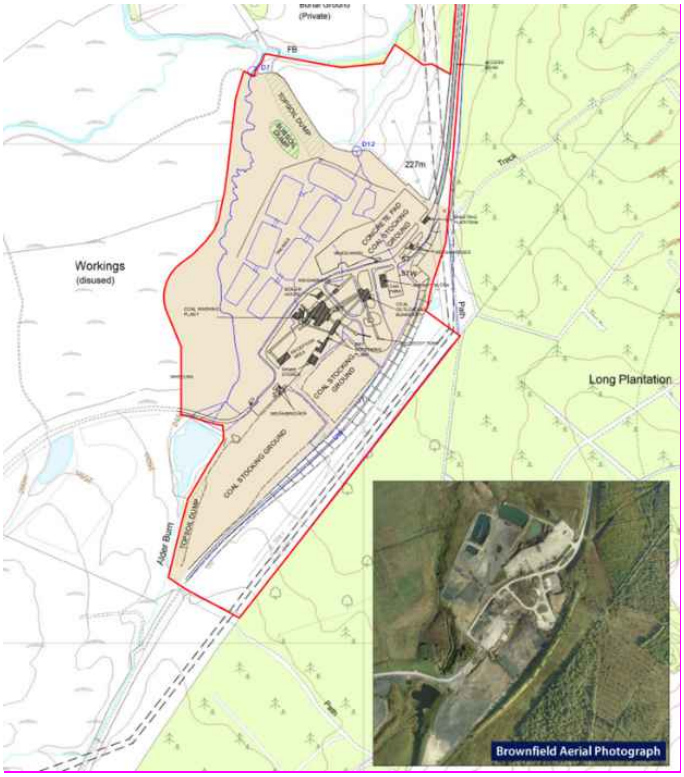

Figure 2.2: Dalquhandy Opencast Coal Site operations

49 More recently, planning permission (CL/15/0273) was granted for 15 wind turbines and a wood fuel drying facility (CHP). A further application, CL/16/0157 was granted permission in 2016 for the CHP and varied in 2024 (P/24/0067/V) to operate as a standalone facility and it is now operational.

50 In June 2017 online planning permission for a mixed-use development of Class 4 (Business), Class 5 (General Industrial) and Class 6 (Storage and Distribution) uses with associated landscaping and infrastructure such as SuDS, parking and internal roadways was granted (CL/17/0157).

51 This application was resubmitted in 2020 (P/20/0772) to allow a further 5-year period to submit matters specified by conditions attached to planning permission CL/17/0157. This was granted in November 2020 and is now the extant planning consent for the Proposed Development Site.

52 The extant consent permits the development of the 28ha site comprising 140,000sqm of commercial floorspace up to a height of 15m, the approved plans are provided in Appendix 6.

53 A photomontage of the consented scheme is provided in Figure 2.3 below.

Figure 2.3: Photomontage of consented scheme

2.7 Cumulative Development

54 The Application includes a cumulative assessment of the Proposed Development and identified surrounding schemes. These include nearby large-scale energy storage developments associated and the Hagshaw Energy Cluster wind farms (where relevant).

55 The nearby energy storage projects within approximately 5km of the Proposed Development Site which have been considered as part of the cumulative assessment are identified in Table 3 below:

	Name	**Location**	**Description**
Nationally Significant: ECU Applications			
00006063	High Netherfauld I BESS	Land 390M NNW Of High Netherfauld House Farm Tower Road, Douglas	Battery Energy Storage System (BESS) (502.5MW) **Screening Request**
00004608	Coalburn II Energy Storage Facility	Land at Broken Cross Open Cast Mine, Tower Road, Douglas, ML11 9PB	BESS scheme 1GW **Consented Development**
00000348	Coalburn 1 BESS	Land north of Birkhill, Cairnhouses Road, Douglas, MLL 0RS	BESS scheme 500 MW **Under Construction**
00004799	Carlisle Road Battery Energy Storage System	B7078 south of Coalburn Substation ML11 0JU	Battery Energy Storage System Development (50 – 200 MW) **Consideration**
00005122	Redshaw Battery Energy Storage System	B7078, 4km southeast of Douglas	500MW Battery Energy Storage System
Local Applications: South Lanarkshire Council			
To be submitted to SLC in May 2025	Glentaggart BESS	4km southeast of Douglas	42MW Battery Storage Facility. **Forthcoming Application**

Table 3: Cumulative Energy Storage Schemes

56 The location of these schemes is provided within R010 Landscape and Visual Impact Assessment Plan 1363/8 LVIA Cumulative Assessment Schemes.

3 The Proposed Development

57 This chapter provides the details of the Proposed Development and the indicative layout. Further details are provided within the Design and Access Statement Ref 003.

3.1 Candidate Technology

58 The Proposed Development layout has been based on a candidate flow battery technology (Invinity Endurium) from Invinity Energy Systems (https://invinity.com) who are the leading global manufacturer of modular vanadium flow batteries for utility-scale energy storage for businesses, industry and electricity networks in the UK and around the world. The Company has 175 MWh of VFBs deployed at, or contracted for delivery to, 82 sites across 18 countries, more than any other company in the space.

59 Developed specifically for high-utilisation applications that make low-carbon renewable generation reliable, Invinity's highly scalable, superior safety, throughput and flexible, factory-built flow battery products can run continually with no degradation, charging and discharging for extended periods of time (Proposed Development design based on minimum 8-hour discharge duration).

60 Importantly, Invinity has two manufacturing bases in Scotland which are located in Motherwell and Bathgate.

61 While the Proposed Development has been designed based on utilising candidate battery technology manufactured in Scotland. The final selection of technology will be determined through a full procurement process, with the implementation of the Applicant's Responsible Contracting Policy (refer to R013).

3.2 Built Infrastructure

62 The proposed layout is indicative and will be subject to small adjustments during detailed design post Site Investigation works. Any adjustments will be submitted to the ECU for approval as part of the usual discharge of conditions process prior to the commencement of construction.

63 The substations and ancillary equipment will be located in the southern area of the Site, these include:

- 400kV substation Compound 92m X 139m X 12.9m (at highest point).
- 5 Customer Switchgear Containers which are 10m X 3.7 m X 3.2m (H).
- 2 40 ft Spare Parts Containers which are 12.2m X 2.5m X 2.7m (H).
- 2 40ft Welfare Containers which are 12.2m X 2.5m X 2.7m (H).
- A 20ft Energy Management System which is 2.4m X 6.1m X 2.6M (H).

64 The remaining infrastructure (northern and southern development areas) will include the following:

- 13, 608 LDES Triple Stacked Containers which are 6.0m X 2.4m X 7.8m (H) plus an additional 0.15m foundation.
- 162 PCS Inverters Single/Double which are 11.8m X 2.1m X 2.6m (H).
- 1141 String Control Units which are 1.1m X 1.1m X 2.4m (H).

- 350 DC Combiner's which are 1m X 0.4m X 1.8m (H).
- 175 AC Distribution Panels which are 1m X 0.4m X 1.8m (H).
- Two 5m Radius Water Tanks (at 2m and 3m in height).

65 The new internal access roads will be constructed using aggregate.

66 Underground cables will be laid between the northern and southern development areas and the substation.

67 Each Battery Compound will be fenced and gravelled.

3.3 Ancillary Infrastructure

68 A summary of the ancillary infrastructure is provided below, further details are presented in the Design and Access Statement Ref 003.

- Fencing & Gates
- CCTV
- Parking
- Landscaping
- Lighting
- Ecological enhancement
- Drainage
- Amendment of Core Path route

3.4 Point of Connection

69 The on-site substation compound will include the Network Operator's (SPEN) apparatus and associated step-up transformer.

70 The substation will be connected to the National Grid via underground cable(s) to the new Redshaw electricity transmission substation south of Douglas on the B7078. These works will be carried out by the Statutory Undertakers (under a separate consent).

3.5 Operational Staff

71 The site will be managed as follows:

- 5 shifts with 3 to 4 people per shift (up to 20 maintenance engineers).
- A Dayshift manager
- An Admin officer

72 The welfare office at the existing CHP plant will be used for the staff.

3.6 Construction

73 The full construction period will be circa 18-24 months however the majority of the construction will be completed in an approximate 18-month period.

74 The Site accesses will be signposted in line with the requirements set out within the outline Construction Traffic Management Plan (CTMP) which has been submitted alongside this Application (R009).

75 Two temporary construction compounds will be set as indicated on the layout plan.

76 Construction activities and deliveries will be carried out Monday to Friday 07:00-19:00 and between 08:00 and 13:30 on Saturdays. No construction activities or deliveries will occur on Sunday or Public Holidays. Where possible, construction deliveries will be coordinated to avoid construction vehicle movements during the traditional AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00) unless otherwise agreed in advance with the LPA.

77 Construction activity is anticipated to peak at approximately 150 construction personnel working on shifts at the Site.

78 The construction phase will be governed by:

- Construction Environmental Management Plan (CEMP)
- Construction Traffic Management Plan (CTMP)
- Site Waste Management Plan

79 These will be live documents secured via condition.

3.7 Decommissioning

80 It is anticipated that the Proposed Development will operate for a period of 40 years. Following this the land will be returned to its pre-development condition.

81 Post operation, a decommissioning plan will be prepared which will confirm how the Site will be restored to its existing use.

82 Decommissioning is expected to take around 2 years.

4 Consultation

4.1 Introduction

83 The development proposal has undergone statutory and non-statutory pre-application consultation which is described below and set out in more detail within the Pre-Application Consultation (PAC) Report (document reference R004).

4.2 Pre-Application Consultation

84 On the 30 January 2025 a Notification of New Project Form was submitted to the Scottish Governments Energy Consents Unit. This form confirmed that Hagshaw LDES Ltd intended to submit an application for the Hagshaw LDES scheme.

4.3 Environmental Impact Assessment (EIA) Regulation

85 A Request for a Screening Opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (as amended) was submitted to the Scottish Governments Energy Consents Unit on the 24th February 2025 (Appendix 2 to this PS).

86 The Screening Request included a development area of approximately 18 hectares, this relates to the Proposed Development Area (which has now been reduced to 17 hectares within this Application). The remaining red line area accounts for wider landscaping and drainage features.

87 The Screening Opinion from was received on the 31st March (Appendix 3 to this PS) and confirmed that the Proposed Development does not constitute EIA development.

88 The Screening Opinion concluded that:

- The Development is not of a scale that has the potential to have a significant impact on the local area.
- The Proposed Development is not within an area which is designated for its environmental sensitivity
- The proposals are not of a scale which would have a wider significant environmental impact within the surrounding landscape.

89 The Screening Opinion listed the following measures which will avoid or prevent significant effects.

- Construction Environmental Management Plan;
- Site Waste Management Plan.

4.4 Consultation with the Community

90 The Hagshaw LDES Community Engagement Strategy was submitted to the Scottish Government Energy Consents Unit in February 2025. This document set out the planned community engagement which was to be undertaken as part of the Proposed Development.

91 This strategy has been followed and the PAC report (document reference R004) submitted alongside this Application details the consultation which has been undertaken.

92 This is summarised below:

- The Applicant initially engaged with the local Community Council, Douglas Community Council, as well as the neighbouring Coalburn Community Council, on 3rd March 2025 with a brochure, invitation to the public consultation events, and an offer of a personal briefing.
- Clydesdale South Ward Councillors were contacted on 3rd March 2025 and were also provided with a brochure, invitation to the public consultation events, and an offer of a personal briefing.
- The Applicant also engaged with the local Dumfriesshire, Clydesdale and Tweeddale MP, as well as the Clydesdale MSP and the six South Scotland regional MSPs. All were offered a briefing and invited to the consultation event.
- The Applicant created a page on the existing 3R Energy website for residents to view more information about the scheme and to leave feedback at https://3renergy.co.uk/projects/hagshaw-ldes/.
- A brochure detailing the plans and inviting residents to the public consultation event was sent on 4th March 2025 to 1,596 addresses., including all addresses within Douglas and Coalburn.
- The Applicant advertised the public consultation events in the Carluke and Lanark Gazette on Wednesday 5th March 2025 and Wednesday 26th March 2025.
- The public consultation events were held at St Brides Centre, Braehead, Douglas, Lanark ML11 0PT from 2pm-7pm on Thursday 13th March 2025 and Thursday 3rd April 2025 at the Coalburn Miner's Welfare, 42 Coalburn Road, Coalburn, ML11 0LH.
- At the first public consultation event, 6 attendees were presented with nine display boards giving information about the Applicant, the Site, and the concept design. Members of the Project Team were at the event, helping to explain the design and answer any questions the attendees had. Attendees were encouraged to provide their thoughts and opinions by way of feedback forms available at the exhibition, or by way of the consultation brochure.
- At the second public consultation event, 13 attendees were presented with 15 display boards, including 6 new boards which highlighted the changes made following feedback from the first consultation event.
- Of the four local residents who completed feedback forms, key matters raised during the consultation included:
- General support for our proposals
- Support for the use of flow battery technology
- Support for community benefit in local area.

4.5 Other correspondence

93 In March 2025, the "Communities before Power Plants" facebook page released an article concerning the Proposed Development stating that:

"This is the first application apart from small trial units we have seen in Scotland and I suspect the UK. If we have to have BESS these are the ones we want".

5 Policy Context

94 The Town and Country Planning (Scotland) Act 1997 Section 37 states that,

"In dealing with such an application the authority shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations."

95 This Section of the Planning Statement identifies the planning policy context which the Proposed Development is assessed against.

5.1 International Context

96 The United Nations Climate Change Convention of the Parties (COP) has been held every year since 1995. Its task is to review the national communications and emissions inventories submitted by the parties with the objective of reviewing and reducing the worlds impact on Climate Change.

97 On 12 December 2015, 196 Parties to the UN Framework Convention on Climate Change (UNFCCC) adopted the Paris Agreement, a legally binding framework for an internationally coordinated effort to tackle Climate Change. The Paris Agreement's key aim was to strengthen the global response to Climate Change by keeping a global temperature rise this century below 2 degrees Celsius (above pre-industrial levels) and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. The UK is legally bound through commitment to the Paris Agreement.

98 The latest COP (COP29) was held in Baku, Azerbaijan in 2024 and emphasised the need for accelerated action, increased financial support, and strengthened collaboration to meet the goals of the Paris Agreement. This has reinforced the UKs obligation to strengthen and implement national Climate Change Policy.

5.2 National Context

99 Table 5.1 sets out the most relevant national policy and guidance for the UK and Scotland.

UK	**Scotland**
The Climate Change Act (2008)	Climate Change (Scotland) Act 2009 & Climate Change (Emissions Reduction Target) (Scotland) Act 2019
The Energy Act (2013)	Electricity Generation Policy Statement (EGPS) 2013
Energy White Paper: Powering our Net Zero Future (2020)	The Scottish Energy Strategy: The Future of Energy in Scotland (2017)
The Sixth Carbon Budget (2020)	Low Carbon Scotland: Climate Change Plan Third Report on Prospects and Policies 2018 – 2032 (RPP3) (2018)
The Net Zero Strategy: Build Back Greener (2021)	Securing a Green Recovery on a path to Net Zero: Climate Change Plan 2018-2032 (update in 2020)

Five Year Review of the Energy Act 2013 (May 2022)	Climate Ready Scotland: Second Scottish Climate Change Adaption Programme 2019 – 2024 (September 2019)
The British Energy Security Strategy (2022)	Government Climate Change Adaption Programme: Progress Report 2022
Powering Up Britain (2023)	Independent Climate Change Committee: Five yearly review of Scottish emission targets (December 2022)
National Battery Storage Strategy (2023)	The Just Transition and Climate Change Adaptation (March 2022)
Rapid Decarbonisation of the GB Electricity System Report (July 2024)	Scotland's Nation Strategy for Economic Transition (2022)
Clean Power 2030 Action Plan (2024)	Scotland's Energy Strategy and Just Transition Plan: Ministerial Statement (January 2023)
The Planning and Infrastructure Bill (2025)	Scotland's Green Industrial Strategy (October 2024)

Table 5.1: National Policy and Legislation

5.3 National Planning Policy

100 The Proposed Development will be determined against National Planning Framework 4 (NPF4).

5.4 South Lanarkshire Local Development Plan 2

101 The Site is located within the jurisdiction of South Lanarkshire Council (SLC), the Development Plan for the purposes of determining the Application is therefore the South Lanarkshire Local Development Plan 2 (January 2021).

102 The Plans overall Strategic Objective is:

"To promote the continued growth of South Lanarkshire by seeking sustainable economic growth and social development within a low carbon economy whilst protecting and enhancing the environment".

103 Policy 1 (Spatial Strategy) seeks to support energy development in appropriate locations (bullet 11) whilst Policy 2 (Climate Change) seeks to address the Governments requirements to reduce greenhouse gas emissions.

104 The Interactive Proposals Map allocates the Site as a Strategic Economic Investment Location (SEIL) associated with Poniel.

105 Policy 8 sets out the Plan's Employment policy, identifying that the Council will identify employment and land use areas. Table 4.1 of the Plan provides a schedule of Employment Land Categories which confirms Poniel as a centre for Distribution and Logistics.

106 Policy ICD1 (Strategic Economic Investment Locations) requires that development should support the strategic role and function of the SEIL. The policy confirms that other development proposals may be acceptable where these:

"1. Create significant new Class 4/5/6 employment opportunities.

2. Involve the creation of strategic office developments (refer to ICDC4).

3. Are identified in the Council's Economic Strategy or any approved masterplan for the SEIL.

4. Provide essential ancillary services or facilities for the businesses within the SEIL. Such proposals should be accompanied by a business plan demonstrating the viability of the business, and justifying its location in a SEIL".

107 Policies 18 (Renewable Energy) and RE1 (Renewable Energy) confirm that applications for Renewable energy will be supported. The policies require that all renewable energy proposals are assessed against the relevant criteria set out in the Assessment Checklist for Renewable Energy contained in Appendix 1 of the Development Plan.

108 The relevant policies of the SLC Development Plan 2 are set out in table 5.2 below.

Volume 1	**Volume 2**
Policy 1 Spatial Strategy	Policy SDCC1 Vacant, Derelict and Contaminated Land
Policy 2 Climate Change	Policy SDCC2 Flood Risk
Policy 5 Development Management and Place Making	Policy SDCC3 Sustainable Drainage Systems
Policy 8 Employment	Policy DM1 New Development Design
Policy 14 Natural and Historic Environment	Policy DM20 Supporting Information
Policy 15 Travel and Transport	Policy ICD1 Strategic Investment Locations
Policy 16 Water Environment and Flooding	Policy NHE9 Protected Species
Policy 18 Renewable Energy	Policy NHE11 Peatland and Carbon Rich Soils
	Policy NHE12 Water Environment and Biodiversity
	Policy NHE13 Forestry and Woodland
	Policy NHE16 Landscape
	Policy NHE18 Walking, Cycling and Riding Routes
	Policy NHE20 Biodiversity
	Policy RE1 Renewable Energy

Table 5.2: Relevant Policies of Adopted Development Plan

5.5 Clyde Valley Strategic Development Plan 2017 (GCVSDP)

109 The GCVSDP is a high-level document which sets out the future development priorities at a strategic level including the designation of a Strategic Economic Investment Location (SEIL) at Poniel. The GCVSDP states that the designated SEILs are the plan's strategic response to delivering long-term sustainable economic growth and that to support the Vision and Spatial Development Strategy.

5.6 Supporting Planning Guidance

110 **The Renewable Energy SPG** (January 2021) sets out the spatial strategy for wind farms but also includes guidance on other forms of renewable energy.

111 Paragraph 4.37 relates to Energy Storage Systems and recognises that these systems are a key technology and seeks to encourage development in this sector. It confirms that proposals for energy storage systems will be assessed on their merits against the relevant LDP policies.

112 The guidance includes the Renewable Energy Framework Map and Renewable Energy Development management considerations map which shows that the Site is subject to two rights of way but is otherwise unallocated.

113 **The Development Framework for the Hagshaw Energy Cluster** is adopted non statutory guidance and is an established strategic location for large scale renewable energy projects.

114 The key aims of the plan are to:

"Support the efficient delivery of the renewable energy potential of the cluster, taking account of all appropriate technologies and the optimisation, extension and repowering of existing wind farms

Maximise the social, economic and environment benefits of renewable energy development within the cluster

Support the Just Transition to a low carbon future through a place-based approach

Minimise adverse impacts of development on the environment and local communities

Deliver investment in nature to enhance climate change and biodiversity resilience".

115 The Site is within the Hagshaw Energy Cluster Area as discussed previously.

5.7 Other Material Considerations

116 Other Material Considerations include:

- South Lanarkshire Community Wealth Building (2021)
- Sustainable Development and Climate Change Strategy 2022 to 2027;
- Scotland's Joint Climate Change Declaration (South Lanarkshire joined in 2010).

6 Business Case & Statement of Need

6.1 Policy Requirement

117 Policy ICD1 (Strategic Economic Investment Locations) states that development located in these designations should support the strategic role and function of the SEIL. The policy confirms that other development proposals may be acceptable where these are (amongst others);

"Identified in the Council's Economic Strategy or any approved masterplan for the SEIL;

Provide essential ancillary services or facilities for the businesses within the SEIL. Such proposals should be accompanied by a business plan demonstrating the viability of the business and justifying its location in a SEIL".

118 The Proposed Development is within the adopted Development Framework Area of the Hagshaw Energy Cluster and provides vital support to the development of large-scale renewable schemes. Its links with the SEIL designation is highlighted within the Clyde Plan Industry, Business and Offices Monitoring Report (2020) which recognises that the "energy park" is part of the SEIL allocation.

119 The Proposed Development will also provide essential ancillary services for businesses within the SEIL, providing a stable and secure electricity supply with opportunities for private wires. This will promote the benefits of the wider allocation, providing an incentive for business to locate in the area.

6.2 Need for LDES within the Hagshaw Energy Cluster Area

120 The provision of LDES plays a crucial role in supporting the continued development of renewable energy and decarbonisation of our electricity network (the National Grid) in line with the Government's Clean Power 2030 Action Plan (CP30 Plan). Since renewable sources like wind and solar are intermittent, LDES stores excess energy when generation is high and releases it when demand increases or generation declines. This ensures a steady and reliable power supply, making renewables more viable as a primary energy source.

121 LDES also improves energy security by providing backup power during extreme weather events and grid disruptions. By enabling a more resilient and sustainable energy system, LDES is a key enabler of the transition to a low-carbon economy.

122 Analysis commissioned by the UK Department for Energy Security and Net Zero (DESNZ) has indicated that deploying 20 GW of LDES by 2050 could lead to electricity system savings of up to £24 billion between 2025 and 2050. This deployment would *"reduce household energy bills by making additional, cheaper renewable energy available to meet peak demand, thereby decreasing reliance on expensive natural gas".*

123 In order to promote the deployment of LDES, DESNZ has recently (October 2024) consulted on designing a new policy framework to enable and encourage investment. The DESNZ consultation document states:

"Long duration electricity storage (LDES) is a key enabler to a secure, cost-effective and low carbon energy system. LDES can help to decarbonise the system by storing excess renewable generation over six hours or longer, replacing flexibility from fossil-fuelled generation and helping to alleviate constraints on the grid. LDES assets can reduce costs to consumers through lowering their energy bills, and by avoiding the need for electricity grid reinforcement and peak generation plant build."

"Investment in Long Duration Electricity Storage (LDES) again after a hiatus of four decades will make an important contribution to this [CP30] mission by integrating renewables and reducing electricity system costs while supporting energy security."

124 The Proposed Development directly responds to this need, providing near term, long duration electricity storage in a critical location. The project lies within the Hagshaw Energy Cluster Development Area which includes a number of onshore wind projects which are strategically located in the Southern Scotland transmission network zone with vital links to the English and Welsh transmission zones.

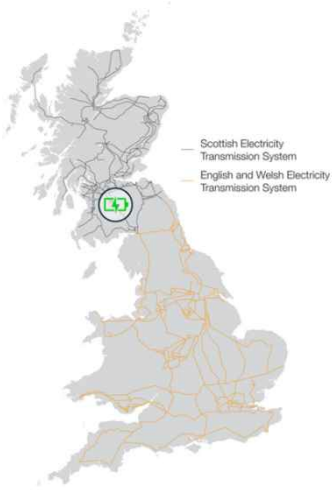

Figure 6.1: Site Location in Context of UK Transmission Network

125 LDES will support the delivery of renewable energy schemes in this vital location by ensuring that the intermittent energy produced can be balanced by the National Grid at a constant and stable rate, avoiding fluctuation in supply and demand. Delivery of LDES in an area which is part of an adopted Development Framework for renewable energy and close to the national electricity transmission network is of strategic importance.

6.3 Impact on Employment Land

126 The Proposed Development will utilise approximately 17 hectares (developable area) for a temporary period of 40 years.

127 The Clyde Plan Industry, Business and Offices Monitoring Report (2020) assessed the provision of land for business, storage and distribution over the period 2018 to 2019. The summarised results for South Lanarkshire are as follows:

- The marketable land totalled 94.44 hectares (the majority of which being within the Poniel SEIL).
- The industrial supply (including marketable land) totalled 213.65 hectares.
- The take up of land during 2018/2019 in South Lanarkshire was 5.31 hectares (2.32 hectares of which was within the Poniel SEIL).

128 This assessment demonstrates that there will still be a significant amount of employment and industrial land available for use should the Proposed Development be consented. It also highlights the lack of uptake of the Poniel SEIL area from the distribution and logistics industry,

despite a significant amount of work and investment over the last decade to promote and regenerate the area.

129 As part of this investment effort, 3R Energy gained outline planning consent (Ref CL/17/0157) for "Mixed Use Development Comprising of Class 4 (Business), 5 (General Industrial) and 6 (Storage and distribution)" in 2017 and 'Conexus' was launched in 2019 as a delivery vehicle for growth.

130 Following limited take up, application P/20/0772 was submitted to extend the time period of the previous consent to allow an additional 5 years for implementation.

131 3R Energy have confirmed that:

"There has been no commercial uptake at Conexus West other than the CHP plant developed by 3R Energy, and temporary renewables infrastructure (batching plant, temporary lay-down area, storage, car parking, office facilities). Market failure of this area as an industrial site is unfortunately evident".

132 Two robust attempts have also been made to securing funding to attract inward investment (Building Scotland Fund in 2019 and Glasgow City Region Investment Zone in 2024). Ultimately both attempts failed.

133 A timeline which identifies the economic development efforts in the area is provided below.

Date	Major commercial activity / efforts to attract industry
1988 - 2001	Europe's largest opencast coalmine closure resulted in local job losses and economic decline / high levels of deprivation.
2000 - ongoing	Livestock farming resumes after ground has been reinstated.
2016	**Biomass CHP** planning approval (CL/16/0157).
2017	**Planning consent CL/17/0157 for 28Ha Heat and Power Par**k. 22,000 ft industrial building completed for CHP.
2018	Ryden appointed to market the M74 Heat and Power Park. Local partnership and collaboration initiated with neighbouring landowner Hargreaves, South Lanarkshire Council and Scottish Enterprise. Creative agency appointed to improve marketing offer.
2019	Area rebranded as a partnership under **Conexus**, with Hargreaves owning and operating **Conexus North**, and Mitchell Energy Ltd (part of 3R Energy group) for **Conexus West**. Expression of Interest submitted for patient investment from Building Scotland Fund. Application required committed business as a partner to invest in an industrial building at this site – no such partner was forthcoming.
2020 - ongoing	Launch of Conexus site to commercial agents in Glasgow led by Ryden Group Ltd. Marketing now continues with website listing. South Lanarkshire Council supports marketing efforts with listing on Invest South Lanarkshire (https://www.investsouthlanarkshire.co.uk/partner-developments/).
2023	**Hagshaw Energy Cluster Development Plan** launch, which includes Conexus West as energy producing area being well placed for supporting renewable energy projects.

2024	In partnership with Hargreaves and supported by South Lanarkshire Council, Conexus applied for Glasgow City Region Investment Zone**.** Application unsuccessful.

Table 6.1 Timeline economic development efforts at Conexus West

134 3R Energy continue to actively explore opportunities to bring both direct and indirect employment, as well as additional economic output, into the area. As part of this effort, the LDES has the potential to offer new businesses within the wider Poniel SEIL the opportunity for a private wire electricity connection. This has the potential to serve as an additional incentive for inward investment, aligning with the core objectives of the SEIL.

135 Furthermore, the Proposed Development will create direct employment itself within the SEIL from an energy related use in line with the Hagshaw Energy Cluster Development Framework and will bring otherwise underutilised former opencast and brownfield land back into productive use. The Proposed Development also stands to create significant indirect employment within the local and national economy (refer to Report R013 for further details).

136 The Proposed Development supports NPF4 Policy 11c by maximising net economic impact through job creation and supply chain development. The Proposed Development is expected to use long duration batteries manufactured in Scotland. This presents an opportunity to retain a greater share of investment nationally.

137 Overall, it is therefore concluded that the provision of the Proposed Development in this location is an acceptable land use given the emergence of the Hagshaw Energy Cluster Development Framework, especially when considering other development opportunities within the SEIL have been slow to materialise despite significant partnership effort.

6.4 The Green Economy

138 Scotland's green economy has grown significantly in recent years. According to Skills Development Scotland (November 2023), nearly £90 billion in green investments are planned or underway, expected to create or support around 77,000 sustainable jobs.

139 The Hagshaw Energy Cluster contributes to this growth, generating 584MW of onshore wind power, with more in the pipeline, and delivering substantial local benefits.

140 The Applicant is committed to long-term community partnerships and local sourcing wherever possible to maximise local economic impact and support Scotland's clean energy transition. As part of local sourcing, the Applicant is exploring supply of the batteries from Invinity, manufactured in Motherwell. Indeed, the Invinity Endurium flow battery system is the candidate technology which the Proposed Development has been designed upon (refer to Report R013).

Figure 6.2: Local Sourcing of Batteries

141 The Applicant promotes local contracting opportunities through a Responsible Contracting Policy (refer to Report R013).

142 Socio-economic analysis (Report R013) estimates the Proposed Development delivered using flow batteries manufactured in Scotland would deliver:

- £17.1m GVA and 180 job-years in South Lanarkshire (90 jobs per year for two years)
- £770m GVA and 1,630 job-years across Scotland (815 jobs per year for two years)

143 Annual operations and maintenance could further contribute:

- £3.1m GVA and 40 jobs in South Lanarkshire
- £8.0m GVA and 70 jobs across Scotland

144 The Proposed Development is also expected to support local public services, generating around £2.5m in annual non-domestic rates.

145 Overall, the Proposed Development is anticipated to deliver significant economic benefits locally and nationally.

6.5 Community Benefits

146 The Socio-Economic Report (R013) submitted alongside the Application has assessed the social impact of the Proposed Development and confirmed that the provision of local employment will have a vital role in attracting and retaining work age population in the local area.

147 The provision of jobs and training within the green economy is a significant benefit for a population whose traditional employment in mining has declined, creating a need for upskilling in new and sustainable industries.

148 The construction sector is also identified (Report R013) as being more important to employment in South Lanarkshire than in Scotland as a whole. The nature of construction is cyclical and as such it is important to maintain a pipeline of work in this industry.

149 The projects 3R Energy has developed to date within the Hagshaw Energy Cluster stand to deliver approximately £1.6 million annually to local communities – £4,383 every day, equating to an estimated £48 million over 30 years (indexed).

150 Community benefit funds are a well-established mechanism through which onshore wind energy developers provide voluntary financial contributions to support local communities. While this is not standard practice for battery storage or long-duration energy storage developments, the Applicant is committed to supporting the local area and will contribute £50,000 per year (index-linked) in community benefit funding from the Proposed Development.

151 This funding will be made available throughout the operational life of the Proposed Development and is intended to provide a reliable, long-term source of income for community-led projects and initiatives.

152 The Applicant will work closely with community representatives to ensure the effective management and allocation of funds. Existing Community Action Plans provide a useful starting point for identifying potential areas of focus, which may include:

- skills development and training opportunities;
- support for local community organisations;
- improvements to leisure and recreational facilities;
- investment in physical regeneration projects; and
- support for local events and community activities

153 Thereby offering significant social and economic benefits to the local area.

7 The Planning Appraisal

154 Consistent with the requirements of S25 of the Town and Country Planning (Scotland) Act 1997, this proposal is designed to comply with the adopted development plan.

155 The key policy documents against which this proposal will be judged are set out in chapter 5 of this Planning Statement. Matters which are considered to hold significant weight in the determination of this proposal are explored in the following section.

7.1 National Legislation and Strategy

156 In direct response to the international Paris Agreement as outlined in section 5.1 of this PS, the Climate Change (Scotland) Act 2009 as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, set the ambition of Scotland's emissions reduction targets to net zero by 2045.

157 The Scottish Government has introduced a number of strategies which seek to increase Scotland's renewable energy mix and improve energy security.

158 Scotland's Energy Statement and Just Transition Plan: Ministerial Statement (January 2023) recognises that "*Scotland already has 13.4 Gigawatts of renewable electricity generation capacity with an ambition to deliver at least 20 Gigawatts of additional low-cost renewable electricity capacity by 2030, which could generate the equivalent of about 50% of Scotland's current total energy demand*".

159 The statement sets out a number of objectives which include:

- To significantly scale up renewable energy production to secure a just transition away from fossil fuels;
- To secure continued and increased investment in the net zero energy economy; and,
- To deliver fairer, more secure energy system that is no longer reliant on volatile international commodity markets.

160 The Proposed Development provides an important support role for the further deployment of renewable energy and the decarbonisation of our electricity grid and is therefore vital to achieving the Scottish Governments Net Zero objectives whilst maintaining energy security.

161 The Climate Change Plan (updated) 2018 – 2032, recognises that by 2032 storage facilities will contribute towards the negative emissions technology mix. Whilst the 2017 Ofgem report states that: "*storage can open up many possibilities, helping to integrate low carbon generation, reduce the costs of the operating the system, and help avoid or defer costly reinforcements to the network*".

162 The Government Clean Power 2030 Action Plan (CP30 Plan) outlines the need for significant expansion of battery energy storage to support the nations transition to a decarbonised electricity grid by 2030. The Plan recognises the importance of long duration energy storage solutions, recognising that they are essential for maintaining grid stability over extended periods of time to help with management of renewable energy.

163 The importance of the development of LDES in the UK is recognised by DESNZ, who have confirmed that LDES play an important contribution to CP30 by integrating renewables and reducing electricity system costs while supporting energy security (please refer to Chapter 5).

164 In December 2022, the Scottish Government published the Biodiversity Strategy to 2045: Tackling the Nature Emergency. This strategy aims to address the *"urgent need to act decisively to address the twin crises of biodiversity loss and climate change together"*. The

strategy sets out its ambition for Scotland to be Nature Positive by 2030, and to have restored and regenerated biodiversity across the country by 2045.

165 The Proposed Development seeks to address central themes of these strategies, aiming to reduce the impacts of Climate Change and contribute towards the decarbonisation of the energy system through the provision of Long Duration Energy Storage. The provision of biodiversity enhancement will also contribute towards the restoration and regeneration of biodiversity in Scotland in accordance with National Policy.

166 It is therefore clear that the principle of the Proposed Development is supported by National Legislation and Strategy.

7.2 National Planning Policy

167 In February 2023, the National Planning Framework 4 (NPF4) was published.

168 NPF4 gives significant weight to tackling the global climate and nature crisis (Policy 1) and Policy 2 seeks to respond to the Climate Emergency through the consideration of climate mitigation and adaptation.

169 The Proposed Development seeks to support the decarbonisation of the energy system (supporting renewable energy) and contribute to biodiversity. The drainage strategy has accounted for a 41% climate change uplift and therefore contributes towards the areas Climate Change Resilience Goals.

170 Policy 3 of NPF4 requires that biodiversity is protected, delivering positive effects on nature. The Proposed Development accords with the principles of Policy 3 through the protection of existing biodiversity features and the provision of an overall enhancement to biodiversity at the Site.

171 Policy 11 of NPF4 provides further guidance on Energy, stating that all forms of renewable energy development, including storage, will be encouraged, promoted and facilitated. The Proposed Development aligns with Policy 11c by delivering measurable economic benefits through employment and supply chain management. Section E of Policy 11 requires that applicants demonstrate how the following impacts are addressed:

i. impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker; The Application has been supported by a Landscape and Visual Impact Assessment (LVIA) and Noise Assessment which have considered impacts on the local community.

The Noise Assessment has demonstrated that the Proposed Development meets the statutory noise limits (landscape and visual impacts are considered further below).

ii. significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable; The LVIA has demonstrated that effects on landscape character would negligible when compared to the extant planning permission for the Site.

The LVIA has concluded that the Proposed Development would not result in markedly different effects than would arise from the extant planning permission for the Site.

It is therefore concluded that the Proposed Development accords with this subsection of NPF4.

iii. public access, including impact on long distance walking and cycling routes and scenic routes; The impact of the Proposed Development on the Core Paths as identified in

paragraph 33 of this PS, has been assessed within the LVIA submitted alongside the Application.

The LVIA concludes that there would be major/moderate adverse effects (compared to the current views) on visual amenity experienced by recreational users of the Core Paths and Aspirational Core Paths which pass through the Site and its environs. However, such effects would not be discernibly greater than those which would arise with the extant permission.

NPF4 recognises that some localised visual effects are expected from energy developments, and it is considered that the identified impact on the short stretches of Core Paths affected would be outweighed by the substantial benefits arising from the scheme.

iv. impacts on aviation and defence interests including seismological recording; LDES schemes do not have a detrimental impact on aviation, defence or seismological recordings.

v. impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised; No telecommunications or broadcasting links are predicted to be affected by the Proposed Development.

vi. impacts on road traffic and on adjacent trunk roads, including during construction; The Proposed Development will not utilise the local highway during construction or operation, save for a very short stretch of the B7078 at the Poniel Interchange. The impacts of the construction phase on the M74 have been assessed within the Transport and CTMP Report (Ref R009).

The operational phase will not generate a significant number of vehicle movements.

vii. impacts on historic environment; There are no historic assets in close proximity to the Site. Due to the previous uses at the Site, no archaeological remains are expected.

The Proposed Development will not have a detrimental impact on the historic environment.

viii. effects on hydrology, the water environment and flood risk; The Application has been supported by a Flood Risk Assessment (R008). This report demonstrates that the Proposed Development will not have a detrimental impact on hydrology, the water environment or flood risk either in isolation or cumulatively at site or wider levels.

ix. biodiversity including impacts on birds; The Application has been supported by an Ecological Impact Assessment (R005) which demonstrates that the Proposed Development will not have a significant impact on protected flora and fauna or ornithology interests at the Site.

The Proposed Development has also introduced biodiversity improvements.

x. impacts on trees, woods and forests; The Proposed Development involves the loss of 0.69 hectares of scrub woodland which runs along the disused railway embankment. These have been assessed as being immature and scrubby in nature.

Their removal will be replaced with approximately 3.35 hectares of new woodland planting which will be managed into establishment by the Proposed Development.

A programme of landscaping and tree planting is proposed to enhance existing biodiversity features on Site.

xi. proposals for the decommissioning of developments, including ancillary infrastructure, and site restoration; Following the cessation of the operational period of the Proposed Development, all infrastructure will be removed from Site. The biodiversity enhancements and landscaping will be retained as legacy improvements.

A decommissioning strategy and programme will be secured via condition.

xii. the quality of site restoration plans including the measures in place to safeguard or guarantee availability of finances to effectively implement those plans; The quality of site restoration and financial guarantees will be secured via condition.

xiii. cumulative impacts. The cumulative impacts of the scheme with other surrounding developments (existing and consented) have been considered as part of the LVIA and noise assessment which have concluded that the development will not have significant cumulative impacts.

172 Further guidance on the environmental requirements is presented in Policy 4 (Natural Places), and Policy 22 (Flood Risk and Water Management) and the requirements of these policies are addressed within the associated technical assessments submitted alongside the Application.

173 Policy 18 of the NPF4 seeks to install an 'infrastructure first' approach to land use planning. The energy network is an important part of the area's infrastructure which must be supported if economic and social prosperity across Scotland is to be achieved.

174 Policy 23 of NPF4 sets out the framework's approach to Health and Safety, seeking to ensure that people and places are protected from environmental harm. The proposed VFB do not represent a fire risk. However, an outline Battery Safety Management Plan (BSMP R011) has been provided for the remaining electrical equipment. The BSMP will be a live dynamic document which will be agreed with the Local Fire Authority prior to commencement and secured via condition.

175 The strategically important location of the Proposed Development (linking the Scottish and English electricity transmission networks) means that the **Overarching National Policy Statement for Energy (EN-1)** is also a material consideration in the determination of the Application[1].

176 **NPS EN1** confirms that "*Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated*" (para 3.3.35). Paragraph 3.3.28 recognises the need for storage over longer durations stating that:

"Whilst important in providing balancing services, many of the storage facilities currently being deployed provide storage over a period of hours but cannot cost effectively cover prolonged periods of low output from wind and solar. There are a range of storage technologies that may be able to provide storage over longer periods of low wind and solar output (e.g. days, weeks or months) but many of these technologies are not yet available at scale or have an upper limit on deployment due to geographical constraints".

177 The Proposed Development is one of the first of its kind, offering large scale Long Duration Storage which meets the country's need for longer duration electricity storage.

[1] While English Planning Policy documents have no legal status in Scotland, they may be considered in limited circumstances, such as cross-border infrastructure projects which is relevant in this case

7.3 Local Planning Policy

178 Policy 5 of the South Lanarkshire Local Development Plan 2 (volume 1) sets out the Council's Development Management and Placemaking Policy. It confirms that:

"In order to ensure that development takes account of the principles of sustainable development, all proposals require to be well designed and integrated with the local area. Proposals should have no unacceptable significant impacts on the local community and the environment".

179 The policy provides a list of bullet points to consider when assessing development proposals. These matters are assessed against planning policy below:

- Principle of Development
- Landscape & Visual Impacts
- Residential Amenity
- Transportation/Road Safety
- Sustainability and Carbon Reduction
- Land
- Natural and Historic Environment
- Surface Water and Flooding
- Other Matters

Principle of Development

180 Policies 18 and RE1 of the South Lanarkshire Local Development Plan 2 (LDP2) set out the permissive framework which applicants for renewable and low carbon energy development (of which the Proposed Development is) will be assessed against.

181 These policies seek to support renewable energy schemes subject to an assessment against the relevant criteria contained within the Assessment Checklist for Renewable Energy. This checklist has been completed and is provided within Appendix 4 of this PS. The assessment concludes that the Proposed Development accords with all relevant criteria and is therefore supported by the permissive framework of the Local Plan.

182 As discussed in chapter 6 of this PS, the Proposed Development is located within a Strategic Economic Investment Location (SEIL) which are allocated under Policies 8 and ICD1 for logistics and distribution. Whilst the Proposed Development does not fall under these Use Classes Policy ICD1 confirms that other development which may be considered acceptable are *"identified in the Council's Economic Strategy or any approved masterplan for the SEIL".* The Proposed Development Site is located within the Hagshaw Energy Cluster Development Framework Area and as such the principle of energy infrastructure uses being located within this area has been accepted.

183 Due to the evolving nature of renewable technologies, it is not common practice to designate specific locations for individual renewable schemes (excluding wind farms in some instances). Consequently, policy directs such developments to industrial and employment sites, where the uses maximise net economic impact benefits such as employment, associated business and supply chain opportunities (NPF4 Policy 11). It can therefore be concluded that the provision of an Energy scheme within an employment allocation can be considered as consistent with the Development Plan, provided its use does not negatively impact the allocation itself.

184 In this instance, the Proposed Development supports and encourages investment into the area (as outlined in Chapter 6) providing ancillary services to the wider employment area and providing a level of employment itself during construction and operation, as well as the potential for significant indirect employment creation in Scotland through the local sourcing of batteries (refer to R013).

185 With regards to the scale of the Proposed Development, the Site has an extant consent for mixed use industrial/commercial buildings with a maximum height of 15m. The Proposed Development is smaller in height than the consented buildings.

186 It can therefore be concluded that the Proposed Development accords with Policies 1 (Spatial Strategy), 2 (Climate Change), 5 (Development Management), 8 (Employment), IDCP1 (Economic Investment Locations), 18 and RE1(Renewable Energy) of the South Lanarkshire LDP2.

Landscape and Visual

187 The LVIA (R010) has assessed the impact of the Proposed Development on the character of the landscape and potential views of the Proposed Development. It has concluded that:

Landscape Character

188 The brownfield nature of the Site, and the presence of multiple operational wind farms to the immediate south-west, west and north-west of the Site, means that effects on landscape character would be no greater than moderate adverse within the Site compared to the current landscape character, and **negligible compared to the extant permission**. Landscape character effects beyond the Site, mainly experienced within the wind farm landscape to the south-west, west and north-west within 1 km of the Site, would be minor adverse compared to the existing landscape character, and **negligible compared to the extant permission**.

189 Effects on the Douglas Valley SLA to the immediate south of the Site would be at worst moderate adverse compared to the existing landscape character. Effects on the SLA would be **negligible compared to the extant permission**.

Visual Impacts

190 Whilst there would be views of the Proposed Development from the surrounding landscape, undulating topography and strong tree cover to the north, east and south of the Site would limit effects on local visual amenity. There would be major/moderate adverse effects (compared to the current views) on visual amenity experienced by recreational users of the Core Paths and Aspirational Core Paths which pass through the Site and its environs. Such effects would **not be discernibly greater than those which would arise with the extant permission**.

191 **Effects on other visual receptors would be much more limited**.

Cumulative Impacts

192 Cumulative landscape and visual effects arising from the Proposed Development in combination with other nearby consented and in-planning energy developments would not be noticeably greater than those arising from the Proposed Development on its own.

Conclusions

193 The assessment concludes that, while some effects would be large magnitude within the Site and its vicinity, there is capacity for this low or low-medium sensitivity landscape to accommodate the Proposed Development without causing unacceptable landscape or visual harm to the wider surrounding area. The Proposed Development would not result in markedly different effects than would arise from the extant mixed-use permission for the Site.

194 It can therefore be concluded that, with appropriate mitigation, the surrounding landscape is able to accommodate the Proposed Development in this location without resulting in significant adverse landscape or visual effects in accordance with Policies 5 (Development Management and Placemaking), 14 (Natural and historic environment), RE18 (Renewable Energy), NHE16 (Landscape) and NHE18 (Walking, Cycling and Riding Routes) of the South Lanarkshire LDP2.

Residential Amenity

195 The potential for impact on Residential Amenity is considered below:

Noise

196 The Noise Assessment submitted as part of the Application (R007) has concluded that that the Proposed Development will give rise to sound levels that do not exceed the measured background sound level in the area by more than 4 dB, and internal noise levels that do not exceed the legislative requirements, and as such the Proposed Development is compliant with the requirements of South Lanarkshire Council's Environmental Health Department.

197 It is therefore concluded that the Proposed Development will not have an adverse impact on Noise at the Site or its surroundings.

Air Quality

198 There are no Air Quality Management Areas (AQMA) within 2km of the Site.

199 The construction works have the potential for give rise to the following air quality effects:

- Dust emissions and associated nuisance generated by the construction works and particularly by the earthworks;
- Additional emissions to the atmosphere from the operation of the construction plant and machinery; and
- Additional emissions to the atmosphere from construction-related traffic generation.

200 With the implementation of appropriate, best practice mitigation measures, it is considered that significant adverse effects to air quality will not arise. Appropriate mitigation measures will be incorporated into a CEMP, developed by the Contractor prior to the commencement of construction works.

201 With regard to emissions from construction-related traffic, the temporary increase in traffic generation associated with the works is not envisaged to be significant. As such, road traffic emissions will unlikely be significantly affected by this temporary addition of traffic to the local road network.

202 The Proposed Development is not anticipated to generate significant air quality effects during the operational phase.

203 The Proposed Development will not have a detrimental impact on residential amenity, therefore complying with the requirements of policies 5 (Development Management and Placemaking) and DM20 (supporting information) of the South Lanarkshire LDP2.

Transport & Road Safety

204 The majority of the construction phase will be undertaken over an 18-month period comprising civil works and installation of the LDES infrastructure. It is anticipated there will be on average 70 HGV deliveries a day with peak periods for civils works and delivery of the plant to Site. The only anticipated indivisible abnormal load will be the crane used for the delivery of the transformer(s) and work on Site. The usual safeguarding measures and notification of the local highway's authority will be undertaken.

205 Two temporary construction compounds will be set up in the Site for welfare facilities and materials lay down as well as parking and HGV turning/manoeuvring.

206 During construction approximately 56 LGV are anticipated from staff movements, this not considered to be significant.

207 Once operational, there will be approximately 6 staff on Site at any one time working in shifts (with an average of approximately 44 traffic movements by car or van over a 24 hour period). HGVs will be used when a requirement for replacement plant or equipment on an occasional basis.

208 All traffic will be routed via the M74 and as such, no adverse effects are considered likely on the local highway network or the amenity of residential properties. This route is currently being used for the construction of the Douglas West Wind Farm Extension, Hagshaw Wind Farm Repowering, and Cumberhead West Wind Farm generating a peak total of 604 HGV deliveries per day which will be completed prior to the construction of the Proposed Development. This demonstrates that the suitability of the road network to accommodate this level of temporary traffic.

209 It is therefore concluded that the construction and operational phases will not have a detrimental impact on the highway network in accordance with Policy 15 (Travel and transport) of the South Lanarkshire LDP2.

Sustainability & Carbon Reduction

210 As described previously, the development of LDES is vital to the transition to Scotland's Low Carbon Future.

211 The Proposed Development will provide enough electricity to power approximately 1.3m homes for a continuous period of up to 12 hours.

212 The Site has been designed to maximise the space and electrical network connection available in this location.

213 The Site layout is functional for its operation in context with the immediate surroundings which constitute other renewable energy schemes. Further details on site design and layout is provided in the Design and Access Statement submitted alongside the Application (R003).

214 The Proposed Development therefore supports Policies 2 (Climate Change), 18 (Renewable Energy), DM1 (New Development Design) and RE1 (Renewable Energy) of the South Lanarkshire LDP2.

Land

Coal Mining

215 A Coal Mining Risk Assessment was carried out as part of planning application CL/17/0157 (the Site). This report concluded that "*there are no mining related risks to the proposed development of the M74 Heat and Power Park. The site development lies outwith the area of productive coal measures strata and outside the areas of previous coal extraction*".

216 This report is provided as an appendix to the Land Contamination Survey (R012) submitted alongside this Application.

Hydrogeology and Geology

217 The Site area is underlain by strata of the Passage Formation and the upper horizons of the Upper Limestone Formation which are barren of any productive coal measures strata.

218 Foundations will be designed to ensure that the Proposed Development does not have a detrimental impact on geology or hydrogeology.

Land Contamination

219 A Contamination Survey (R013) has been provided as part of the Application. This has concluded that whilst due diligence site investigations are required to allow more detailed assessment, there are not considered to be any significant site related technical constraints to development taking place that could not be accommodated utilising standard development practices and design during both the construction and operational phases of the Proposed Development.

220 The operational phase is contained within battery units and as such will not result in land or ground water contamination.

Peat

221 Due to the previously developed nature of the site, the presence of peat is considered unlikely (refer to Figure 2.2).

222 The Proposed Development therefore accords with the requirements of Policy SDCC1 (Vacant, Derelict and Contaminated Land) and Policy NHE (Peatland and Carbon Rich Soils) of the South Lanarkshire LDP2.

Natural and Historic Environment

Ecology

223 An EcIA (R005) has been undertaken to support the Application. This has concluded that "*residual impacts on valued ecological receptors during construction and operational phases are minimal, with no effects being significant at the level of assessment".*

224 A summary of residual effects following mitigation is summarised below (where no reasonable pathway of effect exists and pre-mitigation impact has been discounted, the receptor is not considered in this summary):

- **Construction Phase** Long Plantation (Ancient Woodland): Slight Adverse – Negligible.
- **Construction Phase** Amphibians: Negligible.
- **Construction Phase:** Badgers - Negligible
- **Construction Phase** Breeding Birds: Negligible.
- **Construction Phase** Reptiles: Negligible
- **Construction Phase** Otter: Negligible.
- **Operational Phase** Lowlands mixed deciduous woodland: Moderate long-term gain is considered significant at the level of assessment

Archaeology and Heritage

225 There are no listed buildings, designation landscapes or scheduled monuments on or close to the Site.

226 The brownfield nature of the Site would also suggest that archaeological remains are very unlikely. In their consultation response to the extant planning consent proposal, the West of Scotland Archaeology Service advise that "*it appears unlikely to raise a substantive archaeological issue. This is because the majority of the area that is proposed for development has been subject to extensive levels of previous disturbance associated with opencast mining operations, which is likely to have removed any material associated with earlier phases of occupation that may have been present. As a result of this, I would not consider archaeological work to be required in relation to the current application*".

227 Further information regarding the historic context is provided within Appendix 5 of this PS (Historic Environment Supporting Statement for the M74 Heat and Power Park (2017).

228 It is therefore considered that the Proposed Development will not have an adverse impact on heritage and archaeological interests.

229 The Proposed Development therefore accords with the requirements of Policies 14 (Natural and Historic Environment), NHE12 (Water Environment and Biodiversity), NHE13 (Forestry and Woodland) and NHE20 (Biodiversity) of the South Lanarkshire LDP2.

Surface Water and Flooding

230 A Flood Risk Assessment and Drainage Strategy (R008) has been prepared as part of the Application.

231 The report confirms that the Site is not at risk of coastal flooding (SEPA's coastal flood risk map) and most of the Site is not subject to fluvial flood risk. There is a small area in the north-western part of the Site that is shown to be at risk of flooding from a low, medium, high and climate change fluvial flood extent associated with the Poniel Water. However, this does not impact the developable area which is located 1.21 m higher in elevation than the flood extent and therefore the Site will remain outside of the fluvial flood extent for the operational lifetime with the added effects of climate change.

232 SEPA's surface water and small watercourse flood risk mapping indicates that there are areas in the centre of the Site and along the routes of the Alder Burn and ditches in the east of the Site that have up to high surface water flood risk as well as medium risk with the added effects of climate change (for a 2070 scenario). Depth mapping suggests that flood depths range between 0.3 m and 1 m for the medium climate change flood extent and the mapping suggests there are areas of ponding zones and flow paths associated with the existing drainage arrangement on the site as a result of the former quarrying use.

233 The hydrology of the Site has been significantly altered from its original state due to historic quarrying activities and SEPA mapping does not reflect changes in site levels and the proposed introduction of new drainage infrastructure as a result of the Proposed Development.

234 The proposed Surface Water Drainage Strategy has been designed to manage runoff for the 1 in 200 year rainfall event plus a 41% climate change allowance in new drainage features. These SuDS features will be maintained and managed privately by the applicant to a suitable standard and the strategy will provide a betterment on existing overland flows rates for the area for the 30 year and 100 year storms.

235 Following the implementation of mitigation measures identified through the FRA and the Surface Water Drainage Strategy, there are not expected to be any residual significant effects from the Proposed Development at the Site or wider area in accordance with Policies 16 (Water Environment and Flooding), SDCC2 (Flood risk), SDCC3 (Sustainable Drainage Systems) and NHE12 (Water Environment and Biodiversity) of the South Lanarkshire LDP2.

Other Matters

Socio Economic

236 As set out in the Socio-Economic Report (R013) and summarised in chapter 6, the Proposed Development offers significant socio-economic benefit, contributing towards four of the five pillars of Community Wealth Building in South Lanarkshire (spending, workforce, financial power, and land and property).

237 The Proposed Development will create direct and indirect employment and bring underutilised land back into productive use. While community benefit funding is not always standard practice

for energy storage developments, the Proposed Development will provide up to £50,000 per year in community benefit funds to support community-led initiatives over its operational lifetime. During its operational period, the Proposed Development is also expected to generate approximately £2.5 million in non-domestic rates yearly.

238 The Proposed Development supports NPF4 Policy 11c by maximising net economic impact through job creation and supply chain development. The Proposed Development is expected to use long duration batteries manufactured in Scotland. This presents an opportunity to retain a greater share of investment nationally.

Risk to Human Health and Safety and of Accidents and/or Disaster

239 For the duration of the Proposed Development, there are various risks to workers. Risks are those that are commonly associated with working with machinery and large / heavy quantities of materials. The Proposed Development will be built and operated in accordance with all relevant safety standards and maintained as such.

240 Vanadium Flow Batteries' are chemically and thermally robust, and as such do not represent a risk of fire.

241 Potential effects to human health due to air pollution associated with the Proposed Development are unlikely to be significant.

242 Overall, no significant risk to human health and safety are likely as a result of the Proposed Development.

Transboundary Impacts

243 There are no transboundary nature impacts as this development falls only within the South Lanarkshire Administrative Area.

Cumulative Impacts

244 The technical assessments provided in alongside the Application have considered the potential for cumulative impacts.

245 Overall, it is considered unlikely that the Proposed Development would not result in any significant cumulative effects with other known developments.

8 Conclusion

247 This Planning Statement (PS) has been prepared on behalf of Hagshaw LDES Ltd (the 'Applicant') to accompany a full planning application (The Application) submitted under Section 36 of the Electricity Act 1989 (as amended) for the construction and operation of a LDES, with a discharge duration of up to 12 hours at Conexus West, west of Junction 11 of the M74, Coalburn, Lanark, ML11 0RL.

248 LDES make an important contribution to ensuring a consistent and reliable energy supply as we decarbonise our electricity grid towards Net Zero. By storing energy when demand is low and releasing it over periods of extreme demand, the Proposed Development will help the energy sector cope with the peaks in supply and demand that the electricity grid faces on a daily basis.

249 The Scottish Government has set a target within The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, to achieve net zero emissions by 2045. As part of the drive towards Net Zero, the Government has recognised the need to decarbonise the energy system, confirming that renewable energy (and associated energy storage) has a vital role in this transition.

250 The provision of LDES will play a crucial role in supporting the continued decarbonisation of the electricity network in line with the UK Government's Clean Power 2030 Action Plan (CP30 Plan). The UK Government DESNZ confirming that LDES is a key enabler to a secure, cost-effective and low carbon energy system.

251 South Lanarkshire Council, Public Performance Reports, Sustainable Development and Climate Change (2022- 2027), confirms that South Lanarkshire are fully committed to achieving Net Zero. The South Lanarkshire Local Development Plan 2 recognises that significant weight should be placed on renewable energy schemes whilst ensuring that there are no unacceptable significant adverse impacts generated by them.

252 The Proposed Development provides substantial benefits supporting the renewable energy transition whilst maintaining a secure energy supply which can sustain a strong economy and the contribute to the needs of the local community.

253 The Proposed Development also supports NPF4 Policy 11c by maximising net economic impact through job creation and supply chain development, and stands to deliver significant socio-economic benefits to the local and national economy.

254 In addition to the substantial wider environmental benefits of LDES, it is proposed that the land surrounding the Proposed Development will be enhanced to provide landscape and biodiversity improvement.

255 The Environmental Impacts of the Proposed Development have been assessed in the technical reports submitted alongside the Application and summarised in chapter 7 of this PS. They demonstrate that, with the implementation of suitable mitigation measures, the Proposed Development will not have any adverse impacts when assessed against the extant planning consent at the Site.

256 Having considered the range of material considerations it is clear that any impacts of the Proposed Development would be significantly and demonstrably outweighed by the benefits of the proposed scheme.

257 It is therefore respectfully submitted that the Application should be approved without delay.

Appendix 2: Screening Request

Appendix 3: Screening Opinion

Appendix 4 Renewable Energy Assessment Checklist

Appendix 5: Supporting Statement for the Historic Environment (M74 Heat and Power Park) 2017)

Appendix 6: Extant Consent