



Dean Moor Solar Farm

Draft Statement of Common Ground with National Highways

on behalf of **FVS Dean Moor Limited**

26 August 2025
Prepared by: Stantec UK Ltd
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DEAN MOOR SOLAR FARM
DRAFT STATEMENT OF COMMON GROUND WITH NATIONAL
HIGHWAYS
PLANNING INSPECTORATE REFERENCE EN010155
PREPARED ON BEHALF OF FVS DEAN MOOR LIMITED

The Infrastructure Planning (Applications: Prescribed Forms
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1 Introduction

1.1 Status of the Statement of Common Ground

1.1.1 This draft Statement of Common Ground ('dSoCG') has been produced for FVS Dean Moor Limited ('the Applicant') to support the application for a Development Consent Order (the 'DCO application') to the Secretary of State for Energy Security and Net Zero ('SoS') for Dean Moor Solar Farm ('the Proposed Development') located between the villages of Gilgarran and Branthwaite in West Cumbria (the 'Site'), which is situated within the administrative area of Cumberland Council ('the Council').

1.1.2 This dSoCG has been prepared by (1) the Applicant and (2) National Highways (NH). It is agreed that this dSoCG is an accurate description of the matters raised by NH and the current status of each matter. A high-level overview of the engagement undertaken since June 2023 is summarised in section 3.

1.2 Purpose of this document

1.2.1 The dSoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific matters that may need to be addressed during the Examination. The dSoCG is a 'live' document that will be updated by the parties as matters progress.

1.3 Terminology

1.3.1 In the matters table in Section 2 of this dSoCG, '*Matter agreed*' indicates where issues are resolved. '*Matter under discussion*' indicates where points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties, and '*Matter not agreed*' indicates agreement on the matter could not be reached following significant engagement.

2 Current Position

2.1 Position of the Applicant and National Highways

- 2.1.1 The Applicant and NH have had positive engagement on a number of issues, set out in Table 2.1 and 2.2 below covering a range of topics.
- 2.1.2 One matter is currently still under discussion relating to the scope of the assessment of cumulative effects of construction traffic on the A595 Lillyhall Roundabout (see Table 2.2). The Applicant and NH are confident of resolving this matter during the Examination.
- 2.1.3 The Applicant has provided a response to the matters raised by NH within their Relevant Representation (RR) [[RR-010](#)] within the 'Applicant Response to Relevant Representations' (ARRR) [[REP1-002](#)]. This response, and the points raised by NH's RR are reflected within this dSoCG.
- 2.1.4 The shared position set out below within Table 2.1 '*Matters agreed*' is the agreed position. However, the wording may be refined following further engagement between the parties and these updates will be presented in the next version of this dSoCG.

2.2 Matters agreed

2.2.1 Table 2.1 below details the matters agreed with NH.

Table 2.1 Matters agreed

Ref	Topic	Shared position	Application Doc Ref
NH1	Accident data baseline in the Transport Statement	<p>Applicant Position</p> <p>It is agreed that based on the current PIC and Crashmap data, there is no notable safety concern relating to the road network within the study area and that the Applicant has used the appropriate baseline data for the purposes of the application's Transport Statement assessment.</p> <p>The potential for further updates to background data is acknowledged. Should additional data be available and/or in the event of the Proposed Development being implemented concurrently with any other large-scale developments relying on the road network in the study area, a review of this data may be required to inform measures in the final Construction Traffic Management Plan (CTMP) secured by a DCO Requirement.</p> <p>NH Position</p> <p><i>The 2023 CrashMap data was presented during a meeting on 24.07.25 as requested by NH through their Relevant Rep. The data showed no new incidents at or in the vicinity of the Lillyhall roundabout. It was agreed that this update would be formally captured in the meeting minutes. This issue can now be considered to be resolved.</i></p>	<p>ES Appx 2.5 Transport Statement [APP-102] (section 4.5)</p> <p>Transport Statement Appx A Crashmap Incident Reports, Lillyhall Roundabout (2018-2022)</p> <p>ES Appx 5.2 Outline Construction Traffic Management Plan [APP-109]</p>
NH2	Vehicle Routeing	<p>Applicant Position</p> <p>It is agreed that the vehicle routeing to/from the Strategic Road Network (SRN), as specified in section 5 of the Outline Construction Traffic Management Plan (CTMP), is appropriate for the Proposed Development construction traffic subject to compliance with the OCTMP as-a-whole, including other measures that avoid or mitigate effects on the proposed route.</p> <p>NH Position</p> <p><i>It is agreed that the vehicle routeing to/from the SRN, as specified in section 5 of the OCTMP, is appropriate for the Proposed Development construction traffic subject to compliance with the</i></p>	<p>ES Appx 2.5 Transport Statement [APP-102]</p> <p>ES Appx 5.2 Outline Construction Traffic Management Plan [APP-109] (section 5.3)</p>

Ref	Topic	Shared position	Application Doc Ref
		<i>OCTMP as-a-whole, including other measures that avoid or mitigate effects on the proposed route. This issue can now be considered to be resolved.</i>	
NH3	Approach to managing Abnormal Indivisible Load (AIL) deliveries.	<p>Applicant Position</p> <p>Should AIL be required, an AIL vehicle will only be able to attend the Site by following the appropriate protocols for such vehicles, including the notification of NH and the LHA, with details of the application of the AIL protocols to be provided in the final CTMP.</p> <p>NH Position</p> <p><i>It is agreed that should AIL be required, an AIL vehicle will only be able to attend the Site by following the appropriate protocols for such vehicles, including the notification of NH and the LHA, with details of AIL protocols to be provided in the final CTMP. This matter can now be considered to be resolved.</i></p>	ES Appx 2.5 Transport Statement [APP-102] (section 5)
NH4	Identification of laybys and services along the SRN	<p>Applicant Position</p> <p>It is agreed that compliance with OCTMP measures to control traffic flows to/from the Site can be supported by identifying safe suitable locations for HGV to stop along the SRN before arriving to the Local Road Network. In accordance with advice from NH, detail of the locations identified in the OCTMP are provided for laybys in Table 5.3 of the OCTMP and details of the suitable service stations and laybys are provided in Table 5.4.</p> <p>It is agreed that in advance of the final CTMP these locations should be reviewed to ensure they remain available, and the details of the laybys and services will be provided in the CTMP. The approved details will be provided to delivery drivers and the availability/suitability of stopping locations will be monitored by the Principal Contractor (PC) across the construction period, and details will be updated and communicated to drivers if required.</p> <p>NH Position</p> <p><i>The information provided in the OCTMP has been reviewed and the suggested approach is agreed. National Highways will continue to work proactively with the Applicant to develop and agree the final OCTMP. This matter can now be considered to be resolved.</i></p>	ES Appx 2.5 Transport Statement [APP-102] (section 7)
NH5	Construction	Applicant Position	ES Appx 5.2 Outline

Ref	Topic	Shared position	Application Doc Ref
	Worker Travel Plan	<p>A Construction Worker Travel Plan (CWTP) will form an important part of the final CTMP to ensure a joined-up approach to the management of HGV and LGV (worker vehicle) traffic to/from the Site across the construction period. A Framework CWTP (FCWTP) within the OCTMP includes information on estimated vehicle numbers, worker parking demand, and commits to measures to minimise worker vehicle traffic numbers and support sustainable travel goals.</p> <p>It is agreed that the final CWTP will reflect full details of staff modal splits, provision of minibus services, and sufficient parking provision.</p> <p>A framework approach is appropriate at this stage given that key details for a more advanced CWTP will not be known until the pre-construction phase, such as the final construction programme and project resourcing (including critical inputs such as the proportion of works who are locally based or those which may be non-local and reliant on temporary accommodation in hotels.) However, it is considered that the FCWTP provides a sound basis of for the future CWTP based on outcomes to be achieved and foundational versions of the key measures to be adopted to deliver these objectives.</p> <p>NH Position</p> <p><i>It is agreed that the FCWTP provides the necessary framework of information requested by National Highways to minimise the impacts of construction traffic. Specifically, it includes a commitment to the provision of minibuses to transfer a proportion of construction workers to site.</i></p> <p><i>This will be developed in more detail once a Principal Contractor has been appointed, and the final construction programme and worker numbers are confirmed, with the content of the final CWTP to be in accordance with the objectives and measures established in the framework. The CWTP will form part of the final CTMP to be approved by Cumberland Council as a DCO Requirement. This matter can now be considered to be resolved.</i></p>	Construction Traffic Management Plan [APP-109] (section 7 Framework Construction Workforce Travel Plan)
NH6	Decommissioning Traffic Management Plan	<p>Applicant Position</p> <p>It is agreed that the Framework Decommissioning Management Plan (FDMP) secures the provision of a decommissioning traffic management plan as part of the future Decommissioning Management Plan document suite. This part of the DMP will need to reflect up-to-date consideration of traffic flows and development impacts informed by engagement with the relevant highways authorities.</p>	ES Appx 5.2 Outline Construction Traffic Management Plan [APP-109]

Ref	Topic	Shared position	Application Doc Ref
		NH Position <i>NH note that any traffic flows / development impacts arising from future site decommissioning would need to be confirmed with NH before this matter can be scoped out of any future assessments. Accordingly, a suitable Requirement securing the production of a Decommissioning Traffic Management Plan, as and when necessary, would be considered appropriate.</i>	
NH7	Collaboration with other developments	Applicant Position The Applicant has noted within the CTMP that it will seek to collaborate with other developers (including the prospective developer for the withdrawn Lostrigg Solar DCO) where it is expected that construction traffic movement could cumulatively interact on the network. In doing so, the Applicant would seek to co-ordinate to minimise the effects of the cumulative traffic such that sensitivity thresholds are not exceeded. NH Position <i>National Highways request that the final CTMP includes a firm commitment relating to collaboration with the developers of the nearby Lostrigg Solar site in order to minimise impacts.</i>	ES Appx 5.2 Outline Construction Traffic Management Plan [APP-109]

2.3 Matters under discussion

2.3.1 Table 2.2 below details the matters under discussion with NH.

Table 2.2 Matters under discussion

Ref	Topic	Applicant Position	National Highways Position	Application Doc
NH7	Scope of the assessment of cumulative effects of construction traffic on the A595	Following NH's response to the PEIR, a more detailed assessment of the A595 and Lillyhall Roundabout was undertaken and presented in a follow-up meeting on 20 September 2024.	<i>Lilyhall Roundabout - The Lilyhall roundabout on the A595 is shown in ES Appx 2.5 - Transport Statement (APP-102) to be the access point from the SRN for traffic related to the</i>	ES Appx 2.5 Transport Statement [APP-102] (section 4) ES Appx 5.2 Outline

Ref	Topic	Applicant Position	National Highways Position	Application Doc
	Lillyhall Roundabout	<p>The assessment utilised traffic survey data collected on the unclassified road east of Lillyhall Roundabout (part of LRN) and referred to as 'Branthwaite Road') and supplements that with NH's data from WebTRIS, collected on A595 north of Lillyhall Roundabout which is part of the SRN.</p> <p>The WebTRIS data was extracted for the same week from which the ATC data was collected (17 April 2023 to 23 April 2023) and is therefore considered complementary and up-to-date and reflective of the road conditions during the same period as the ATC data.</p> <p>The results of the assessment evidenced that there would be a negligible impact on the A595, and this was confirmed through comparative engagement with the preliminary assessment being undertaken by the transport team for the Lostrigg Solar development (application now withdrawn).</p> <p>The TS has provided compelling data and analysis of the forecast effects of the construction and operational period for the Proposed Development on the Lillyhall Roundabout and adjoining A595. That evidence has demonstrated the de minimis impacts on those aspects of the SRN.</p> <p>The Applicant does not consider that NH has fully substantiated the rationale for its concerns with regards to congestion and/or queueing at Lillyhall Roundabout beyond an assessment of Google Maps traffic data, which is not considered to be a robust or accurate form of traffic surveying or network effect appraisal.</p> <p>The Applicant continues to assert that the data and appraisal in the TS demonstrates that effects are not significant and therefore require no further analysis.</p>	<p><i>construction, as well as that related to the future operation and eventual decommissioning of the proposed development.</i></p> <p><i>Throughout the engagement process, further information has been requested by NH relating to up-to-date baseline traffic flows and the operation of the Lilyhall roundabout itself in order to fully understand the potential traffic impact of the proposed development.</i></p> <p><i>This information is required to understand the extent of any current congestion and/or queueing that may be exacerbated by the traffic flows associated with the proposed development. To date, this information has not been provided.</i></p> <p><i>It is understood that the Applicant is committed to the collection of turning count, queue and ATC data at Lillyhall Roundabout in September 2025 and this is welcomed.</i></p> <p><i>NH will work with the Applicant and undertake a timely review of this additional data when received.</i></p>	<p>Construction Traffic Management Plan [APP-109]</p> <p>ES Ch 11 Cumulative Effects and Residual Effects Summary [APP-042]</p>

Ref	Topic	Applicant Position	National Highways Position	Application Doc
		<p>The Applicant has, however, committed to collecting network user data, including link flow trend information and turning movement and queue length data at the Lillyhall Roundabout.</p> <p>As set out above, that data is not to be collected until after the education summer 2025 holidays, i.e. until September 2025. Once collected, it will be used further to appraise the forecast effects and will be provided to NH in due course.</p> <p>The outcome from the appraisal will be recorded in the OCTMP [APP-109] and if necessary, the final CTMP will take the outcome into account in the design of the management measures that will be consulted on with NH and the LHA ahead of DOR submission.</p>		

2.4 Matters not agreed

- 2.4.1 The Applicant and NH do not currently consider that there are any matters which have not been agreed or are capable of being resolved during the Examination.

3 Record of Engagement

3.1 Summary of consultation and engagement

3.1.1 The table below summarises communication in relation to progressing this dSoCG. The Applicant notes there has been a variety of informal communication, such as telephone calls between the parties to discuss updates on the Proposed Development and various ad-hoc queries, which are not set out in the table below.

Table 3.1 Summary of consultation and engagement with National Highways

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
NH.A	18.05.2023	Meeting (ES Appx 2.5, Appx D Consultation Meeting Minutes with Cumberland Council and National Highways [APP-102])	Meeting to discuss transport scoping. It was agreed that transport could be scoped out of the Environmental Statement.
NH.B	06.10.2023	Email correspondence (ES Appx 2.5, Appx C Correspondence with Cumberland Council and National Highways [APP-102])	NH re-confirmed that the main concern is the roundabout and that there are no other specific issues. NH noted that the Applicant agreed to undertake appraisal work to confirm minibus numbers.
NH.C	23.04.2024	Statutory Consultation Response	<ul style="list-style-type: none"> NH agreed with the minutes of the scoping discussions. NH requested further information on the causation factors of recorded incidents on the SRN. NH noted that the Lillyhall roundabout suffers from congestion at peak periods and further information was requested regarding baseline conditions and expected construction and staff vehicle movements in this location. NH disputed the baseline data used for the analysis within the TMR as it was based

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
			<p>on a 2015 base year and is therefore not appropriate to draw conclusions relating to current baseline conditions at Lillyhall Roundabout.</p> <ul style="list-style-type: none"> NH requested deliveries outside of peak periods where possible as a firm commitment. NH requested further information relating to services and laybys along the SRN where vehicles can wait outside of the scheduled delivery window.
NH.D	02.08.2024	Email correspondence (ES Appx 2.5, Appx C Correspondence with Cumberland Council and National Highways [APP-102])	The Applicant provided a response to NH's statutory consultation response in relation to incident causation on the SRN, congestion at Lillyhall Roundabout, the data used for baseline conditions at Lillyhall Roundabout, commitment to scheduling deliveries, and providing further information for the methodology for calculating construction staff numbers / routing.
NH.E	22.08.2024	Email correspondence (ES Appx 2.5, Appx C Correspondence with Cumberland Council and National Highways [APP-102])	NH confirmed that further information is requested on causation factors on incidents at the SRN, the baseline conditions of Lillyhall Roundabout, clarification of the cumulative assessment, information around lay-by areas, and clarification of average staff numbers.
NH.F	20.09.2024	Meeting (ES Appx 2.5, Appx E Consultation Meeting Minutes with Lostrigg and National Highways Regarding Cumulative Assessment of Lillyhall Roundabout [APP-102])	Meeting to discuss NH's outstanding comments from the review of the OCTMP.
NH.G	01.10.2024	Meeting (ES Appx 2.5, Appx E Consultation Meeting Minutes with Lostrigg and National Highways Regarding Cumulative Assessment of	Meeting set up to discuss cumulative impacts with Lostrigg Solar on Lillyhall Roundabout with National Highways and RWE.

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
		Lillyhall Roundabout [APP-102])	
NH.H	09.10.2024	Email correspondence (ES Appx 2.5, Appx C Correspondence with Cumberland Council and National Highways [APP-102])	Stantec shared a minute from the meeting with Lostrigg with NH which was held to discuss the respective assessments of Lillyhall Roundabout. Lostrigg confirmed transport was being scoped out of the ES and that both developments will cooperate during the construction phase.
NH.I	13.10.2024	Email correspondence (Appx C Correspondence with Cumberland Council and National Highways [APP-102])	NH agreed with the minutes and maintained that a technical assessment and modelling of the roundabout is still required and provided quotes to undertake traffic surveys.
NHJ K	14.11.2024	Email correspondence (Appx C Correspondence with Cumberland Council and National Highways [APP-102])	The Applicant confirmed that, on the basis of the forecast traffic generated by the proposals, it is disproportionate to undertake modelling of the effects on the Lillyhall Roundabout which are judged to be not significant both for Dean Moor and Lostrigg. The Applicant will keep the situation under review through engagement with the Lostrigg team and will review their Access Strategy to be published during their statutory consultation.
NH.L	22.11.2024	Email correspondence (Appx C Correspondence with Cumberland Council and National Highways [APP-102])	NH maintain that sufficient and proportionate evidence has not been provided to support the Applicant's position and consider that the original baseline information presented is out of date and should be updated to evidence the assumptions made. NH recommend carrying out traffic counts at Lillyhall Roundabout to evidence the baseline operation, as the WebTRIS data only provides details of link flows, and requests further information relating to forecast construction vehicle and staff trips.
NH.M	26.06.025	Meeting (Appx C Correspondence with Cumberland Council and National Highways [APP-102])	NH agreed to delay data collection to September 2025 to avoid roadworks and ensure time for analysis. Turning movement surveys will include warm-up and cool-down periods, while link counts will run for a full week. Inter-peak data was debated, with limited value noted but interest expressed from NH due to equipment availability. Personal Injury Crash data is up to date and will be referenced in formal documentation.

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
NH.N	24.07.2025	Meeting (Appx C Correspondence with Cumberland Council and National Highways [APP-102])	Covered updates on accident data, confirming no new incidents near Lillyhall roundabout, allowing the issue to be resolved. Stantec to clarify the parking / minibus provisions in formal documentation. NH requested consultation on the Construction and Decommissioning Traffic Management Plans, which will be included in the draft DCO. Further clarification on staff modal splits, provision of minibus services and occupancy rates, and on Site parking provision during construction was since provided. This includes a commitment to the provision of minibuses to bring a proportion of construction workers to Site.
NH.O	04.08.2025	Email Correspondence (Appx C Correspondence with Cumberland Council and National Highways [APP-102])	Confirmation from NH of agreement with meeting minutes from 26/07/2025 and 24/07/2025. Clarifications provided by Stantec on minibus and parking provisions, which NH have agreed they are satisfied with, and as such may mark the issue as resolved.

4 Signatures

4.1.1 This Statement of Common Ground is agreed upon:

On behalf of National Highways:

Name:

Signature:

Date:

On behalf of the Applicant:

Name:

Signature:

Date:

