



Dean Moor Solar Farm

~~Draft Statement of Common Ground~~ ~~with~~ Lake District National Park Authority Draft Statement of Common Ground

on behalf of **FVS Dean Moor Limited**

~~26 August~~30 September 2025

Prepared by: Stantec UK Ltd

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**DEAN MOOR SOLAR FARM
DRAFT STATEMENT OF COMMON GROUND WITH LAKE DISTRICT
NATIONAL PARK AUTHORITY
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 prepared in respect of the 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 SoCG has been prepared by (1) the Applicant and (2) the Lake District National Park (LDNP) Authority (LDNPA). It is agreed that this dSoCG is an accurate description of the matters raised by the LDNPA and the current status of each matter. A high-level overview of the engagement undertaken since August 2023 is summarised in section 3.

1.2 Purpose of this document

1.2.1 The SoCG 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. In the planning process, SoCGs are an established means 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 the Lake District National Park Authority

2.1.1 The Applicant and the LDNPA have had positive engagement on various matters primarily focused on the assessment of landscape and visual impacts of the Proposed Development, the selection of viewpoints, and the embedded mitigation to minimise impacts on the LDNP.

2.1.2 The Applicant has provided a response to the matters raised by the LDNPA within their Relevant Representation ('RR') [RR-013] within the 'Applicant Response to Relevant Representations' (ARRR) [REP1-002]. This response, and the points raised by the LDNPA's RR are reflected within this dSoCG.

2.1.3 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.

2.1.4 This dSoCG has been updated for Deadline 3 in response to the Rule 17 Letter (Request for Further Information) [PD-010] issued by the ExA on 19 September 2025. The main purpose of the Rule 17 letter was to request further information from the Applicant, and where relevant the LDNPA under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010. Those topics and points of clarification relating to the Issue Specific Hearing (ISH) were set out in annex A of the Rule 17 letter.

2.1.5 Because the ExA was unable to ask questions at the ISH, the Applicant has sought to provide additional clarification where able to do so. This dSoCG has therefore been updated to include reference to the duty to seek to further the purposes of the LDNP under section 11A National Parks and Access to the Countryside Act 1949, as per item 5a of the agenda for the Issue Specific Hearing [EV3-001] / Annex A of the Rule 17 Letter.

2.2 Matters agreed

2.2.1 Table 2.1 below details the matters agreed with the LDNPA.

Table 2.1 Matters agreed

Ref	Topic	Shared position	Application Ref
LDNPA.1	Impacts on the Lake District National Park (LDNP) (landscape character)	It is agreed that effects to the special qualities of the LDNP and its relevant character areas, including: LDNP Character Assessment and Guidelines (2021) LDNP Areas of Distinctive Character 8: Loweswater, and the LDNP Landscape Character Assessment and Guidelines (2021) Landscape Character Type : LCT G Rugged Angular Slate High Fell; and LDNP Landscape Character Assessment and Guidelines (2021) Landscape Character Type: LCT I: Upland Limestone Farmland, would not be significant for the construction, operation, and decommissioning stages.	ES Ch7 Landscape and Views [APP-039] ES Ch7 Landscape and Visual Impact [REP2-032] ES Appx 7.2 Schedule of Landscape Effects [APP-120]
LDNPA.2	The selection and assessment of viewpoints to support landscape and visual impact assessment	<p>The view locations used to assess impact on visual receptors and visual amenity have been selected to account for representative, specific, and illustrative viewpoints, and sequential views.</p> <p>The LDNPA suggested that additional viewpoints should be considered: View Locations 13 (view from Blake Fell within the LDNP / WHS) and 14 (view from Fellbarrow within the LDNP / WHS).</p> <p>The LDNPA is content that the view from Darling Fell (VL14) is representative of the Fellbarrow range. These viewpoints have been assessed within ES Chapter 7 - Landscape and Visual, which concluded that in the worst case accounting for the LVIA and EIA methodology (where visual receptors are considered to be very high sensitivity due to the LDNP and WHS, that the effects from both locations were likely to be moderate adverse, long-term, partially reversible, and significant. The LVIA / EIA assessment methodology concludes that the magnitude of effect is negligible. The GLVIA guidelines use a four point scale to assess impacts – the lowest of which is</p>	ES Ch7 Landscape and Views [APP-039] Appx 7.5 View Location Photosheets [APP-126] ES Ch7 Landscape and Visual Impact [REP2-032] Appx 7.5 View Location Photosheets [REP2-038, 039, 040, 041, 042, 043, 044, 045] Appx 7.1 [APP-119] Landscape and Visual Methodology [REP2-034]

Ref	Topic	Shared position	Application Ref
		<p>“negligible”. The LDNPA considers the term “negligible” as problematic as this can be considered as analogous to imperceptible and as a result assessed the impact as minor (the third point in the scale) in the GLVIA assessment. As a consequence, the combination of minor impact and very high sensitivity resulted in a significant effect when applying the EIA matrix.</p> <p>The LDNPA prefer the use of very low magnitude as used in the EIA methodology rather than negligible which in combination with a high sensitivity results in a minor adverse and not significant effect. The Applicant concludes that there is agreement on the magnitude of change albeit difference in terminology, and the difference in resulting level of significance is due to methodical variation as a result of the five point scale and very high sensitivity. This represents a worst case scenario which is accepted.</p> <p>It is agreed that while there are some distant views of the Lake District fells, the network of small lanes around the LDNP are more suited to local traffic rather than visitors to the LDNP and that any effect of the Proposed Development onto views into the Lake District would not be significant.</p>	Appx 7.3 Schedule of Visual Effects [APP-121 REP2-036]
LDNPA.3	View Locations for which visualisations have been prepared	It is agreed that the selection of VL13 (view from Blake Fell) for photomontage visualisation in ES Appendix 7.6 - Visualisation is an appropriate representative view location for the purpose of the application's LVIA.	<p>Ch7—Landscape and Visual [APP-039]</p> <p>ES Appx 7.5—View Location Photosheets [APP-126]</p> <p>ES Appx 7.6—Visualisations [APP-134]</p> <p>Ch7 - Landscape and Visual Impact [REP2-032]</p> <p>ES Appx 7.5 - View Location Photosheets</p>

Ref	Topic	Shared position	Application Ref
			[REP2-038, 039, 040, 041, 042, 043, 044, 045] ES Appx 7.6 - Visualisations [REP2-047, 048, 049, 050, 051, 052] ES Appx 7.3 Schedule of Visual Effects [APP-121]REP2-036]
LDNPA.4	Consideration of assessment of cumulative effects with the former Lostrigg Solar DCO	<p>The potential for cumulative effects on the LDNP and WHS from the Proposed Development and former Lostrigg Solar DCO is acknowledged and understood by LDNPA. Following engagement with the LDNPA on this topic, the Applicant has prepared additional assessment including the consideration of an additional view location from Blake Fell (VL 13) (represented by VLC5 in ES Appendix 7.4).</p> <p>This is described within ES Appendix 7.4 - Cumulative Assessment and is considered an acceptable approach to addressing this issue. Although the overall geographical extent would be small compared to the wider views available and the magnitude of effect would be negligible, the overall significance of the cumulative effect is assessed to be moderate adverse (significant) medium to long term, partially reversible / partially permanent during operation due to the very high sensitivity of the receptor. The Applicant accepts that methodological variation between the ES and LDNPA approach results in different conclusions but that there is agreement on the magnitude of effect. This difference is set out in the previous response (LDNPA2).</p> <p>For possible impacts to the LDNP Areas of Distinctive Character (ADC) 8: Loweswater, during construction there would be some visible activity from higher ground within the LDNP, which would result in a small scale change within the wide angled view from the LDNP. Ultimately for receptors experiencing the LDNP, it's Special Qualities and views, and therefore the cumulative effects of the Proposed Development and Lostrigg would do little to alter the experiential qualities of the</p>	Ch7—Landscape and Visual [APP-039] Appx 7.5 View Location Photosheets [APP-128] Ch7 - Landscape and Visual Impact [REP2-032] Appx 7.5 View Location Photosheets [REP2-038, 039, 040, 041, 042, 043, 044, 045] Appx 7.3: Schedule of Visual Effects [APP-121]REP2-036] Appx 7.4 Cumulative Assessment [APP-122] Ch11 - Cumulative Effects and Residual Effects Summary [APP-

Ref	Topic	Shared position	Application Ref
		<p>Loweswater ADC and would not alter its key characteristics. The significance of cumulative landscape effects during construction for ADC 8: Loweswater is therefore assessed as being minor adverse, indirect, short-term, partially reversible/partially permanent, and not significant level of cumulative effect.</p> <p>During operation, the elements associated with the solar farm would constitute a just discernible visual change in views towards the coastline. This would result in a very small change to the visual experiential qualities within the ADC, but no discernible change in its key characteristics. The magnitude of effect for ADC 8: Loweswater would be negligible adverse, and overall significance assessed as minor adverse and not significant.</p>	042
LDNPA.5	Approach to minimising impacts on the Lake District National Park World Heritage Site (WHS)	<p>It is agreed that the assessment of impacts to the Lake District as a WHS has been considered within ES Chapter 6 - Cultural Heritage and ES Chapter 7 - Landscape and Views.</p> <p>ES Chapter 6 concludes that there would be a minor adverse visual effect over a 40-year period, translating to less than substantial harm to the WHS.</p> <p>It is understood that the LDNPA recognise that the Proposed Development is not permanent, that the Proposed Development includes new landscaping and an element of co-located agricultural use during operations, and that the infrastructure from the Proposed Development will be removed with full restoration of the Site and return to agriculture at the end of the Proposed Development's operational life.</p>	<p>ES Ch6 Cultural Heritage [APP-037]</p> <p>ES Ch7 Landscape and Visual [APP-039] ES Ch6 Cultural Heritage [REP2-027]</p> <p>ES Ch7 Landscape and Visual Impact [REP2-032]</p>
LDNPA.6	Compliance with LDNPA policies	<p>As the Site lies outside of the Lake District National Park the application does not fall to be considered under the policies contained in the Lake District National Park Local Plan (2020-2035). Regard has however been given to policies as listed below, and the Application does not conflict with the relevant policies from the LDNP Local Plan:</p> <ul style="list-style-type: none"> • Policy 01: The national and international significance of the Lake District • Policy 02: Spatial strategy • Policy 05: Protecting the spectacular landscape 	<p>Planning Statement [AS-010]</p> <p>ES Ch7 Landscape and Visual [APP-039]</p> <p>ES Ch6 Cultural Heritage [APP-037] ES Ch7 Landscape and Visual Impact [REP2-</p>

Ref	Topic	Shared position	Application Ref
		<ul style="list-style-type: none"> • Policy 06: Design and development • Policy 07: Historic environment • Policy 20: Renewable and low carbon energy <p>These policies are addressed within ES Chapter 6 - Cultural Heritage and ES Chapter 7 Landscape and Visual. The Planning Statement summarises compliance with these policies as a whole.</p> <p>The importance of the appropriate generation of renewable energy is recognised in the Lake District National Plan (2020-2035) Policy 20.</p>	032] ES Ch6 Cultural Heritage [REP2-027]
LDNPA.7	Mitigation planting / Landscape Strategy Plan	<p>It is agreed that the sensitive siting of generating station equipment within the Site and the introduction of a positive landscape strategy to break up long distance views will help to mitigate potential effects on the LDNP and WHS.</p> <p>The areas where equipment may be located are represented by the Works Plans which exclude development from more elevated open areas. The Landscape Strategy Plan (LSP) has been informed by engagement with the LDNP which indicated that the proposed approach would soften the visual impact of the Proposed Development.</p> <p>This position is subject to the LDNPA's consideration of the LSP, OLEMP, and Chapter 7 - Landscape and Visual and supporting visualisations, which are provided within the application.</p>	ES Fig 7.6—Landscape Strategy Plan [APP-088] ES Fig 7.6 - LSP [REP2-046] ES Appx 7.7 - Outline Landscape Ecological Management Plan OLEMP [APP-145] ES Ch7 Landscape and Visual [APP-039] ES Ch7 Landscape and Visual Impact [REP2-032] Works Plans [APP-007]
LDNPA.8	Design / siting of infrastructure within the Site to minimise the impact on the	<p>It is agreed that the generating station equipment (e.g. solar arrays) have generally been sited in the least intrusive locations within the Site, and avoiding the higher land to the south/west of the Site demonstrates the applicant's regard for the need to minimise potential visual impacts on the LDNP.</p> <p>As acknowledged within the LVIA, even with mitigation, the solar arrays within the Site</p>	ES Fig 7.6—Landscape Strategy Plan [APP-088] ES Fig 7.6 - LSP [REP2-046] ES Appx 7.7 - Outline

Ref	Topic	Shared position	Application Ref
	LDNP	would be visible in long distance views. The strategy to mitigation is to minimise the effect through retention of existing woodland and hedgerows. The Works Plans secure the retention of these existing features and the LSP and OLEMP include improvements to make use of existing linear vegetation and establish new linear blocks of vegetation to 'break up' the site, and minimise the effect on long distance views.	Landscape Ecological Management Plan OLEMP [APP-145] Design Approach Document DAD [APP-029] Works Plans [APP-007] ES Ch7 Landscape and Visual [APP-039] ES Ch7 Landscape and Visual Impact [REP2-032]
LDNPA.9	Duty to seek to further the purposes of the LDNP under section 11A National Parks and Access to the Countryside Act 1949.	The Applicant has had regard to the provisions of section 11A National Parks and Access to the Countryside Act 1949. The Applicant has sought to avoid harm to the LDNP through measures that have been embedded in the design of the Proposed Development or secured as additional mitigation. The LDNP was a key consideration from the inception of the project, influencing Site selection and the siting of infrastructure within the Site (as set out in section 5 of the Design Approach Document (DAD). The Applicant has sought to minimise effects on the LDNP through careful siting, with the exclusions of generating station equipment from the elevated plateau within the southern part of Area C (which are most visible from the LDNP). The Applicant has also collaborated with the LDNPA on the development of a landscape strategy intended to help break up long distance views through the introduction of new and enhanced existing landscape features throughout the Site which are appropriate and proportionate to the Proposed Development. This mitigation is secured via the LSP and OLEMP alongside the parameters for the extents of development within the Works Plans. No significant adverse residual landscape impacts to the LDNP are reported across the construction, operational and decommissioning phases of the Proposed Development. The LDNPA is satisfied that the Applicant has sought to further purposes of the LDNP	Works Plans [APP-007] DAD [APP-029] LSP [REP2-046] OLEMP [APP-145]

Ref	Topic	Shared position	Application Ref
		<u>for the reasons given by the Applicant. It is not considered that there are any other reasonable and proportionate measures which should be taken to further the statutory purposes of the LDNP. The Secretary of State (as relevant authority) can therefore be content that the duty in section 11A has been complied with.</u>	

2.3 Matters under discussion

2.3.1 There are currently no matters under discussion between the Applicant and the LDNPA.

2.4 Matters not agreed

2.4.1 There are currently no matters which have not been agreed, or which are not anticipated to be agreed during Examination between the Applicant and the LDNPA.

3 Record of Engagement

3.1 Summary of consultation and engagement

3.1.1 The table below summarises communication in relation to progressing this SoCG. The Applicant notes that 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 the LDNPA

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
LDNPA.A	18.08.2023	LDNPA input into the EIA Scoping Opinion [APP-097]	Agreement that the LDNP and WHS should be assessed. The LDNPA raised that any potential impacts likely to be visual rather than transport / noise related and suggested mitigation through landscape planting. Agreement of the ZTVs used. Proposed consideration of Blake Fell and Fellbarrow viewpoints.
LDNPA.B	22.09.2023	Email correspondence (ES Appendix 7.10 - Stakeholder Engagement [APP-149])	Confirmation of agreement that view locations relating to the LDNP (nos 12, 13, and 14) are appropriate and representative for assessment.
LDNPA.C	28.03.2024	Statutory Consultation Response (summarised within Table 7.2 of ES Chapter 7 Landscape and Visual [APP-039]).	The LDNPA's response welcomes the effort made to not propose panels on higher land to west of Site and having regard to potential for views. The LDNPA consider that the Proposed Development would not have significant effects on views into the Lake District. The LDNPA consider that the availability of views is strongly affected by local topography. Blake Fell and Fellbarrow the views most likely to be affected.

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
			The LDNPA recommended that mitigation would depend on the success of planting within the Site to break up the massing of panels.
LDNPA.D	06.09.2024	Email correspondence (ES Appendix 7.10 - Stakeholder Engagement [APP-149])	<p>The Applicant wrote to the LDNPA to confirm the proposed list of supporting visualisations for the Environmental Impact Assessment to demonstrate how the Proposed Development will appear prior to, and post-establishment of the landscape measures at each location. The LDNPA proposed changing visualisation VL12 to VL13 (view from within Blake Fell) (09.09.2024).</p> <p>The Applicant further proposed additional viewpoints for the cumulative visual assessment with Lostrigg Solar DCO (06.09.24). The LDNPA further recommended cumulative assessment of Fellbarrow range (09.09.24).</p>
LDNPA.E	09.09.2024	Email correspondence (ES Appendix 7.10 - Stakeholder Engagement [APP-149])	The LDNPA wrote to the Applicant in response to the request for confirmation of the proposed visualisations (sent 06.09.24). The LDNPA stated that it was not necessary to produce a visualisation for VL12 (Local PRoW near Cogra Moss / Felldyke within the Lake District National Park / WHS) and requested that the viewpoint at Blake Fell is selected to assess the impact on the National Park. The LDNPA stated that a representative view from the Fellbarrow range would be appropriate to include to assess the cumulative effects with Lostrigg.
LDNPA.F	10.01.2025	Meeting (Not minuted)	<p>Meeting to discuss the changes to the Proposed Development since the PEIR stage and the LDNPA's role in the DCO process.</p> <p>The Applicant shared a draft of the Landscape Strategy Plan (ES Figure 7.6) and discussed the landscaping proposals and visual screening proposed across the Site.</p>
LDNPA.G	08.07.2025	Meeting (Minuted)	Discussion of dSoCG and wording of the dSoCG in relation to the level of effect concluded in ES Ch7 Landscape and Visual. Agreed that minor disagreements on the wording of the level of effect did not represent a significant difference in terms of judgment of effects. Agreed that View Location 14 should be labelled as Darlington Fell, rather than Blake Fell. The LDNPA confirmed that a viewpoint from any of the summits of the Fellbarrow range would be representative. Agreed on the language in relation to the relevance of the LDNPA Local Plan policies.

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
LDNPA.H	19.09.2025	Email	The Applicant shared a draft position on the duty to seek to further the purposes of the LDNP under section 11A National Parks and Access to the Countryside Act 1949 to confirm the LDNPA's agreement in relation to point 5a from the Issue Specific Hearing agenda.
LDNPA.I	26.09.2025	Email	The LDNPA agreed the shared position in relation to the duty to seek to further the purposes of the LDNP under section 11A National Parks and Access to the Countryside Act 1949.

4 Signatures

4.1.1 This Statement of Common Ground is agreed upon:

On behalf of the Lake District National Park Authority:

Name:

Signature:

Date:

On behalf of the Applicant:

Name:

Signature:

Date:

