



**The Infrastructure Planning (Examination Procedure) Rules  
2010 – rule 17**

**Application by FVS Dean Moor Limited for an order granting  
development consent for the Dean Moor Solar Farm project**

**Request for further information**

**Response by the Lake District National Park Authority**

**20 November 2025**

**Your ref: EN010155**

**Our ref: 7/2025/E0064**

**Our Identification number: [REDACTED]**

## **1. Introduction**

- 1.1 The Lake District National Park Authority are registered as an Interested Party in the consideration of this application.

- 1.2 In the Rule 17 letter dated 18 November the ExA has asked for

*further clarification regarding item 'LDNPA.2' in Table 2.1 of the SoCG. Although this is recorded as an agreed matter, it appears that the parties interpret the application of the EIA methodology differently. To aid understanding, I ask that both parties clearly set out their respective approaches—step by step—with reference to the EIA methodology and relevant GLVIA guidance.*

## **2. LDNPA approach to assessing Landscape and Visual effect**

- 2.1 We have engaged with this project from pre-application advice starting in the summer of 2023. Our approach has been:

**Step1 – Identifying the location, nature and scale of the development.**

- 2.2 This was achieved through document review and site visit. As a result of this assessment it could be concluded that there would be no effects on landscape receptors within the national Park having regard to the distance of the development from the boundary.

**Step 2 – Establishing the extent of effect.**

Views into the National Park

- 2.3 This included an assessment of the views from the site towards the National Park through site visit and an assessment of our view on setting, having regard to the GLVIA Third Edition and English Heritage guidance on the setting of heritage assets.

- 2.4 Our conclusion was that:

*6.4 The land provides some distant views of the Lake District Fells. However, the network of small lanes is more suited to local traffic. Those approaching the Lake District for recreation or visiting the area with the specific intention of enjoying the National Park landscape are more likely to use other routes. We consider therefore that any effect of the development on views into the Lake District would not be significant.*

Views out of the National Park

- 2.5 This step involved review of the prepared ZTVI maps and ground truthing. I visited Lamplugh, Fell Dyke and Cogra Moss. This confirmed that the intervening ridge of High Park – Branthwaite Edge effectively and fully screens views of the development from valley level locations within the National Park.

- 2.6 I then walked the slopes of the Fellbarrow range and Blake/Burnbank Fells to assess the effect on views out from elevated locations. It was apparent that due to the site of the development and the ability to look over the intervening ridge there would be some effect on views out of the National Park, as part of a wide sweep of view from these limited and elevated locations.

### **Step 3 - Considering the effect**

- 2.7 Once field work was complete we sought to describe and explain our assessment of the effect having regard to the guidance contained in the GLVIA Third Edition.
- 2.8 We considered National Park purposes, the Special Qualities of the Lake District National Park, NPPF guidance and the Landscape Character Supplementary Planning Document.

- 2.9 Our conclusion was set out in pre-application advice:

*6.11 The sensitivity of recreational users of the areas where views are available will be very high. The effect on visual amenity would be negative but we note that the change is not intended to be permanent (40 year lifespan and reversible). We consider that the magnitude of the effect from the identified views from the fells would be 'minor' having regard to the size of the development and the guidelines for managing landscape change.*

*7.1 The sensitivity of recreational users of the areas where views are available will be very high. The magnitude of the effect would be minor, because although the size of the development is large, it is sited some considerable distance from the National Park boundary, and further still from viewpoints where the application site might be apparent.*

*7.2 We would suggest that a high sensitivity combined with a minor magnitude would give a slight or minor harm, especially as the development would have a limited lifespan and should be reversible.*

In coming to the conclusion we have had regard to the guidance in the GLVIA Third Edition that makes a virtue of professional judgment and describing effects in words rather than seeking to restrict them to fit neatly within defined four point scales or tables.

- 2.10 The GLVIA at paragraph 3.34 advises that a four point scale may be helpful and gives an example of using: major/moderate/minor/negligible. The GLVIA goes on in paragraph 3.36 to stress that: Tables support text, not replace it.
- 2.11 We are wary of a using a four point scale for assessing landscape in visual effects that has 'negligible' as the bottom of the four. This suggests no effect, effectively making the scale a three point one for these purposes. Since we concluded the effect was more than negligible, we used 'minor' in our response.

#### **Step 4 - Review**

- 2.12 When we saw details of the DCO we noted that the submitted documents made reference to a 'moderate adverse' effect on the visual amenity of the Lake District. We thought that might overstate the effect and discussed the issue with the applicant's team when considering the draft SoCG.
- 2.13 The applicant team drew our attention to tables used for the purposes of EIA development, which I found very helpful to review and refine the language used in our assessment.

| <b>Magnitude</b> | <b>Sensitivity</b>                  |                                     |                                     |                                  |
|------------------|-------------------------------------|-------------------------------------|-------------------------------------|----------------------------------|
|                  | <b>High</b>                         | <b>Medium</b>                       | <b>Low</b>                          | <b>Very Low</b>                  |
| High             | Major<br>Adverse /<br>Beneficial    | Major<br>Adverse /<br>Beneficial    | Moderate<br>Adverse /<br>Beneficial | Minor<br>Adverse /<br>Beneficial |
| Medium           | Major<br>Adverse /<br>Beneficial    | Moderate<br>Adverse /<br>Beneficial | Minor<br>Adverse /<br>Beneficial    | Negligible                       |
| Low              | Moderate<br>Adverse /<br>Beneficial | Minor<br>Adverse /<br>Beneficial    | Negligible                          | Negligible                       |
| Very Low         | Minor<br>Adverse /<br>Beneficial    | Negligible                          | Negligible                          | Negligible                       |

- 2.14 Using an initial four point scale of High, Moderate, Low, Very Low for the effects is very helpful where this 'quantifying' of landscape and visual effects may be necessary. In this context a very low effect combined with a very low sensitivity can reasonably result in a 'negligible' outcome.
- 2.15 This has helped me to refine our advice which is that the visual effect would be minor over the 40 year lifespan of the development, as a result of a high sensitivity coupled with a very low (rather than minor) magnitude of effect. This reflects the now agreed position.

### **3. Conclusion**

- 3.1 I trust that this explanation of our process helps to clarify the position. The development would affect a small selection of viewpoints in the National Park where the sensitivity of the viewer (visual receptors) would be high. The development would be large, but located in the region of 7-9km from the closest views. It would have a 40 year lifespan and is accompanied by mitigation in the forms of considered location and landscaping. The development would consolidate the appearance of the 'evidences of industry' and development within the sea ward part of the wide sweep of view that is available from these elevated locations.

- 3.2 Our conclusion is therefore that would suggest that a high sensitivity combined with a very low magnitude would give a minor harm, especially as the development would have a limited lifespan and should be reversible.
- 3.3 We have discussed the position with the applicant's team on 20 November, and we are in agreement that our respective responses explain the approaches that we have taken.
- 3.4 Please accept these observations and advice as the response on behalf of the Lake District National Park Authority.