



Dean Moor Solar Farm

~~Draft~~ Statement of Common Ground with the Cumbria Wildlife Trust

on behalf of FVS Dean Moor Limited

~~28 October~~ 25 November 2025

Prepared by: Stantec UK Ltd

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DEAN MOOR SOLAR FARM

~~DRAFT~~ STATEMENT OF COMMON GROUND WITH CUMBRIA WILDLIFE

TRUST

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 ('~~d~~SoCG') 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 Cumbria Wildlife Trust (CWT). It is agreed that this SoCG is an accurate description of the matters raised by the CWT and the current status of each matter. A high-level overview of the engagement undertaken since March 2024 is summarised in section 3.

1.2 Purpose of this document

1.2.1 The ~~d~~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. This ~~ise~~ ~~d~~SoCG is ~~a 'live' document that will be updated by the parties as matters progress~~ the final version of this document.

1.3 Terminology

1.3.1 In the matters table in Section 2 of this ~~d~~SoCG, '*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 engagement.~~

2 ~~Current~~Final Position

2.1 Position of the Cumbria Wildlife Trust and the Applicant

2.1.1 The Applicant and the CWT have had positive engagement covering the proposed ecological mitigation and enhancements across the Site, specifically within the County Wildlife Site (CWS), and the measures to protect the CWS from effects during the construction, operational, and decommissioning phases.

2.1.2 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 the CWT. The CWT position is italicised as it is quoted from the CWT's comments on a previous draft of the dSoCG.

Table 2.1 Matters agreed

Ref	Topic	Shared position	Application Ref
CWT1	Control measures to avoid construction impacts on CWT interests, including but not limited to the CWS	<p>The Applicant and the CWT have discussed the need to ensure that Dean Moor CWS is protected and demarcated during the construction period to protect it from works, noting that Works Area 1 includes a small part of the CWS. It is agreed that subject to effective controls being in place for construction via the Construction Environmental Management Plan (CEMP) and Soil Management Plan (SMP), the ecological interests of the Site, including the CWS and wildlife and habitats across the Site, can be protected from adverse effects as outlined in section 5.5 of the OCEMP.</p> <p>This will be subject to the content of the final versions of these plans being implemented as-approved, and with compliance and outcomes monitored by the Ecological Clerk of Works (ECoW) and kept under review throughout construction, with the 'live' CEMP and SMP updated if necessary to secure the approved environmental outcomes, including protections for wildlife and habitats across the Site.</p>	<p>Ch8 - Biodiversity [REP2-053] (section 8.7)</p> <p>Appx 5.1 OCEMP [APP-108]</p> <p>Appx 5.4 OSMP [APP-110]</p>
CWT2	Control measures to avoid decommissioning impacts on CWT interests, including but not limited to the CWS	<p>The Applicant and the CWT have discussed the need to ensure that the CWS is protected and demarcated during the decommissioning period to protect it from works, noting that Works Area 1 includes a small part of the CWS. It is agreed that management plans to be in place for decommissioning, as set out in the Framework Decommissioning Management Plan (FDMP) secured by a DCO requirement, can provide effective controls to protect the interests of the CWS subject to the correct implementation, monitoring, and updated as appropriate. However, after decommissioning, the landownership of parts of the CWS within the Site would revert back to the landowner.</p> <p>The Decommissioning Management Plan (DMP) document suite will include measures</p>	<p>Ch8 - Biodiversity [REP2-053] (section 8.7)</p> <p>Appx 5.4 FDMP [APP-111]</p> <p>Ch5 - Construction and Decommissioning Methodology and Phasing [APP-036]</p>

Ref	Topic	Shared position	Application Ref
		<p>equivalent to those provided by the CEMP, as set out within the FDMP.</p> <p>It is agreed that the FDMP provides a suitable framework for a DMP suite which will include measures equivalent to those provided by the suite of management plans that will govern the construction phase such as the CEMP and the SMP, and are therefore expected to be able to provide measures to protect habitats and wildlife across the Site, including within the CWS. .</p>	
CWT3	Control measures to avoid operational impacts on CWT interests, including but not limited to the CWS	<p>The need to ensure that the CWS is protected and enhancements are delivered during the operational period is agreed. In addition, it is agreed that the management plans which would be in place for the operational phase, as secured by a DCO Requirement, can provide an effective means by which to protect and enhance the Site's ecological value.</p> <p>The OOMP secures the good management of the Site throughout the operational period, including controls on maintenance and repair works, and monitoring / maintenance of the water environment and flood risk.</p> <p>The OLEMP provides the management measures to manage the Site for nature conservation and biodiversity and deliver Biodiversity Net Gain (BNG) commitments as well as the delivery and management of other green infrastructure features such as enhanced hedgerows and watercourses. It is agreed that CWT are supportive of the measures in the OOMP and OLEMP as foundations for the final versions to be submitted for approval following detailed design. Subject to the final versions being in accordance with these outlines, and approved measures being followed on Site to ensure the habitats and species on Site are considered during the operational phase. This includes critical habitats including riparian corridors, woodland, and habitats across the CWS.</p>	<p>Appx 3.1 OOMP [APP-107]</p> <p>Appx 7.7 OLEMP [APP-145]</p> <p>Ch8 - Biodiversity [REP2-053] (section 8.7)</p>
CWT4	CWT interests in water quality effects	<p>It is agreed that watercourses need to be protected from adverse effects arising from Site activities and that the Proposed Development presents a positive opportunity to enhance watercourses as habitats which will also have benefits for water quality.</p> <p>It is agreed that the minimum 8m buffer to watercourses, which accord with Lead Local Flood Authority (LLFA) requirements and secured in the Works Plans will support watercourse protections. It is also agreed that where works must occur within the 8m buffer to enable construction or improvement for crossing points, these will be subject to the LLFA consenting</p>	<p>ES Appx 2.3 WFD [APP-098]</p> <p>Appx 5.1 OCEMP [APP-108]</p> <p>Appx 3.1 OOMP [APP-107]</p> <p>Appx 5.3 OSMP [APP-]</p>

Ref	Topic	Shared position	Application Ref
		<p>process, (land drainage consent) which shall be supported by appropriate method statements that include environmental protection measures and best practice.</p> <p>Along with good design, control documents such as the OCEMP (e.g. sections 5 and 11), OSMP, and OOMP will support best practice in Site activities to prevent pollution, siltation, or other damage to watercourses in the construction and operational phases across the Site.</p> <p>Measures to enhance the watercourses as habitats such as targeted planting and management, and mitigation measures (e.g. grazing management), are established by the LSP and OLEMP. It is agreed that subject to the successful delivery of enhancement and protection measures there can be benefits to watercourses and water quality. CWT are supportive of the considerations towards watercourse protection and habitat improvement.</p> <p>It is agreed that there may be benefits to the Applicant seeking to engage with the West Cumbria Rivers Trust (WCR) in accordance with CWT recommendations for advice on the monitoring of water quality and waterways on Site. It is understood that opportunities for further engagement with the WCRT on this topic can be considered further post-Examination, should the application be consented.</p>	<p>110</p> <p>Ch 8 - Biodiversity [REP2-053]</p> <p>Appx 7.7 OLEMP [APP-145]</p> <p>Fig 7.6 LSP [REP2-046]</p> <p>Works Plans [APP-007]</p> <p>Appx 2.4 FRA & ODS [REP2-022]</p>
CWT5	Public accessibility proposals affecting the CWS	<p>Both the Applicant and CWT consider that the proposed permissive paths in Areas C and B and information boards along the routes are an opportunity to improve green infrastructure connectivity, highlight local biodiversity, and explain the significance of the CWS and the reason for its designation. In particular, CWT are supportive of improving access and increasing awareness of the status of the CWS, the reasons for its designations, information on the habitats and species supported, and the enhancements being delivered as part of the Proposed Development.</p> <p>It is agreed that it will be beneficial for the Applicant to engage with the CWT on the content of the information boards and the green infrastructure strategy to be delivered via the LEMP. The CWT is satisfied that the OLEMP commitment to engagement with the CWT will support this.</p>	<p>Appx 7.7 OLEMP [APP-145]</p> <p>Fig 7.6 LSP [REP2-046]</p> <p>Appx 3.1 OOMP [APP-107]</p>
CWT6	Protection of identified and unidentified peat deposit resources	<p>The Applicant and CWT are aligned in considering peat as an important resource that must be protected. Areas of peat deposits are identified in a Peat Survey Report (PSR) within Area C of the Site, and are excluded from development through the Works Plans and/or otherwise</p>	<p>Appx 10.3 PSR [APP-173]</p> <p>Appx 5.3 OSMP [APP-]</p>

Ref	Topic	Shared position	Application Ref
	within the Site	<p>protected in management plans for each phase of the Proposed Development.</p> <p>Peat will not be extracted or handled and no structures (e.g. buildings or solar arrays) or intrusive works such as cabling are proposed in areas of peat, including a minimum 10m buffer around identified areas of peat deposits, to avoid potential impacts. Where Site activities have potential to effect peat resources they will only occur if they can be managed to avoid adverse impacts and this is secured through outline management plans for each phase of the Proposed Development.</p> <p><u>Protection of undiscovered peat within the CWS</u></p> <p>Although no areas of peat were identified in the CWS that may be concurrent with Work No. 1, should any areas of peat be discovered or suspected in the course of construction, further preventative measures may be required. This approach is set out within section 5.5 and 11.3 of the OCEMP and section 3.10 of the OSMP which require that the SMP and toolbox talks support Site staff to identify potential unexpected peat deposits, and commits to stopping work in the affected area, conducting investigation, and updating the OCEMP and/or SMP if needed.</p> <p>CWT support the avoidance of any loss (e.g. extraction) or damage (e.g. compaction, drying) to areas of peat deposits on the Site. Where peat is discovered, the preventable measures outlined in the OCEMP and OSMP must be followed and updated as required. It is understood that the Applicant should also consider the CWT Peat Team as an available resource as part of the pre-construction activities and across all subsequent phases of the Proposed Development.</p>	<p>110</p> <p>Appx 5.1 OCEMP [APP-108]</p> <p>Appx 3.1 OOMP [APP-107]</p> <p>Appx 7.7 OLEMP [APP-145]</p>
CWT7	The opportunity to secure Biodiversity Net Gain (BNG) and the approach to BNG calculation	<p>The BNG Report based on the LSP and OLEMP indicates that BNG of 114.69% for habitats, 44.84% for hedgerows, and 12.56% for watercourses could be achieved. However, it is also recognised that metric outcomes could change based on an up-to-date environmental baseline established in pre-construction, and it is therefore appropriate to take a conservative approach in establishing minimum commitments at the application stage so long as this does not unduly constrain more ambitious outcomes being delivered.</p> <p>The LSP and OLEMP provide a strong foundation for securing a significant minimum BNG</p>	<p>Appx 7.7 OLEMP [APP-145]</p> <p>Appx 8.8 BNG Report [APP-157] Fig 7.6 LSP [REP2-046]</p>

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		<p>based on detailed design, which would be at least 60% for habitats, 20% for hedgerows, and 5% for watercourses.</p> <p>The Applicant understands that the CWT support adopting a conservative approach to securing the BNG within the OLEMP, which is secured by DCO Requirement. The Applicant aims to exceed these targets, which is supported by a commitment within the OLEMP to re-calculate the BNG based on the final design and to update the LEMP to deliver the outcome of this calculation, as long as it is no less than the minimum commitments of the OLEMP.</p> <p>The LEMP will be updated every five years and will include annual monitoring, and will support third party monitoring. This will enable the CWT to monitor the progress on creating acid grassland and/or other habitat enhancements specific to the CWS. The CWT acknowledge the potential for positive benefits to habitats and species across the site and specifically for the CWS therein. It is agreed that monitoring (see CWT11) will be essential for securing BNG delivery and reporting on progress toward BNG targets. The CWT welcomes the OLEMP commitments to continual engagement with the CWT ahead of LEP and OLEMP production and across the Proposed Development's operational lifetime.</p>	
CWT8	Restoration of acid grassland and purple moor-grass communities	<p>The Applicant proposes to restore areas of purple moor-grass, rush pasture communities and acid moorland habitats, noting that these are the features for which the CWS is designated. At the same time, it is mutually acknowledged that these features may be challenging to deliver due to the longstanding intensive grazing use and the effect this has on soil nutrient levels, and because drainage may have changed the hydrology and structure of the soil which would impact the habitat / communities present.</p> <p>It is recognised that the CWT will encourage the pursuit of these habitats, is supportive of continuing to be involved in discussions and implementation of improvements to the current habitat conditions on Site, and wish to see these restored where practicable and possible. The language of the OLEMP will ensure ongoing engagement with the CWT as part of final LEP and LEMP production. Should some habitats be deemed not suitable, then this will be discussed with CWT and alternative suitable targets implemented. Thereafter continual monitoring and engagement with the CWT (see CWT11) will support review of the success of</p>	<p>Appx 7.7 OLEMP [APP-145]</p> <p>Appx 8.8 BNG Report [APP-157]</p> <p>Fig 7.6 LSP [REP2-046]</p>

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		the habitats and the need for any changes in future LEMP updates.	
CWT9	Siting of Solar Arrays (Work No. 1) within the County Wildlife Site (CWS)	<p>The Applicant has retained the option of locating solar PV arrays (Work No. 1) within the small area within the north of the part of the CWS that is within the Site. Should Work No 1 be located in the CWS development in this area would exclude buildings or access tracks which would have a habitat-displacing footprint and could require compaction or excavation of soils.</p> <p>The Applicant appreciates that CWT's preference for solar arrays to not be located within the CWS, and it is agreed that addressing CWT's concerns regarding this matter depends on the extent of solar array development within the CWS, a consideration of impacts based on the final design, and the mitigation measures that may be available for the specific technology which is not available in sufficient detail at this stage.</p> <p>It is noted that while not named as consultees in the dDCO requirements specifically, control documents for each phase commit the Applicant to engagement with the CWT as part of document production and during the phases themselves. CWT also anticipate being consulted by the Council ahead of approval of submissions on Requirements.</p> <p>It is agreed that the management plans governing the implementation, operation, and decommissioning of the Proposed Development can be an appropriate way to manage the CWS and other CWT interests across the Site. The final versions of these plans will be informed by updated assessments so that the mitigation and design response is informed by an up-to-date baseline. The final plans are subject to DCO Requirements and CWT will be able to provide feedback on these during the discharge of requirements process, and will be able to determine whether the final proposed mitigation is sufficient for the purposes of protecting the CWS.</p> <p>The OCEMP and FDMP include measures to protect the CWS within Work No.1, should this area not be excluded from the final design. This includes demarcation with appropriate barriers from other areas of Work No. 1, so that additional mitigation measures can be implemented and monitored by the ECoW.</p> <p>During the operational phase, the CWS will be managed in line with the objectives for</p>	<p>Works Plans [APP-007]</p> <p>Appx 7.7 OLEMP [APP-145]</p> <p>Fig 7.6 LSP [REP2-046]</p> <p>Appx 3.1 OOMP [APP-107]</p> <p>Appx 5.1 OCEMP [APP-108]</p> <p>Ch8 - Biodiversity [REP2-053]</p> <p>Appx 5.4 FDMP [APP-111]</p>

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		<p>ecological enhancements are set out in section 3.4 of the OLEMP. Works in the CWS will be subject to additional monitoring and method statements where required, including the results of changes to the grazing regime to sward height / diversity and fauna, and annual recording of grassland habitat and condition.</p> <p>The Applicant will continue to engage with CWT informally on the detailed design, control document production, ongoing monitoring and review/updates of documents once approved, the efficacy of mitigation measures, and the progress of enhancements to the CWS.</p>	
CWT10	Aspirations for ecological improvement of the CWS	<p>The Applicant and CWT agree that the Proposed Development can be a positive opportunity to enhance the ecological value of the CWS, which could be at risk of losing its designation, if its quality significantly deteriorates more than it has to date, and it is acknowledged that the Site is currently under intensive grazing pressures which are not likely to cease in a 'no-change' scenario absent the opportunities presented by the Proposed Development.</p> <p>The Applicant has proposed to seek to create acid grassland and restore the purple moor-grass / rush pasture features for which the CWS is designated, where possible, and has set ambitions for biodiversity enhancement across the Site, including within the CWS, as set out in the OLEMP.</p> <p>The CWT is supportive of these targets and both parties are committed to working together further on these enhancements and the opportunities for nature recovery in the CWS.</p> <p>It is agreed that it is appropriate that the final LEMP be iterative and revised (as appropriate) by the Applicant at the end of the first 5-year establishment period and every 5 years thereafter. Each update will be informed by annual monitoring, with this to form the evidence base for LEMP updates as the planting matures and the ecology of the Site evolves. This will allow the LEMP measures to be adapted to deliver the Site's biodiversity objectives and will mean CWT are updated on progress toward these objectives and provided the evidence base to justify altering course if necessary.</p> <p>It is agreed that the language of the OLEMP will be updated to commit to ongoing engagement with the CWT on progress toward the Site's environmental targets and specifically for the</p>	<p>Ch8 - Biodiversity [REP2-053] (<i>see the list of embedded mitigation within section 8.5 - Likely Significant Effects</i>)</p> <p>Appx 7.7 OLEMP [APP-145]</p> <p>Fig 7.6 LSP [REP2-046]</p> <p>Appx 8.8 BNG Report [APP-157]</p>

Ref	Topic	Shared position	Application Ref
		CWS.	
CWT11	CWT interest in Site monitoring	<p>It is agreed that control documents for the operational period (namely, the LEMP and OMP) will require regular updates across the Proposed Development's operational life to stay current and reflect evolving Site conditions and best practice over the 40-year period. Requirements for monitoring and reporting are embedded in the OLEMP and OOMP which can support an evidence base for management plan updates and good decision-making should changes be required. It is agreed that the proposed schedule of monitoring and updates is appropriate for this purpose.</p> <p>It is agreed that the use of a suitably qualified ecologist as a key monitoring party will ensure suitable records of habitat condition and progress toward target conditions for biodiversity net gain commitments (per OLEMP section 6) and will therefore support the CWT in having habitat records for the part of the CWS that is within the Site. It is also agreed that the Applicant will need to ensure adequate provision in the LEMP/OMP for relevant 3rd parties to be able to have access to the CWS within the Site to directly monitor their interests.</p> <p>In order to ensure that the data collected by the Applicant is of maximum benefit to the CWT, and provided in a helpful format, it is agreed that an additional commitment will be added to the OLEMP for the Applicant to consult the CWT prior to establishing the final monitoring strategy within the LEMP. This is because the current monitoring commitments are in line with the UKHab methodology for the purposes of monitoring progress in relation to BNG as expected by the Council and Natural England.</p> <p>While agreed as appropriate and necessary for this purpose, it is acknowledged that CWT have an alternative methodology and the monitoring conducted by the Applicant may be a positive opportunity to deliver multifunctional benefits for both BNG and CWT data collection. Opportunities for synergies that support Applicant and CWT objectives will be explored and kept under continual review, including through control documents and the potential for community benefit funding.</p> <p>The CWT also welcome an update to the OLEMP that establishes a clear commitment to sharing annual monitoring data with the CWT outside of publication for LEMP update</p>	<p>Fig 7.6 LSP [REP2-046]</p> <p>Appx 7.7 OLEMP [APP-145]</p> <p>Appx 8.8 BNG Report [APP-157]</p> <p>Appx 3.1 OOMP [APP-107]</p> <p>Appx 5.1 OCEMP [APP-108] (see section 5)</p> <p>Ch8 - Biodiversity [REP2-053] and supporting appendices including:</p> <ul style="list-style-type: none"> • Appx 8.2 NVC Survey [APP-151], • Appx 8.1 PEA and GCN Report [APP-150] and • Appx 8.3-8.6 Bat [APP-152], Otter & Water Vole [APP-153], Breeding Bird [APP-154], and Wintering Bird and Hen Harrier survey reports [APP-155] <p>Appx 5.4 OSMP [APP-110]</p>

Ref	Topic	Shared position	Application Ref
		submissions. This can support CWT ecological monitoring even in the event it is not possible to accommodate both methodologies fully as part of the LEMP.	
CWT12	Opportunities for habitat enhancements across the Site	<p>The Applicant's aspirations for the Site to deliver multifunctional green infrastructure benefits is welcome by the CWT provided these values are manifested in the detailed design, construction, and operation of the Proposed Development.</p> <p>Enhancement will be achieved through new and improved vegetation and Site management, including monitoring to achieve BNG outcomes. In addition, proposed landscaping and ecological enhancements have been considered in relation to existing and new on-Site features and with regard for connectivity with the wider off-site green infrastructure network. It is agreed that the CWT are generally supportive of the intentions for enhancement within the CWS and for the habitat enhancements proposed across the Site, which align with the recommendations CWT made at the statutory consultation.</p> <p>The LSP and OLEMP provide a baseline for habitat and biodiversity improvement for the Site as a whole, including retaining and enhancing sensitive habitats such as hedgerows, woodland, and watercourses, the creation of species rich grassland, and buffers between infrastructure and sensitive habitats such as peat and watercourses.</p> <p>As recommended by CWT, broadleaved woodland is proposed to the northern and western boundaries of Area A, the northern escarpment, and western boundary and watercourses within Area C. Areas of scrubland are further proposed adjacent to watercourses within Area C and the northern boundary of Area A.</p> <p>Riparian planting will be targeted to the areas around the escarpment of Thief Gill gully, with the objective of improving water quality and the structure and diversity of vegetation. Enhancements to the existing pond on-site within Area D are proposed within section 3.2 of the OLEMP, with the intention of reducing shading, providing a willow screen, and promoting areas of open water and improving its function as a habitat. The ephemeral pond within Area C will be retained, and grassland around its bank enhanced.</p> <p>It is agreed that areas of peat will be protected during works and safeguarded from impacts</p>	<p>Appx 7.7 OLEMP [APP-145]</p> <p>Fig 7.6 LSP [REP2-046]</p> <p>Appx 3.1 OOMP [APP-107]</p> <p>Appx 5.1 OCEMP [APP-108]</p> <p>Ch8 - Biodiversity [REP2-053]</p> <p>Appx 5.4 FDMP [APP-111]</p> <p>DAD [APP-029]</p>

Ref	Topic	Shared position	Application Ref
		<p>during operation, although intentional targeted enhancements or expansion to areas of peatland habitats will not be considered given the practicalities of achieving this. Whilst the CWT encourage peat restoration, it is agreed that the Applicant's intentions to focus on features and habitats which will not affect the hydrology of the Site represents sustainable and achievable development in this instance given the need to return the site to present use following decommissioning.</p> <p>As set out within CWT8, the OLEMP has adequately considered the potential for acid grassland and purple moor-grass creation, which is dependent on several factors, some of which will be informed by the results of further testing (e.g. soil acidity testing) and ongoing monitoring surveys.</p>	
CWT13	Effective grazing management	<p>It is agreed that grazing must be suitably controlled if it is utilised for vegetation management, to be complementary to the Proposed Development's biodiversity commitments.</p> <p>The CWT are supportive of the principle of controlled sheep grazing across the Site, as set out within the Outline Grazing Management Plan, on the understanding that this will likely need stricter controls within the CWS and subject to the CWT's review of and input into the final GMP. While the CWT have recommended cattle grazing as preferable within the CWS, it is acknowledged that there may be practical limitations with this and that effectively controlled sheep grazing can also be appropriate.</p> <p>As per the OGMP (Appendix A of the OLEMP), the Site will be monitored by an ecologist to facilitate grazing management and prevent overgrazing, including the use of temporary barriers to restrict access to hedgerows, ponds, and watercourses As set out in section OLEMP 3.11, the effects of the grazing regime on the CWS will be regularly monitored and it is agreed that both the control measures and monitoring regimes related to grazing will need to be stronger/tighter for grazing within the CWS compared to other parts of the Site.</p> <p>The advice provided by the CWT with respect to grazing to-date will be considered in the final GMP, which will form part of the final LEMP, and which commits to continual engagement with the CWT to inform LEMP production and then across its implementation.</p>	<p>Appx 7.7 OLEMP [APP-145] (see Appx A - OGMP)</p> <p>Ch 8 - Biodiversity [REP2-053]</p>

2.3 Matters under discussion

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

2.4 Matters not agreed

2.4.1 The Applicant and the CWT do not currently consider there to be any matters which have not yet been agreed, or which are not capable of being resolved during Examination.

2.4.1

3 Record of Engagement

3.1 Summary of consultation and engagement

- 3.1.1 The table below summarises communication in relation to progressing this eSoCG. This is not a complete record of all engagement between the Applicant and the CWT but reflects the key discussions which relates to content within this eSoCG.

Table 3.1 Summary of consultation and engagement with the EA

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
CWT.A	19.03.24-20.03.24	Emails (ES Appx 8.9 Stakeholder Engagement [APP-158])	The Applicant stated the aspiration to work with the CWT to develop plans for ecological enhancements. The Applicant's ecologist shared the PEIR Biodiversity CH, PEA and GCN report, Bat Survey Report, Breeding Bird Survey Report, NVC Survey Report, Otter and Water Vole Survey Report for the CWT's consideration.
CWT.B	02.05.24	Online Meeting (ES Appx 8.9 Stakeholder Engagement [APP-158])	Discussion of the CWT's aspirations for the ecological enhancement of the CWS, including a reduction in grazing, improvements to the diversity of grassland, and freshwater and wetland habitats. Discussion of the status and designation of the CWS Discussion of the potential for placement of solar panels within the CWS. Discussion of the proposals for grazing management and consideration of how to enhance purple moor-grass within the CWS. The CWT enquired into whether cattle grazing would be possible. Discussion of the potential for water quality improvement within the CWS due to reduced grazing. The CWT advised engaging with the West Cumbria Rivers Trust to advise on effective monitoring of water quality. The Applicant summarised the proposals at PEIR stage and the PEIR survey results, the DCO process moving forwards, and CWT's role in the process.
CWT.C	15.05.24	Emails (ES Appx 8.9 Stakeholder Engagement [APP-158])	Clarification / confirmation of meeting minutes from 02.05.25.

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
CWT.D	15.05.24	Statutory Consultation Response (summarised, along with the Applicant's position on each point, within Table 8.3 of Ch8 – Biodiversity [APP-038])	<p>CWT requested the CWS be clearly marked and appropriate stand-off distances applied.</p> <p>CWT raised the potential for the Proposed Development to lead to negative impacts on the Dean Moor CWS during construction and decommissioning.</p> <p>CWT requested protective measures near watercourses during construction and decommissioning to mitigate pollution, particularly from high rainfall.</p> <p>CWT stated a preference for the CWS to not be utilised for solar arrays, and that the areas used are restricted to those currently grazed as intensive pasture, and that high value habitats are significantly buffered from the development.</p> <p>CWT highlighted the avoidance of peat as a necessary measure.</p> <p>CWT expressed support for the review of land management practices for the CWS, including the existing grazing regime to deliver biodiversity benefits and offered to input into restoration / grazing management plans.</p> <p>CWT requested biodiversity measures such as retention of scrub, enhancement to existing hedgerows and woodland, and planting within Thief Gill Gully.</p>
CWT.E	31.01.25	Meeting (ES Appx 8.9 Stakeholder Engagement [APP-158])	<p>Discussion of the CWS in relation to an iteration of the Parameter Plan (ES Figure 3.4) and the Landscape Strategy Plan (ES Figure 7.6).</p> <p>Discussion of the historic management of the CWS and the current intensive grazing land use. deterioration of the CWS</p> <p>Discussion of the possibility of the CWS losing its status to the decline of the species for which it was designated, and the Applicant's ambition to promote these species.</p> <p>Discussion of the CWT's statutory consultation response and how these points would be addressed within the application submission.</p> <p>Discussion of BNG proposals and the conservative approach to securing a BNG target within the application.</p> <p>Discussion of the ambition to create wet acid grassland within the CWS and the drainage of the CWS.</p> <p>CWT provided parts of the historic evidence of drainage and species records within the CWS.</p>
CWT.F	09.10.25	Meeting	<p>The Applicant and the CWT went through the remaining matters under discussion from the dSoCG submitted at D2, and agreed on actions to resolve these matters, including an update to the OLEMP to reflect a commitment to engaging with the CWT prior to conducting monitoring, so that the data collected is useful, and in an accessible format for both parties.</p>

4 Signatures

4.1.1 This Statement of Common Ground is agreed upon:

On behalf of Cumbria Wildlife Trust:

Name:

Signature:

Date:

On behalf of the Applicant:

Name:

Signature:

Date: