



# Dean Moor Solar Farm

## Statement of Common Ground with National Highways

on behalf of **FVS Dean Moor Limited**

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25 November 2025  
Prepared by: Stantec UK Ltd  
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**Firma Energy**

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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  
and Procedure) Regulations 2009 5(2)(Q)

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## Contents

<b>1</b>	<b>Introduction.....</b>	<b>1</b>
1.1	Status of the Statement of Common Ground .....	1
1.2	Purpose of this document .....	1
1.3	Terminology.....	1
<b>2</b>	<b>Current Position.....</b>	<b>2</b>
2.1	Position of the Applicant and National Highways .....	2
2.2	Matters agreed .....	3
2.3	Matters under discussion .....	6
2.4	Matters not agreed.....	6
<b>3</b>	<b>Record of Engagement.....</b>	<b>7</b>
3.1	Summary of consultation and engagement.....	7
<b>4</b>	<b>Signatures .....</b>	<b>10</b>

## Tables

Table 2.1	Matters agreed .....	3
Table 3.1	Summary of consultation and engagement with National Highways .....	7

# 1 Introduction

## 1.1 Status of the Statement of Common Ground

1.1.1 This Statement of Common Ground ('SoCG') 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 SoCG has been prepared by (1) the Applicant and (2) National Highways (NH). It is agreed that this SoCG 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 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. 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. This SoCG is the final version of this document, and has been signed by both parties at page 10.

## 1.3 Terminology

1.3.1 In the matters table in Section 2 of this SoCG, '*Matter agreed*' indicates where issues are resolved.

## 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 below, covering a range of topics.
- 2.1.2 One matter remained under discussion in a previous iteration of the SoCG issued at D2, 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 agree that this has been resolved by the data collected by the Applicant at Lillyhall Roundabout in September 2025 and summarised within Appendix F – Appraisal of Traffic Surveys at Lillyhall Roundabout [REP4-028] of the Transport Statement (TS) [REP4-027]. Agreement on this matter is captured within Table 2.1.
- 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 SoCG.
- 2.1.4 The shared position set out below within Table 2.1 ‘Matters agreed’ is the agreed position.

## 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 Ref
NH1	Accident data baseline in the Transport Statement	<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>Appx 2.5 Transport Statement [<a href="#">APP-102</a>] (section 4.5)</p> <p>TS Appx A - Crashmap Incident Reports, Lillyhall Roundabout (2018-2022)</p> <p>Appx 5.2 OCTMP [<a href="#">REP2-025</a>]</p>
NH2	Vehicle Routeing	<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>Appx 2.5 Transport Statement [<a href="#">APP-102</a>]</p> <p>Appx 5.2 OCTMP [<a href="#">REP2-025</a>] (section 5.3)</p>
NH3	Approach to managing Abnormal Indivisible Load (AIL) deliveries.	<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>Appx 2.5 Transport Statement [<a href="#">APP-102</a>] (section 5)</p>
NH4	Identification of laybys and services along	<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</p>	<p>Appx 2.5 Transport Statement [<a href="#">APP-102</a>] (section 7)</p>

Ref	Topic	Shared position	Application Ref
	the SRN	<p>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>	
NH5	Construction 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 (including a commitment to the provision of minibuses to transport a proportion of workers to site) 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 agreed that the FCWTP provides the necessary framework of information requested by NH 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>The FCWTP 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 the Council in consultation with National Highways as a DCO Requirement.</p>	Appx 5.2 OCTMP <a href="#">[REP2-025]</a> (section 7FCWTP )
NH6	Decommissioning Traffic Management Plan	<p>It is agreed that the Framework Decommissioning Management Plan (FDMP) secures the provision of a decommissioning traffic management plan (DTMP) as part of the future Decommissioning Management Plan (DMP) document suite. This will need to be broadly similar (in terms of scope and background informing data) as the CTMP for the construction phase and will therefore need to reflect up-to-date consideration of traffic</p>	Appx 5.2 OCTMP <a href="#">[REP2-025]</a>

Ref	Topic	Shared position	Application Ref
		flows and development impacts informed by engagement with the relevant highways authorities. The DMP suite is secured by Requirement 13 of the draft DCO and must be substantially in accordance with the FDMP which commits to ensuring updating baseline conditions and being developed through engagement with relevant stakeholders at the time.	
NH7	Collaboration with other developments	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. The OCTMP includes a commitment to include any collaborative measures within the final CTMP depending on the developments which may come forwards in the vicinity of the Site and the nature of the overlap and environmental effects.	Appx 5.2 OCTMP <a href="#">[REP2-025]</a>
NH8	Scope of the assessment of cumulative effects of construction traffic on the A595 Lillyhall Roundabout	It is agreed that the Proposed Development will not materially affect the performance of Lillyhall Roundabout and the adjoining A595 during the construction and operational phases. This has been confirmed by the data collection and analysis of network user data, including link flow trend information, turning movement, and queue length data at Lillyhall Roundabout and undertaking a cumulative impact assessment. The findings from this exercise are summarised within Appendix F of the TS and are agreed as effectively supporting the conclusions of the Proposed Development's ES Appendix 2.5 Transport Statement regarding the potential for significant effects.	Appx 2.5 Transport Statement <a href="#">[REP4-027]</a> (section 4) TS Appendix F – Appraisal of Traffic Surveys at Lillyhall Roundabout <a href="#">[REP4-028]</a> Appx 5.2 OCTMP <a href="#">[REP2-025]</a> Ch 11 Cumulative Effects and Residual Effects Summary <a href="#">[APP-042]</a>



## **2.3 Matters under discussion**

- 2.3.1 There are no matters which are under discussion between the Applicant and the NH.

## **2.4 Matters not agreed**

- 2.4.1 The Applicant and NH do not consider that there are any matters which have not been agreed.

## 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 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 [ <a href="#">APP-102</a> ])	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 [ <a href="#">APP-102</a> ])	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 minibuss numbers.
NH.C	23.04.2024	Statutory Consultation Response	<ul style="list-style-type: none"> <li>NH agreed with the minutes of the scoping discussions.</li> <li>NH requested further information on the causation factors of recorded incidents on the SRN.</li> <li>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.</li> <li>NH disputed the baseline data used for the analysis within the TMR as it was based on a 2015 base year and is therefore not appropriate to draw conclusions relating to current baseline conditions at Lillyhall Roundabout.</li> <li>NH requested deliveries outside of peak periods where possible as a firm commitment.</li> <li>NH requested further information relating to services and laybys along the SRN where vehicles can wait outside of the scheduled delivery window.</li> </ul>

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
NH.D	02.08.2024	Email correspondence (ES Appx 2.5, Appx C Correspondence with Cumberland Council and National Highways [ <a href="#">APP-102</a> ])	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 [ <a href="#">APP-102</a> ])	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 [ <a href="#">APP-102</a> ])	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 Lillyhall Roundabout [ <a href="#">APP-102</a> ])	Meeting set up to discuss cumulative impacts with Lostrigg Solar on Lillyhall Roundabout with National Highways and RWE.
NH.H	09.10.2024	Email correspondence (ES Appx 2.5, Appx C Correspondence with Cumberland Council and National Highways [ <a href="#">APP-102</a> ])	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 [ <a href="#">APP-102</a> ])	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.

Ref	Date	Engagement Type & Record	Key topics discussed and key outcomes
NHJK	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	26.06.2025	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.
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.
NH.P	08.10.2025	Email correspondence	The Applicant shared a draft of the TS Appendix F – Appraisal of Traffic Surveys at Lillyhall Roundabout which summarises the traffic survey data collected at Lillyhall Roundabout in September 2025, and concludes that the performance of Lillyhall Roundabout will not be materially affected by the Proposed Development.
NH.Q	15.10.2025	Email correspondence	NH confirmed that it is unlikely that the Lillyhall Roundabout would be affected by the Proposed Development, given the evidence on operating conditions at the roundabout and the forecast quantum of construction trips.

## 4 Signatures

4.1.1 This Statement of Common Ground is agreed upon:

On behalf of National Highways:

Name: [REDACTED]

Signature: [REDACTED]

Date: 20/11/2025

On behalf of the Applicant:

Name: [REDACTED]

Signature: [REDACTED]

Date: 20/1

