

Submission ID: SE6C97E17

Response to Examining Authority's Written Questions 1 submitted under separate standalone document for Cadent Gas Ltd.

TWEEN BRIDGE SOLAR FARM
RESPONSE TO EXAMINING AUTHORITY’S FIRST ROUND OF WRITTEN QUESTIONS
DEADLINE 2 (19 MAY 2026)
CADENT GAS LIMITED

1. INTRODUCTION

1.1 This document comprises a response on behalf of Cadent Gas Limited (**Cadent**) to Q4.0.12 of the Examining Authority’s first round of written questions (**ExQ1**). This submission should be read alongside Cadent’s relevant representation (RR-002) (the **Relevant Representation**) and Cadent’s written representations (REP1-072) (the **Written Representation**).

Table 1

EXQ1	Question to	Question	Response
Q4.0.12	Statutory Undertakers	<p>Protective Provisions</p> <p>Please set out your position with regards to the tests under s127 and s138 of PA2008 as applicable to your respective interests.</p>	<p>Cadent Gas Limited (“Cadent”) is a statutory undertaker for the purposes of the Planning Act 2008 and is a licensed gas transporter under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in North London, Central and North-West England. Cadent’s primary duties are to operate, maintain and develop its networks in an economic, efficient and coordinated way.</p> <p>At this stage, Cadent is not satisfied that the tests under section 127 of the Planning Act 2008 can be met in relation to the carrying on of Cadent’s undertaking unless its protective provisions are included in the DCO. Cadent provided its protective provisions as an Appendix to its Relevant Representation and its Written Representation.</p> <p>Cadent also has experience of promoters securing insufficient rights in land within DCOs for necessary diversions of its apparatus or securing rights for the benefit of</p>

EXQ1	Question to	Question	Response
			<p>incorrect entities. It is important that sufficient rights are granted to Cadent to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations given that the draft DCO includes the power to undertake any such diversions. As a responsible statutory undertaker, Cadent’s primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations.</p> <p>Given the Project interacts with Cadent’s apparatus, Cadent would expect the draft DCO to include protective provisions for Cadent’s benefit. At this stage, no such protective provisions have been included and no justification has been provided by the Applicant for this omission (including in the updated Explanatory Memorandum (REP1-006), the response to Cadent’s Relevant Representation (REP1-043) and the Statutory Undertakers Position Statement (APP-187)). The Statutory Undertakers Position Statement (APP-187) does not set out how the test under section 127 can be met in respect of Cadent’s assets.</p> <p>The updated draft DCO submitted to the Planning Inspectorate on 19 November 2025 (AS-002) was submitted after there had been any engagement with Cadent on protective provisions. Cadent issued its required protective provisions to the Applicant on 6 August 2025. However, Cadent did not receive a response to this draft from the Applicant until 1 April 2026.</p> <p>As such, Cadent has only recently been able to make some positive progress with the Applicant but has not yet reached satisfactory agreement. On this basis, Cadent considers that section 127 cannot currently be discharged although Cadent is committed to working with the Applicant to ensure that appropriate protection is provided to Cadent.</p>