

GREAT NORTH ROAD SOLAR AND BIODIVERSITY PARK
COMMENT ON UPDATED DOCUMENTS AND SUBMISSIONS SUBMITTED BY
THE APPLICANT AT DEADLINE 1
DEADLINE 2 (16 JANUARY 2026)
CAIDENT GAS LIMITED

1. INTRODUCTION

- 1.1 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.
- 1.2 Cadent has an interest in land as noted in the Book of Reference (see plot 2/2).
- 1.3 Cadent submitted a relevant representation (RR-024) which sets out Cadent’s position on the Project and the application of the tests pursuant to the Planning Act 2008. Cadent also submitted a written representation (REP1-086) which reiterated its position.
- 1.4 Cadent is submitting this document as a comment on updated documents and submissions submitted by the Applicant at Deadline 1.
- 1.5 Cadent does not object in principle to the development proposed by the Applicant.

2. THE DRAFT DCO

- 2.1 Cadent require protective provisions to be included within the Development Consent Order (“DCO”) to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. The Applicant has included draft protective provisions for the benefit of Cadent at Part 7 of Schedule 13 to the draft DCO, however the draft DCO was submitted before there had been any engagement with Cadent on the protective provisions (as noted on the draft statement of common ground to be submitted by the Applicant at this Deadline 1) and it is not clear what the protective provisions included in the draft DCO were based on. As a result, the protective provisions are not sufficient. Cadent’s position was set out in its relevant representation (RR-024) and its written representation (REP1-086) and Cadent’s relevant representation contained the protective provisions that Cadent requires and which mirror those included in precedent DCOs.
- 2.2 The Applicant’s updated draft DCO submitted at Deadline 1 does not address Cadent’s submissions and does not address Cadent’s fundamental concerns with the protective provisions included in the draft DCO.
- 2.3 The Applicant has not sought to justify any departure from Cadent’s required protective provisions and the precedent in made DCOs in either its application documentation or in its Responses to Relevant Representations Report (REP1-065).

2.4 Cadent's preferred form of protective provisions are substantially similar to National Grid Electricity Transmission plc (NGET) preferred form of protective provisions contained at Appendix 2 to NGET's written representation (REP1-097).

2.5 Cadent further notes that:

- 2.5.1 NGET's position as set out in NGET's written representation (REP1-097) is consistent with Cadent's position, and Cadent endorses NGET's position at Paragraph 1.30 to 1.32 of NGET's written representation (REP1-097). The provisions that Cadent requires to be included are set out at Paragraph 6 of Appendix 1 to Cadent's relevant representations (RR-024) (please also see Paragraph 6 of Appendix 2 to NGET's written representation);
- 2.5.2 NGET's required form of protective provisions (included at Appendix 2 to its written representation (REP1-097)) include substantially similar wording to that required by Cadent in respect of the requirement for acceptable insurance and acceptable security. Cadent's required wording is at Paragraph 11(5) of Appendix 1 to Cadent's relevant representation (RR-024), together with associated definitions (please also see Paragraph 11(7) of Appendix 2 to NGET's written representation (REP1-097)); and
- 2.5.3 NGET's required form of protective provisions (included at Appendix 2 to its written representation (REP1-097)) include substantially similar wording to that required by Cadent in respect of the requirement for an indemnity. Cadent's required wording is at Paragraph 11 of Appendix 1 to Cadent's relevant representation (RR-024) (please also see Paragraph 11 of Appendix 2 to NGET's written representation (REP1-097)).

2.6 Following a meeting in November 2025 Cadent received updated draft protective provisions from the Applicant in the week commencing 12 January 2026. The draft protective provisions are not yet agreed, and several matters remain outstanding.

3. NEXT STEPS

- 3.1 Cadent continues to liaise with the Applicant in relation to bespoke protective provisions in respect of Cadent's assets but these are not yet agreed. Discussions are ongoing, and Cadent will continue to engage proactively to reach a mutually acceptable form of protective provisions.
- 3.2 Unless and until final agreement is reached, Cadent:
 - 3.2.1 maintains its position as set out in its relevant representation (RR-024) and written representation (REP1-086); and
 - 3.2.2 continues to request inclusion of its required form of protective provisions in the draft DCO.
- 3.3 Cadent reserves its right to make further submissions and to respond to any comments submitted by the Applicant at Deadline 2 and further deadlines.

CMS CAMERON MCKENNA NABARRO OLSWANG LLP
16 JANUARY 2026