

**Workgroup Consultation Response Proforma****CMP434: Implementing Connections Reform**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to [usc.team@nationalgrideso.com](mailto:usc.team@nationalgrideso.com) by **5pm on 06 August 2024**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact [usc.team@nationalgrideso.com](mailto:usc.team@nationalgrideso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Chris Gent	
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<b>Phone number:</b>	Click or tap here to enter text.	
<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input checked="" type="checkbox"/> Other

**I wish my response to be:**

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration)

**For reference the Applicable CUSC (non-charging) Objectives are:**

- The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;
- Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;
- Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and
- Promoting efficiency in the implementation and administration of the CUSC arrangements.

\*The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.

**Please express your views in the right-hand side of the table below, including your rationale.**

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the Original solution better facilitates: Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D Click or tap here to enter text.
2	Do you support the proposed implementation approach? (see pages 59-61)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>The Crown Estate supports the prioritisation of projects which are consentable, deliverable and economic, and are aligned to Government's targets and critical to Net Zero. We broadly support the principles of what the outlined implementation approach looks to achieve, to move at pace to implement connection reform in 2025, although we do have concerns about practical deliverability in the tight timescales proposed.</p> <p>We seek to ensure no inadvertent impacts or disadvantage from both the choice of implementation timing and gate criteria of CMP434 and CMP435 on critical "in-flight" offshore wind projects that are currently subject to Habitat Regulations Assessment (HRA) processes and live seabed leasing processes being led by The Crown Estate, as explained later in this response, which could represent up to 8.5GW of offshore wind projects that would contribute to decarbonising the electricity system. We would like to seek assurance from ESO that these processes and projects can be safeguarded transitionally during 2025 – particularly in relation to implementation of CMP435 and Gate 2 criteria.</p>
3	Do you have any other comments?	Click or tap here to enter text.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the <a href="#">Workgroup Consultation Section</a> ) <input checked="" type="checkbox"/> No Click or tap here to enter text.

## Specific Workgroup Consultation questions

5	<p>Do you agree with the elements of the proposed solution?          Element 7 has been de-scoped and Element 10 is proposed to be codified within the STC through modification <a href="#">CM095</a>.          Please provide rationale for your answer and any suggestions for improvement to each element?</p>	
	<p><b>Element 1:</b> Proposed Authority approved methodologies and ESO guidance (see pages 9-10, 55)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	<p>Given the early nature of the connection reform process, its current implementation and its future application, it seems appropriate to ensure that the detail of the proposed methodologies sit outside of the code process. As explored later in the response, The Crown Estate's position relating to TMO4+, Gate 1 and Gate 2 processes and criteria is considered in the context of agreements with our customers. We wish to ensure that connection reform proposals do not impose direct obligations on landowners. To try to codify any methodologies relating to land that could have implications for the agreements that The Crown Estate has with customers, would create complications and limitations.</p>	
	<p><b>Element 2:</b> Introducing an annual application window and two formal gates, which are known as Gate 1 and Gate 2 (i.e. the Primary Process) (see pages 11, 35-36)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	<p>We welcome the introduction of annual application windows and formal processes associated with the two gates. We would welcome further engagement with ESO in the context of the future potential role The Crown Estate could play in the connections process (as alluded to in future CUSC considerations in Element 5), as to how the gate processes and timelines are considered in the context of future leasing of offshore wind.</p>	
	<p><b>Element 3:</b> Clarifying which projects go through the Primary Process (see pages 11-12, 35-36)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>Click or tap here to enter text.</p>	
	<p><b>Element 4:</b> Significant Modification Applications concept, including the proposed criteria and the proposed level of codification (see pages 12-13, 36-39)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>Click or tap here to enter text.</p>	
	<p><b>Element 5:</b> Clarifying any Primary Process differences for customer groups (see pages 13-14, 35-36)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	<p>The Crown Estate notes the introduction of a Letter of Authority offshore equivalent for offshore projects.</p> <p>We wish to ensure that connection reform proposals do not impose direct obligations on landowners. We view the Letter of Authority (LoA) offshore equivalent at Gate 1 as a voluntary undertaking and the ESO would need to take its own view in the event that The Crown Estate or any landowner does not provide a Letter of Authority in any circumstances. As we understand that a Gate 1</p>	

connection offer is proposed to be indicative, we recommend that the term 'Authority' is amended to 'Acknowledgement' (a "Letter of Acknowledgement"), which provides more of a recognition at Gate 1 that project interests can simply be acknowledged, but that there is no authority or guarantee provided by The Crown Estate that such a project has rights to develop. We look forward to working with ESO to ensure Guidance associated with the offshore LoA is appropriate.

For the avoidance of doubt, this will need to be considered for ad-hoc project proposals and outcomes from structured leasing processes.

For new structured, market-based leasing processes, beyond Offshore Wind Leasing Round 5 which is currently under way, it is our understanding from the change timeframes proposed by ESO that it is unlikely that The Crown Estate will commence new offshore wind leasing processes before the introduction of the connection reform minimum viable product (MVP). As such there would be no basis for The Crown Estate to provide any LoA for any offshore wind interests prior to announcement of a future offshore wind leasing round by The Crown Estate. Therefore, we will continue to work with ESO to explore the role The Crown Estate can play in the connections process for future offshore wind leasing – as alluded to in future CUSC considerations in Element 5.

For ad-hoc leasing processes, applied to sectors which do not necessarily have structured seabed leasing rounds (e.g. interconnectors, tidal stream), we recognise the ESO's need for a LoA (or equivalent) in order to provide ESO with generation demand signals to be considered in Strategic Spatial Energy Plan (SSEP) and network planning. From The Crown Estates perspective, in principle we consider that an LoA could be provided for such ad-hoc project interests subject to understanding a project's needs to our reasonable satisfaction.

Additionally, we note the ESO's observations relating to interconnectors and offshore hybrid assets (OHA), and the recommendation to provide a connection date and location to these projects at Gate 1 ahead of formal allocation through Gate 2 criteria. We recognise this can provide a degree of certainty for developers of interconnectors and OHAs when considering cable routings, and project delivery, and the complexities of aligning interests with multiple parties and neighbouring connecting countries.

Although an offshore LoA may not be required by ESO at Gate 1 for Interconnectors and OHAs, we think that an Agreement for Lease with The Crown Estate would be an appropriate criterion at Gate 2 in line with other offshore energy projects. We would welcome consideration by ESO for Interconnectors and OHAs to require an Agreement for Lease (AfL) from The Crown Estate as a condition of the ESO's proposed longstop arrangement and Gate 2 criteria applicable to Interconnectors and OHAs.

Noting the focus of these proposals on delivering a minimum viable product (MVP) for 2025 implementation, we strongly support development of further connection reform proposals that would allow The Crown Estate having a role in the connection application process for future offshore energy leasing. We welcome continued engagement with the ESO to explore options and their potential implications for future CUSC modifications. We would welcome in response to this

consultation that a clearer process and timeline for future CUSC modifications looking beyond 2025 is provided by ESO, to include consideration of The Crown Estate's role in future connections processes for offshore energy projects.	
<b>Element 6:</b> Setting out the process and criteria in relation to Application Windows and Gate 1, including introducing an offshore Letter of Authority equivalent as a Gate 1 application window entry requirement for offshore projects (see pages 15-16, 39-40)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>We note the proposed timing of the Gate 1 application window from 1<sup>st</sup> January 2025 to mid-February 2025. The timing of this window would drive the timing of potential requests for Letters of Authority from landowners. We note that the timescales for implementing any final proposals are extremely tight and so we would encourage the ESO to develop an impact assessment to accompany final proposals in order that all stakeholder dependencies have been worked through and verified in order to support the recommended application window timings.</p>	
<b>Element 7:</b> Fast Track Disagreement Resolution Process (de scoped from this modification – see pages 16, 58)	<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.	
<b>Element 8:</b> Longstop Date for Gate 1 Agreements (see pages 16, 40-41)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>We note the ESO's proposal for a longstop date for fulfilment of Gate 2 criteria three years after Gate 1 offer acceptance. The duration of the longstop period is important. If the intention of the longstop date is to genuinely provide a backstop for reserving capacity and connection point locations, expecting normal course of business to reasonably allow projects achieve Gate 2 criteria, we could envisage that the longstop period should be longer and that a period of four years should be considered for offshore projects given the significant complexities involved in developing offshore projects compared to onshore. We believe that a 4-year longstop period should provide developers of any offshore project enough time to enter into an Agreement for Lease with The Crown Estate subsequent to a Gate 1 offer acceptance.</p>	
<b>Element 9:</b> Project Designation (see pages 17-18, 48-49)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>In principle The Crown Estate supports ESO's proposals to be able designate specific projects in line with a Project Designation Methodology.</p> <p>We recommend that the Project Designation Methodology should include projects that fulfil and accelerate achieving net zero goals. We also suggest that the methodology should include projects that rely upon coordinated network designs where such coordinated network designs are demonstrated to be in the best interests of consumers.</p> <p>We seek to ensure no inadvertent impacts or disadvantage from both the choice of implementation timing and gate criteria of CMP434 and CMP435 on critical "in-flight" offshore wind projects. We would like to understand if Element 9 (&amp;/or</p>	

Element 10 below) could be used to safeguard the grid connection status of critical offshore wind projects pending outcomes of in-flight leasing or habitat regulation assessment (HRA) processes – especially where these processes commenced prior to these connections reform proposals and are expected to conclude in 2025.

Two such key processes that are in the public domain are:

(1) Offshore Wind Leasing Round 5 in the Celtic Sea ([Offshore Wind Leasing Round 5](#)):

(2) A programme to increase capacity within seabed areas that have been previously granted rights, are not being fully utilised, and may have limited options for alternative uses. ([TCE Capacity Increase Programme](#)).

The projects under consideration in this capacity increase process were awarded rights in either The Crown Estate's Offshore Wind Leasing Round 3, or The Crown Estate's 2017 Offshore Wind Extensions opportunity, the latter of which sought to unlock additional capacity in the UK offshore wind portfolio in an efficient way, by extending existing offshore wind farms. The projects are:

Awel y Môr

Dudgeon Extension

Sheringham Shoal Extension

North Falls

Five Estuaries

Rampion 2

Dogger Bank D

Together, these two “in-flight” processes enable the deployment of up to 8.5GW of offshore wind that would support decarbonising the electricity system and we would wish to ensure that the choice of timescales for implementation of connection reforms in CMP434 or CMP435 do not inadvertently disadvantage projects involved in these in-flight processes. We are happy to discuss this further with the ESO. Not having such assurances in place could reduce investor confidence in projects, cause extra delays, and potentially push costs upwards.

**Element 10:** Connection Point and Capacity Reservation (proposed to not be codified within the CUSC, but is intended to be codified within the STC through modification [CM095](#) – see pages 18-20 and the [CM095 Workgroup Consultation](#), pages 6-10 <https://www.nationalgrideso.com/document/322801/download>)

☒ Yes

☐ No

The Crown Estate supports the proposals relating to Connection Point and Capacity Reservation. It is important for projects identified in HND or HND FUE design recommendations (whether the recommendations relate to projects from



leasing processes that have been concluded – such as Offshore Wind Leasing Round 4 - or and leasing processes that are ongoing – such as Offshore Wind Leasing Round 5) that a route to connection and capacity on the network can be safeguarded while design recommendations are bedding in. Not having such assurances in place could reduce investor confidence in projects, cause extra delays, and potentially push project costs upwards.

We would welcome a discussion with the ESO to understand how Project Designation (Element 9) and Connection Point and Capacity Reservation (Element 10) may be applied in the 2025 window and to which offshore projects.

**Element 11:** Setting out the criteria for demonstrating Gate 2 has been achieved and setting out the obligations imposed once Gate 2 has been achieved (see pages 20-24, 42-46)

☐ Yes

☒ No

The Crown Estate welcomes criteria which can demonstrate land rights for project development. We note that Gate 2 criteria are not proposed to be codified. We would, therefore, wish to be involved in the determination and approval of any criteria that relate to land rights that may be provided by The Crown Estate (whether onshore or offshore land rights) to ensure no imposition of obligations from grid connection processes on landowners.

In Element 11.1 the Gate 2 criteria provide examples of where “one approach” to onshore and offshore projects may create complications or may not be appropriate. Proposed differences in the proposals applicable to HND and HND/FUE-connected projects, for interconnectors and offshore hybrid assets strongly suggests that offshore energy projects need to be treated distinctly from onshore energy projects in grid connection processes, especially considering deliverability, net zero legislation, energy policy objectives and system needs. Offshore wind leasing processes by The Crown Estate take these considerations into account to deliver a credible project pipeline closely linked with system needs, in contrast to some onshore technologies.

For example, there are elements of the Gate 2 criteria proposed which are already covered in lease agreements or agreements for lease (AfL) that The Crown Estate manages directly with customers. This includes:

- **Energy density and capacity considerations:** As part of The Crown Estate’s leasing process for offshore energies a detailed appraisal of potential power output capacities for offshore technologies is undertaken which is reflected in the agreement for lease as a capacity limit. Importantly, this also takes account of environmental assessments, such as plan level Habitats Regulation Assessment (HRA). Using energy density tables for offshore projects would create a duplicative but less detailed process, as they would not capture the level of detail covered in agreements for lease which will have been proposed for portions of seabed cognisant of the potential energy and environmental characteristics of that site alongside wider technology and market conditions. We propose that energy density criteria for seabed leased for offshore projects in England & Wales should continue to be determined by The Crown Estate. We are supportive of the ESO empowering landowners with information, evidence and guidance to

determine energy density commensurate with understanding of land use, but the determination of sufficiency and suitability of land should be agreed between the developer and landowner. It is also unclear what the land energy density should be for an onshore converter station associated with the connection of an Interconnector of OHA.

- **Red Line Boundaries:** Agreements for Lease and Leases entered into with The Crown Estate for offshore projects will determine project areas, boundaries and capacity limitations. As we do not expect energy density table criteria to need to be applied to offshore projects, so a red line boundary for offshore projects would not be required as part of a Letter of Authority. The extent to which any changes to project boundaries or capacities are considered sits between The Crown Estate and customers. As such, we propose that confirmation by The Crown Estate of capacity limitations in an Agreement for Lease or proposed Agreement for Lease would be sufficient to satisfy Gate 2 location criteria for offshore projects.
- **Option and lease agreement timelines:** The proposed minimum option period (3 years), and proposed minimum lease term (20 years) present a challenge. For some sectors we would look for more bespoke arrangements best suited to the technology and project - for example, test and demonstration projects for wind, wave or tidal technologies or other novel technologies such as offshore solar or electrolysis. We would welcome a discussion to understand the relevance of minimum option period and minimum lease term to ensure that is the ESO's interests are compatible with current and potential future leases. The Crown Estate supports connections reform that can drive industry information to better empower landowners in their dialogue with promoters. Evidencing the ability to secure land rights that would support a developer's interest in a connection agreement should be feasible, but we do not believe that connections reform should drive minimum requirements in land agreements. Disclosure of terms of bilateral land agreements would also be subject to confidentiality provisions.
- **Overseas land rights:** We note that the ESO has advised that if a project is a Non-GB project (i.e. generating outside of GB waters whether offshore or onshore) but it is directly connecting into the GB system (i.e. if and where it is not classed as an Interconnector or an OHA), then it will need to provide the relevant land rights obtained in the country where it is situated. We are not aware of a similar requirement for Interconnectors or Offshore Hybrid Assets to have to evidence the grid connection arrangement or land interests in the overseas country. We believe that all offshore projects passing through England & Wales Territorial Waters (whether offshore wind, Interconnector, offshore hybrid asset, non-GB project) should evidence an Agreement for Lease with The Crown Estate as a common Gate 2 criteria.

**Element 12:** Setting out the general arrangements in relation to Gate 2 (see pages 25-26, 47)

☐ Yes  
☐ No

Click or tap here to enter text.



<b>Element 13:</b> Gate 2 Criteria Evidence Assessment (see pages 26-27, 47-48)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>Under the fourth bullet point on page 27 of the consultation document it states “A statement to the Director’s best knowledge, no-one else has any rights over the land (for the purpose of energy) …”</p> <p>We would welcome revision of this sentence to specify rights for one energy generation type or technology. As currently drafted it may prevent more novel or co-located projects from materialising. For example, there are known overlaps between offshore wind generation and CO2 storage sites, which share the same location spatially in 2D but have a 3D element due to the depth of CO2 storage beneath the surface.</p> <p>As drafted, we note that the Director’s self-declaration of evidencing Gate 2 criteria is not verified by the landowner. Confidentiality provisions in land agreements may limit what evidence can be provided by either party. It is our view that Connection Reforms should not drive or influence confidentiality provisions in bilateral land agreements.</p> <p>We suggest that the Gate 2 criteria evidence assessment could potentially comprise a stepped process with mandatory and optional elements e.g. Step 1 – a mandatory non-duplicate land interest check based on assessment of shapefiles supported by further project due diligence by the ESO as required; Step 2 – an optional suitability check only to the extent needed by the ESO.</p>	
<b>Element 14:</b> Gate 2 Offer and Project Site Location Change (see pages 28, 46)	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<b>Element 15:</b> Changing the offer and acceptance timescales to align with the Primary Process timescales (e.g. a move away from three months for making licenced offers) (see pages 29, 42-46)	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<b>Element 16:</b> Introducing the proposed Connections Network Design Methodology (CNDM) (see pages 29, 53-55)	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	
<b>Element 17:</b> Introducing the concept of a Distribution Forecasted Transmission Capacity (DFTC) submission process for Distribution Network Operators (DNOs) and transmission connected Independent Distribution Network Operators (iDNOs) to forecast capacity on an anticipatory basis for Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations aligned to the Gate 1 Application Window (see pages 30-33, 51-53)	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Click or tap here to enter text.</p>	

	<b>Element 18:</b> Set out the process for how DNOs and transmission connected iDNOs notify the ESO of Relevant Embedded Small Power Stations or Relevant Embedded Medium Power Stations which meet Gate 2 criteria (see pages 33-34, 51-53)	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>It is important to note that some smaller offshore energy projects testing and demonstrating technologies at commercial scale are seeking to connect to the distribution network and will have a BEGA with the ESO. This is particularly the case for some of the Floating Wind Test &amp; Demonstration projects. The Crown Estate would be keen to engage with the ESO and the relevant DNOs regarding those projects.</p>		
6	Are there any elements of the proposal which you believe should not be included as part of this proposed solution, which the Proposer believes represents the 'Minimum Viable Product' reforms required to the connections process? If not, why not? (Please note the element number in each of your responses if applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> No
<a href="#">Click or tap here to enter text.</a>		
7	As per question 6, are there any additional features which you believe should be included as part of Minimum Viable Product reform to the connections process?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<a href="#">Click or tap here to enter text.</a>		
8	Do you agree that the Gate 1 process should be a mandatory process step, or do you think Gate 1 should be an optional process step with projects being able to apply straight into the Gate 2 process if the project meets both the relevant Gate 2 and Gate 1 criteria?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>There should be scenarios where projects can have the option to apply straight into the Gate 2 process. This may be a timing point, given the proposed annual Gate 1 window process but more frequent Gate 2 windows. For example between annual Gate 1 windows it may be possible for projects to enter into an Agreement for Lease with The Crown Estate and be able to achieve both the Gate 1 and Gate 2 criteria.</p> <p>In the context of offshore energy projects, it may not be possible for landowners such as The Crown Estate to grant letters of authority to specific projects at Gate 1 before locations are defined and competitive processes have taken place. However, projects that are successful through a competitive offshore tender</p>		

	<p>process can feasibly be in receipt of a project-specific LoA at Agreement for Lease award, at which point where many, if not all, Gate 2 criteria can be met and a Gate 2 application can be made by the successful developer.</p> <p>Through our Statement of Intent and working relationship with ESO there are opportunities to explore, ahead of competitive tender processes, how best to inform strategic planning considerations, including potential connection locations, capacities and timings, which the Gate 1 process looks to achieve. We strongly support development of further connection reform proposals that would allow The Crown Estate having a role in the connection application process for future offshore energy leasing, and how our Whole of Seabed and Routemap programmes for marine spatial evidence can help to inform strategic energy system and network planning processes and future connection processes. We welcome continued engagement with the ESO to explore options and their potential implications for future CUSC modifications. We would welcome in the final recommendations subsequent to this consultation that a clearer process and timeline for consideration of the TCEs role in the connections process for offshore projects is provided.</p>	
9	<p>Do you believe that the proposed Gate 1 and Gate 2 process could duly or unduly discriminate against any types of projects? If so, do you believe this is justified?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>We are not convinced that one approach to grid connection, for onshore and offshore energy technologies, continues to be appropriate to transform the energy system in Great Britain to meet the dual challenges of Net Zero and nature recovery.</p> <p>Technologies, development processes, regulation, consenting, land provision, and supply chain processes can differ substantially between offshore and onshore energy projects. In its approach to offshore leasing, TCE considers legislative targets, Government policy objectives, deliverability and system needs to ensure the amount and capacity of projects is suitable. By contrast, the speculative nature of some onshore projects has led to capacity oversupply manifested in the connections queue.</p> <p>We understand and fully support the ESO taking action to solve the connection queue. However, this mainly relates to onshore technologies. We would therefore recommend that the Gate 2 to Whole Queue proposals are implemented in the first instance for onshore projects as part of a Minimum Viable Product in 2025, and implemented for offshore projects in a subsequent implementation phase at a later date where necessary.</p> <p>As we have highlighted elsewhere in our responses to CMP434 and CMP 435, we seek to ensure no inadvertent impacts or disadvantage from both the choice of implementation timing and gate criteria on critical “in-flight” offshore wind projects and in particular to ensure that the implementation of CMP435 proposals does not</p>		

	<p>inadvertently affect up to 8.5GW of offshore wind projects that would support decarbonising the electricity system:</p> <p>(1) Offshore Wind Leasing Round 5 in the Celtic Sea (<a href="#">Offshore Wind Leasing Round 5</a>):</p> <p>(2) A programme to increase capacity within seabed areas that have been previously granted rights, are not being fully utilised, and may have limited options for alternative uses. (<a href="#">TCE Capacity Increase Programme</a>).</p> <p>The projects under consideration in this capacity increase process are:</p> <p>Awel y Môr</p> <p>Dudgeon Extension</p> <p>Sheringham Shoal Extension</p> <p>North Falls</p> <p>Five Estuaries</p> <p>Rampion 2</p> <p>Dogger Bank D</p> <p>We would wish to ensure that the timescales for implementation of connection reforms in CMP434 (or CMP435) do not inadvertently disadvantage these in-flight processes. Not having such assurances in place could reduce investor confidence in projects, cause extra delays, and potentially push costs upwards.</p>	
10	<p>Please provide your views on the proposed options ((a) to (e) on page 45) to mitigate the risk of requiring a developer to submit their application for planning consent earlier than they would in their development cycle (with the risk this consent could expire and any extension from the Planning Authority is not automatic).</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p><a href="#">Click or tap here to enter text.</a></p>		
11	<p>Do you agree that DFTC should be included as part of CMP434? If not, do you believe that the reformed connections process can function without DFTC? Please justify your answer. (see pages 30-34, 51-53)</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p><a href="#">Click or tap here to enter text.</a></p>		

12	<p>The Proposer intends to set out supporting arrangements for TMO4+ via a combination of guidance and methodologies (e.g. DFTC, CNDM, Project Designation, Gate 2 Criteria). Do you anticipate any issues with having these outside of Code Governance? (see Pages 9-10, 55)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>We wish to ensure that connection reform proposals do not impose direct obligations on landowners. To try to codify any methodologies relating to land that could have implications for the agreements that The Crown Estate has with customers, would create complications and limitations.</p>		