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Able Marine Energy Park

Material Change 2

Updated Regulation 6 Statement

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Revision 1
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ABLE MARINE ENERGY PARK MATERIAL CHANGE 2

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UPDATED REGULATION 6 STATEMENT

Text in black in this document is reproduced from the original Regulation 6 statement, and is supplemented by text in red to reflect developments since the original statement was written.

1. Summary

1.1. Regulations 5(2)(p) and 6(3) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the Regulations) provide that, where an application for a Development Consent Order is for a project which involves the construction or alteration of harbour facilities, it must be accompanied by a statement setting out why the making of the order is desirable in the interests of:

(a) securing the improvement, maintenance or management of the harbour in an efficient and economical manner; or

(b) facilitating the efficient and economic transport of goods or passengers by sea or in the interests of the recreational use of sea-going ships.

1.2. This statement updates the outline case for the original Development Consent Order and sets out how the scheme as amended is desirable in the interests of facilitating the efficient and economic transport of goods by sea.

2. The Project

2.1. Able Humber Ports Limited (Able) is applying for a material change to the Development Consent Order it secured in 2014, under which it is be permitted to build a quay on the south bank of the Humber and to develop neighbouring land for the purpose of manufacturing and shipping components related to the marine energy sector. The new quay is proposed to be built on the south bank of the Humber near North Killingholme north of Immingham, and involves the development of approximately 268 hectares of land onshore, and 45 hectares of estuary. The quay will have the capacity to handle more than 5 million tonnes of cargo a year. Under the proposed scheme a new harbour jurisdiction will be created for which Able will be the harbour authority.

2.2. The seabed in front of the quay will be dredged in front of it to a maintained depth of -11 metres Chart Datum (mCD) to allow vessels, including jack up vessels, to berth so that large and/or heavy components related to the marine energy sector can be loaded efficiently onto them for onward transport. An approach channel and turning area are also proposed to be dredged to a maintained depth of -9 mCD. The quay will be designed to be operated 24 hours a day, and will be able to be lit at night.

2.3. The onshore site will provide areas for marine energy electricity generators, including wind turbines (blades, towers, foundations and nacelles) to be manufactured, as well as areas for

other components in the supply chain. The onshore area will be divided into plots each expected to consist of a main building together with an open storage area, employee car parking and other associated facilities and structures.

2.4. The advantage of having manufacturing immediately adjacent to the quay is that marine energy components are too large and heavy to transport by road without great difficulty. In the case of offshore wind turbines, for example, the central hub to which the blades are fixed, the 'nacelle', weighs between 150 and 300 tonnes, the blades are up to 60 metres long, and the towers and foundations are even larger and heavier; advances in technology are likely to mean that the components are likely to get both larger and heavier over time.

2.5. Since this statement was written in 2011, turbines have become larger and heavier as predicted. In 2019 GE announced a 12MW turbine with a nacelle weighing 675 tonnes, and blades 107 metres long[1]. In 2020 Siemens Gamesa announced a 14MW turbine with a nacelle weighing 500 tonnes and with blades that are 108 metres long[2]. The difficulty of transporting such components over long distances has increased, and consequently the case for manufacturing facilities adjacent to a harbour has therefore become much stronger. In the intervening period no alternative facility equivalent to AMEP has been proposed or constructed.

2.6. The changing nature of offshore wind infrastructure is indeed the main driver for the material change – the quay previously had a 'slot' in it to accept twin-hulled vessels that were expected to be developed, onto which the infrastructure would be loaded. The vessel designs have changed and so this slot is now not fit for purpose. It is therefore being replaced with a wider berth parallel to the quay instead, which will be more resilient to future changes.

3. Policy Framework – The need for the DCO

3.1. The policy framework within which this project is being developed is set out at the European, National, Regional and Local levels.

European

3.2. The European Union has allocated targets for energy consumption from renewable sources to each member state, averaging 20% of all energy consumption (not just electricity consumption). The UK must increase from a 2005 level of 1.3% to 15% by 2020, Germany from 5.8% to 18%, the Netherlands from 2.4% to 17% and Denmark from 17% to 30%. Offshore wind will need to play a significant role in all these countries' energy production, and there will be a market for the installation of wind turbines in the North Sea beyond the UK. Current estimates suggest that the Round 3 project alone (see paragraph 3.7) will require up to £100 billion of new investment.

3.3. AMEP is designated as an Assisted Area (EU approved) and as such the UK Government's Offshore Wind Ports Infrastructure Fund, which specifically targets Port Development (in partnership with would-be inward investors), can be accessed to support the Renewables Industry.

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[1] https://www.ge.com/renewableenergy/wind-energy/offshore-wind/haliade-x-offshore-turbine

[2] https://www.siemensgamesa.com/en-int/newsroom/2020/05/200519-siemens-gamesa-turbine-14-222-dd

3.4. Although the UK has left the EU, the other potential North Sea offshore wind developing countries have not and are still subject to EU renewable energy targets. Moreover, the UK Government has adopted '*The Ten Point Plan for a Green Industrial Revolution*'[3]. Under this Plan, the Government is committed to producing 40GW of offshore wind by 2030 and to facilitate this the Government has set out its support for ports and manufacturing infrastructure in order to create high quality employment in coastal regions.

National

3.5. The UK's EU target of 15% for renewable energy is to be met primarily by increasing the amount of electricity generated from renewable sources from 5.5% to about 30%. In addition, the Climate Change Act 2008 requires the UK to reduce carbon emissions by 80% of 1990 levels by 2050. The National Policy Statements for Overarching Energy (EN-1), Renewable Energy (EN-3) and Ports set out the government's policy on the need for additional port capacity to enable renewable energy-related activities.

3.6. The need for all forms of electricity generation is unequivocally stated as urgent. The Overarching Energy NPS EN-1 states that *'the IPC should therefore assess all applications for development consent for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them in this Part*', (paragraph 3.1.3). The Ports NPS then states that (paragraph 3.5.1) '*the decision-maker should accept the need for future capacity to ... support the development of offshore sources of renewable energy'*.

3.7. As the body with the sole authority to lease the sea bed between the UK territorial limit and the continental shelf, the Crown Estate has conducted three rounds of applications for offshore windfarm sites, the first two of which are under development. Able's proposed development is ideally located for the three largest sites allocated in Round 3, which between them could support over 20GW of electricity generation capacity, which would require over four thousand 5MW wind turbines.

3.8. The Department for Energy and Climate Change issued a 'prospectus' in September 2009 listing potential port sites that could supply these offshore sites. Of the sites identified, Able's Humber site has the benefit of being the largest in terms of availability of onshore land. Large scale development is necessary if a complete supply chain is to operate at a single site, and thus deliver maximum economic and environmental benefits.

3.9. In August 2011 the UK Treasury granted Enterprise Zone (EZ) status to the Humber Estuary Renewable Energy Supercluster. Part of the aim of this EZ is to incentivise large-scale manufacturers to locate at AMEP, through the provision of Enhanced Capital Allowances (ECAs). The Humber Estuary EZ encompasses 248 hectares of AMEP and is the largest site of its type in the UK. A further 25 hectares, also within the EZ, will provide Rate Relief for companies locating within the AMEP supplier park. This demonstrates the recognition by the Government of a need for development of renewable energy infrastructure in the EZ area. This need would be fulfilled in part by the AMEP project.

[3] https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution

3.10. In his Autumn Statement (29th December 2011), the Chancellor announced Government's support for the Humber as a Centre for Offshore Renewable Engineering (CORE). This will represent a partnership between Central and Local Government and the Humber Local Enterprise Partnership to ensure that businesses looking to invest in manufacturing for the Renewables Industry receive the most comprehensive support possible. Only five UK geographic locations have been selected for this important and strategic classification.

3.11. Despite their age, the National Policy Statements for Overarching Energy (EN-1), Renewable Energy (EN-3) and Ports are all still in effect, although the energy NPSs are being reviewed this year.

3.12. In 2019, the government increased the 2050 emissions target from an 80% reduction of 1990 levels to 100% reduction, i.e. net zero. Since 2011 it also introduced a target of 30GW of offshore wind capacity by 2030, which was increased to 40GW in 2020. The need for renewable electricity generation is therefore much stronger than before.

3.13. The Crown Estate has since announced its preferred sites for a fourth round of offshore wind development, although the total constructed and consented under the first three rounds so far, plus the fourth round, does not reach the 40GW target so further offshore wind projects will be needed.

3.14. In March 2021 the government announced eight freeports to be created in England and one of these (Humber region) encompasses AMEP, and in the budget a few days later, AMEP was specifically referred to in the main budget document thus[4]:

"The government will make an offer of support, in principle, to the Able Marine Energy Park on Humberside following the conclusion of the competition to upgrade ports infrastructure for the next generation of offshore wind."

3.15. The national case for a harbour to deliver offshore wind infrastructure has thus become much stronger since the original DCO application.

Regional

3.16. Regionally, the site is in the Yorkshire and Humber Region and is covered by the May 2008 Yorkshire and Humber Plan Regional Strategy to 2026. Section 2 of this states that *'Further development of the Humber Ports should be realised within the context of the RSS's objective of maintaining the integrity of internationally important biodiversity sites such as the Humber Estuary cSAC, SPA and Ramsar site.'* Note that the regional strategy is likely to be abolished in around April 2012 following the enactment of the Localism Bill.

3.17. Regional strategies were indeed abolished in 2012.

Local

3.18. Locally, the proposed Marine Energy Park site is wholly within the boundary of North Lincolnshire Council (NLC), which is a unitary authority. The site forms part of the 'South Humber Bank Industrial Area', which is *'unique in that it is the UK's last development site*

[4] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/966868/BUDGET_2021_-_web.pdf, paragraph 2.135

fronting a deep water channel. The site, although largely greenfield and isolated from a main built up urban area, is located within an existing industrial port landscape'.

3.19. The land is within the area designated as the South Humber Bank for the purposes of policy LC20 – South Humber Bank Landscaping Initiative.

3.20. NLC is committed to realising the maximum development potential of the South Humber Bank, stating that *"The South Humber Bank Industrial Area is proposed for industrial development principally because the land is allocated adjacent to a deep water channel of the River Humber. The site therefore has special potential for estuary related industry to locate there"*.

3.21. The proposed facility will therefore fulfil needs identified through policy at various levels of government.

3.22. North Lincolnshire Council's Core Strategy[5] remains in place, with the South Humber Bank identified for development under policy CS12. The policy refers to the improvement of the A160/A180 at Immingham, which has subsequently been authorised by its own DCO and is now operational.

4. Statement pursuant to Regulations 5(2)(p) and 6(3) of the Regulations

4.1. (This text replaces the original text rather than supplementing it). The granting of the material amendment to the Development Consent Order is desirable in the interests of facilitating the efficient and economic transport of goods by sea. The revised quay, harbour and the associated development will provide a unique facility to support the necessary expansion of the offshore renewable energy sector in the North Sea which is supported by UK Government policy. The facility will enable marine energy components to be shipped to the new facility and assembled onsite. The facility will also provide the capability for assembled generators to be loaded onto specialist ships for installation at sea.

4.2. The reconfiguration of the facility will mean that the transport of such goods – offshore energy components – will be economic, and the proximity of the site to several of the Crown Estate Round 3 and now Round 4 North Sea sites means that the transport of goods will be efficient. The reconfiguration would make the transport of goods more economic and efficient because the quay would be the optimal shape for vessels to transport the latest and future generations of marine energy components.

[5] http://www.planning.northlincs.gov.uk/planningreports/corestratergy/adopteddpd/FullCoreStrategy.pdf