

# **NeuConnect**

**UK – GERMANY**

**HDVC INTERCONNECTOR**

**PCI Concept for Public Participation**

**June 2020**

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## 1. Introduction

### NeuConnect

NeuConnect is a proposed 1400 Mega Watt (MW) High Voltage Direct Current electricity (HVDC) interconnector connecting the British and German transmission systems connecting at Grain West 400 kV substation at the Isle of Grain, Kent, United Kingdom and Fedderwarden substation near Wilhelmshaven, Germany.

NeuConnect Interconnector is being developed by an international, experienced consortium that includes Meridiam, Allianz Capital Partners on behalf of Allianz Group and Kansai Electric Power, with the project also supported by Greenage Power and Frontier Power as developers. The key partners bring a proven track record in delivering largescale energy infrastructure, creating a team with significant experience and expertise in interconnector projects.

NeuConnect was included in the Union List of Projects of Common Interest (PCI) under The Regulation for the Trans-European Energy Infrastructure (EU 347/2013) (hereby referred to as the TEN-E Regulation) on 31st October 2019. The list was adopted by Commission Delegated Regulation (EU) 2020/389 and NeuConnect is therefore a PCI.

NeuConnect will cross through three Member States which are the United Kingdom, the Netherlands and Germany, whilst also passing through the territorial waters of a third – the Netherlands. The nominated National Competent Authorities, which required to coordinate and facilitate the “Comprehensive Decision” on the project for each territory, are as follows:

- **UK:** Marine Management Organisation (MMO)
- **Germany:** Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen (BNetzA)
- **The Netherlands:** Ministry of Economic Affairs

Further information on the requirements of the NCAs can be found in Article 8(1) of the TEN-E Regulations.

For the purposes of transparency and ensuring public participation in the permit granting process, Article 9(3) of the Regulations requires a promoter of a PCI project to submit a Concept for Public Participation, which is to be in accordance with the manual of procedures for the permit granting process published by each Member State. In the United Kingdom this document is the *Manual of Procedures: The permitting process for Projects of Common interest in the UK published May 2014* (the "**Manual of Procedures**").

This Concept for Public Participation document has been produced to inform the Marine Management Organisation (MMO), acting on behalf who are the National Competent Authority ("**NCA**") for the UK designated on behalf of the Secretary of State for Business Energy and Industrial Strategy, how the requirements of Article 9 of the Regulations shall be satisfied in accordance with the procedures provided for in the Manual of Procedures.

The consultation and engagement programme has included and will continue to include stakeholder engagement, proactive engagement with consultees, the media and the general public. Early discussion of strategic options with local authorities was undertaken ahead of public engagement to aid the scoping and assessment of options for the project. This approach meets NeuConnect's obligations under the Regulations and the consenting regimes in the respective Member States.

NeuConnect has and will submit report(s) on the consultation alongside the relevant onshore consent and marine license applications in each of the Member States summarising the results of the public consultation activities as required by Article 9(4) of the TEN-E Regulations.

A separate Concept for Public Participation has been produced for both GB and Germany, both of which can be found on the respective project websites detailed below:

- [www.neuconnect.eu](http://www.neuconnect.eu)
- [www.neuconnect.eu/de](http://www.neuconnect.eu/de)

## Project Overview & Description



**Figure 1: Project Route Corridor Overview**

NeuConnect will consist of two high voltage subsea cables and two high voltage underground cables, together with a fibre-optic cable for telemetry purposes, connected to a Converter Station and substation in both Great Britain and Germany, allowing up to 1.4GW of electricity to move in either direction. NeuConnect will be made up of the following elements:

### The North Sea

A pair of HVDC submarine cables and associated fibre-optic cable extending for approximately 700km between the UK and German coastlines, passing through the UK, Dutch and German Economic Exclusive Zones (EEZs). Where possible, the subsea cables will be buried in trenches under the sea floor. Where trenches cannot be excavated, the subsea cables will be protected using alternative protection systems.

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The two cables will be installed using a cable laying vessel or barge. Where possible, the subsea cables will be buried in trenches under the sea floor. Where trenches cannot be excavated, the subsea cables will be protected using alternative protection systems.

The high voltage subsea cables will be brought ashore at landfall locations in GB and Germany. Underground Joint Transition Chambers (JTCs) will be required at each landfall location to bring the subsea cables ashore and connect them to DC cables that will run underground from the landfall location to the converter station.

## The UK

- Approximately 270km of HVDC submarine cables within the UK EEZ;
- Approximately 2km of HVDC onshore underground cables from the coast in the UK to a Converter Station at the Isle of Grain
- A Converter Station at the Isle of Grain to convert electricity between Direct Current (DC) and Alternating Current (AC)
- High Voltage Alternating Current (HVAC) underground cables from the Converter Station to a new 400kV substation called Grain West at the Isle of Grain in Kent

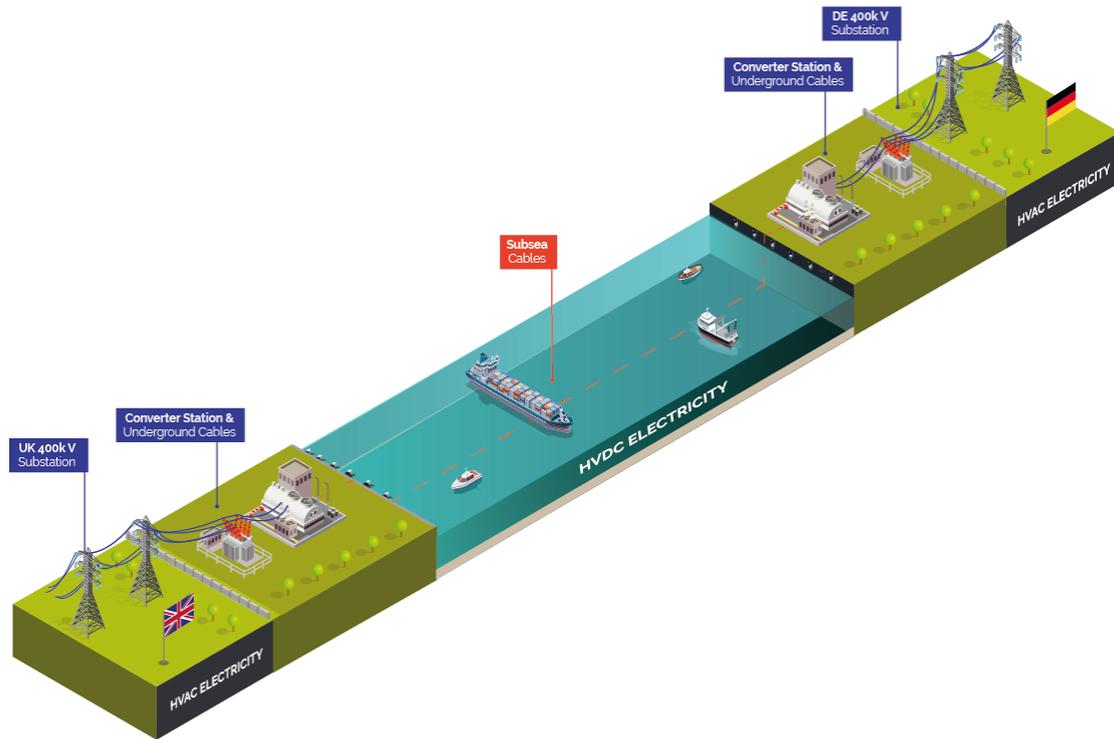
## The Netherlands

- Approximately 220km of HVDC submarine cables within the Dutch EEZ

## Germany

- Approximately 210km of HVDC submarine cables within the German EEZ
- Approximately 12.5km of HVDC onshore underground cables from the coast at Hooksiel to a Converter Station at Fedderwarden, Germany
- A Converter Station at Fedderwarden to convert electricity between Direct Current (DC) and Alternating Current (AC)
- High Voltage Alternating Current (HVAC) underground cables from the Converter Station to the existing Fedderwarden substation
- New equipment within the existing Fedderwarden substation

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**Figure 2:** Key elements of the NeuConnect Interconnector

## 2. Public Consultation Process in the United Kingdom

### Pre-Application Consultation

#### The Planning Process

The GB onshore and the GB offshore elements of NeuConnect Interconnector will be consented by separate bodies and pursuant to different legislative frameworks. Planning permission pursuant to the Town and Country Planning Act (TCPA) 1990 granted by Medway Council, the relevant local planning authority, will be required for the onshore elements. A marine licence pursuant to the Marine and Coastal Access Act (MCAA)2009 issued by the MMO will be required for the GB offshore elements.

It is noted that there is an area of crossover between the onshore and offshore consenting regimes, with the area between the mean low water mark and the mean high watermark, known as the intertidal area, being subject to both TCPA and MCAA permissions.

NeuConnect is fully aware of the benefit of undertaking early and comprehensive pre-application consultation with all relevant stakeholders and persons and considers consultation to be of vital importance to the success of the proposals. In particular, NeuConnect is aware of UK government guidance in relation to consultation which provides as follows in relation the onshore and offshore elements:

#### National Planning Policy Framework (NPPF)

The UK Government's National Planning Policy Framework which sets out their planning policies and how these are expected to be applied states that "*early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.*"<sup>1</sup>

#### Marine Policy Statement (MPS)

The UK Government's Marine Policy Statement, which provides the framework for taking decisions affecting the marine environment, states "*decisions should ... be taken after*

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<sup>1</sup> Paragraph 188 of the National Planning Policy Framework, March 2012

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*appropriate liaison with terrestrial planning authorities and other regulators and in consultation with statutory and other advisors where appropriate".<sup>2</sup>*

## Stakeholder Engagement & Scope of Consultation

NeuConnect have consulted and will continue to consult with stakeholders and communities who are potentially likely to be affected by, or interested in, either or both of the GB Onshore and GB Offshore elements of NeuConnect Interconnector to ensure they have the opportunity to consider and inform the proposals.

In broad terms, the relevant stakeholders and communities who may be likely to be affected by the proposals for NeuConnect are those who live or work in the vicinity of the proposals. Details of the stakeholders and other consultees who have been consulted and the manner in which they were consulted are set out in the table below:

Onshore Consultee(s)	Mechanism for Consulting
<b>District / Borough Council, Unitary Authorities &amp; County Councils, specifically:</b> <ul style="list-style-type: none"><li>Medway Council</li></ul>	Meetings with planning officers are ongoing and are expected to continue throughout the pre-application process.  We are also actively sharing information and consulting elected members at relevant authorities through a combination of written materials, telephone and face-to-face discussions, events and online materials.
<b>Members of Parliament</b> <ul style="list-style-type: none"><li>Kelly Tolhurst, MP for Rochester &amp; Strood</li></ul>	Via postal, electronic and telephone correspondence, supplemented with face-to-face meetings, as required.
<b>Department for Business, Energy &amp; Industrial Strategy / Relevant Government Ministers</b>	Via postal, electronic and telephone correspondence, supplemented with face-to-face meetings, as required.

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<sup>2</sup> Paragraph 2.3.2.2 of the UK Marine Policy Statement, March 2011

<p><b>Members of European Parliament</b></p>	<p>Via postal, electronic and telephone correspondence, supplemented with face-to-face meetings, as required.</p>
<p><b>Parish Councils</b> - Isle of Grain Parish Council</p>	<p>Via postal, electronic and telephone correspondence, supplemented with face-to-face meetings, as required.</p> <p>We will also be inviting Parish Councils to attend a public exhibition event in their local area.</p>
<p><b>Landowners &amp; Tenants</b></p>	<p>Via postal, electronic and telephone correspondence, supplemented with face-to-face meetings, as required.</p>
<p><b>Interest / Third Party / Community Groups</b></p>	<p>Via postal invitations to attend a public exhibition in their local area and, where appropriate, through individual stakeholder meetings.</p> <p>Additional consultation will include postal, electronic and telephone correspondence, supplemented with face-to-face meetings with local interest / third party / community groups, as required.</p>
<p><b>Ofgem &amp; Other Statutory Consultees</b></p>	<p>Via postal, electronic and telephone correspondence, supplemented with face-to-face meetings, as required.</p>
<p><b>Members of the public and / or businesses situated in the vicinity of any</b></p>	<p>Via postal invitations to attend a public exhibition in their local area. The invitations</p>

<p><b>cable route options / landfall locations / converter station locations</b></p>	<p>will also include contact details should they wish to request further information.</p> <p>The project website, freephone information line, consultation email address and freepost response service will provide further mechanisms for ongoing participation from local residents and businesses.</p>
<p><b>General Public</b></p>	<p>Via the project website and local media coverage and/or media advertising. The project website will remain operational for the duration of the pre- and post-application process and will include details of the public consultation events.</p> <p>Freephone information line, consultation email address and freepost response service will provide further mechanisms for ongoing participation from the wider public.</p>

Prior to undertaking full public consultation on the UK Onshore elements of NeuConnect was undertaken in two phases, NeuConnect presented high-level information on all UK onshore elements of the project to stakeholders and the local community. This included undertaking the following stakeholder engagements:

Date	Body	Attendees
05.11.2018	Medway Council	Elected members Planning officers
11.12.2018	Rural Liaison Committee	Medway Council elected members and officers Parish Council representatives from all 11 PCs within Medway

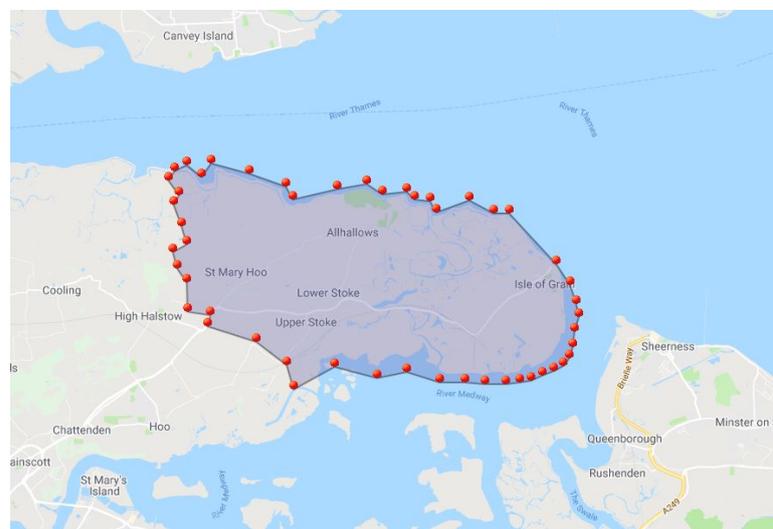
28.02.2019	Isle of Grain Parish Council	Elected members Parish clerk
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A public information event was held on Wednesday 21<sup>st</sup> November 2018 to display the initial proposals for NeuConnect between 3.00pm and 7.00pm at Grain Village Hall, Chapel Road, Isle of Grain and was attended by approximately 35 individuals.

The event provided attendees with the opportunity to view the high-level proposals for the project, including potential onshore cable routes, location of the proposed Converter Station and substation, and location of the landfall, together with information about the need for and benefits of interconnectors, details of the relevant planning processes and anticipated timescales for the project.

## Invitations & Consultation Zones

An invitation newsletter was distributed to 2,120 households and businesses in the local area advising them of the proposals and the events and contained information about NeuConnect, an overview of and background to the project, and information on the need for and benefits of interconnectors. The invitations were sent to those homes and businesses thought to be most affected by the proposals within the immediate vicinity and were distributed on Thursday 6<sup>th</sup> June. The following map illustrates the distribution area.



**Figure 3:** A map depicting the area targeted in the public consultation invitation newsletter distribution area

## Public Participation

NeuConnect held two public consultation events to display its final proposals on Thursday 20<sup>th</sup> June 2019 between 4.00pm and 8.00pm, and on Saturday 22<sup>nd</sup> June 2019 between 11.00am and 4.00pm. Both events were held at Grain Village Hall, Chapel Road, Isle of Grain and were attended by 28 individuals, with invitations issued to the same mailing area as for the public information event (see Figure 3). Both events were attended by representatives of NeuConnect, project engineers, environmental consultants and community relations advisers.

Both events displayed details about the final proposals and gave the opportunity for attendees to provide their feedback ahead of submitting a TCPA application to Medway Council. The information presented included a background to NeuConnect, an overview of the project, information on the need for and benefits of interconnectors, GB offshore elements (including landfall and cable corridor), GB onshore elements (including cable route, Converter Station and substation), highways and environment, environment & ecology works and anticipated project timescales using both exhibition boards and an information leaflet about the project.

In order to generate additional feedback from the local community, NeuConnect sent a copy of the information leaflet, together with a copy of the feedback form, to 681 households and businesses in Grain village to provide the community with a further opportunity to comment on the proposals.

This was followed by a community canvassing session conducted on High Street, Isle of Grain on Monday 15<sup>th</sup> July 2019 from 4.30 – 7pm. Both methods boosted engagement levels and generated additional feedback responses from members of the local community.



**Figure 4:** A map depicting the area targeted in the post-exhibition distribution area

## UK Offshore Consultation

Development of the UK Offshore elements has been undertaken through ongoing consultation with specific organisations that have statutory and/or non-statutory responsibility for, or an interest in, the area(s) that were considered for the offshore cable route corridor, which enabled a preferred corridor to be identified. The stakeholders consulted include:

- Centre for Environment, Fisheries and Aquaculture Science (CEFAS), including Coastal Process, Benthic Ecology, Fisheries, Shellfisheries
- Crown Estate
- Environment Agency
- Fishermen Associations and organizations: National Federation of Fishermen's Organizations (NFPO), Clacton Fishermen's Association, Queenborough Fishermen's Association, Orford and District Fishermen's Association, Felixstowe Ferry Fishermen's Association, Harwich Fishermen's Association, Thames Fishermen's Association / Leigh Port Partnership, Lowestoft Fishermen's Association, Swale Fishermen, Thanet Fishermen's Association, Five independent fishermen/companies
- Historic England
- Joint Nature Conservation Committee (JNCC)
- Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA)
- Local harbour authority

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- Maritime and Coastguards Agency
- Ministry of Defence
- MMO
- Natural England
- Peel Ports London Medway (Local Harbour Authority)
- Royal Yachting Association
- The SUNK User Group
- Trinity House

## EIA Scoping Input

A statutory EIA under the terms of the Marine Works (EIA) Regulations 2007 (with reference to Annex I and II of Council Directive 85/337/EEC), is not required for the GB Offshore Scheme. This has been confirmed by the Marine Management Organisation (MMO) (see ENQ/2019/00012).

Notwithstanding this, in order to provide the MMO with relevant information to assess and understand the likely impacts of the proposed activities, a voluntary non-statutory Environmental Appraisal (EA) has been prepared. The scope of the EA was discussed and agreed with the MMO and their statutory advisors (see ENQ/2012/00012).

## UK Onshore – Planning Application

The consultations required to be undertaken following the submission of the application file are provided by the statutory regimes relevant to both the GB onshore and GB offshore elements of NeuConnect Interconnector. The requirements for each regime are set out below:

Following receipt of a TCPA planning application, Medway Council was required to undertake a period of consultation where further views can be given on the application. As part of this process, Medway Council consulted with a variety of different groups, including:

- Neighbouring residents and community groups
- Statutory consultees, where there is a requirement set out in law to consult a specific body who have a duty to respond to the proposal
- Non-statutory consultees who are likely to have an interest in the proposals but are not designated in law

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In addition, Medway Council was required to publicise the application and consultation period via a number of means, including:

- By site display in at least one place on or near the land to which the application relates for not less than 21 days
- By publication of the notice in a newspaper circulating in the locality of the land to which the application relates
- By publication of prescribed information on a website maintained by a relevant local planning authority

As the GB onshore elements are to be the subject of a voluntary Environmental Impact Assessment (EIA) and accompanied by an ES, Medway Council is required to determine the applications within the statutory time limit of 16 weeks, unless a longer period is agreed between the authorities and the applicant.

## **UK Offshore – Planning Application**

Further consultation will also take place on the GB Offshore elements of NeuConnect including:

- Publication in two local newspapers for two consecutive weeks, and in the Fishing News, a notice containing prescribed information (5 notices in such newspapers or other publications as it thinks fit);
- Supplying copies of the Marine Licence application; the environmental appraisal; any further information; and a letter stating that representations in response to the consultation should be made in writing to the MMO within 28 days of the date of such letter, to such consultation bodies as it considers appropriate;
- Supplying a copy of the environmental appraisal to an European Economic Area (EEA) State if that EEA State requests it; and
- Consulting the authorities of any EEA State to which information has been provided;

## 3. Public Consultation Processes in Germany and the Netherlands

### Public participation steps undertaken for the project in the Netherlands (pre-PCI status)

In the Netherlands, the project is a fully offshore project which falls within the exclusive jurisdiction of Dutch national authorities. As such, certain stakeholders which could potentially be affected by PCI projects will not be affected by the NeuConnect project. This concerns the following stakeholders listed in Annex VI under 3 under a of the TEN-E Regulation: regional and local authorities, landowners and citizens living within the vicinity of the project.

The relevant stakeholders for the NeuConnect project, national authorities, the general public and their associations, organisations or groups, were engaged in public participation in the following ways:

- The intention to undertake the project was announced by the Dutch marine authorities (RWS) together with a document setting out the purpose and preliminary timetable of the project, alternative routes considered, expected impacts, and possible mitigation measures. This information document, called the EIA scoping document, was published in the Dutch national gazette. The general public and any interested party could submit views on the intention to undertake the project and the document. One view was submitted by a party owning assets along the proposed route for the NeuConnect cable;
- In addition, relevant government bodies and governmental advisory bodies, including the EIA Commission, were consulted and asked for advice in relation to the information document;
- On the basis of these consultations, RWS determined the scope and detailing of the EIA required for the project. It is customary in the Netherlands to combine the TENE public participation steps with the EIA procedure; and
- Relevant stakeholders were invited for one-on-one sessions to discuss the plans for the project and to gain insight into any objections or concerns these stakeholders might have. The relevant stakeholders the project met with include the Ministry of Economic Affairs and Climate Change, the Ministry of Agriculture, Nature and Food Quality, the Ministry of Defence, the Coastguard, the Dutch Enterprise Agency, Dutch and Danish Fishing Associations, the Gemini Offshore Wind Farm, the Dutch chapter of Bird Life International and oil and gas asset owners along the project route.

After submission of the permit applications, additional public consultation steps will take place. The EIA and the draft permits will be published for public inspection during which all interested parties may submit their views. The final permits will also be published and made available for public inspection.

## **Public Consultation process in Germany**

A full Concept for Public Participation document, setting out the public consultation process which has taken place in Germany has been prepared for NeuConnect. The document, "KONZEPT ZUR ÖFFENTLICHKEITSBETEILIGUNG IN DEUTSCHLAND" will be available on the <https://neuconnect.eu/de> website.

In summary, according to Art. 9 Para. 4 in conjunction with Annex VI points 3, 5 and 6 TEN-E VO, the public must be involved at least once within the framework of the pre-proposal section. To implement this required public participation, a public information event took place on August 16, 2019 in the Hotel Atlantik in Wilhelmshaven, Germany.

Further details of the engagement process are set out in the Germany CfPP document, which is available at <https://neuconnect.eu/de>.

## 4. Ten-E Compliance

The table below demonstrates how NeuConnect has satisfied the requirements set out in the TEN-E Regulation UK Manual of Procedures, including the following Regulations: 4.1.1, 4.2.1 – 4.2.5, 4.3.1 – 4.3.9, 4.4.3, 4.5.1 – 4.5.5 and 4.6.5.

Requirement	Detail	Comment
<b>Creation of a dedicated project website</b>	Separate member state specific websites have been established for both the GB and onshore elements and are available at <a href="https://neuconnect.eu/">https://neuconnect.eu/</a> and <a href="https://neuconnect.eu/de">https://neuconnect.eu/de</a> and are regularly updated	Requirement completed
<b>Publication of a Project Information Leaflet</b>	Separate information leaflets have been prepared in both English and German and are available at <a href="https://neuconnect.eu/">https://neuconnect.eu/</a> and <a href="https://neuconnect.eu/de">https://neuconnect.eu/de</a>	Requirement completed
<b>Publication of Non-Technical Summary</b>	Separate NTS' being produced in English and German	To be made available in due course
<b>GB Public Participation Events</b>	Consultation was undertaken in June-July 2019	Requirement completed
<b>Other Member State Public Participation Events</b>	Public consultation in Germany was undertaken in August 2019, within two months of the commencement of GB public consultation	Requirement completed

NeuConnect confirms its compliance with the TEN-E Regulations requirements in respect of:

- The establishment of a dedicated project website with links to the European Commission's website
- A Link to the Department of Business, Energy and Industrial Strategy's website on which the TEN-E UK Manual of Procedures has been published
- The production of a Project Information Leaflet of 15 pages or less, and

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- Commencement of public consultation in each Member State within the required two month period.

Further information about the project can be found by visiting the NeuConnect project website at:

- <https://neuconnect-interconnector.com> (English)
- <https://neuconnect-interconnector.com/de/> (German)