



Netherlands Enterprise Agency

# *Structural Vision for Offshore Wind Energy*

*Commissioned by the ministry of Climate Policy and Green Growth*

*Unofficial translation for convenience only*

*>> Sustainable. Agricultural. Innovative.  
International.*

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The President of the House of Representatives  
of the States General  
Prinses Irenestraat 6  
2595 BD THE HAGUE

Date August 7, 2025  
About Structural Vision for Offshore Wind Energy (SV WoZ)

Dear Mr President,

The Government recently informed the House of Representatives about the challenging market conditions for upcoming offshore wind energy projects.<sup>1</sup> The Government also recognises challenges in the realisation of offshore wind farms that have already been permitted. Through this letter, the Government informs the House about the permit amendment for the wind farm at the IJmuiden Ver Beta site (2 GW). This permit was granted in June 2024 to Zeevonk, a consortium of Vattenfall and Copenhagen Infrastructure Partners (CIP).<sup>2</sup> Such a permit change is not common, but the Government considers it necessary to achieve the energy targets and minimise the financial consequences for both the Government and TenneT. You were previously informed about this confidentially by letter, as this information was still commercially sensitive at the time.

#### **Reason: Delta Rhine Corridor delay**

Zeevonk was originally supposed to build a 2 GW offshore wind farm combined with a 1 GW electrolyser at the Maasvlakte to produce green hydrogen, in line with the permit that was drawn up based on the company's bid in the tender. This project was originally scheduled for completion at the end of 2029. In addition, Zeevonk was to make a major contribution to scaling up offshore solar energy by constructing a 50 MWp solar park within the wind farm. Finally, Zeevonk was to pay the Government €20 million annually for the entire 40-year permit period (a total of €800 million).

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**Our hallmark**  
KGG / 33 561

**Attachment(s)**

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<sup>1</sup> Parliamentary Paper 33 561, no. 84.

<sup>2</sup> Parliamentary Paper 33 561, no. 65.

Zeevonk has indicated that it is no longer financially and economically feasible to realise the project in accordance with the current permit due to the delayed completion of the Delta Rhine Corridor (DRC). The DRC was originally scheduled for commissioning at the end of 2028.<sup>3</sup> Via the DRC, it will be possible to transport green hydrogen produced at the Maasvlakte to customers in the Netherlands, Belgium and Germany. After the permit was awarded to Zeevonk, the Government announced that completion of the DRC has been postponed to 2032.<sup>4</sup> This delay limits the green hydrogen sales market to customers at the Maasvlakte, causing Zeevonk to miss out on a large portion of its expected revenue. Due to challenges in the electrification of, among other things, our energy-intensive industry,<sup>5</sup> Zeevonk will most likely be unable to bridge this period by selling electricity. Therefore, a delay in completion of the electrolyser is not sufficient to realise the project in its current form and further changes to the permit are required.

### Proposed permit changes

To adapt the project to these new circumstances and after carefully weighing the interests at stake, the Government has decided to fundamentally amend the permit, in addition to minor technical changes, on the following points:

1. Phased realisation: Zeevonk will build the project in two phases. The first 1 GW will be realised in 2029, in line with the current schedule. The second 1 GW will be realised in 2032, so completion of the wind farm will coincide approximately with completion of the DRC.

This phased realisation ensures that the wind farm will still count towards achieving half of the 2030 climate target. At the request of the Government, TenneT has already concluded contracts for construction of the offshore grid for the 21 GW Offshore Wind Energy Roadmap.<sup>6</sup> The phasing therefore has significant financial implications for TenneT, as the current contracts with offshore grid suppliers do not provide for this partial delay and new agreements must therefore be made. An estimate of the financial consequences for TenneT arising from the amended permit and the resulting planning and (interface) coordination was taken into account in the decision-making process. If the Netherlands Authority for Consumers and Markets (ACM) approves these additional costs, they will be incorporated into the grid tariffs, as these follow from a mandate from the national government.

2. System integration measures: The minimum mandatory capacity of system integration measures, such as electrolysers, will be reduced to at least 500 MW. Also, these measures will only be implemented in early 2033, once the DRC is

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<sup>3</sup> Parliamentary Paper 29 826, no. 198.

<sup>4</sup> Parliamentary Paper 29 826, no. 212.

<sup>5</sup> Parliamentary Paper 29 826, no. 234.

<sup>6</sup> Parliamentary Paper 33 561, no. 53.

available, so that green hydrogen can also be sold in the rest of the Netherlands and possibly to neighbouring countries.

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3. Reduction and postponement of financial offer: the total amount that Zeevonk has to pay will be reduced to €400 million. Zeevonk will pay the original offer of €20 million per year for the first two years (2024-2025), then nothing for a number of years, and from the time the wind farm becomes operational, Zeevonk will gradually pay more. Zeevonk will pay the most in the last permit years. The 2026 Draft Budget includes the net loss of revenue (totaling €400 million) in the budget.
4. Offshore solar: the requirement for the offshore solar park will be adjusted to an innovative project. This means that Zeevonk will realize a 6 MWp offshore solar park by 2028 at the latest. This is earlier than originally stipulated in the permit. In addition, Zeevonk will scale up the offshore solar park to a capacity of 50 MWp, if this is financially and technically feasible, as this innovative technology has not yet proven itself on a large scale.
5. Grid tariffs: the Government acknowledges that certain system integration measures, including electrolysers, can play a role in alleviating grid congestion and that they currently face relatively high grid connection costs. Therefore, the Government will continue to emphasise in discussions with ACM that the network tariffs for such systems will be appropriate to the role they play in the energy system, while also recognising ACM's role as an independent regulator.

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Zeevonk retains one permit for the entire project. To ensure Zeevonk can make two separate investment decisions, the Government has entered into a licensing agreement with Zeevonk to regulate enforcement of these two projects.

These changes are the result of extensive discussions with Zeevonk. In making these changes, the Government has sought to strike a balance between the financial consequences for the national budget and TenneT, policy objectives and the realisation of this project. One of the Government's conditions was that only permit changes that address the substantial negative impact of the DRC's delay would be implemented, and not to compensate for other possible setbacks or business risks. The Government therefore asked KPMG to investigate, based on Zeevonk's financial models, whether these permit changes are financially justifiable, given the financial and economic consequences for Zeevonk caused by the DRC delay. The results of this investigation are attached to this letter, with confidential business information redacted. KPMG concludes, among other things, that it is reasonable to compensate Zeevonk for the consequences of the DRC delay and that, based on an analysis of the project's return, the proposed permit changes do not appear to constitute overcompensation. The Government therefore considers the permit changes to be justified.

If these changes had not been implemented, Zeevonk would, in all likelihood, no longer be able to realise the wind farm. This would most likely lead to a request for the permit to be revoked, after which the wind farm would have to be reauthorised. This scenario leads to more delays in the realisation and the loss of almost the

entire financial offer of Zeevonk (€780 million, the first payment has already been received). Moreover, given the challenging market conditions for offshore wind energy, the Government currently expects little interest from other wind farm developers to build this wind farm. The financial consequences for the national budget and TenneT, and the impact on climate and energy targets, will therefore likely be greater in this scenario. Therefore the Government is convinced that the best solution is to allow the project to proceed in a modified form.

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### Legal context

The (rare) permit for construction of an offshore wind farm is issued to a party after going through a careful tender procedure. This is based on the legal framework established by the Offshore Wind Energy Act, not public procurement law. In this case, the wind farm was permitted using the tender procedure of a comparative test with a financial offer, in which Zeevonk and one other party submitted an application. Zeevonk received the most points, partly due to its commitment to system integration. As explained above, after the permit was granted, it became apparent that the DRC would be delayed. This prompted Zeevonk to object to the permit being awarded under the existing conditions, with the request to amend the permit.

In deciding on the permit amendment, the Government had to weigh up several interests. For example, the Government considers it important to achieve the 2030 energy targets and only wanted to make agreements with sufficient prospects for realisation of the wind farm. On the other hand, the Government also had to realistically weigh up the feasibility of Zeevonk's business case under the changed circumstances. The various scenarios (phasing, postponement, re-permitting) and their impact on TenneT's costs were also discussed. The Government has also had an assessment carried out of whether the other offer for this site could also be upheld under these circumstances, which would likely not be the case.

Normally, a permit can be amended based on the policy rule for amending the permit, with the condition for amendments being that the application's total score remains unchanged. In exceptional cases, this can be deviated from under the General Administrative Law Act.

Weighing all interests, the Government has concluded that – due to the commitment to both a wind farm and an electrolyser at this specific site, and thus the dependence on the DRC for all bids – amending the permit is justified. This does not preclude third parties from filing objections and appeals against the amendment decision.

The Minister of Climate Policy and Green Growth,  
S.T.M. Hermans



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