# European Commission's Guidance on designating renewables acceleration areas

WindEurope's response to the public consultation

## Permitting for renewable energy projects

The European Union wants to be climate neutral by 2050. **Wind energy will play the biggest role** in providing clean and competitive power: **it is set to generate 50% of Europe's electricity by 2050**. And wind energy will be key for Europe's energy security as mandated in the EU's REPowerEU strategy and the Wind Power Package.

However, **the EU is building only just over half the wind volumes it needs** to reach its objectives. The region built 16 GW in 2023 whereas it needs 30 GW annually to be in line with its 2030 renewables target.

The European Commission is aiming at 420 GW of wind energy capacity by 2030 up from 220 GW today. The key challenge holding back installations **remains permitting:** our experience is that none of the Member States currently meets the legally binding EU permitting deadlines. **Europe is not permitting enough new wind farms to meet the huge demand in renewables. Nor is it permitting them fast enough**.

EU law says new renewable energy installations should be permitted within 2 years and repowered ones within 1 year. **There have been improvements in some markets** since the introduction of the Emergency Regulation on Permitting in 2022 and the new rules agreed upon in the revised Renewable Energy Directive in early 2023.

Last year saw a surge in onshore permits handed out. Germany has rigorously implemented the EU Emergency Measures on Permitting. The application of the concept of "Overriding Public Interest" has proven highly effective to expedite projects entangled in legal disputes. Germany also exempted new projects in specific zones, previously covered by a broader Strategic Environmental Assessment, from the usual Environmental Impact Assessment similar to how acceleration areas would work. Spain increased the number of people working in permitting authorities. France, Greece and the region of Flanders also saw significant increases However, many other Member States have not taken any action when it comes to implementing the new good rules.

So **Member States can improve permitting in many aspects**. This could be by increasing staff, shortening deadlines and clearly defining steps and timelines within the administrative services involved, accelerating grid development, and facilitating flexible grid connection. **Those improvements must continue to be implemented as a matter of priority and in parallel to Renewable Acceleration Areas designation**. **Streamlining renewables permitting both in and outside acceleration areas** is key to Europe unlocking the renewables volumes required for its energy security and decarbonisation.

**Digitalisation** of permitting processes remains another key area of improvement in many countries. WindEurope, Amazon Web Services and Accenture have been working on software called EasyPermits that can contribute to the solution. EasyPermits can help public administration and local communities to embrace and speed up the whole permitting process. It has been tested successfully in Denmark and Poland already. After the test period it could be one of the digital tools applied to streamline permitting in Europe and elsewhere.

## Renewables Acceleration Areas

On top of the Renewable Energy Directive, the European Commission and national Energy Ministers committed to speeding up permitting of new and repowered wind plants the implementation of the Renewable Energy Directive in the European Wind Power Action Plan last October. And while permitting is a big bottleneck, the Environmental Impact Assessment (EIA) on its own usually is not the biggest obstacle. There are some exceptions such as in Italy, where it is managed at regional level, and the EIA does constitute the main bottleneck. But overall, it enables consultation and collaboration with local communities, increasing acceptance of the project.

If implemented properly and under the strict condition that no resources are diverted from permitting projects in other areas, Renewables Acceleration Areas may be one of the tools that can help to speed up permitting. It is positive that Member States are encouraged to actively think where to deploy renewables and not only to consider spatial constraints to renewables deployment. In Germany, for example, setting a national target for how much land is to be used for wind energy in the future has increased the pressure and willingness for the designation of additional areas in regional and land-use planning. Dedicated renewables areas as acceleration areas can mainly be positive when such areas have already undergone a strategic environmental assessment. However, when done incorrectly the designation of Renewables Acceleration Areas could slow down the expansion of wind significantly.

Having this in mind designating renewable acceleration areas need to consider the following issues:

### General principles

- The establishment of acceleration areas **should not lead to no-go areas**. They should in no instance prevent the development of renewable energy projects, even outside of acceleration areas, unless clearly forbidden for a well-defined reason and checked by the European Commission. There are already calls at national level that suggest this dynamic. In Portugal some stakeholders are arguing that projects outside of acceleration areas should not get any permits. In France the Law on the Acceleration of Renewable Energy Production introduced the right for municipalities that have defined a "sufficient" number of acceleration areas to define "exclusion areas". While in Italy local entities have interpreted areas outside of the renewables acceleration areas as no-go areas, even in instances where a project has received a positive environmental screening.

- The establishment of acceleration areas **should not slow down the ongoing permitting processes**. In Denmark, despite the long-term benefits acceleration areas might have, some projects have been delayed in several municipalities. They are waiting for the establishment of so-called energy parks (Danish equivalent of acceleration area). It would be better to go through the regular permitting process than to wait for the establishment of energy parks.

- Governments must ensure that permits for new projects are handed out within one year inside acceleration areas. If Governments do not stick to this deadline, establishing them makes no practical sense. Moreover, designating renewables acceleration areas should **not increase bureaucratic procedures** even further. This could lead to even slower permitting. There is already a lack of experts working on permitting and impact assessments at national levels. It is better for them to work on processing permit requests than defining acceleration areas. The lack of staff can especially be critical in smaller markets e.g. in Estonia where the State hired environmental experts for research to set up acceleration areas. Developers then could not find staff to do their impact assessments.

- Member States' mapping of renewable deployment areas should already be aligned with the **EU's 2050 Climate & Energy goals**. They need to consider climate neutrality, not only the 2030 objectives. Once acceleration areas have been established adding new ones could prove to be challenging.

## Recommendations on spatial mapping

- For onshore wind an efficient way of designating the acceleration areas would be to propose them in **precise zones**, possibly all zones already identified as not requiring environmental impact assessments, and easy to identify zones where environmental impact is limited. This could be areas such as harbours, degraded land, industrial land, along transport corridors.

- The identification of renewable acceleration areas should be based on **specific, transparent and objective criteria.** And they should be enacted in a consistent way with all previous regulations under RED II (particularly suitable areas mentioned in article 15 of Directive EU/2018/2001). Irrelevant legal constraints to the development of a wind farm should not be considered and overriding public interest as well as multi use of space should be applied. In Italy in some instances even if an area had no legal constrains from an environmental or landscape perspective, authorities have automatically disregarded designating such area as an acceleration area due to other constraints that were not necessarily relevant to the development of wind projects.

- **For offshore wind renewable acceleration areas are not needed in most countries**. Member States are already required to identify space for offshore wind development in their Maritime Spatial Plans. In any case, an overall consistency should be ensured between the Renewables Acceleration Area framework and other spatial planning tools (e.g. Maritime Spatial Plans).

- There **is no one-size-fits-all approach**. Introducing acceleration areas may be useful in some countries provided zero resources are diverted from approving projects outside acceleration areas. In others it might slow permitting down even further and create further opposition to renewable energy projects. France, for example, has previous experience establishing *Zones de Développement Eolien* (ZDE) which led to a drastic decrease in the number of wind farm authorisations.

- **Areas that already have wind farms in them should be prioritised**. These areas have already been subject to impact assessments. It would be ideal to use this impact already to facilitate easier permitting for **repowering** projects. Such a rule was already enshrined into legislation in Italy for areas with wind farms that have potential for repowering.

- Wind energy development depends on the precise assessment of the primary energy availability (wind resources). Such an **assessment is technically complex and time consuming**. Acceleration areas must reflect the wind potential for an effective deployment of renewables.

- Concerning grids, there is a difference between the time to define acceleration areas which might be below the time to plan grid development. This does not take away the need to also **accelerate grid development and to facilitate grid permitting.**

- Member States should pay particular attention to **the risk of speculation over land** within the perimeter of the renewable acceleration areas as such actions could end up increasing the overall cost of projects and slow down renewables development. The risk for speculation will be higher if the areas where developers can build any new projects are defined in a more limited way.

## Staff and tools

- **Tools should be provided to facilitate the identification of acceleration areas** such as a mapping portal, the right level of information and competency for the administration and municipalities to rely on common rules.

- Member States should lay out plans outlining a hiring strategy to **increase expert staff working on renewable acceleration areas**. There both has to be enough staff and knowhow to designate acceleration areas.