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Table of Contents

1. Introduction 4
2. Permitting: One of the Main Barriers to Renewable Deployment 9
   - Environmental and Land Use Challenges 9
   - Administrative Fragmentation 10
   - Excessive Duration and Procedural Complexity 12
   - Inconsistent Implementation 14
   - Insufficient Administrative Capacity and Lack of Practical Guidance 15
   - Stakeholder Consultation 17
   - RED III's Response: Streamlined Permitting within RAAs 17
3. Renewable Acceleration Areas under RED III: The Legal Framework 19
   - A Two-Step Approach: Mapping and Designation 19
   - The Designation Process: RAA Plans, Mitigation Rulebooks, and Strategic Environmental Assessment 20
   - Priority Areas and Mandatory Exclusions 22
   - Regulatory Benefits within RAAs 24
   - Relevance for the Energy Community Contracting Parties 26
4. Challenges in Designing Renewable Acceleration Areas 28
   - Data and Mapping Challenges 28
   - Environmental Constraints 29
   - Governance and Administrative Capacity 32
   - Stakeholder Participation 36
   - Lessons Learned from Early Implementation Projects 38
5. Support from Contracting Parties: The Energy Community Centre for Renewables Acceleration 41
   - Operational Foundations 41
   - Pilot Projects in the Western Balkans 42
   - Capacity Building for Spatial Planning and Permitting Authorities 42
   - Current focus and Next Steps 43
6. From Designation to Promoting Investments: The Role of Permitting during Early Implementation 46
7. Conclusion and Outlook 48

1. Introduction

Europe's energy transition has entered a decisive phase. The convergence of geopolitical pressures, energy price volatility, and the imperative to achieve climate neutrality by 2050 has made the rapid scaling of renewable energy not merely desirable, but strategically essential. The war in Ukraine and the energy market disruptions that followed have exposed the structural vulnerabilities of fossil fuel dependency and galvanised political will across the European Union and the Energy Community to act with greater urgency. In the Energy Community, the electricity sectors of the Energy Community Contracting Parties risk to be locked in domestic fossil-fuel generation following the entry into force of the Carbon-Border Adjustment Mechanism (CBAM), if not counterbalanced by rapid uptake of home-grown renewable energy.

The revised Renewable Energy Directive (RED III, Directive (EU) 2023/2413) reflects this imperative directly. For the EU, it increases the target to 42.5% renewables in gross final energy consumption by 2030,[2] which requires the EU to nearly double its renewable energy share within less than a decade. While the overall target for the Energy Community of 31%[3] remains unchanged for now, the goal to reach climate neutrality by 2050 is a shared one. Moreover, the tools available to achieve them – from national support schemes to fast-track permitting on the basis of designated renewable acceleration areas – are largely the same. To support the trajectory in the EU, installed wind and solar power generation capacity must double by 2030, reaching 510 GW and 592 GW respectively.[4] In the Western Balkans, the installed capacity for electricity generation from solar and wind sources is currently around 1.5 GW, or only 7% of their total installed capacity.[5] According to the National Energy and Climate Plans designed to implement their 2030 targets, the Western Balkans aim to add some 10 GW of wind and solar capacity to that,[6] i.e. by a factor much higher than in the EU. With the exception of Serbia, these national targets meet or slightly exceed the levels required by the Ministerial Council.[7]

Adding these additional capacities and meeting these targets is not a matter of resource availability: the solar, wind, hydro, and other renewable potential across the EU and the Energy Community is broadly well understood, and in many Contracting Parties, abundant. The same goes for investors' interest. Data from 2024 show that Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, and Serbia collectively hold a combined 23 GW of prospective utility-scale solar and wind capacity.[8] The binding constraint is increasingly administrative.

2 Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001 as regards the promotion of energy from renewable sources (RED III), OJ L 2023/2413, 31.10.2023, Art. 3.

3 According to Decision No 2022/02/MC-EnC of the Ministerial Council, the overall target is to be achieved by the sum of binding national contributions, of which those of the Western Balkan Contracting Parties are as follows: Albania 52.0%, Bosnia and Herzegovina 43.6%, Kosovo* 32.0%, Montenegro 50.0%, North Macedonia 38.0%, Serbia 40.7%.

4 European Commission, Commission Staff Working Document, Guidance on designating renewables acceleration areas, SWD (2024) 333 final, Brussels, 13.5.2024, p. 1.

5 https://www.nature.org/en-us/about-us/where-we-work/europe/stories-in-europe/operational-blueprint-europe-energy-community/

6 https://energytransition.rs/western-balkans-electricity-vision-for-2030/

7 Energy Community CBAM Tracker 2025, https://www.energy-community.org/topics/CBAM/tracker.html at page 21.

8 https://globalenergymonitor.org/research/race-top-western-balkans-2024-western-balkans-can-leapfrog-gas-solar-and-wind-power-clean

Renewable energy carries a structurally distinct cost profile from fossil fuels. Its close-to-zero variable costs and steadily declining capital expenditure mean that renewable electricity has historically been more price-stable than fossil fuel-based generation.[9] During the energy crisis of 2021-2023, the accelerated rollout of renewables demonstrated a concrete ability to reduce supply risks and moderate energy prices for citizens and businesses.[10] Greater renewable deployment thus directly supports strategic autonomy, reduces exposure to volatile international commodity markets, and contributes to long-term industrial competitiveness. For Energy Community Contracting Parties, the same logic applies with particular force: the Western Balkans remain significantly more dependent on fossil fuels than EU Member States, most notably on highly polluting coal and lignite.[11] The transition to renewables offers not only environmental benefits but a structural opportunity to reduce import dependency, stabilise domestic energy prices, and attract investment.

Today, one of the major obstacles to achieving the 2030 targets is the complexity and length of administrative procedures for granting permits to renewable energy projects and related infrastructure, not only in the EU but in particular in the Western Balkans.[12] These permitting bottlenecks hinder investment, slow project development, and reduce planning visibility for developers and investors alike.[13] They have been identified in successive EU legislative acts and policy communications as a systemic barrier requiring structural reform.[14] Administrative barriers have, if anything, become more prominent as technology costs have fallen and financing conditions have improved: the challenge of deploying renewables at speed is now as much a governance challenge as a technical or financial one.

RED III responds to this challenge in a comprehensive manner, addressing permitting bottlenecks particularly through Articles 15b to 16f. Among its most significant innovations is the requirement for Member States to designate Renewables Acceleration Areas (RAAs): specific geographic zones identified as particularly suitable for renewable energy development, where environmental conflicts are expected to be limited and manageable, and where individual projects can accordingly benefit from substantially streamlined and time-limited permitting procedures. By front-loading environmental and spatial assessment to the planning stage, RAAs are designed to reduce procedural complexity at the project level without compromising

[9] Commission Recommendation (EU) 2024/1343 of 13 May 2024 on speeding up permit-granting procedures for renewable energy and related infrastructure projects, OJ L series, 21.5.2024, recital (2).

[10] Ibid., recital (3).

[11] Energy Community CBAM Tracker 2025, https://www.energy-community.org/topics/CBAM/tracker.html at page 31.

[12] OECD (2022), Multi-dimensional Review of the Western Balkans: From Analysis to Action, OECD Development Pathways, OECD Publishing, Paris, https://doi.org/10.1787/8824c5db-en, at page 52. For a more detailed analysis see EIHP, Energy Community Study on Permit-Granting and Planning of Energy Projects in the Energy Community, https://www.energy-community.org/dam/jcr:5f01148d-597e-4845-90b4-36d64a51ad3c/EIHP_SEA_RESpermitting_062024.pdf

[13] Commission Staff Working Document - Guidance to Member States on good practices to speed up permit-granting procedures for renewable energy projects and on facilitating Power Purchase Agreements, SWD/2022/0149 final.

[14] Communication from the Commission, REPowerEU Plan, COM (2022) 230 final; ECLAREON et al., RES Simplify — Technical Support for RES Policy Development and Implementation, interim report, available at: https://op.europa.eu/en/publication-detail/-/publication/0e9db9fa-d653-11ec-a95f-01aa75ed71a1

environmental integrity. This constitutes a paradigm shift from reactive, project-by-project authorisation towards proactive, area-based planning.

The implementation of this framework is, however, deeply complex and politically contested. Transposition of the relevant RED III provisions has proceeded at markedly different pace across EU Member States. Not surprisingly, the interface between national administrative procedures related to spatial planning and permitting, on the one hand, and European law on the other turned out to be complex. The absence of coordinated exchanges between national and regional siting experts, limited methodological alignment, and insufficient integration of data, grid planning, and stakeholder engagement have created inefficiencies that may affect both legal compliance and public support for deployment. Even in the EU, there is thus a risk of significant delays in the implementation. [15] In this situation, it is important to complement legislative efforts with early action through pilot projects on the ground.

For Energy Community Contracting Parties, the challenges are structurally analogous, and in several respects more acute. While Contracting Parties are not yet formally bound by RED III's transposition deadlines, progressive alignment with the EU acquis is both a commitment and a strategic imperative, as expressed by the Recommendation of the Ministerial Council to advance with the implementation of Articles 15b to 15e and Articles 16 to 16f of RED III.[16] The practical difficulties of RAA designation (data gaps, institutional fragmentation, limited administrative capacity, and contested land-use decisions) mirror those faced across the EU, against a backdrop of generally weaker regulatory infrastructure and fewer dedicated resources.

Considering that all Contracting Parties are also candidates for accession to the EU, early implementation of the relevant parts of the RED III will also benefit the required alignment with the EU acquis communautaire and thus advance the enlargement process. There are two dimensions to this additional benefit:

Firstly, the Reform Agendas – nationally agreed conditionalities which upon fulfilment allow Contracting Parties to tap into the financial support made available under the EU's Reform and Growth Facility for the Western Balkans – identify the fast-tracking of renewable energy permits as stand-alone requirements. The individual Reform Agendas underline the importance of the matter across all six Contracting Parties but also reveal occurring delays:

In Albania, the Reform Agenda required amendments to the in-force regulations for the permit issuance to simplify permit issuance procedures for renewables (households and large installation) by June 2025;[17]

[15] SolarPower Europe, *EU Renewable Energy Permitting: State of Play* (16 July 2025), pp. 12, 16; CAN Europe and EEB, Renewable Acceleration Areas: Comparative assessment on the designation of RAAs in selected EU countries, Briefing, April 2026, p. 2.

[16] Recommendation 2024/1/MC-EnC on accelerating the deployment of renewable energy projects and implementing the energy efficiency first principle.

[17] Step 4.2.2.3. under ANNEX III to the Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans.

In Bosnia and Herzegovina, the Reform Agenda required the reduction of permitting procedures time for renewables (including households, public buildings and large installations) by 50% by June 2026 to enable faster deployment of renewables;[18]

In Kosovo*, the Reform Agenda envisaged the simplification of permitting procedures for renewables for households and large installations by December 2025;[19]

In Montenegro, the Reform Agenda required a study for the assessment of renewable energy potential by December 2024, including the analysis of locations from the aspect of development potential, conflicts with the environment and society, and the possibility of connection to the energy grid.;[20]

In North Macedonia, the Reform Agenda required the simplification of permit issuance procedures for renewables by reducing the timespan elapsed from the request to the permit issuance by 18 months for large installations, and by 6 months for households, public buildings and small consumers (by June 2026);[21]

In Serbia, the Reform Agenda envisaged the adoption of the legal and institutional framework for designating renewable acceleration areas and permit granting procedures in line with the Directive (EU) 2023/2413 by June 2026.[22]

Secondly, the fast-tracking of renewables, the designation of acceleration areas and the streamlining of permitting as promoted under the Reform Agendas and in the Energy Community also pursues strategic goals: these short-term objectives are necessary preconditions not only for access to EU finance and improving the investment conditions but also for the countries' much needed green industrial recovery, the reduction of fuel costs and the increased security of supply. In many instances, this nexus is reflected in the National Energy and Climate Plans, together with policies and measures for faster renewable energy uptake.

Another key objective and consequence of improved spatial planning and accelerated permitting for renewable energy projects is the support to the just transition agenda. Among many other benefits, the designation of RAA by public authorities offers the advantage of channelling investors' interests towards the designated areas, especially if combined with site-specific auctions or other eligible support measures. The legal framework governing the designation of RAAs (Article 15c RED III) places strong emphasis on areas particularly suitable for renewable deployment where significant environmental impacts are not expected, and requires the

[18] Step 1.6.1.2. under ANNEX VIII to the Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans.

[19] Policy Area 2b.3. under ANNEX IV to the Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans.

[20] Reform measure 2.3.2, Step 1, Activity 1.3. under ANNEX V to the Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans.

[21] Reform 2.3.2.1. under ANNEX VI to the Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans.

[22] Reform 7.1.5. under ANNEX VII to the Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans.

prioritisation of artificial/built surfaces, industrial sites, mines, degraded land etc. By focusing on these areas, the RAAs are likely to correlate with carbon-intensive areas affected by the phase-out of fossil fuels subject to just transition policies, as well as strategic planning instruments such as Just Transition Plans or Roadmaps.[23]In the light of the multiple strategic relevance of RAAs for the Contracting Parties in the Western Balkans – namely the accelerated uptake of renewables and decarbonisation of the energy and industrial sectors, just transition, security of supply and the enlargement process – this Advisory Note is meant to support national and local planning and permitting authorities. Its focus is threefold:

Set out the legal framework for RAAs under RED III;

Identify the key planning and permitting challenges that authorities must navigate in designing and implementing RAAs;

Introduce the support available from the Energy Community Centre for Renewables Acceleration, which has been established to provide targeted technical assistance and facilitate coordination throughout this process.

The Advisory Note builds on the legal provisions in RED III as well as on several existing guidance documents and studies. Challenges and reasons for delay outside planning and permitting – the subject-matter of the RED III provisions assessed here – such as grid connections, financing or access to hardware and raw materials – are not covered.

Key Message RAAs represent a structural shift in how renewable energy deployment is governed: from case-by-case project authorisation towards strategic, area-based smart planning. They can support key transformations, from decarbonisation and just transition to EU accession. At the local level, RAAs can turn these broader policy objectives into concrete spatial and investment opportunities, enabling municipalities to identify where renewable energy development is most suitable, align it with local development priorities and infrastructure, and provide greater certainty to communities and investors (bottom-up approach). Properly designed, RAAs allow authorities to front-load environmental and spatial assessment at the planning stage, reducing procedural complexity and legal risk at the project level without compromising environmental standards, while maximizing the local value of the investments. RAAs steer development towards low-conflict areas, and evidence suggests that these areas can provide enough renewable potential to meet, and in some

[23] Cf. Energy Community Secretariat, Policy Guidelines 01/2025-EnCS on Just Transition as part of integrated energy and climate planning.

2. Permitting: One of the Main Barriers to Renewable Deployment

Across Europe and the Energy Community, permitting procedures consistently rank among the most significant barriers to renewable energy deployment.[24] While the potential for solar, wind, hydro, and other renewable sources is broadly well understood, the ability to translate that potential into installed capacity is constrained not primarily by technology or financing, but by the length, complexity, and unpredictability of administrative authorisation processes. As the European Commission has observed, the "complexity, variety and often excessive duration" of permit-granting procedures "constitutes a major barrier to the swift and necessary deployment of renewable energy and to achieving a more affordable, secure and sustainable Union energy system".[25] This section examines five principal dimensions of that barrier as they manifest across the EU and Energy Community jurisdictions.

Environmental and Land Use Challenges

The need to reconcile accelerated renewable energy deployment with environmental protection and competing land-use objectives lies at the heart of RAAs instruments as designed by RED III. The rapid expansion of renewable energy has increasingly brought project development into interaction with environmental and biodiversity protection requirements, particularly where projects are proposed in environmentally sensitive locations. Environmental assessment procedures, including Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA), provide the EU legal framework through which such potential impacts are identified, assessed and addressed.[26] Where significant environmental concerns are identified, their resolution may require changes to project location or design and the development of appropriate mitigation measures, and may also become subject to administrative or judicial challenge.

At the same time, the flexibility already available under the EIA framework has not always been fully reflected in national permitting systems. In some cases, renewable energy projects have been subjected to environmental assessment requirements without sufficient differentiation according to their scale, location and likely environmental effects, including small-scale and rooftop solar installations. This can result in procedural requirements that are disproportionate to the environmental risks involved. For projects with limited and predictable environmental impacts, proportionate screening, clear thresholds and standardised or predetermined mitigation measures can provide a more efficient approach while maintaining environmental protection.

[24] European Commission, Technical support for RES policy development and implementation – Simplification of permission and administrative procedures for RES installations (RES Simplify) Interim report, https://op.europa.eu/en/publication-detail/-/publication/0e9db9fa-d653-11ec-a95f-01aa75ed71a1/language-en

[25] Commission Recommendation (EU) 2024/1343, recital (4).

[26] https://environment.ec.europa.eu/law-and-governance/environmental-assessments_en

This is precisely one of the challenges that RED III seeks to address through its streamlined permitting and environmental assessment framework.

Under the conventional project-by-project approach, however, there is no general requirement to first identify suitable areas for renewable energy development at the planning level, assess their environmental implications and establish the necessary mitigation measures before individual projects come forward. As a result, important questions concerning location, environmental sensitivity and appropriate mitigation may only be addressed once a concrete project enters the permitting process. RED III seeks to change this sequence through the RAA framework by moving a substantial part of this consideration upstream to the planning stage.

Where renewable energy development may affect Natura 2000 sites, the specific requirements of Article 6(3) and (4) of the Habitats Directive also apply. [27] Where significant effects cannot be excluded at screening stage, an Appropriate Assessment is required and, if adverse effects on site integrity cannot be excluded, the project may only proceed under the Article 6(4) derogation mechanism, subject to its strict conditions.[28] This requires a balancing of the need to preserve the integrity of the Natura 2000 network against circumstances in which a project nevertheless needs to proceed for imperative reasons of overriding public interest. Recognising the strategic importance of renewable energy deployment for climate, energy security and other public-interest objectives, RED III introduces a presumption that renewable energy projects are of overriding public interest for the purposes of this assessment. The presumption addresses this particular element of the Article 6(4) derogation mechanism, while the requirements concerning the absence of alternative solutions and compensatory measures remain applicable.

A separate challenge arises from competing land use and existing land-use restrictions, often related to land designated for agriculture, industrial use, tourism or urban settlements.[29] This affects in particular the priority areas for RAAs as identified by RED III. Many priority land categories cannot be used in practice without amendments to existing sectoral legislation. For example, Ukraine has no legal definition of "degraded agricultural land" and prohibits construction within road protection corridors or impose other land-use restrictions that effectively prevent renewable energy development.

Administrative Fragmentation

One of the most persistent features of permitting systems across Energy Community jurisdictions is the fragmentation of administrative responsibilities. A single renewable energy project may require authorisations from:

[27] https://environment.ec.europa.eu/topics/nature-and-biodiversity/natura-2000/permitting-procedure_en

[28] Where adverse effects on site integrity cannot be excluded, authorisation may nevertheless be possible under the derogation mechanism in Article 6(4), subject to three cumulative conditions: the absence of alternative solutions, the existence of imperative reasons of overriding public interest, and the adoption of all necessary compensatory measures to ensure the overall coherence of the Natura 2000 network.

[29] European Commission, RES Simplify, loc. cit. at page 41 (for wind projects).

- The national energy ministry or regulatory authority (grid connection, capacity allocation);
- Environmental protection agencies (environmental impact assessments, species and habitat surveys);
- Local and regional planning authorities (land-use permits, building permits);
- Grid operators (connection agreements, network studies);
- Cultural heritage bodies (where projects are located near protected sites);
- Water management authorities (for hydro and floating solar);
- Aviation and defence authorities (for wind turbines above a certain height).

Each of these authorities typically operates under its own legal framework, with its own timelines, documentation requirements, and internal decision-making procedures. Fragmentation can be particularly visible at municipal level, where responsibilities that are functionally part of the same permitting process may be divided between different departments or authorities. For example, the issuance of a building permit for a solar or wind project may require separate checks by the municipal planning department, the building-control or construction department, the environmental department, and, where applicable, the fire-safety or infrastructure department. A project developer may therefore be required to submit substantially overlapping technical information to several municipal bodies, with one department unable to finalise its decision until another has completed its assessment. In some cases, the municipality may also require a separate land-use or planning decision before the building permit can be issued, even though both procedures assess closely related aspects of the same project.

Moreover, administrative fragmentation does not end with the granting of the permit. The construction phase can generate a second layer of institutional fragmentation. Responsibility for monitoring compliance with the conditions attached to a building permit may rest with a municipal construction inspectorate, while environmental permit conditions are supervised by a separate environmental authority and grid-related infrastructure is inspected or approved by the relevant network operator. This can result in several authorities inspecting the same construction site at different stages, without a clearly designated body responsible for coordinating their findings. For example, a municipality may supervise whether the developer is constructing the foundations and ancillary structures in accordance with the approved plans, while an environmental authority separately monitors compliance with biodiversity or habitat-mitigation measures. If the two authorities apply different interpretations of the approved project documentation, the developer may be required to modify construction works or provide additional documentation despite having already obtained the relevant permits. Conversely, gaps

in the allocation of supervisory responsibilities may mean that no authority has a comprehensive overview of whether all permit conditions are being implemented in practice.

The consequences are significant. In the absence of a single permitting window or coordinating authority, developers must manage multiple parallel and often sequential procedures with limited visibility on overall timelines. The complexity of coordination at different levels of government is frequently cited as a main barrier, including by public authorities themselves, and institutional fragmentation compounds these challenges through weak coordination across the multiple ministries involved in renewable energy planning, creating communication gaps and inconsistent implementation approaches.[30] The European Commission has consistently identified effective multi-level coordination as a prerequisite for functional permitting systems, recommending that Member States design single contact points that "limit the number of authorities involved to what is necessary" while concentrating technological, environmental, and legal expertise, and that those contact points "mediate exchanges between project developers and other relevant authorities to ensure a uniform interpretation of permit-granting rules".[31]

In practice, progress has been uneven. Portugal illustrates the difficulty of coordination even where digital tools exist: environmental and municipal permits are processed on two separate platforms, SILiAmb and SIRJUE, which are not harmonised with one another and cause substantial delays as a result; a gap the government's EMER2030 taskforce is now working to close through a planned single one-stop shop.[32] A wider survey of EU Member States confirms that the scope and application of permitting measures change significantly from one region to the next, and that authorities at local and municipal level frequently lack the experience needed to handle complex energy project applications consistently.[33] The Commission's 2024 RAA Guidance warns explicitly that fragmented planning "risks creating a lack of clarity for renewable energy project developers and investors and could reduce support for the RAA designation process" more broadly.[34] For Energy Community Contracting Parties, where institutional coordination mechanisms are often less developed than in EU Member States, this fragmentation is a particularly acute constraint.

Excessive Duration and Procedural Complexity

Even where permitting responsibilities are clearly allocated, the procedures themselves are often inherently lengthy. As described above, the permitting process for renewable energy projects prior to the implementation of the acceleration measures stipulated in RED III can take an excessive amount of time. For onshore wind, the duration of the permit-granting procedures in the EU varies between 3 and 9 years, while for ground-mounted solar projects, the reported

[30] CERRE, Speeding up Renewable Energy Permitting in Europe: Overcoming Implementation Challenges (2024), pp. 26–27.

[31] Commission Recommendation (EU) 2024/1343, points 14–15.

[32] SolarPower Europe, EU Renewable Energy Permitting: State of Play (16 July 2025), p. 14.

[33] Ibid.

[34] European Commission, SWD (2024) 333 final, p. 26.

duration varies between 1 year and over 4.5 years.[35] Public consultation requirements in particular (essential for social acceptance and for the long-term legal robustness of permitting decisions) can take a long time when they are poorly sequenced or conducted without adequate preparation. In many jurisdictions, consultation is held at a late stage, after developers have already made substantial investments, reducing the capacity to incorporate feedback meaningfully and increasing the risk of subsequent legal challenge. A further bottleneck is the limited digitalisation of permitting procedures. In many jurisdictions, applications continue to rely heavily on paper documentation, physical submissions, manual verification and correspondence between applicants and authorities. Even where online application systems exist, they are often fragmented across different authorities and are not interoperable.

Good practice in Europe increasingly focuses on moving from fragmented online applications towards integrated, end-to-end digital permitting systems that provide a single point of access for project developers, enable the submission and exchange of documents, facilitate coordination between competent authorities, and allow applicants to track the status of their applications and applicable deadlines. The European Commission has identified the single digital portal/one-stop-shop model as an important direction for improving transparency, interoperability and administrative efficiency. Denmark provides a particularly relevant example: the Danish Energy Agency acts as a central contact point for renewable-energy permitting and, for offshore wind, coordinates the involvement of relevant authorities and issues the necessary licences. Other useful examples include Portugal, where a digital platform developed by E-Redes (the country's TSO) and the permitting authorities is designed to enable "zero-paper" processing, inter-agency coordination, real-time application tracking and monitoring of response deadlines; Estonia, which has advanced digitalisation and automation of permitting and design submissions through a single digital platform; and France, where online procedures cover a large share of environmental and other permitting processes. The Netherlands also provides an example of integrating several permits through an online one-stop-shop approach.

The resulting timelines are, in many cases, incompatible with the pace of deployment required to meet 2030 targets. In Poland, obtaining all necessary permits for a wind power plant currently takes between five and seven years; for solar installations, procedures can extend to around four years.[36] In Romania, while solar permitting is among the faster processes in the region at two to two and a half years, wind projects regularly take around five years due to accumulated procedural delays.[37] Across Energy Community Contracting Parties, the situation is similarly challenging: procedures for the grid connection of renewable energy projects to transmission networks range from approximately one year in Ukraine to seven years in Bosnia and

[35] Commisison Staff Working Document: Guidance to Member States on good practices to speed up permit-granting procedures for renewable energy projects and on facilitating Power Purchase Agreements, SWD/2022/0149 final at point I.2.

[36] Dentons, Renewables Acceleration Areas in Poland, client briefing, February 2025, p. 1; similarly, Reform Institute (Bajczuk, R., Niewitała-Rej, M., Śniegocki, A.), Transition, on Time — renewables acceleration areas in Poland, Warsaw, February 2024, p. 12 (estimating 5.5–7 years in total for onshore wind).

[37] SolarPower Europe, *EU Renewable Energy Permitting: State of Play*, webinar recording, YouTube, 2025, available at: https://www.youtube.com/watch?v=REA4_mL889c.

Herzegovina.[38] The financial consequences are concrete: a permitting delay of two years for a solar project has been estimated to cost approximately EUR 25,000, representing roughly ten percent of total project costs.[39] For onshore wind projects, the costs of delay have been estimated at 4.9 mln € (or 9% of the project values).[40]

Delays in processing authorisations not only put timely achievement of energy and climate targets at risk but increase overall project costs and can lead to the installation of less efficient technologies by slowing the uptake of more recent innovation.[41] Notably, under Council Regulation (EU) 2022/2577, which introduced temporary emergency measures to accelerate renewable energy permitting, several Member States recorded double-digit increases in the volume of permits issued for onshore wind.[42] This suggests that procedural simplification, where it has been meaningfully implemented, produces measurable results and that the barriers are administrative in nature rather than inherent to the projects themselves.

Inconsistent Implementation

A third and often underestimated dimension of the permitting challenge is inconsistency of application. Even within a single country, permitting regulations may be applied in significantly different ways between regions, municipalities, or individual administrative officers. This creates an uneven playing field for developers and can produce outcomes in which high-potential areas in administratively complex jurisdictions experience systematic delays, while projects in lower-capacity areas face comparatively lighter procedures irrespective of their strategic value.

The gap between legal reform and practical implementation is particularly pronounced in the current period. No country assessed in recent European surveys had formally designated all of its RAAs in compliance with the 21 February 2026 deadline under Article 15c of RED III, and implementation on the ground remains limited even where national legal frameworks have nominally been put in place.[43] The broader pattern is one in which legislative reform at the national level has not been consistently followed by the secondary legislation, operational guidelines, and institutional arrangements needed to make that reform functionally applicable: theoretically the legal reform exists, but it is not yet effectively applied on the ground.[44]

A consistent approach combines national strategic direction and guidance with a structured bottom-up approach to spatial planning and renewable energy deployment. Under such an approach, regions and municipalities are actively involved in identifying suitable areas, assessing

37 The Nature Conservancy (TNC) and Energy Community, Operational Blueprint for Renewables Acceleration Areas in the Energy Community (2024), available at: https://www.nature.org/content/dam/tnc/nature/en/documents/Operational_Blueprint_Energy_Community.pdf

39 Ibid.

40 World Economic Forum, How permitting processes are hampering Europe's energy transition, https://www.weforum.org/stories/energy-transition/wind-energy-permitting-processes-europe/

41 Commission Recommendation (EU) 2024/1343, recital (5).

42 Ibid., recital (6), citing COM(2023) 764 final.

43 CAN Europe and EEB, Comparative assessment (April 2026), p. 2.

44 SolarPower Europe, *EU Renewable Energy Permitting: State of Play* (16 July 2025), pp. 4, 12.

local infrastructure and environmental constraints, while national authorities establish the overall objectives and trajectory, as well as common framework incl. methodological and procedural rules. One practical model is to allocate indicative renewable energy capacity or deployment shares to regions and municipalities, taking into account factors such as available land, resource potential, grid capacity, and environmental constraints. This can turn municipalities into active participants in planning where renewable energy development is considered in advance and integrated into local spatial strategies.

Examples from European countries illustrate how such territorial allocation can work in practice. In Germany, for example, the federal framework was accompanied by binding or indicative targets for the designation of areas for onshore wind at the level of the Länder (still under the Habeck administration), with the allocation subsequently translated into regional planning requirements. In Denmark, municipalities have likewise played a central role in identifying and planning areas for renewable energy development, with national and regional frameworks providing the broader parameters within which local planning takes place. Such approaches can be adapted to the institutional circumstances of Energy Community Contracting Parties: the precise allocation mechanism can vary, but the principle of giving sub-national authorities a defined planning role can help create a more predictable pipeline of projects.

The Commission's 2024 RAA Guidance acknowledges the risk of inconsistent implementation directly, noting that "some degree of uniformity at national level for RAA designation is desirable" and that the process "will require cooperation between different administrative levels and policy domains, from energy to nature conservation and spatial planning, within Member States, and across Member States, where cross-border impacts could be of relevance".[45]

By engaging in immediate early implementation as recommended by the Ministerial Council, the Energy Community Contracting Parties and their competent authorities (in particular municipalities) have the unique chance to capitalise on the multiple benefits of RAA designation while legislative reform efforts aimed at transposing RED III are still being discussed or ongoing in their respective countries.

Insufficient Administrative Capacity and Lack of Practical Guidance

Underlying all four dimensions described above is a capacity constraint that is structural in character. Many national and local officials tasked with reviewing renewable energy applications have limited experience with complex energy projects and lack access to the technical expertise needed to assess environmental impact studies, grid connection plans, or ecological surveys. Government agencies frequently lack the technical and administrative resources to manage

[45] European Commission, SWD (2024) 333 final, p. 26.

complex spatial planning processes, and staff shortages, limited training, and inadequate digital tools compound the difficulty.[46]

This gap manifests in several concrete ways: requests for additional documentation that may be redundant or poorly targeted; extended response times due to bottlenecks within under-resourced agencies; and risk-averse decision-making driven by concern about legal challenge. Authorities in this position tend towards excessive caution, for example by requesting disproportionate rounds of environmental assessment and applying precautionary interpretations to procedural requirements even where the legal framework does not require it.[47] The net effect is a permitting environment characterised by delay and unpredictability even in cases where the underlying project would, on its merits, satisfy all substantive requirements.

A further dimension of this challenge is the gap between primary legislation and operational implementation. National legal reforms frequently need to be followed by secondary legislation and administrative guidelines to become functionally applicable on the ground, and this secondary layer is often missing or significantly delayed. The Commission has recognised this explicitly, noting that "given the novelty of the concept of RAAs, the different starting points of Member States and the time-consuming and complex processes which the designation of RAAs could entail, practical guidance is deemed necessary to ensure that the implementation of this provision takes place in a timely manner".[48] Its 2024 Recommendation calls on Member States to provide clear online manuals of procedure including a sequential description of stages, binding deadlines for each stage, application templates, and information on public participation options,[49] and to ensure sufficient and adequately skilled staffing of permit-granting entities and environmental assessment authorities.[50] The latter is important because the effectiveness of permitting reform ultimately depends on the administrative capacity available to implement it. RED III expressly recognises this in Article 16(7), which requires Member States to provide their competent authorities with adequate and sufficient human resources, including appropriate opportunities for upskilling and reskilling, in line with the planned renewable energy capacity to be installed under their integrated National Energy and Climate Plans (NECPs).

To address this structural gap in the Energy Community context, the Centre for Renewables Acceleration has developed a suite of practical tools designed to help permitting authorities build the knowledge and confidence needed to process applications more efficiently and consistently. These tools are described in detail in Section 5.

[46] RENewLand, Accelerating Romania's renewable future: a policy framework for integrated spatial planning of renewable energy acceleration areas, Policy position, June 2025, pp. 8–9.

[47] SolarPower Europe, *EU Renewable Energy Permitting: State of Play*, webinar recording, YouTube, 2025, available at: https://www.youtube.com/watch?v=REA4_mL889c

[48] European Commission, SWD(2024) 333 final, p. 3.

[49] Commission Recommendation (EU) 2024/1343, point 20.

[50] Ibid., point 25.

Stakeholder Consultation

Stakeholder consultation is another critical element of an effective permitting framework. While consultation can be perceived primarily responding to a procedural requirement or a mechanism for securing public acceptance, its value is broader. When undertaken early, transparently and at the appropriate territorial level, consultation can help identify potential conflicts before they become sources of delay, improve the quality of project planning, and strengthen the legal and social robustness of permitting decisions. Early stakeholder engagement allows project developers and authorities to identify issues relating to land use, biodiversity, landscape, cultural heritage, infrastructure, local development priorities and community concerns while there is still sufficient flexibility to address them. Consultation should therefore begin upstream of the individual permitting decision, including where possible during spatial planning and the designation of renewables acceleration areas.

This is particularly relevant to the bottom-up approach mentioned above. Regions and municipalities should not only be recipients of nationally determined renewable energy targets but active participants in deciding how those targets can best be implemented within their territories. Early dialogue with local authorities, communities, landowners, grid operators, environmental organisations and other relevant stakeholders can help identify areas where renewable energy development is both technically feasible and locally appropriate. In turn, this can make subsequent project-level permitting more predictable because many of the fundamental questions concerning land use, environmental sensitivity and local infrastructure have already been considered through the planning process.

Consultation is also important for improving consistency across municipalities and regions. Where local authorities have different levels of experience with renewable energy projects, structured stakeholder engagement can provide a common platform for sharing information, clarifying expectations and identifying recurring concerns. National or regional authorities can support this process through common consultation methodologies, guidance and standardised information materials, while municipalities can ensure that local knowledge and concerns are properly reflected.

RED III's Response: Streamlined Permitting within RAAs

RED III responds to these structural challenges through a set of specific permitting provisions for projects located within designated Renewables Acceleration Areas. Under Article 16a of RED III, projects within RAAs must receive a permitting decision within twelve months, reduced to six months for repowering projects and installations below defined capacity thresholds.[51] Under certain conditions, projects in RAAs benefit from an exemption from dedicated environmental assessments under the Environmental Impact Assessment Directive and the Habitats Directive, replaced by a shorter screening procedure; where authorities fail to respond within established

[51] Directive (EU) 2023/2413 (RED III), Art. 16a; European Commission, SWD (2024) 333 final, p. 2.

deadlines for intermediate procedural steps, tacit approval applies.[52] The Commission has further recommended that renewable energy projects qualify for the most favourable available procedure and be presumed to be in the overriding public interest and in the interest of public safety.[53]

This compressed pathway is made possible by the upfront environmental screening carried out during the RAA designation process itself. By identifying areas where environmental conflicts are expected to be limited and manageable, authorities effectively pre-clear the zone for renewable energy development, allowing impacts to be identified and addressed at the strategic level rather than project by project.[54]

The accelerated pathway is, however, conditional on the quality of the designation process that precedes it. RAA designation must itself follow a rigorous sequence — public consultation, strategic environmental assessment, and coordination across planning, energy, and environmental authorities. The quality of this upfront work directly determines the legal robustness and practical utility of the resulting accelerated permitting regime.

The permitting challenge is therefore not simply a question of administrative efficiency. It reflects deeper structural issues: fragmented governance, insufficient institutional capacity, inconsistent regulatory application, and a persistent gap between legislative ambition and operational practice. RAAs, when properly designed, address all these dimensions simultaneously.

Going forward, Section 3 sets out the legal framework in detail; Section 4 examines the principal challenges that authorities must navigate in the designation process. Section 5 summarises the support made available by the Energy Community Secretariat's Centre for Renewables Acceleration.

[52] European Commission, SWD(2024) 333 final, p. 7; Commission Recommendation (EU) 2024/1343, point 17.

[53] Commission Recommendation C(2022) 3219 final of 18 May 2022, point 2; Commission Recommendation (EU) 2024/1343, point 2.

[54] European Commission, SWD(2024) 333 final, pp. 8, 20.

3. Renewable Acceleration Areas under RED III: The Legal Framework

The revised Renewable Energy Directive introduces a new framework for accelerating the deployment of renewable energy projects across Europe. Recognising the urgent need to strengthen energy security, reduce dependency on imported fossil fuels, stabilise energy prices, and achieve climate neutrality objectives, RED III requires Member States to establish a more strategic and streamlined approach to renewable energy planning and permitting. Renewable Acceleration Areas are the centrepiece of that approach: specific geographic zones on land, at sea, or on inland waters, designated by competent national authorities as particularly suitable for the installation of renewable energy plants of a specific technology, on the basis that deployment there is not expected to have significant environmental impacts. The legal framework is anchored in Articles 15b to 16a of RED III, complemented by the permitting provisions of Articles 16 to 16f.

A Two-Step Approach: Mapping and Designation

RED III establishes a deliberate two-step sequence of spatial planning obligations.

Under Article 15b, Member States were required to carry out, by 21 May 2025, a coordinated mapping exercise of their territory to identify the land, surface, sub-surface, sea, and inland water areas necessary for the installation of renewable energy plants and their related infrastructure — including grid and storage facilities — needed to meet at least their national contributions towards the 2030 EU renewable energy target.[55] In carrying out this mapping, Member States must take into account three sets of criteria: the potential for renewable energy production of specific technologies in the different areas; projected energy demand, taking into account demand-side flexibility, expected efficiency gains, and energy system integration; and the availability of relevant energy infrastructure, including grids, storage, and other flexibility tools, or the potential to create or upgrade such infrastructure.[56]

Under Article 15c, Member States were then required to ensure that competent authorities adopt, by 21 February 2026, one or more plans designating Renewables Acceleration Areas for at least one renewable energy technology, as a subset of the areas identified under Article 15b.[57] Member States may exclude biomass combustion and hydropower from this obligation. They remain free to determine the size of individual RAAs but should ensure that their combined size is significant and contributes to achieving the Directive's objectives; the Directive also requires Member States

[55] RED III, Art. 15b; European Commission, SWD (2024) 333 final, pp. 2–3.

[56] European Commission, SWD (2024) 333 final, p. 4.

[57] RED III, Art. 15c; European Commission, SWD (2024) 333 final, p. 3.

to promote the multiple use of the areas identified, to reduce potential land- and sea-use conflicts.[58]

Two clarifications from the Commission's 2024 Guidance are of practical importance for permitting authorities. First, RAAs are only a subset of the areas in which renewable energy projects may be developed: their designation does not prevent the ongoing or future installation of projects in other areas, which remain subject to the standard permitting rules of Article 16b. The designation of RAAs must therefore not lead to the creation of de facto 'no-go areas' for renewables outside the designated zones.[59] Second, Member States may build on existing planning and mapping documents (including maritime spatial plans) where areas for faster renewable deployment have already been identified, avoiding duplication of effort and additional administrative burden.[60]

Step	Description	Legal Reference (RED III)
1	Mapping and identification of suitable areas	Art. 15b
2	Designation of RAAs and planning	Art. 15c
3	Environmental assessment and public participation	Art. 15c(2), 15d
4	Publication, review, and sizing	Art. 15c(3)
5	Accelerated permitting in RAAs	Art. 16a
6	Monitoring and reporting	Art. 15b(4)

Table 1: Steps for implementing Renewables Acceleration Areas.

[58] Reform Institute, Transition, on Time (February 2024), p. 8; RAA-PERMIT-BOOST project description, Annex 1, p. 4.
[59] European Commission, SWD (2024) 333 final, p. 7.
[60] Ibid., pp. 5, 7.

The Designation Process: RAA Plans, Mitigation Rulebooks, and Strategic Environmental Assessment

The designation of RAAs under Article 15c involves two main steps.[61]

The first step is the preparation of the RAA plan for the specific technology or technologies to be deployed. This comprises, on the one hand, the identification of the areas themselves, following the criteria of Article 15c(1)(a) and using all appropriate and proportionate tools and datasets — including wildlife sensitivity mapping — with priority given to areas where environmental impacts are expected not to be significant. On the other hand, it comprises the preparation of a mitigation 'rulebook': a set of rules on effective mitigation measures to be adopted in the designated area, aimed at avoiding or, where avoidance is not possible, significantly reducing the environmental impacts of the projects to be installed there. The rulebook must be targeted to the specificities of the area and the technology concerned, following the mitigation hierarchy (first avoid, then reduce) and applying measures in a proportionate and timely manner.[62] The rulebook is a central element of the framework: projects that comply with its rules benefit from a presumption of compliance with the relevant provisions of EU environmental law and, in most cases, from an exemption from project-level environmental assessments. Identifying and addressing impacts at the strategic level in this way is what allows projects in RAAs to benefit from simpler and faster procedures.[63]

The second step is mandatory strategic assessment. The draft plans designating RAAs must be made subject to a Strategic Environmental Assessment in accordance with the SEA Directive in all cases, and — where the plan is likely to have a significant impact on Natura 2000 sites — to an appropriate assessment under Article 6(3) of the Habitats Directive. Member States must ascertain that the RAA plan will not have significant environmental impacts within the meaning of Article 15c(1)(a).[64]

Public participation is embedded at both levels of this process. Article 15d requires Member States to promote participation during the preparation of the plans designating RAAs, in accordance with the consultation procedures of the SEA Directive (including identifying and involving the public affected or likely to be affected) and, beyond the planning stage, through the direct and indirect participation of local communities in the renewable energy projects themselves. Because projects within RAAs are, under certain conditions, exempted from project-level environmental assessment, public consultation at the plan level effectively takes the place of consultation at the project level, making a meaningful, early, and well-documented

[61] European Commission, SWD (2024) 333 final, pp. 8–9.

[62] Ibid., pp. 8, 19–21.

[63] Ibid., p. 20.

[64] Ibid., p. 8; Directive 2001/42/EC (SEA Directive); Directive 92/43/EEC (Habitats Directive), Art. 6(3).

consultation process at the designation stage essential. This obligation does not only arise under EU law, but also under international law, in particular Article 7 of the Aarhus Convention.[65]

Priority Areas and Mandatory Exclusions

Article 15c(1)(a)(i) sets out a non-exhaustive list of area types that should be given priority in RAA designation: artificial and built surfaces such as rooftops and facades of buildings, transport infrastructure and its direct surroundings, parking areas, farms, waste sites, industrial sites, mines, artificial inland water bodies, lakes or reservoirs and, where appropriate, urban waste water treatment sites, as well as degraded land not usable for agriculture.[66] The common feature of these areas is that they are either already artificial and built, with ongoing economic activity, or degraded land of limited agricultural value; categories in which the environmental impacts of renewable energy projects are, as a general premise, expected to be less significant than elsewhere. The Commission nevertheless cautions that environmental impacts cannot be ruled out a priori in these or any other areas, and that appropriate tools and datasets should be used to identify, among the priority areas, those where deployment is genuinely not expected to have significant impacts.[67]

Conversely, Article 15c requires the exclusion of certain areas from RAA designation on account of their high environmental value: Natura 2000 sites, areas designated under national protection schemes for nature and biodiversity conservation, major bird and marine mammal migratory routes, and other areas identified on the basis of sensitivity maps and other appropriate and proportionate tools. A limited exception applies to artificial and built surfaces located within such areas, where synergies with existing structures and uses can be harnessed.[68] Cross-border effects also warrant attention: under Article 16a(3), the exemption from project-level environmental assessment does not apply to projects likely to have significant effects on the environment in another Member State, so authorities seeking to preserve the full benefit of streamlined procedures should avoid designating as RAAs areas where cross-border impacts are likely.[69]

The effective implementation of renewable energy targets requires action not only at national level but also at regional and local level. This can, however, be challenging where municipalities and other local stakeholders have a strong focus on site-specific restrictions and where renewable energy development is perceived primarily in terms of its local impacts. In such circumstances, a purely project-by-project approach can encourage a NIMBY ("not in my backyard") dynamic, whereby the need for renewable energy deployment is broadly or partly accepted – yet individual projects are being opposed. In this context and within the focus of the

[65] European Commission, SWD (2024) 333 final, p. 24; RED III, Art. 15d; UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention), Art. 7.

[66] RED III, Art. 15c(1)(a)(i); European Commission, SWD (2024) 333 final, p. 9.

[67] European Commission, SWD (2024) 333 final, p. 10.

[68] Ibid., p. 12.

[69] Ibid., p. 13; RED III, Art. 16a (3).

present Advisory Note, early implementation through the designation of priority areas pursuant to Article 15c of RED III may well constitute 'low-hanging fruits', in particular for municipalities. The designation of low-conflict areas, such as industrial areas, mining and waste sites as well as other degraded lands does not only promote the multiple objectives of RAAs as identified above, including an industrial policy based on decarbonisation and a just transition. It also helps reducing land use conflicts and may even generate synergies with other activities in these areas.[70] Given the assumed low impact on biodiversity and other environmental protection goals, potential obstacles to the further designation process are excluded from the outset and a shift of renewable energy projects towards more sensitive areas avoided. As a best practice example, the Oeko-Institut refers to Italy's exclusive focus on artificial surfaces, which only "includes areas of the categories industrial, commercial, public, and private service areas. These areas can be combined primarily with PV, both ground-mounted, integrated with large-scale car parks or rooftop, industrial buildings, for instance."[71]

Example: Making Priority Areas Usable in Practice

Regulatory obstacles frequently stand between the priority areas named in the Directive and their actual availability for deployment. The French urban planning code long prohibited solar PV within a 100-metre buffer on either side of motorways; the 2023 French law on renewable energy acceleration removed this barrier by introducing a derogation for solar energy plants. In Germany, the ban on building within 40 metres of motorways has been lifted and replaced by a 200-metre corridor designated as a privileged area for solar PV.[1] Slovenia's Recovery and Resilience Plan commits to identifying priority areas for solar at car parks, railways, closed landfills, and abandoned mines, implemented through its Act on the Promotion of the Use of Renewable Energy Sources; in the German Lusatia region, wind and solar projects with a combined capacity of close to 7,000 MW are planned by 2030, primarily on former mining sites.[1] The lesson for Contracting Parties is that an early review of the applicable legal framework, i.e. identifying **prohibitions and restrictions that block deployment in otherwise suitable priority areas, should be built into the RAA planning process from the outset.**[1]

As outlined by the RES Simplify project, European practice examples demonstrate different ways of strengthening a multi-level approach. In Germany, the federal states are required under the

[70] Oeko-Institut: From policy to action Follow-up | Overview of Renewable Energy Spatial Planning and Designation of Acceleration Areas in Selected EU Member States (2025), https://www.nature.org/content/dam/tnc/nature/en/documents/o/e/Oeko-Institut-2025-Follow-Up-Spatial-Planning_Acceleration_Report.pdf p. 38.

[71] Oeko-Institute, loc. cit., p. 20.

Renewable Energy Act framework to report to the federal government on the status of renewable energy deployment. This includes information on permitted renewable energy installations, progress in repowering and the amount of land available for further wind energy deployment under regional and urban land-use plans. Where the available area is insufficient, the reasons for the shortfall and proposals for improvement must also be identified. These monitoring results are assessed through cooperation between the federal government and the Länder and feed into federal reporting on progress towards renewable energy targets and recommendations for further measures. This creates a feedback mechanism between national targets and sub-national implementation: the availability of land and the progress of regional planning can be monitored against the overall deployment trajectory, allowing shortcomings to be identified before they translate into a persistent permitting bottleneck.

Luxembourg provides a different example of how local participation can be encouraged through incentives. All 102 municipalities have signed the Climate Pact, demonstrating a broad commitment to the national energy and climate objectives. The State also encourages municipalities to identify land that could be used for renewable energy projects. Municipalities that promote several energy projects on their territory can receive state subsidies supporting their involvement with project developers, with those resources subsequently available for other local purposes. This illustrates how national policy can create positive incentives for municipalities to actively facilitate renewable energy deployment rather than treating it solely as an external administrative burden.

The underlying principle is not to remove local discretion, but to place it within a clearer strategic framework. National authorities can establish the overall trajectory and minimum deployment expectations; regions can translate these into spatial strategies and coordinate infrastructure and land-use planning; and municipalities can identify suitable sites, engage local stakeholders and facilitate individual projects. The designation of RAAs can provide an important vehicle for bringing these levels together. In particular, starting with low-conflict areas can generate early results and demonstrate that renewable energy deployment can be compatible with local economic value creation.

Regulatory Benefits within RAAs

Once designated, RAAs confer a set of specific regulatory advantages on projects developed within them.

Shortened, binding permitting timelines. Under Article 16a, the permit-granting process for projects in RAAs must not exceed twelve months (twenty-four months for offshore projects), reduced to six months for repowering projects and installations with an electrical capacity below 150 kW. These deadlines may be extended by up to six months only where duly justified by extraordinary circumstances (three months for small installations, repowering, and related

storage and grid connections).[72] For solar energy equipment installed on existing artificial structures, the permitting procedure is limited to three months.[73]

Simplified environmental assessment. Projects within RAAs that comply with the applicable mitigation rulebook benefit, under the conditions of Article 16a, from an exemption from dedicated environmental impact assessments under the EIA Directive and from the appropriate assessment under Article 6(3) of the Habitats Directive. These are replaced by a swift screening procedure designed to identify the exceptional projects likely to cause significant unforeseen adverse effects.[74]

Tacit approval. Where competent authorities fail to respond within the established deadlines for intermediate procedural steps, those steps are considered approved — a mechanism of positive administrative silence that directly counteracts procedural stagnation in under-resourced administrations. The Commission has recommended that Member States introduce such rules, with appropriate safeguards, also outside acceleration areas.[75]

Overriding public interest. Under Article 16f, the planning, construction, and operation of renewable energy plants, their grid connection, the related grid itself, and storage assets are presumed to be in the overriding public interest and to serve public health and safety when balancing legal interests under the EU nature and water directives — a presumption that remains available until climate neutrality is achieved.[76]

Procedural infrastructure. Article 16 requires Member States to establish or designate single contact points that guide applicants through the entire administrative process, to make all procedures fully digital by 21 November 2025, and to provide developers with an online manual of procedures setting out stages, deadlines, and templates.[77] Together with the upfront designation work, these elements substantially reduce the risk of legal challenge at project level and improve investment certainty.

The direction of travel at EU level, moreover, points towards further reinforcement rather than retrenchment. In December 2025, the European Commission presented the European Grids Package, comprising a revision of the TEN-E Regulation and a proposed directive on the acceleration of permitting procedures for energy infrastructure, together with targeted amendments to RED III. Among other elements, the proposals would consolidate and extend the RED III acceleration mechanisms (including permitting deadlines, digital single portals, and tacit approval) and introduce structured, time-limited grid connection procedures with decision

[72] RED III, Art. 16a; Reform Institute, Transition, on Time (February 2024), p. 10 (Table 2: key deadlines under RED III).

[73] RED III, Art. 16d; Reform Institute, Transition, on Time (February 2024), p. 10; see also Council Regulation (EU) 2022/2577, and Commission Recommendation C(2022) 3219 final, point 3.

[74] European Commission, SWD (2024) 333 final, pp. 7, 20; RAA-PERMIT-BOOST project description, Annex 1, p. 4.

[75] Commission Recommendation (EU) 2024/1343, point 17.

[76] RED III, Art. 16f; Reform Institute, Transition, on Time (February 2024), p. 10.

[77] RED III, Art. 16(1), (3) and (4); Commission Recommendation (EU) 2024/1343, point 20; Reform Institute, Transition, on Time (February 2024), p. 10.

deadlines of one to three months depending on project category.[78] While these proposals are at the moment of writing at the beginning of the ordinary legislative procedure and their final shape remains open, they confirm that area-based planning and streamlined permitting will remain the organising principles of EU energy infrastructure law for the coming decade. This development supports the case for Contracting Parties to invest in the corresponding institutional capabilities now.

Relevance for the Energy Community Contracting Parties

Implementation of the RAA framework across the EU is advancing, but unevenly. As of April 2026, six of twelve Member States assessed by CAN Europe and the European Environmental Bureau had completed legal transposition of the RAA provisions — using different legal techniques, from amendments to existing energy and planning laws (Germany) to dedicated legislative decrees building on earlier 'suitable areas' frameworks (Italy) and new provisions linking acceleration areas directly to spatial planning and potential mapping (Romania, Poland). Spain ratified a Royal Decree-law transposing the RAA provisions in March 2026, while France, Greece, Portugal, Lithuania, and Croatia remained in partial or early stages of transposition. Denmark is widely regarded as leading the way in practice, with Portugal also considered a pioneer in participatory, science-based siting.

Although no country assessed had formally designated all of its RAAs by the deadline[79], authorities who are proceeding with the implementation process are necessarily starting from scratch. Several EU Member States had already developed spatial-planning mechanisms, renewable energy suitability mapping, priority areas or other area-based approaches before RED III entered into force. The RES Simplify work stream on comparative assessments show that several countries have been able to build on existing planning frameworks and institutional arrangements when implementing the new requirements. In France and Germany, for example, mechanisms for spatial mapping and identifying areas for renewable energy development were already in place before RED III was formalised, even though not fully correspond to the new RAA requirements. In parallel, other Member States have either initiated mapping processes or integrated the RED III requirements into existing spatial-planning processes. Therefore, implementing authorities are advised to take action and begin identifying areas that are likely to be suitable for renewable energy development, particularly locations with relatively low environmental and land-use conflicts, such as industrial areas, degraded land, former mining sites, existing infrastructure corridors or suitable artificial surfaces.

For the Energy Community Contracting Parties, this emerging body of implementation experience is directly relevant. Contracting Parties are committed to progressive alignment with the EU energy acquis under the Energy Community Treaty and within the enlargement process.

[78] European Commission, European Grids Package, presented 10 December 2025, comprising a proposal for a revision of the TEN-E Regulation and a proposal for a Directive on the acceleration of permit-granting procedures for energy infrastructure, with targeted amendments to Directive (EU) 2023/2413, Directive (EU) 2019/944, and Directive (EU) 2024/1788.

[79] CAN Europe and EEB, Comparative assessment (April 2026), pp. 2–4.

In line with the Ministerial Council's Recommendation of 2024 and a future incorporation of RED III in the Energy Community acquis communautaire. The RAA framework is expected to shape the reference standard against which national planning and permitting systems in the region will be assessed and reformed. In the meantime, the immediate, early and locally driven preparation for RAA designation in the Contracting Parties gains particular importance. Starting this work now, with the support of the Centre for Renewables Acceleration, can ensure that valuable time is not lost and that Contracting Parties can build on the experience already accumulated in EU Member States. Early action would allow authorities to identify suitable and low-conflict areas, engage municipalities and other relevant stakeholders, and address environmental, land-use and grid-related constraints before individual projects enter the actual permitting process. It would also provide authorities with an opportunity to develop the necessary administrative capacity, test methodologies and establish effective coordination among national, regional and local levels. In this way, the effort invested at this early stage can pay off later by creating a more predictable pipeline of areas suitable for accelerated renewable energy deployment and reducing the time and uncertainty among investors and project developers. At the same time, authorities would be able to gain and share valuable practical experience, learn from approaches already being developed across Europe, and progressively adapt existing national and local planning instruments to the requirements of RED III.

In cooperation with organisations such as The Nature Conservancy (TNC), the Energy Community Secretariat has developed adapted guidance for the implementation of pilot projects for RAA designation in the Western Balkans.[80] Based on the principles laid down therein, TNC has been applying a smart siting approach for city or canton in the region such as Nikšić in Montenegro and Zadar County in Croatia, and more recently in Montenegro.

Together with the Open Society Foundations Western Balkans (OSF WB), the Energy Community Secretariat's Centre currently provides tailored technical assistance to the municipalities of Bitola (North Macedonia) and Elbasan (Albania) for the acceleration of renewable energy deployment, with a particular focus on brownfields in coal-mining and metallurgical industry sites, respectively. These projects showcase the feasibility and benefits of early implementation regarding the RAAs strategic potential for decarbonisation, just transition and green industrial policy.

The practical challenges of designation (assembling the evidence base, conducting strategic assessments, coordinating institutions, and engaging communities) are examined in the following section; the support available to Contracting Parties in meeting them is further set out in Section 5.

[80] Energy Community and The Nature Conservacy, Operational Blueprint: Designation of Renewables Acceleration Areas (February 2025), https://www.energy-community.org/secretariat/organisation/RESCentre.html

4. Challenges in Designing Renewable Acceleration Areas

While the RAA framework offers a compelling regulatory architecture, its practical implementation confronts national and local authorities with a set of interconnected challenges.

Data and Mapping

The designation of Renewable Acceleration Areas relies heavily on the availability of reliable, up-to-date and geographically detailed data. Member States are required to carry out coordinated mapping exercises that integrate renewable energy potential, environmental sensitivities, grid availability, infrastructure readiness, and land-use constraints. In practice, many authorities continue to face significant challenges related to data quality, accessibility and interoperability.

The first challenge concerns the availability of comprehensive information on biodiversity, protected habitats, species distribution, water resources, and landscape characteristics. In many jurisdictions, these datasets are incomplete, outdated, or scattered across multiple institutions. The Romanian experience is illustrative: environmental and land-use information remains siloed across different organisations without effective sharing mechanisms, and the absence of integrated, up-to-date datasets prevents evidence-based decision-making for renewable energy planning.[81] The comparative picture across the EU shows similar unevenness. While countries such as Czechia, Spain, Italy, and Poland have developed environmental or biodiversity mapping tools that directly inform RAA identification (often drawing on GIS layers, national biodiversity databases, or dedicated mapping portals) Germany, Greece, and Romania still lack integrated national sensitivity maps, and Croatia, Portugal, and Lithuania have only partial mapping frameworks in place.[82] Even where tools exist, implementation gaps persist: France has advanced national mapping systems and biodiversity observatories, yet certain RAAs still overlap with sensitive areas due to non-uniform application.[83]

A second challenge concerns geospatial capacity itself. RAA designation requires the integration of multiple GIS layers (renewable resource potential, existing infrastructure, land-use restrictions, protected areas, and permitting constraints) into a single coherent analytical framework. The absence of harmonised datasets and limited GIS capacities can significantly complicate screening and assessment. Emerging methodological work points to practical solutions. The RENewLand project has developed a GIS-based multi-criteria decision-making methodology, applying the Analytic Hierarchy Process to weigh environmental sensitivity, renewable potential, and socio-economic impact in a transparent and replicable manner, with pilot testing underway in the Romanian counties of Prahova and Brașov.[84] The European Commission, for its part,

[81] RENewLand, Accelerating Romania's renewable future (June 2025), p. 9.

[82] CAN Europe and EEB, Comparative assessment (April 2026), p. 6.

[83] Ibid.

[84] RENewLand, Accelerating Romania's renewable future (June 2025), pp. 5–7.

recommends that Member States make use of the consolidated datasets available in the Energy and Industry Geography Lab and the Photovoltaic Geographical Information System, complemented by national and regional data.[85]

Assembling a coherent, legally defensible evidence base for RAA designation therefore requires substantial institutional coordination and, in many cases, investment in new data infrastructure. A recurring recommendation from implementation experience is the creation of centralised, open-source spatial data platforms that aggregate land use, protected area, biodiversity, grid infrastructure, and resource potential data in a single accessible interface. [86] This step would reduce information asymmetries between institutions and enabling more informed decision-making across governance levels.

Example: GIS and Mapping Practices

Poland's National Recovery Plan (REPowerEU chapter) made the mapping of onshore wind and photovoltaic potential for the entire national territory (in an easy-to-use digital format) a formal milestone for the disbursement of EU recovery funds, directly linking data infrastructure to financing. [1] The Czech Ministry of Environment has published national mapping for wind and solar areas, providing a non-binding basis for assessing areas suitable for designation.[1] In Croatia's Zadar County, a pilot project supported by TNC demonstrated how multi-criteria analysis can systematically rank land sensitivities and identify areas that balance environmental protection with renewable energy potential; a methodology now feeding into national-level RAA screening.[1]

Environmental Constraints

The designation of Renewable Acceleration Areas requires a careful balance between accelerating renewables deployment and guaranteeing a high level of environmental protection. Under RED III, RAAs must be located in areas where renewable energy projects are not expected to have significant environmental impacts; Natura 2000 sites, areas designated under national protection schemes, and major bird and marine mammal migratory routes must be excluded, and the designation itself must be based on a Strategic Environmental Assessment. This must be supplemented, where a Natura 2000 site is likely to be affected, by an appropriate assessment under Article 6(3) of the Habitats Directive.[87]

[85] Commission Recommendation (EU) 2024/1343, point 28.

[86] RENewLand, Accelerating Romania's renewable future (June 2025), p. 10.

[87] CAN Europe and EEB, Comparative assessment (April 2026), p. 6; Directive 2001/42/EC (SEA Directive); Directive 92/43/EEC (Habitats Directive), Art. 6(3).

Authorities must assess a wide range of environmental considerations in this process:

- biodiversity and protected habitats, including buffer zones and connectivity corridors around excluded areas;
- bird and bat migration routes, particularly for wind installations;
- water resources, relevant for floating solar and small hydro;
- landscape and visual impact, particularly for onshore wind and large-scale solar in sensitive landscapes;
- cumulative impacts, i.e. the combined effects of multiple projects within a given area, which may exceed the sum of individual project impacts and which project-level EIAs often fail to capture adequately.

Implementation experience shows that approaches to these requirements diverge considerably. Countries such as Czechia, Italy, Poland, and Spain have provided clear statutory exclusions for Natura 2000 sites, nationally protected areas, and additional zones such as migration routes and critical habitats. By contrast, the legal frameworks in France and Germany are less comprehensive: in Germany, certain categories of protected areas (including nature parks and Ramsar sites) may still be included in RAAs, particularly onshore.[88] The German case illustrates a broader risk that deserves particular attention from Energy Community authorities: because German RAAs largely mirror pre-existing plans, there has been very limited additional environmental screening (including, in some instances, no new SEA) and very little public participation in the designation process itself.[89] This "copy-paste" approach may deliver formal compliance at speed, but it undermines precisely the front-loaded environmental assessment on which the legal robustness of the accelerated permitting pathway depends. France and Germany have both relied on existing SEAs predating the RAA framework rather than conducting new assessments, while Czechia, Italy, Poland, Spain, Romania, and some Austrian regions provide for SEAs in the designation process.[90] However, the depth of assessment varies, particularly where responsibility lies with regional authorities.

For the identification of areas where the renewable energy plants would not have a significant environmental impact and thus be eligible for RAA designation, Article 15c(1)(a)(iii) of RED III requires the usage of "all appropriate and proportionate tools and datasets" and thus goes beyond formally protected areas. This leaves wide discretion to the competent authorities in determining and using broader environmental-sensitivity information, while making sure that no

[88] CAN Europe and EEB, Comparative assessment (April 2026), p. 6.

[89] Ibid., p. 3.

[90] RENewLand, Accelerating Romania's renewable future (June 2025), p. 10.

potential source of data is being left out to the extent it is appropriate and not disproportionate. The authorities are thus encouraged to map and rely, at least in a first step, on all available sources that may improve the quality and robustness of the potential RAA designation, and not only on pre-existing national or local GIS mapping. For the EU, the Joint Research Centre's Energy and Industry Geography Lab make available relevant sources, however non-exhaustive. In a second step, the authorities should narrow down existing databases to the site-specific characteristics of the RAA in question as well as the specific technology (if any) the RAA should relate to.

Mitigation frameworks reveal a similar pattern. Under Article 15c, each RAA plan must include a set of rules on effective mitigation measures (a "mitigation rulebook") targeted at the specific area and technology. Yet only a few countries have so far introduced binding, predefined mitigation measures, with Spain the frontrunner; in several others, including Poland and Romania, mitigation requirements are anticipated in legislation or SEA processes but remain undefined.[91] Comparative assessments accordingly recommend strengthening ex ante requirements: using best-available biodiversity and sensitivity data as a minimum standard, excluding highly sensitive areas, preventing copy-paste designation from former planning exercises, and automatically requiring SEAs, upfront mitigation measures, and regular monitoring, especially for cumulative impacts in offshore areas and regions under high land pressure.[92]

Area Type	Country Example	Approach
Artificial and degraded land prioritisation	Romania, Poland	Prioritisation of artificial surfaces, industrial sites, transport corridors, and degraded land explicitly embedded in legal frameworks; also reflected in emerging practice in Spain, Austria, and France.[93]
Statutory environmental exclusions	Czechia, Italy, Poland, Spain	Clear statutory exclusion of Natura 2000 sites, nationally protected areas, migration routes, and critical habitats from RAA designation.[94]

[91] Ibid.
[92] Ibid., p. 10.
[93] Ibid., p. 5.
[94] Ibid., p. 6.

Area Type	Country Example	Approach
Binding mitigation rulebooks	Spain	Frontrunner in introducing binding, predefined mitigation measures at RAA level, operationalising the Article 15c mitigation rulebook requirement.[95]
Cumulative impact assessment	European Commission	Commission guidance recommends strategic-level cumulative impact assessment as part of RAA designation, rather than deferring the issue to project-level EIAs.[96]

Table 2: Emerging environmental safeguard practices in RAA designation.

These challenges are compounded by the environmental data gaps described in Section 4.1. Solutions therefore lie in early environmental screening, strategic spatial planning, and close cooperation between energy, planning, and environmental authorities to ensure that RAAs are both environmentally responsible and legally functional. Experience suggests that upholding high environmental standards is not a brake on acceleration but a condition for it: weakening biodiversity and water protections increases litigation risk, undermines public support, and ultimately slows deployment.[97]

Governance and Administrative Capacity

Effective RAA implementation requires strong coordination between spatial planning, energy, environmental, and permitting authorities. Responsibilities related to renewable energy development are typically shared among ministries responsible for energy, environment, agriculture, and regional development, as well as local permitting authorities, making coordination a structural necessity rather than an administrative nicety.

The scale of this coordination task is well illustrated by Romania's draft institutional framework for RAA designation, which allocates responsibilities across no fewer than seven institutions: the Ministry of Energy as coordinating authority; the Ministry of Environment for impact assessments; the Ministry of Agriculture for land-use compatibility; the Ministry of Public Works for integration into urban development plans; the national energy regulator for grid integration rules; the transmission and distribution system operators for infrastructure identification; and the

[95] Ibid., p. 7.
[96] European Commission, SWD (2024) 333 final, p. 19.
[97] CAN Europe and EEB, Comparative assessment (April 2026), p. 10.

General Secretariat of the Government for coordination among national and local authorities.[98] In practice, however, Romania's implementation has been hindered by low inter-ministerial coordination, insufficient technical capacity across key institutions, and the absence of centralised decision-making where responsibilities are dispersed without clear leadership or accountability, creating communication gaps and inconsistent implementation approaches.[99] Financial constraints have compounded the problem, preventing the Ministry of Energy from procuring the external expertise needed to launch the mapping process.[100] The early implementation process recommended by the Ministerial Council can avoid such traps, as it leaves time to authorities to learn and evolve before top-down obligations apply, including in inter-institutional cooperation and coordination. A regional approach to capacity building and knowledge sharing, as promoted by the Energy Community Secretariat and supported by partner organisations and donors, can foster this learning effect even further.

This governance challenge is multi-dimensional. Vertical fragmentation arises where national ministries and local planning authorities hold different and sometimes conflicting priorities and interpretations of applicable regulations. Horizontal fragmentation arises where energy, environment, and planning departments at the same level of government operate in silos.

Capacity constraints and the lack of sufficient and skilled human resources constitute a problem and a reason for delay across Europe.[101] RED III recognises such constraints in Article 16(7), which requires Member States to provide their competent authorities with adequate and sufficient human resources, including appropriate opportunities for upskilling and reskilling, in line with the planned renewable energy capacity to be installed under their integrated National Energy and Climate Plans (NECPs). Likely to challenge any stakeholder involved, and not only public administration, capacity limitations are particularly pronounced at local level, where authorities may lack dedicated staff, technical expertise, and digital tools. And the political economy of designation matters: a Political Economy Assessment (PEA) can provide a useful framework and examine which actors may gain or lose from the designation of particular areas, where institutional or political incentives may favour maintaining the status quo, and where disagreements between national and local priorities are likely to emerge. Such an assessment can inform the design of stakeholder engagement, clarify where stronger coordination or political leadership may be required, and help identify measures to address legitimate concerns, such as in strategic land-use decisions, and reduce incentives for delay or non-implementation. Conducting the assessment early in the designation process can therefore help ensure that institutional and procedural arrangements are not only technically appropriate, but also realistic in the respective political and economic context.

[98] RENewLand, Accelerating Romania's renewable future (June 2025), p. 4.

[99] Ibid., pp. 2, 8.

[100] Ibid., p. 5.

[101] Commission Staff Working Document - Guidance to Member States on good practices to speed up permit-granting procedures for renewable energy projects and on facilitating Power Purchase Agreements, SWD/2022/0149 final, point I.4.

Governance models across Europe reflect existing institutional structures, and no single model has emerged as definitive. In more decentralised systems such as Austria, Italy, and Poland, regional authorities play a central role in identifying and designating RAAs, with the effect of enabling greater sensitivity to local conditions but requiring strong coordination mechanisms to ensure national coherence. In Poland, for instance, RAAs will be designated by provincial governments on the basis of plans requiring agreement from the mayors of affected municipalities, the competent regional environmental director, and the relevant energy network company.[102] In other countries, including Croatia, Greece, and Lithuania, governance frameworks are still being defined, with ongoing discussions on the allocation of responsibilities.[103] In the Western Balkans, permitting systems generally retain a strong role for central government ministries and agencies, while responsibilities for spatial planning, land use, construction and other project-level approvals are often distributed across different levels of government[104]. Smaller renewable energy projects, regarding for instance construction permitting or environmental assessments, are often administered at local level, while large-scale and more complex undertakings may involve authorities at national or regional level who dispose of the required institutional capacity. Also, national spatial plans are subsequently implemented by local and regional authorities, allowing for local initiative and participation. This combination of centralised decision-making in some areas and fragmented multi-level responsibilities in others can make coordination particularly challenging and contribute to lengthy and unpredictable permitting procedures. Therefore, it is important that vertical and horizontal coordination with other levels of government becomes part of the process from the outset. This will allow the national legislature to draw on the experiences made once there is an obligation to design a governance model under RED III.

Addressing these governance challenges requires more than technical guidance. It requires institutional reform: clarification of roles and responsibilities, establishment of inter-ministerial coordination mechanisms, investment in training and capacity building, and, in some cases, the creation of dedicated coordination structures and protocols. The recommendation emerging from implementation experience is the establishment of permanent multi-stakeholder working groups bringing together key ministries, system operators, environmental NGOs, industry associations, academia, and local authorities as the central coordination point for data sharing, methodological alignment, and policy coherence.[105] Such groups can provide an effective forum for bringing together expertise that is otherwise dispersed across institutions, identifying potential conflicts at an early stage, and building a common understanding of the objectives and methodologies underpinning renewable energy planning and permitting. They can also strengthen transparency and stakeholder ownership, particularly where their input is incorporated into the designation of renewables acceleration areas and broader spatial-planning

[102] Dentons, Renewables Acceleration Areas in Poland (February 2025), p. 2.

[103] CAN Europe and EEB, Comparative assessment (April 2026), p. 5.

[104] OECD, Multi-dimensional review of the Western Balkans, from analysis to action (April 2022), p.52.

[105] RENewLand, Accelerating Romania's renewable future (June 2025), p. 9.

processes. At the same time, multi-stakeholder structures should not become an additional procedural layer or substitute for clear institutional responsibility. If membership is too broad, mandates are insufficiently defined, or decision-making requires consensus on every issue, such groups can become slow and resource-intensive to manage, potentially adding - rather than reducing - administrative burdens. Effectiveness therefore depends on clear leadership and mandate, defined responsibilities and transparent decision-making, proportionate membership composition, preparation of materials, coordination of participants and a strong mediation capacity to reconcile divergent views[106].

Equally, sufficient financial, technical, and human resources for planning authorities are a precondition for high-quality, evidence-based, and legally sound designation processes.[107] Poland's National Recovery Plan offers a concrete financing model: it links EU recovery funds to milestones including at least 106 new positions in the state administration responsible for digitalising permitting and grid planning, and capacity-building projects for central administration and local governments implemented by more than one hundred entities.[108]

In general, regulatory impact assessments (RIAs), or equivalent implementation assessments, should be used as a practical tool to identify and quantify the financial, human and institutional resources required to implement proposed structural reforms and the acquis. In particular, the assessment should translate the proposed changes into concrete resource requirements—including staffing, training, digital infrastructure and other implementation costs—and provide a robust basis for budget planning and allocation. This would help address a common weakness of RIA processes, whereby the assessment is treated primarily as a formal requirement without calculating the actual resources needed to put the reform into practice. With the financial resources available for strengthening administrative capacity potentially being more limited in the Western Balkans, it is even more important to identify resource needs accurately and to make effective use of available support. Capacity-building through the exchange and practical application of experience is central to the support offered by the Centre for Renewables Acceleration, helping authorities to increase institutional capacity and translate lessons learned into concrete implementation improvements.

[106] RES Simplify Final Report Technical support for RES policy development and implementation – simplification of permission and administrative procedure for RES installations (April 2023)

[107] CAN Europe and EEB, Comparative assessment (April 2026), p. 9, Recommendation 4.

[108] Reform Institute, Transition, on Time (February 2024), pp. 7–8.

Coordination Structures in Practice

Portugal has established thematic working groups including civil society and academia around its RAA designation process, coordinated through the EMER 2030 structure.[1] Romania's RENewLand stakeholder process culminated in a National Joint Stakeholder Principles Declaration endorsed by sixteen organisations spanning wind and solar associations, developers, investors, environmental NGOs, public authorities, and academia which established a shared foundation for the designation process before formal mapping begins.[1] Such approaches illustrate how coordination structures can also inform the practical assessment of the reforms required to implement them. In particular, stakeholder input can strengthen RIAs and Political Economy Assessment by helping authorities identify the institutional, human and financial resources needed to operationalise the new framework, including staffing, technical expertise, data and digital infrastructure, mapping and environmental assessment capacity, and stakeholder engagement processes. Used in this way, RIA and PEA can move beyond being formal ex ante assessment requirements and serve as practical tools for translating the proposed reform into concrete implementation and budgetary needs.

Stakeholder Participation

RED III requires public participation at two levels: during the preparation of RAA plans, primarily through the procedures of the SEA Directive (including identifying and involving the public affected or likely to be affected and ensuring access to relevant information) and through the direct and indirect participation of local communities in renewable energy projects themselves.[109]

In practice, achieving genuine social acceptance for RAAs involves navigating a complex web of competing interests and perceptions. Local opposition to renewable energy installations (particularly wind turbines) competing land-use priorities, and concerns regarding environmental impacts can all affect the acceptance of proposed acceleration areas. Tensions with agricultural land users arise particularly where large-scale solar is proposed on productive farmland, and distrust of planning processes is most pronounced where past development decisions have been perceived as imposed on communities without adequate consultation. Municipalities sit at the centre of these tensions: mayors and local government staff are frequently called upon to act as enablers, facilitators, and mediators between developers, investors, hosting communities, and

[109] CAN Europe and EEB, Comparative assessment (April 2026), p. 7; RED III, Art. 15d.

civil society. However, the capacities of local planning entities to deliver this dialogue are severely strained, and without adequate support, municipalities struggle to play this role effectively.[110]

Comparative implementation experience shows marked differences in both the timing and quality of engagement. A first group of countries has introduced relatively structured participation frameworks. Portugal has developed a particularly proactive approach through its "Renováveis Participa" platform, which provides an open and accessible interface for citizens, municipalities, NGOs, and other stakeholders to contribute to the designation process, with contributions integrated into the Strategic Environmental Assessment.[111] By contrast, several countries rely on minimum procedural requirements: formal notices and written submissions that risk remaining largely invisible to the public, as observed in Poland and Czechia. Germany and Austria represent cautionary cases: in Germany, consultation largely took place upstream during earlier wind energy and offshore spatial planning, while the actual designation of RAAs has occurred with limited or no additional public engagement, raising concerns regarding transparency and procedural legitimacy[112]. In Austria, the fragmentation of authority between the federal government and the nine federal states (*Bundesländer*) leads to inconsistent, late, or superficial public and civic engagement, raising questions as to whether stakeholders and the public are sufficiently involved specifically in the new RAA designation process. Such concerns can and should be mitigated in the preparatory process for RAA designation in the Western Balkans, in particular by full and comprehensive public participation at all stages.

Beyond procedural participation, the substantive fairness of deployment has emerged as a decisive factor. The Fast & Fair Renewables & Grids Initiative constitutes the first European cross-sector consensus on these questions, endorsed by commercial developers, local government associations, civil society organisations, and industry bodies including the European Renewable Energy Federation, SolarPower Europe, and WindEurope. The initiative has distilled this experience into five baseline principles: early and meaningful engagement of local stakeholders ("local projects – local influence"); tangible and proportionate community benefits ("local projects – local value"); transparent use and communication of revenues; nature-positive deployment applying the mitigation hierarchy; and the empowerment of community-led initiatives on a level playing field with professional actors.[113] The principles are addressed precisely to the root causes of local opposition, and their central insight is directly relevant to RAA designation: perceived fairness is not a soft factor but a determinant of deployment speed.

The same conclusion emerges from the EU comparative assessment: early and meaningful public involvement, clear communication of what RAA designation changes in practice for local communities (procedural streamlining, safeguards, monitoring obligations) and minimum standards for transparent, fair, and meaningful benefit-sharing are consistently identified as

[110] Fast & Fair Renewables & Grids Initiative, United behind a European consensus on baseline principles for Fast & Fair Renewables & Grids (2025), pp. 1–2.

[111] CAN Europe and EEB, Comparative assessment (April 2026), p. 8.

[112] Ibid.

[113] Fast & Fair Renewables & Grids Initiative, Baseline principles (2025); see also https://fastandfairenergy.eu/

priorities for high-quality designation.[114] The Commission's 2024 Recommendation points in the same direction, calling on Member States to ensure that public hearings are organised early and regularly, when they can still influence the location, routing, or technology of projects, and to encourage the passing of benefits to local communities, including through energy communities and other co-ownership structures.[115] This approach is further developed in the Commission's 2026 Public Inclusion Toolbox for Renewable Energy, providing a range of practical tools that authorities can adapt to the circumstances of individual projects and communities. These include timely and accessible information and communication, structured procedural participation and trust-building measures, facilitation services and impartial intermediaries, as well as financial participation and benefit-sharing mechanisms such as community benefit funds, opportunities for local investment and lower household energy bills. The toolbox emphasises that there is no one-size-fits-all approach and that effective participation should be meaningful, transparent, inclusive and appropriately supported.

Effective stakeholder engagement is not simply a procedural obligation but a strategic investment in the long-term viability of the RAA framework. RAAs that are perceived as legitimate by affected communities are more likely to be legally robust, less likely to face prolonged appeals, and more likely to deliver the renewable energy capacity they are designed to enable.

Lessons Learned from Early Implementation Projects

The mapping and designation of RAAs is still at early stages in many parts of the EU as well. In the absence of binding legislation, the lessons learned for Contracting Parties concern practical and proactive steps to be taken by different stakeholders in that process, from national administration to regions and municipalities with competences in spatial planning. In the following a few hands-on recommendations are derived from the experience made in RED III implementation in the EU and the Energy Community. They are meant to provide additional guidance to Contracting Parties of the Energy Community.

Begin the preparation of the mapping and siting process leading to the designation of RAAs based on country-wide coordination between competent authorities. Even under an early and bottom-up implementation paradigm, such an approach comes closest to Article 15b of RED III. It will also avoid duplication and intra-administrative conflict and ensure mutual support and learning on vertical and horizontal levels. It will further allow the state-level authorities in charge to interlink these activities with planning and reporting under the NECP. A good example for early country- and stakeholder-wide coordination is the inclusive and transparent process of National Territory Mapping for Renewable Electricity in Ireland.[116]

Close cooperation among different authorities and stakeholders throughout the process is also key to closing data gaps and can be a catalyst for facilitating siting and permitting procedures

[114] CAN Europe and EEB, Comparative assessment (April 2026), p. 11, Recommendations 9–11.

[115] Commission Recommendation (EU) 2024/1343, points 9–10.

[116] https://www.allirelandsustainability.com/public-consultation-on-national-territory-mapping-for-renewable-electricity/

alike, especially at times when the legal governance is still fluid. In the absence of legal rules, authorities on different horizontal and vertical levels within the administration could e.g. enter into voluntary administrative arrangements to facilitate the cooperation. Such informal coordination is evidently without prejudice to the legal norms and competences applicable to spatial planning in each country.

National strategic direction should be combined with bottom-up regional and municipal planning. National renewable energy objectives should be translated into clear expectations for regions and municipalities, while allowing sufficient flexibility to reflect local circumstances. Indicative or binding regional and municipal contributions to renewable energy deployment could be established on the basis of factors such as renewable resource potential, available land, grid capacity, environmental constraints and existing infrastructure. This gives local authorities a clear role in delivering national objectives while retaining discretion over the selection of specific sites. It also helps address NIMBY dynamics by making the distribution of responsibilities and benefits more transparent and by allowing municipalities to plan proactively rather than responding to individual projects on an ad hoc basis.

Maintaining a balance between proactiveness in initiating a process and diligence in carrying it out is of utmost importance. Given that the mapping and designation of RAAs takes place in the context of harmonised European law, compliance with the RED III provisions at all stages is decisive to avoid later regrets. At the same time, the RED III legal framework leaves a wide discretion to national authorities, which have to take into account the national and local context. In this situation, involving external partners such as the Energy Community Secretariat and building on best practice examples in wider Europe can serve as valuable guidance.

Take the RED III bias for brownfields, industrial sites, degraded lands and similar low-conflict areas seriously. Unless additional obstacles such as contamination or ownership issues arise, this will facilitate the environmental permitting per se, i.e. even without additional fast-tracking, and is more likely to secure access to energy and transport infrastructure. Such prioritisation also fully taps into the RAAs full strategic potential for smart industrial policy and just transition. Possible funding opportunities should be explored at an early stage.

In line with generally acknowledged principles of project management, the assignment of clear roles within the dedicated teams in each authority, the setting of strategic targets and priorities with monitoring and documentation routines is essential. To overcome capacity constraints, proactive support can be sough in organisations such as the Energy Community, but also pan-European initiatives such as the Pact for Skills, which supports public and private organisations to upskill and reskill staff involved in the green and digital transitions.[117] Moreover, providing guidance and additional support to Member States' authorities (and possibly transferrable to Contracting Parties) also lies at the heart of the ongoing LIFE project RAA-PERMIT-BOOST.[118]

117 https://pact-for-skills.ec.europa.eu/about_en
118 Boosting renewable energy acceleration implementation.

Early and comprehensive public stakeholder consultation has proved key for essentially all projects. Dissemination of information is thus of great importance in designation procedures on all levels. Where, as in the municipalities currently engaged in pilot projects with the Centre for Renewables Acceleration, the promotion of renewable energy generation is closely linked to flagship transformation projects such as industrial transformation or the closure of mining sites, they can benefit from high public awareness. To this purpose, it is worth taking the European Commission 2026 Public Inclusion Toolbox for Renewable Energy into account (see chapter 4.4), which includes practical tools that ensure timely and accessible information and communication, structured procedural participation and trust-building measures, facilitation services and impartial intermediaries, as well as financial participation and benefit-sharing mechanisms such as community benefit funds, opportunities for local investment and lower household energy bills.

Written non-binding guidance issued by the authorities on the designation process itself as well as the expected contribution of all stakeholders involved can increase clarity and ultimately speed up the procedures. Where the applicable legislation on permitting leaves that space, the competent authorities should not only consider renewable energy-specific manuals for the process but also reduce applicable maximum timeframes by committing to shorter deadlines for the authorities, to the extent feasible in line with the law and the principles of good administration. Other simplification measures, as outlined below, should be considered.

To avoid bottlenecks in present and future work, the preparation for RAA designation should be based on but also contribute to expanding, systemising and digitalising databases, cadastres, geographic information systems (GIS), grid mapping, environmental and biodiversity sensitivity data and other relevant sources of information.[119] Reliable data sets allegedly are still rare in the region, and least so in municipalities. If this is the case, they would need to be initially established and require regular updates. For greater efficiency, developing an appropriate mapping tool could also be subjected to inter-institutional cooperation. In Denmark, for instance, a joint public partnership owned by the state, the municipalities and the regions, runs the online platform The Danish Environmental Portal which collects data covering the entire country. Croatia, Poland and Greece have similar centralised GIS. Spain and the Belgian region of Flanders provide good examples for transparent sensitivity datasets and maps.[120]

Municipalities and regions take the initiative, e.g. by teaming up with the Centre for Renewables Acceleration for a pilot project, comes with clear advantages for early implementation. One of the most important ones is the proximity to local stakeholders and the public concerned. Municipalities can also get actively involved by supporting or participating in energy communities, which offers the local population and business concrete benefits, including financially, from the support to RES.

[119] At EU level, the Energy and Industry Geography Lab (EIGL) is visualising some the the data.

[120] Commission Staff Working Document - Guidance to Member States on good practices to speed up permit-granting procedures for renewable energy projects and on facilitating Power Purchase Agreements, SWD/2022/0149 final, points I.5.a. and d II.

5. Support from Contracting Parties: The Energy Community Centre for Renewables Acceleration

The challenges set out in the preceding sections are demanding but Contracting Parties do not face them alone. The Energy Community Centre for Renewables Acceleration has been established within the Energy Community Secretariat, pursuant to Procedural Act 2025/23/ECS-ENC, to assist Contracting Parties in developing effective planning, faster and simpler permit-granting processes, and institutional frameworks for renewable energy development.[121] It serves as a platform for technical assistance, cooperation, and exchange, and its core objective is to operationalise renewables acceleration in low-conflict areas as a credible, scalable, and environmentally responsible decarbonisation instrument across the Contracting Parties. The Centre is managed by the Secretariat and supported by Delegated Experts providing specialised technical and operational expertise.

Operational Foundations

The Centre's work builds on two policy documents developed specifically for the Energy Community context in cooperation with The Nature Conservancy (TNC). Together, these documents provide the methodological and practical framework guiding the Centre's work on renewables acceleration areas and permitting reform. The Operational Blueprint for Renewables Acceleration Areas, serves as the methodological guideline for the Centre's work on the designation of RAAs.[122] It is complemented by the Permitting Protocol which provides a detailed overview of the permitting reform agenda and the modalities for establishing one-stop-shops.[123] The Centre's role is to operationalise these instruments in a structured manner — transforming the framework of RED III, the Operational Blueprint, and the Permitting Protocol into practical implementation pathways tailored to the Contracting Parties. In accordance with the Procedural Act of the Energy Community Secretariat on the establishment of the Energy Community Secretariat's Centre for Renewables Acceleration (2025/23/ECS-ENC), the Centre is managed by the Secretariat and supported by Delegated Experts providing specialised technical and operational expertise. Two entities of the Energy Community Secretariat, namely the Task Force on Environment and the Renewable Energy Coordination Group form the core target group as key, interlinked institutional structures. They serve as focal points for the communication with governments of Contracting Parties. As the Centre will develop and will scale up the approach tested within the project for the Western Balkan region, the two groups will also cover the spatial layer, addressing the current gap in expert authorities and representatives actively engaged with the Secretariat.

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[121] https://www.energy-community.org/secretariat/organisation/RESCentre.html

122 The Nature Conservancy and Energy Community, Operational Blueprint for Renewables Acceleration Areas in the Energy Community, available at: https://www.nature.org/content/dam/tnc/nature/en/documents/Operational_Blueprint_Energy_Community.pdf

123 The Nature Conservacy and Energy Community, Permitting Protocol (RES One-Stop-Shops), published during the Technical Workshop on Renewable Acceleration Areas and RES Permitting Reform, Podgorica, 28–29 April 2026, available at: https://www.energy-community.org/dam/jcr:d1bc6e2f-f64d-4c12-b468-01b1dac4b70d/RES%20OSS.pdf

Pilot Projects in the Western Balkans

Building on the substantial work already undertaken by the Energy Community Secretariat on renewables acceleration areas and permitting reform, the establishment of the Centre created a dedicated framework for consolidating and scaling up these efforts. Following the establishment of the Centre, cooperation with the Open Society Foundations – Western Balkans provided dedicated funding to translate this work into practical implementation through pilot activities and to further develop approaches that can subsequently be replicated and scaled up across the Energy Community. It can be considered a first pilot for the Centre, with the approach to be scaled up to all Contracting Parties at a later stage. Following a call for Expressions of Interest for technical assistance launched in spring 2026, pilot projects are selected on the basis of defined criteria (contribution to a just transition, relevance and feasibility, institutional readiness and willingness, and replication potential) with priority encouraged for coal-affected municipalities undergoing a just transition, areas identified as strategic in National Energy and Climate Plans, and regions demonstrating strong local commitment or cross-sectoral potential.

For each selected pilot, the Centre provides tailored technical support. Planned activities include technical workshops with national authorities, support for the development of GIS-based mapping layers, and advisory support for drafting RAA-related legal and planning instruments. Lessons learned from pilot implementation will be systematically captured and translated into practical guidance, templates, and recommendations applicable across the Contracting Parties — so that pilot activities serve not only as individual interventions, but as building blocks for a scalable, region-wide acceleration framework. Further information on the project and the pilot framework is available on the Energy Community website.[124]

Capacity Building for Spatial Planning and Permitting Authorities

Capacity building is a core component of the Centre's activities and is closely linked to its technical assistance and pilot-based approach. Support to national and local authorities, the primary audience of this note, is provided through technical workshops and structured stakeholder dialogue. The Podgorica workshop of April 2026 is a first example: a dedicated feedback session gathered input directly from the key target audience on the current status, stakeholder challenges, and key issues in the permitting and planning of RAAs, and the findings will inform both the selection of support under the current call and the potential scaling up of support in subsequent phases.[125]

Capacity building is deliberately embedded in the broader implementation process rather than delivered as one-off training: the pilot projects serve as practical learning environments in which authorities apply new approaches directly, supported by continuous expert guidance. This

[124] Energy Community Secretariat, https://www.energy-community.org/secretariat/budget/RAA_WB6.html
[125] Link

combination of training, advisory support, and real-world application is intended to create sustainable institutional learning and long-term capacity improvements.

Current focus and Next Steps

In the sequential logic established by Articles 15b of the RED III, the exercise leading to the designation of RAAs which in turn triggers the fast-track permitting provisions in Articles 16a et seq. RED III, the first step envisaged is the coordinated mapping of the national territory pursuant to Article 15b. In the Energy Community, Ukraine is the first Contracting Party that having carried out that mapping.[126] Complementing these efforts, the Energy Community Secretariat is implementing the Cross-Border Sustainable Renewable Energy Acceleration in Ukraine – Mapping Synergy Renewable Energy Acceleration Areas between Ukraine, EU Member States and Moldova project, with financial support from the European Climate Foundation.[127] The project has developed RAA identification criteria and applied them through GIS-based mapping in five western Ukrainian oblasts – Lviv, Zakarpattia, Ivano-Frankivsk, Chernivtsi and Vinnytsia – taking into account environmental constraints, renewable energy potential and infrastructure readiness.[128] The resulting spatial input layers identify recommended and priority areas that can support the subsequent planning and designation of RAAs in accordance with the RED III framework on a regional and municipal level.[129]

Montenegro provides an instructive example of how bottom-up and top-down approaches can complement each other. The process did not start with a nationwide RAA mapping exercise.[130] Rather, an initial smart-siting pilot was undertaken at the municipal level in Nikšić, with support from The Nature Conservancy, to identify areas with high renewable energy potential and comparatively low environmental and social conflict.[131] The experience and methodology developed through the Nikšić pilot were subsequently scaled up through the Montenegro Energy Growth and Acceleration (MEGA) project, launched in 2024 to undertake a similar assessment across the entire territory of Montenegro and identify, among others, areas potentially suitable for future RAA designation. But tellingly, it happened only once a municipality, Nikšić, pioneered the siting with the support of TNC. Experience thus shows that a top-down approach needs to be complemented at least by a bottom-up approach where municipalities and regions take the initiative on action that rather fit under Art. 15c RED III, namely, to enable the designation of RAAs.

Legally, this may be a consequence of the absence of a binding obligation to transpose RED III. Conceptually, the approach creates real-life governance laboratories for learning lessons which may later, if considered useful, be scaled up on a national level. Empirically, it is confirmed by the

[126] https://rezoma.mev.gov.ua/

[127] https://www.energy-community.org/secretariat/budget/RAA.html

[128] https://www.energy-community.org/dam/jcr:e118b5f6-b874-40e4-a06d-c773d03d24c1/RAAs%20CRITERIA%20Ukraine_EN.pdf

[129] https://www.energy-community.org/secretariat/budget/RAA/map.html#7/49.566/28.871

[130] https://www.nature.org/en-us/about-us/where-we-work/europe/stories-in-europe/smart-siting-renewable-energy-montenegro/

[131] https://mia.gov.me/en/presentation-of-the-national-study-mapping-optimal-locations-for-solar-and-wind-energy-development-in-montenegro/

fact that the two highest-ranked pilot projects currently supported by the Centre address municipalities, namely Bitola in North Macedonia and Elbasan in Albania.

The bottom-up approach is not uncommon in the EU neither, albeit mostly prior to the adoption of RED III. Several Member States have used local/regional spatial-planning experiments for renewable energy that were subsequently institutionalised at national level. The Netherlands provides a particularly instructive example: under the national framework for Regional Energy Strategies, 30 energy regions bring together municipalities, provinces, water boards, grid operators, businesses and civil society to assess renewable energy potential, identify suitable locations and consider the associated grid and infrastructure needs. Several regions had developed approaches which were later rolled out nation-wide, including elements of formal spatial and environmental planning and alternative procedural approaches and governance models[132]. Denmark, where municipalities have been long enjoying strong spatial planning rights, has made similar experiences, while other Member States also had relevant planning or "suitable area" frameworks before RED III. Germany and France, for example, had established spatial-planning and mapping approaches for renewable energy that could subsequently be connected to the RED III mapping and acceleration-area requirements, while Italy's pre-existing "suitable areas" (*aree idonee*) framework has provided a particularly direct basis for the introduction of its RAA system. The comparative work undertaken by the Öko-Institut shows that, across the Member States examined, RED III has generally been integrated into existing spatial-planning processes where such processes were already available, rather than requiring an entirely new planning architecture.

In its current cooperation with the municipalities, the Centre for Renewables Acceleration and its partner OSF are supporting the preparatory work for RAA designation technically, but equally as motivators, facilitators and moderators in close cooperation with the local authorities and stakeholders. Over time, the municipal pilots are expected to be first reflected in local and regional spatial planning. Ultimately, they should be scaled up nationally and feed into coordinated mapping on the national level, as well as governance solutions needed for the implementation of RED III. The projected further development is depicted in the table below.

Step	Description	Status
1	Identifying and assessing relevant and reliable datasets for determining low-conflict areas (including gaps), sensitivity mapping and identification of low-conflict areas	ongoing

[132] The Spatial Dimension of Energy Governance: Examining the Evolution of Regional Strategies, Experimentalism, and Cross-Sectoral Planning Dynamics in the Netherlands, https://www.researchgate.net/publication/392782082_The_Spatial_Dimension_of_Energy_Governance_Examining_the_Evolution_of_Regional_Strategies_Experimentalism_and_Cross-Sectoral_Planning_Dynamics_in_the_Netherlands?utm_source=chatgpt.com

Step	Description	Status
2	Infrastructure availability and development mapping, demand mapping, mitigation rulebook, SEA and public consultations	short-term
3	Designation of low-conflict RAA and incorporation in municipal and regional spatial plans and strategies	mid-term
4	Consultation of and exchange with all national relevant authorities and other stakeholders	throughout
5	Permitting reform, through national regulatory authorities or other competent decision-maker	mid- and long-term
6	Practical permitting arrangements, incl. at local level where certain renewable installations (e.g. rooftop solar) can be fully permitted (e.g. through one-stop-shops and as part or in subsequence to local RAA pilots)	mid- and long-term
7	Integration in coordinated territorial mapping and NECPs, through practical implementation driven by local/ municipal actors, and reconcile with national ambition levels	mid- and long-term
8	Scale-up to additional municipalities and regions: Energy Community Network of Renewable Acceleration Municipalities, incl. through support designed to transition from spatial identification towards implementation and increased investments, through improved coordination in planning (e.g. on infrastructure needs and local permitting), cooperation across border, regions and municipalities.	mid- and long-term

Table 3: Roadmap for activities supported by the Centre.

6. From Designation to Promoting Investments: The Role of Permitting during Early Implementation

For several years, attracting investments has been a high policy objective of governments and local authorities in the Western Balkans alike, and is indeed decisive for fast decarbonisation of their energy systems and modernisation of their industries. With the Centre for Renewables Acceleration's current focus on mapping and siting aspects, the immediate benefits for the attraction of investment in renewable energy generation may not be self-evident. Yet these activities address some of the risks that most directly affect the development of renewable energy projects: uncertainty over location, environmental and social constraints, competing land uses, infrastructure availability and the likelihood of delays or legal challenges during permitting. As seen above, delays in permitting significantly affect the NPV of renewable energy projects. In a region governed by harmonised European rules, including high environmental protection standards, it is clear and in any investors' best interest that only a robust RAA designation process, taking into account all environmental and social concerns and involving the public concerned, can legitimise such fast-tracking of permitting procedures.

Fast-track permitting is can substantially boost investments, as it does not only accelerate processes but also reduces complexity, incl. in early development stages. Transposing i.e. Articles 16, 16a and 16 f of RED III largely depends on reforms of the national permitting systems governed by sector-specific energy legislation and/or general administrative laws, which in turn may hinge on a legally binding obligation stemming from Energy Community law. The Permitting Protocol[133] provides an adequate methodology for its later implementation based on a one-stop-shop approach, which does not need to be reproduced here.

That said, the Western Balkan Contracting Parties have not yet tapped into the full potential of simplifying and streamlining the permitting procedures even ahead of fast-tracking as introduced by RED III. The Directive's predecessor, RED II, is applicable also in the Energy Community.[134] The measures taken thereunder to simplify, shorten and make more transparent the permit-granting procedure are to be reported in the NECPs. RED II requires that administrative procedures for permit granting for renewables electricity generation projects shall not exceed two years (excluding the time for environmental permitting procedures). RED II also requires Contracting Parties to designate a single contact point ('one stop shop') in the permitting procedure for project promoters. Implementation of this principle is lagging behind in the Contracting Parties.[135] The one-stop-shop concept should, however, not be understood as necessarily requiring a single, centralised national authority. Article 16(3) of RED III requires Member States to establish one or more contact points for the permit-granting procedures for renewable energy projects, but does not prescribe the administrative level at which such contact points must be

[133] The Nature Conservacy and Energy Community, *Permitting Protocol (RES One-Stop-Shops)*, loc.cit.

[134] With regard to permitting, the relevant provisions are Articles 15 to 17.

[135] See EIHP, Energy Community Study on Permit-Granting and Planning of Energy Projects in the Energy Community, loc.cit.

established. This leaves considerable scope to adapt the institutional model to the distribution of competences within each country. In systems where regional or municipal authorities already play an important role in spatial planning, land-use decisions, building permits or other project-level authorisations, regional or local one-stop shops could provide a particularly effective interface for project promoters and local stakeholders. Besides these, and based on EU Member States' experience, Contracting Parties can take a number of additional measures to ensure faster permitting procedures as well as proceedings of litigation cases, as documented in a number of existing studies and guidance documents.[136] Generally speaking, full implementation of the RED II provisions on permitting could help shortening delays significantly, thus yielding concrete yet belated results, while the fast-tracking approach of RED III is at least prepared to the point where all it takes is amendments to national legislation.

[136] For best-practice examples in Member States see Commission Staff Working Document - Guidance to Member States on good practices to speed up permit-granting procedures for renewable energy projects and on facilitating Power Purchase Agreements, SWD/2022/0149 final, point I.1.b.; ECLAREON et al., RES Simplify — Technical Support for RES Policy Development and Implementation, interim report, loc. cit., pp. 17 et. seq.

7. Conclusion and Outlook

Renewable Acceleration Areas are one of the most consequential reforms of European renewable energy planning and permitting law in a generation. They respond to a diagnosis that this note has documented in detail: the binding constraint on renewable energy deployment is no longer technology, resource potential, or finance, but the length, complexity, fragmentation, and unpredictability of administrative authorisation processes. By shifting environmental and spatial assessment from the individual project to the planning stage, the RAA framework offers a way to reconcile speed with environmental integrity, provided the upfront work of designation is done well.

The emerging implementation experience across the EU carries a clear double lesson for Energy Community Contracting Parties. On the one hand, the challenges are real: no assessed Member State met the February 2026 designation deadline in full, and the recurring obstacles (including data and mapping deficits, environmental assessment gaps, fragmented governance, strained administrative capacity, and uneven public participation) will arise in the Energy Community context in at least equal measure. On the other hand, the framework demonstrably works where it is taken seriously: countries that have invested in sensitivity mapping, statutory exclusions, binding mitigation rulebooks, genuine strategic environmental assessment, and early, structured public participation are building acceleration areas that are both faster and more legally robust than the project-by-project systems they replace. Shortcuts including copy-paste designations, skipped assessments, minimal consultation deliver formal compliance at the price of the legal certainty and public legitimacy on which acceleration ultimately depends.

For national and local permitting authorities in the Contracting Parties, the task ahead is therefore demanding but well-charted. The legal framework is defined; the Commission's guidance, the Operational Blueprint, and the Permitting Protocol provide the methodology; and the comparative record identifies both the pitfalls and the good practice. The Energy Community Centre for Renewables Acceleration exists precisely to help authorities translate this body of knowledge into national practice: through pilots, tools, and sustained technical assistance. Authorities that engage early with the designation process, and with the support available for it, will be best placed to convert the region's substantial renewable potential into deployed capacity, energy security, and affordable energy for their citizens.