

## National Territory Mapping for Renewable Electricity

The Eastern and Midland Regional Assembly welcomes the public consultation<sup>1</sup> on National Territory Mapping for Renewable Energy and the future preparation of a Draft Plan for designating Ireland's first Renewable Acceleration Area (RAA). The purpose of this public consultation is to review the proposed national territory mapping for onshore wind, offshore wind, and solar energy, to meet the requirements of Article 15b of the Renewable Energy Directive 2023/2413 (known as the RED III Directive) and to identify any key considerations that should be taken into account in preparing a Draft Plan for the designation of a Renewable Acceleration Area (RAA) in line with Article 15c of the Directive.

The submission set out hereunder contains recommendations on behalf of the Regional Assembly. This submission has been prepared by the executive of the Regional Assembly and approved by the Members of the Eastern and Midland Regional Assembly.

### 1.0 Overall Context

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional, Spatial and Economic Strategy (RSES), oversight and coordination of City and County Development Plans and Local Economic and Community Plans, management of EU Operational Programmes, EU project participation, and the implementation of national economic policy. As a strategic policy body, EMRA also participates in the consultation processes of other relevant strategic plans and policies.

The role and function of the Regional Assembly, including the scope of the RSES 2019-2031, was provided for in the Planning and Development Act 2000-2025, which included support for and alignment with the economic policies and objectives of the Government. However, this legislation has been superseded by the Planning and Development Act 2024-2025, which was signed into law on the 17<sup>th</sup> October 2024. The provisions of the Planning and Development Act 2024-2025 relevant to the Regional Assemblies commenced on 2<sup>nd</sup> October 2025 and various sections of the legislation will commence on a phased basis in the coming months.

It is noted that the Planning and Development Act 2024-2025 expands the scope of the RSES and the functions of the Regional Assembly. This includes matters directly relevant to the Department of the Climate, Energy and the Environment (DCEE) in the context of National Territory Mapping and

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<sup>1</sup> Public Consultation Link: <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/consultations/public-consultation-on-national-territory-mapping-for-renewable-electricity/>

preparation of a Draft Plan for the designation of RAAs under Article 15c and 15d of the RED III Directive. These are explored in the submission below.

The Regional Assembly is further mindful of its obligations, as a ‘relevant body’, as prescribed under the Climate Action and Low Carbon Development Act 2015, as amended, to perform its functions in a manner consistent with the need to achieve Ireland’s national climate objective.

### **1.1 Regional Spatial and Economic Strategy (RSES)**

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region was made by the Members of the Assembly in June 2019, and it is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of people and places in the Region, from urban to rural, with access to quality housing, travel and employment opportunity for all.

The vision of the RSES is supported by sixteen Regional Strategic Outcomes (RSOs), that are aligned with National Strategic Outcomes of the National Planning Framework (NPF) and framed around the three key principles of Healthy Placemaking, Climate Action and Economic Opportunity. Of particular relevance to this public consultation are the RSOs that seek to build climate resilience (RSO 8), that support the transition to low carbon and clean energy (RSO 9), seek to protect and enhance ecosystem services (RSO 10), conserve and enhance biodiversity and protect landscape and heritage (RSO 11), support a strengthening of the blue-green economy (RSO 15) and, the sustainable management of water and other environmental resources (RSO 7).

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), achieve alignment of investment priorities with those of the National Development Plan (NDP) and the National Marine Planning Framework (NMPF), and thus Project Ireland 2040, by coupling new development with the requisite investment in services and infrastructure. In doing so, the RSES supports the spatial, economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Eastern and Midland Region. The RSES also sets the context for local authorities within the Region to develop their City and County Development Plans (CDPs), and Local Economic and Community Plans (LECPs) in a manner that will ensure alignment between national, regional and local plans.

The RSES presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; securing Athlone, Drogheda and Dundalk as Regional Growth Centres, acting as regional economic drivers and supports for their wider catchment areas; and promoting a network of large economically active Key Towns (which include

Swords, Maynooth, Bray, Navan, Naas, Wicklow, Longford, Mullingar, Tullamore and Portlaoise) that provide employment and services to their surrounding areas. All of this is supported by self-sustaining growth towns, self-sustaining towns and a network of multifaceted rural places.

## **2.0 Submission**

This public consultation aims to gather feedback on National Territory Mapping for Renewables which has been created by gathering existing renewable energy designations from City and County Development Plans and this mapping is a requirement under Article 15b (of the [EU Renewable Energy Directive 2023/2413](#)). It also aims to identify key considerations which should be considered when drafting the plan for the designation of at least one Renewable Acceleration Area (RAA) under Article 15c.

In response, this submission seeks to highlight the role of the Regional Assembly as identified in new national planning legislation and updated national planning policy. It also emphasises that the outputs developed by DCEE to achieve compliance under the RED III Directive including National Territory Mapping and future RAA designation, should align with the role of the Regional Assemblies outlined in the Planning and Development Act 2024, as amended, regarding regional renewable energy. The submission also seeks to address the questions asked in the Public Consultation Report and note the relevant policies and objectives of the RSES 2019-2031 for the Eastern and Midland Region.

### **2.1 New RSES, Planning & Development Act 2024 and NPF 2025**

The Planning and Development Act 2024, as amended, sets out specific requirements for the review of the RSES, including the following:

- Sections 29 (1)(e), 1(f) and 1(g) of the Act state that an RSES shall make provision for strategies relating to onshore renewable energy; climate change adaptation and mitigation; and marine and coastal matters that facilitate the coordination of land-sea interactions for coastal planning authorities within the region.
- Sections 29 (1)(h), 1(k), 1(m), 1(o) further require an RSES to make provision for matters including coastal zone management as a consequence of sea level change, including the identification of strategic infrastructure; the preservation and protection of the environment and its amenities; a strategy relating to landscape and landscape character that coordinates the categorisation of landscapes, in terms of their capacity to absorb particular types of development, across the region so as to ensure a consistent approach to the protection of the landscape; and, a flooding and flood management plan for the region.

Furthermore, the onshore Regional Renewable Energy Strategy (RRES) must meet national targets, identify and facilitate electricity grid infrastructure, include upgrade projects and support infrastructure. It must also make provision for energy security and promote steps for coordination and cooperation between public bodies.

The review of the RSES for the Eastern and Midland Region will be prepared in accordance with the new legislative requirements and demonstrate consistency with Project Ireland 2040 including the NPF 2025, NMPF 2021, NDP 2025, and other national policies. Other plans which will be closely aligned with the RSES are the Regional Enterprise Plans (REPs)<sup>2</sup> and Designated Maritime Area Plans (DMAPs), relevant to the Region. A National Designated Maritime Area Plan for Offshore Renewable Energy is in the early stages of development and is also relevant to National Territory Mapping and the designation of future RAAs.

The NPF 2025 renews its emphasis on climate action with the need for Ireland to transition to a carbon neutral and climate resilient society. A key component of this is the need to accelerate the growth of renewable energy generation. New policies in the NPF promote the accelerated roll-out of renewable energy. This emphasis aligns with a commitment to achieving climate neutrality no later than 2050, a 51% reduction in greenhouse gas emissions by 2030 and legally binding objectives in the Climate Action and Low Carbon Development (Amendment) Act 2021. The NPF reflects the target of achieving at least 5GW of installed offshore wind capacity by 2030, and the longer-term ambition for over 37GW of offshore renewable energy (ORE) to be delivered before 2050. It also highlights the role of ports to the ORE industry.

**Table 1: Regional Renewable Electricity Capacity Allocations**

Region	Energised capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030	Energised Capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030
	<b>Onshore Wind</b>			<b>Solar PV</b>		
Eastern and Midlands	284	1,966	25%	306	3,294	45%
Northern and Western	1,761	1,389	35%	0.3	959	12%
Southern	2,622	978	40%	138	3,302	43%
<b>Total</b>	<b>4,667</b>	<b>4,333</b>		<b>445</b>	<b>7,555</b>	

Source: Table 9.1 Regional Renewable Electricity Capacity Allocations, National Planning Framework 2025

<sup>2</sup> Department of Enterprise, Tourism, and Employment.

As illustrated in Table 1 (above), regional renewable electricity capacity allocations were identified for the three Regional Assemblies. Such allocations are intended to facilitate the accelerated roll-out and delivery of renewable electricity infrastructure for onshore wind and solar energy generation development and support the achievement of 2030 targets in the Climate Action Plan. The table outlines that the Eastern and Midland Region must achieve 25% of the national share of onshore wind and 45% share of solar PV by 2030.

In addition to its support for the offshore wind industry in meeting Climate Action Plan targets, the NPF 2025 refers to energy policy and the use of renewable hydrogen as a zero-emission energy source. It also highlights the importance of energy security on the island of Ireland. It signals the need to prepare a National Coastal Change Strategy and Coastal Change Management Plans. It contains new National Planning Objectives (NPOs) regarding the effects of sea level change and coastal erosion and adaptation responses.

The NPF also emphasises the need for protection and restoration of biodiversity including protected habitats and species, integration of biodiversity protection and restoration in planning and development, a consistent/strategic approach across local authorities on their Local Biodiversity Action Plans influenced by the National Biodiversity Action Plan and implementation of a new National Nature Restoration Plan. Work on the preparation of this new plan is underway, as it must be submitted to the EU Commission by September 2026.

## **2.2 National Territory Mapping**

The Regional Assembly welcomes the National Territory Mapping for onshore, offshore wind energy and solar energy as a key step in meeting Ireland's obligations under the EU Renewable Energy Directive 2023/2413 (RED III). Climate Action is one of the three key principles of the RSES, and the Climate Strategy of the RSES aims to ensure that the RSES drives climate resilience throughout the Region and accelerates climate action.

Furthermore, the RSES supports 'the transition to low carbon and clean energy', climate mitigation in line with global and national targets and harnessing the potential for a better distributed renewables-focused energy system to support the transition to a low carbon economy by 2050 (RSO 9). Climate change and climate focused Regional Planning Objectives (RPOs) are integrated throughout the RSES and include priorities related to the built environment, sustainable transport, energy and waste, flood resilience and water, and green infrastructure and ecosystem services (Section 7.9).

The Regional Assembly supports an increase in renewable energy sources under RPOs 4.84, 6.9, 7.35 8.23, 10.20 and 10.24. This includes the use of wind energy – both onshore and offshore, biomass, and solar photovoltaics and solar thermal, both on buildings and at a larger scale on appropriate sites,

in accordance with national policy. It supports the electrical infrastructure which underpins the transmission network for renewable energy generation (RPO 10.22). As outlined above, the Planning and Development Act 2024, as amended, requires a new Regional Renewable Energy Strategy (RRES) to be included in the RSES to meet national targets, identify and facilitate electricity grid infrastructure, including upgrade projects and support infrastructure, make provision for energy security, and promote steps for coordination and cooperation between public bodies. The existing RSES supports *“the sustainable development of Ireland’s offshore renewable energy resources in accordance with the...‘Offshore Renewable Energy Development Plan’ and any successor thereof including any associated domestic and international grid connection enhancements”* (RPO 10.24).

### Methodology

The Public Consultation Report refers to the development of the National Territory Maps from existing wind energy strategies or renewable energy strategies in City and County Development Plans (CDPs). While the Regional Assembly considers it practical to draw from existing CDPs subject to environmental assessment processes, which aligns with Article 15b which states *“Member States may use or build upon their existing spatial planning documents or plans”*, reliance on such plans to inform the designations for the National Territory Maps may limit the State’s ability to fully meet its EU obligations under Article 15b. As such, when seeking to designate a RAA at a national level, a strategic, forward-looking approach should be explored. All existing CDPs will be undergoing a review process in line with the new Planning and Development Act 2024, as amended, thus relying on these plans as a source of information that is subject to change, may limit or restrict the identification of suitable areas as RAA.

CDPs should provide a foundational input, but should not be an exclusive source of information for identifying a RAA. The consistency of methodologies used for developing CDP wind and energy strategies must be carefully considered, including baseline data sources, data reliability, data compilation and presentation, land use change<sup>3</sup> since they were adopted, assumptions applied, changes in electrical grid infrastructure availability and technology, etc. The Regional Assembly is charged with preparing a regional strategy for renewables, so ideally the methodology designed to address the requirements of RED III should be consistent with the approach underpinning the Regional Renewable Energy Strategy (RRES). Overall, the approach to National Territory Mapping must be unambiguous and evidence based. It should also clearly show intercounty and interregional interaction (i.e. between renewable energy areas).

The Regional Assembly notes in the Public Consultation Report that any planning application *“for development within any lands already designated, will be subject to detailed assessment by the*

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<sup>3</sup> Corine data and the Land Use Evidence Review is an important consideration, available here: DAFM; DCEE (2023) <https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/publications/land-use-review-phase-1/>

*relevant Planning Authority and is subject to all relevant planning and environmental legislation and regulations*". However, it remains unclear whether the lands which are classified as 'acceptable in principle' under Tier 1 or Tier 2 'open for consideration' within Map 1 (Onshore Wind) and Map 2 (Solar) or undesignated areas on Map 1, 2 or Map 3 (Offshore), if designated as a RAA, would avail of the streamlined permitting procedures. As a result, clarification is sought on this matter and it is recommended this is addressed in the Draft Plan.

#### Classification

In relation to Map 1 (Onshore Wind) and Map 2 (Solar) the Regional Assembly considers it important that the National Territory Mapping and future Draft Plan for RAA designation provide clarity on Tier 4 areas, currently identified as "*Unclassified/ No Designation Areas*". Given that these areas have not yet been assessed or designated within existing CDPs, it is recommended that the Plan either explicitly confirms that Tier 4 areas will be subject to further review as potential areas suitable for RAAs, or, if not, the Draft Plan should state there is no intention to explore these areas further. Such clarity is essential to ensure transparency and to inform planning authorities and stakeholders of the scope and limitations of future renewable energy development opportunities.

The Regional Assembly notes that within the National Territory Maps for solar and onshore wind, areas classified as "*Open for Consideration*" are designated differently. In the case of solar, this classification appears to reflect areas of *low to medium environmental risk*, whereas for onshore wind, it includes areas identified as having *low capacity*. For clarity and consistency, the Regional Assembly recommends that both maps feature an "*Open for Consideration*" classification based on a combination of environmental risk and grid capacity. Similarly, the Draft Plan should clearly outline the criteria used to classify lands as Tier 3 in Map 1 (Onshore Wind) and Map 2 (Solar), which have been designated as unsuitable.

#### Mapping Coverage/ Renewable Energy Type

The only part of the Eastern and Midland Region with solar energy mapping on Map 2 is within the functional area of South Dublin County Council. This is an exceptionally limited amount of information, and clarity is required as to whether this meets the requirements of the Directive and whether other sources of data can be used.

Six of the twelve counties in the Eastern and Midland Region have wind energy development mapping though some areas of Counties Laois and Longford are also indicated.

The Regional Assembly requests clarity regarding the frequency of reporting to the European Commission, for example, whether there will be an opportunity to update the National Territory Mapping and draft Plan for RAAs, following the preparation of the Regional Renewable Energy

Strategy for the Eastern and Midland Region, and whether other renewable energy forms, such as hydrogen, biomass, etc. will be considered in future iterations.

#### Landscape and Cumulative Renewable Energy Developments

The Regional Assembly is awaiting the publication of a National Landscape Strategy (NLS) incorporating landscape characterisation which will inform the preparation of the Regional Renewable Energy Strategy for the Eastern and Midland Region. The National Territory Mapping should be consistent with the NLS. The Eastern and Midland Region includes a UNESCO World Heritage Site (WHS) along with many other sensitive natural and cultural heritage landscapes that must be protected. Consideration of the potential impacts on the UNESCO WHS due to mapping designations will require specialist expert advice. The cumulative number of permitted renewable energy developments in the Region, including significant environmental impacts should be considered within this process.

#### Impact of Climate Change on Coastal Areas

Coastal flooding mapping and associated future scenarios should guide the identification of suitable areas to be included along the coastline, based on information from the Office of Public Works, Marine Institute, etc. Buffer areas should be considered, given the impact of sea-level rise and onshore or land-based flooding. This process is taking place ahead of a future National Coastal Change Strategy and sub-national Coastal Change Management Plans. As noted above, as part of the review of the RSES, the Regional Assembly must make provision for a regional strategy on the marine and coastal area and address coastal zone management and climate change adaptation and mitigation.

#### Other RED III requirements

Article 15a (iii) gives *‘priority to artificial and built surfaces, such as rooftops and facades of buildings, transport infrastructure and their direct surroundings, parking areas, farms, waste sites, industrial sites, mines, artificial inland water bodies, lakes or reservoirs and, where appropriate, urban wastewater treatment sites, as well as degraded land not usable for agriculture’*. As the maps have solely relied on existing CDP designations, it is unclear if priority has been given to existing built-up areas which would be classified as low environmental risk. Clarity is sought on this issue and should be explicitly addressed and explored in both the National Territory Mapping and the Draft Plan, as outlined in the Directive.

Regarding Map 3 (Offshore Wind), the Regional Assembly welcomes the inclusion of the four sites identified in the South Coast Designated Maritime Area Plan which appears to be compliant with Article 15b. These sites are for ‘fixed position’ renewable energy development. This approach is consistent with the RSES which recognises the importance of advancing offshore energy projects such as wind, wave, and tidal energy and associated developments such as Ireland’s domestic and international grid connections (RPO 10.24) and supports *“the sustainable development of Ireland’s*

*offshore renewable energy resources in accordance with the....‘Offshore Renewable Energy Development Plan’ and any successor thereof including any associated domestic and international grid connection enhancements”* (RPO 10.24). The Assembly supports the new streamlined permitting process, as set out in Article 16a, which will be instrumental in helping Ireland meet its renewable energy targets.

It is also noted that the additional sites (1-5) referenced on Map 3 are currently under consideration, have the benefit of Maritime Area Consents (MACs), and are progressing through the planning process. However, it remains unclear whether, if any of these sites were designated as a RAA, they would continue through the existing planning and MAC processes, (already at an advanced stage for some) or if they would benefit from the streamlined permitting procedures outlined in Article 16a. The Regional Assembly notes a RAA is not permitted in protected areas such as Marine Protected Areas (MPAs). Therefore, it is requested that Map 3 is updated to include MPAs.

#### Other RSES Sections of Relevance

In addition, Section 7.2 of the RSES sets out the strategy for *Integrated Land and Marine Planning* which seeks to ensure consistency and alignment with the Marine Strategy Framework Directive, national maritime spatial plan (with the NMPF subsequently published in 2021) and a framework for collaborative cross boundary and cross border engagement. Therefore, it is requested that the Draft Plan and any RAA within the maritime space, should reflect this integrated approach with alignment of both terrestrial and marine planning strategies.

The RSES also supports the protection of ports from inappropriate uses while promoting diversification and in line with Ireland’s renewable energy ambitions and, the use of ports as a hub for offshore renewable energy development. In this regard the RSES states *“the EMRA supports the protection of the marine related functions of ports in the Region in order to ensure the future role of ports as strategic marine related assets is protected from inappropriate uses, whilst supporting complimentary economic uses including the potential for facilitating offshore renewable energy development at ports”* (RPO 8.23). This is consistent with the NPF 2025.

### **2.3 Key Considerations for the Draft Plan/ RAA Designation**

#### Role of the Regional Assemblies in Renewable Acceleration Areas (RAAs)

The Regional Assembly welcomes the designation of Renewable Acceleration Areas (RAAs) to support the acceleration of renewable energy infrastructure, in line with Article 15c of the EU Renewable Energy Directive 2023/2413. As outlined in the Directive, the identification of RAAs should focus on areas with low environmental sensitivity excluding environmentally protected or sensitive sites and this is considered a balanced approach to facilitate renewable energy development while safeguarding the environment.

The designation of RAAs requires a coordinated and collaborative planning process, involving all relevant stakeholders. As set out in the NPF 2025 and the Planning and Development Act 2024, as amended, the Regional Assemblies are tasked with a key role in the spatial coordination of Ireland’s energy transition and climate resilience. This includes, for the first time, a formal function in setting indicative regional targets for onshore wind and solar PV deployment—ensuring that national climate and energy goals are delivered in a spatially balanced, environmentally sustainable, and community-embedded manner. This represents a significant step forward in aligning land use planning with energy policy. The Regional Assembly supports the delivery of a RAA and would welcome reference to the explicit role of the Regional Assembly regarding regional targets for onshore wind and solar PV deployment in the Draft Plan. It is recommended that the Regional Assembly be given a defined input in the designation of a RAA, reflecting their strategic planning function and renewable responsibilities as now set out in the NPF 2025 and the Planning and Development Act 2024, as amended.

#### Grid Capacity and Bottlenecks

The Regional Assembly considers that Ireland's electricity transmission grid may lack the capacity to connect planned renewable energy projects, thus threatening the delivery of a RAA, the achievement of national targets under the Climate Action Plan, the National Energy and Climate Plan, and the carbon emission targets. Grid bottlenecks are also preventing timely connection of new renewable energy projects, which could impact the delivery of a RAA. Furthermore, until the publication of Regional Renewable Energy Strategies, a high risk of spatial mismatch between grid investment planning, generation, and grid capacity remains. It is requested that the Draft Plan should address grid capacity and bottlenecks and outline how transmission grid development will be aligned to support the delivery of RAAs.

The RSES sets out *Guiding Principles for Energy Networks* which seek to establish a consistency of approach among planning authorities, both in identifying areas suitable for renewable energy development and having regard to potential environmental impacts, to reflect the advancements in technology, and the need to engage with, and be responsive to the needs of communities that live close to renewable energy infrastructure. Early stakeholder engagement and community participation is supported, including community ownership models, optimisation of community benefit from renewable projects and developing sustainable energy communities.

Additionally, the protection of sub-sea cables and connections is vital and should be referenced in the Draft Plan. The RSES identifies such key telecommunications and energy infrastructure as part of the regional spatial and economic growth strategy as it enables societal and economic activity.

#### Environmental Considerations

Ireland's climate, biodiversity, and water protection objectives are now embedded in both domestic and EU law, requiring full compliance in infrastructure planning and delivery. Infrastructure delivery

must fully comply with Ireland's obligations under the Climate Action and Low Carbon Development Act 2015, as amended, the Water Framework Directive, the Strategic Environmental Assessment and Habitats Directive, and the EU Nature Restoration Law.

As stated in Article 15c, RAAs shall not be located in *“Natura 2000 sites and areas designated under national protection schemes for nature and biodiversity conservation, major bird and marine mammal migratory routes as well as other areas identified on the basis of sensitivity maps and the tools referred to in the point (iii), except for artificial and built surfaces located in those areas such as rooftops, parking areas or transport infrastructure”*. The Regional Assembly considers that these areas need to be carefully considered as part of the selection and designation of a RAA. The Draft Plan should be accompanied by an Appropriate Assessment (AA) and SEA to identify any likely significant effects of developing a RAA including the construction, operation and decommissioning phases of the development of various renewable energy technology. This is crucial to ensuring that renewable energy projects located in RAAs comply with these rules and can benefit from shorter and streamlined permitting procedures, as set out in Article 16a of the Directive, and particularly the exemption from dedicated environmental assessments.

#### Biomass and Other Renewable Energy Forms

The Regional Assembly notes that under Article 15c, that Member States can exclude biomass and hydropower as a source of renewable energy. However, the Regional Assembly considers the Draft Plan should consider biomass as a key renewable energy source, alongside offshore and onshore wind and solar sources. As outlined in the RSES, rural areas play a central role in the delivery of renewable energy, including wind, solar, and biomass. Building on this existing capacity, there is a clear opportunity to support low-carbon and low-impact forms of land use such as local agri-food systems and biomass production. This recognises the role of biomass, which can not only enhance energy diversity and resilience, but also provide sustainable economic opportunities for rural communities, in line with national and EU climate objectives.

Furthermore, the RSES recognises the need to continue to expand micro-generation of renewable energy, geothermal energy, district heating, storage of heat and energy and support the strengthening of the electricity transmission and distribution network. District heating offers an efficient and cost-effective heating option using networks from a variety of potential technologies and renewable energy sources, such as combined heat and power (CHP), biomass energy, geothermal or energy from waste (RPOs 7.37, 7.34, 7.38 and 10.19). The use of renewable energy solutions to provide heating and hot water to houses and businesses contributes to sustainability as it reduces demand for and consumption of energy. Waste heat represents a substantial indigenous resource and is the single largest available low carbon source of energy available in the Region.

The provision of infrastructure will support and facilitate a more distributed, renewables-focused energy generation system, harnessing both on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting sites of optimal energy production to the major sources of demand.

#### Priority Areas

As stated above, Article 15c states that the location for RAA should be prioritised in existing artificial and built-up areas including but not limited to, rooftops, farms, transport infrastructure, industrial sites or mines. In this context, the Regional Assembly recommends that the Draft Plan and associated National Territory Mapping clearly demonstrate how the identification of potential RAAs reflects this prioritisation.

#### Data and Digital Tools

The designation of an RAA should be underpinned by a clear, evidence-based rationale supported by robust and up-to-date data. This includes using comprehensive datasets that incorporate key energy and environmental considerations such as grid capacity, resource availability, environmental sensitivities, and land use constraints.

In this regard, the Regional Assembly draws the Department's attention to the Regional Development Monitor (RDM) which hosts a range of environmental indicators of relevance. The RDM<sup>4</sup> is a collaborative project between the three Regional Assemblies, the All-Island Research Observatory (AIRO) at Maynooth University and spatial infrastructure partners, Tailte Éireann (TÉ) via the GeoHive platform. The aim of the RDM is to collate and visualise a range of relevant socio-economic and environmental indicators to present the performance of each of the three regions in terms of achieving the objectives outlined in their respective RSEs. The RDM provides a series of new national mapping and visualisation tools to assist Government departments, regional assemblies, local authorities, planners, policy makers, researchers and members of the public in gaining a greater insight into social, economic and environmental trends to aid better decision making. The Assembly invites the Department to explore and utilise this open resource and consider its potential for monitoring the RAAs and requirements of the Directive.

#### Stakeholder Consultation and Cross Boundary Interactions

In terms of stakeholder engagement and public consultation, the Regional Assembly notes that once designated, RAAs are exempted from the need for environmental assessment at local project level and an environmental report would be undertaken upon designating. It is recommended that this is clearly outlined in the Draft Plan when designating an area as a RAA, ensuring compliance with international law, such as Article 7 of the Aarhus Convention which relates to '*Public Participation Concerning Plans, Programmes and Policies Relating to the Environment*'.

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<sup>4</sup> <https://www.emra.ie/regional-development-monitor/>

The Regional Assembly considers that the Draft Plan should explicitly address the importance of cross-border collaboration across local and regional administrative boundaries. Effective cross-boundary coordination is essential to the successful designation and long-term development of a RAA, particularly in regions where infrastructure, environmental sensitivities, and renewable energy projects affect several different administrative boundaries. The interface between renewable energy projects and designations along the border with Northern Ireland also requires consideration and engagement.

#### Governance of Renewable Acceleration Areas

The designation and implementation of an RAA should be supported by clear governance structures and coordinated engagement across all relevant stakeholders, including Government departments, state agencies, regional assemblies, local authorities, developers, and the wider public. Public consultation associated with the National Territory Mapping and the Draft Plan for a future RAA, should enhance awareness and understanding of how RAAs will be managed, including the specific roles, responsibilities, and powers of key bodies involved in planning and consent processes. Clear guidance for project applicants should also be provided, with accessible information made available early in the process.

### 3.0 Recommendations

The Department is requested to consider the following recommendations of the Regional Assembly before finalising its National Territory Mapping and in the formation of a Draft Plan for the designation of a Renewable Acceleration Area (RAA)/ future RAAs.

#### **National Territory Mapping**

1. The methodology used for National Territory Mapping should be unambiguous; evidence-based and allow for temporal changes and technological advancement. Datasets should be carefully considered and any assumptions described. While the use of existing wind and energy strategy mapping is a valuable resource, varying methodologies in local authority strategies, when they were prepared, including their environmental assessments and implementation, could affect the reliability of National Territory Mapping and future RAA designation.  
Reason: In the interest of transparency, and proper planning and sustainable development.
2. The methodology used by the Department of Climate, Energy and the Environment for National Territory Mapping should be transferable, where applicable, to the preparation of the Regional Renewable Energy Strategy by the Regional Assembly.  
Reason: In the interest of consistency and proper planning and sustainable development.
3. (a) The “*Open for Consideration*” category in Maps 1 and 2 (Onshore Wind and Solar) should be based on both environmental risk and grid capacity.

(b) The Department is required to clarify whether coastal flooding and coastal zone buffers have been included in the mapping to take account of sea-level rise and onshore/ land-based flooding.

(c) Marine Protected Areas should be clearly shown in Map 3 (Offshore).

(d) Given the limited solar mapping for the country, the Department may wish to use additional sources of data, such as the DAFM Food Vision Dashboard<sup>5</sup> which illustrates solar farm projects and solar panels.

(e) The Department is requested to clarify whether it is planned to select RAAs from Tier 1 or 2 on the National Territory Mapping (Map 1 or 2) or offshore, or any unclassified areas on such mapping.

(f) The interface between different counties, regions and the border with Northern Ireland should be carefully considered, to ensure that there is a logical and sequential approach to the identification of renewable energy areas, having regard to infrastructure availability, environmental sensitivities, communities and the built environment, etc.

Reason: In the interest of clarity, and proper planning and sustainable development.

#### **Draft Plan for developing a Renewable Acceleration Area**

4. The Draft Plan for the future designation of a Renewable Acceleration Area should recognise the statutory role of the Regional Assembly in preparing a Regional Renewable Energy Strategy and other related provisions, as set out in the Planning and Development Act 2024, as amended, and the NPF 2025.

Reason: To reflect the enhanced role of the Regional Assembly under the Planning and Development Act 2024, as amended, and to align with the policies and objectives of the NPF 2025.

5. The Regional Assembly should be involved in the identification and designation of Renewable Acceleration Areas, ensuring alignment between the review of the Regional Spatial and Economic Strategy and the forthcoming Regional Renewable Energy Strategy. These strategies will support the delivery of national targets through renewable power capacity allocations, facilitate accelerated roll-out and delivery of renewable energy and grid infrastructure, supporting energy security and coordination among public bodies.

Reason: In the interest of consistency, and the proper planning and sustainable development of the Region.

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<sup>5</sup> DAFM Food Vision Dashboard - <https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/policies/food-vision-2030-a-world-leader-in-sustainable-food-systems/#food-vision-2030-dashboard>

6. The roles and responsibilities of Government departments, relevant state agencies, regional assemblies, local authorities, and other stakeholders regarding the designation and implementation of Regional Acceleration Areas should be defined.  
Reason: In the interest of clarity.
  
7. The Draft Plan should illustrate how it is connected to other national plans (for example, NPF, NMPF, National Marine Planning Policy Statement, Offshore Renewable Energy Development Plan, National Designated Maritime Area Plan, Nature Restoration Plan and National Landscape Strategy) and how it will influence regional strategies on renewable energy, marine and coastal matters, climate change adaptation and mitigation.  
Reason: In the interest of clarity.
  
8.
  - (a) The Draft Plan should specify whether Tier 4 ("*Unclassified / No Designation*") areas will be reviewed as potential Renewable Acceleration Areas.
  - (b) The Draft Plan should explain the criteria used for classifying lands designated under Tier 3 ("*Unsuitable/ Exclusion Zone*") for both wind and solar.
  - (c) As per Article 15a (iii), the Draft Plan should explicitly demonstrate how artificial and built-up surfaces (industrial sites, mines, rooftops, etc.) have been prioritised.
  - (d) The Draft Plan should seek to address existing grid capacity limitations and bottlenecks which could potentially delay the delivery of Renewable Acceleration Areas.
  - (e) The Draft Plan should emphasise the importance of securing sub-sea cables, which are vital infrastructure for the country and accelerating renewable energy transmission.
  - (f) Biomass should be included as a key renewable energy source in the Draft Plan, in line with the RSES, recognising the role of rural areas in supporting low-carbon, land-based energy systems. It should also reference other renewable energy sources and a commitment to their examination (e.g. hydrogen) in the next iteration of the Plan/ future RAA designation.
  - (g) The Draft Plan should clarify reporting requirements under the EU Directive and opportunities for revision, where necessary.
  - (h) While streamlining approval processes to improve efficiency, safeguards required by EU environmental law and the Aarhus Convention should be fully implemented. This process should facilitate stakeholder engagement and seek to optimise community benefits from renewable energy schemes.
  - (i) The Draft Plan should be informed by the requirements of SEA, AA, floods, nature restoration and other EU Directives.
  - (j) The Draft Plan should clarify whether sites 1-5 on Map 3 can benefit from the new streamlined permitting procedure outline in Article 16a, if designated as a Renewable Acceleration Area.
  - (k) The Draft Plan should promote cross-border and cross-boundary cooperation, recognising collaboration across local and regional administrative boundaries.

(l) The Assembly recommends the use of open digital tools like the Regional Development Monitor (RDM) to support evidence-based decision-making and monitoring of the Draft Plan.

Reason: In accordance with the requirements of Article 15, and in the interest of transparency, clarity, and proper planning and sustainable development.

#### **4.0 Conclusion**

The Regional Assembly welcomes the opportunity to engage in the process of formulating the National Territory Mapping and the preparation of the Draft Plan for the designation of a Renewable Acceleration Area. This process to meet the requirements of the RED III Directive will also support a key principle of the Regional Assembly's Regional Economic and Spatial Strategy on climate action.

The Regional Assembly looks forward to continuing engagement with the Department of Climate, Energy and the Environment on renewable energy delivery in the Region, the RED III Directive and future RAAs.

Regards,



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Clare Bannon,  
A/Director  
Eastern and Midland Regional Assembly  
10<sup>th</sup> October 2025