

Feedback of the Netherlands Association for Renewable Energy (NVDE)

Renewable Energy: guidance on designating renewable energy acceleration areas

February the 23th, 2024

The Netherlands Association for Renewable Energy (NVDE) welcomes the opportunity to contribute to the call for evidence on guidelines for identifying Renewable Energy Acceleration Areas that will be provided by the Commission as part of the revised Renewable Energy Directive. By giving feedback in this document, we hope to contribute to speed up the designation of renewable energy acceleration areas. In our view, this is necessary to develop and deploy projects more rapidly in order to be able to achieve the Commission's renewable energy targets.

Extended scope of Renewable Acceleration Areas is needed

The European wind power action plan announced that the Commission will launch the Accele-RES initiative. This initiative aims to speed up the transposition and implementation of the revised Renewable Energy Directive and accelerate the deployment of renewable energy projects. Under the Directive, Member States must designate renewables acceleration areas for one or more technologies by 21 February 2026. Renewables Acceleration Areas should be areas particularly suitable for quickly deploying renewable energy plants given that deploying the specific type of renewable energy source is not expected to have a significant environmental impact in these areas. To designate these areas, Member States must prepare a plan or plans for one or more types of renewable energy sources. Under the Renewable Energy Directive, Member States are free to decide for which renewable energy technologies they designate renewable acceleration areas and the size of those areas.

As NVDE, we note that the request for guidance has an angle which is particularly focused on onshore and offshore wind and solar projects. We believe that it is also important to broaden the scope of renewables acceleration areas with renewable energy sources needed for the provision of sustainable heating and cooling. Think of geothermal projects, aquathermal projects, bio-energy projects, bio-gas projects etc.. Member states are free to decide for which technologies they designate acceleration areas, but we strongly recommend the Commission to give Member States more guidance in taking renewable heat projects into account in the designation process.

List of specific measures to take into consideration

This *call for evidence* is expected to help Member States identify the necessary steps for the timely and effective implementation of the legal obligation to designate renewables acceleration areas as set out in

the revised Renewable Energy Directive. As NVDE, we would like to list some specific measures, regarding broader spatial planning considerations, land use, stakeholder engagement and public participation, etc.

1. **Encourage Member States to designate areas where (multiple forms of) supply, storage and demand of renewable energy are collocated.** Think of ports, industrial clusters and (on- and off-shore) areas where new technologies can easily be deployed next to existing projects, which are already operational. Also encourage Member States to provide for dedicated administrative teams from the central and local authorities to speed up permitting processes in each acceleration area.
2. **Emphasize that the establishment of acceleration areas should not lead to no-go areas for renewable energy projects.** The expertise of project developers should be recognized when defining areas suitable for renewable energy projects. They have valuable know-how in determining whether a project site is viable or not and are already working with local authorities on the issue of public acceptance. National authorities therefore should not define top-down no-go areas.
3. **Examine within each Member State how political decision-making from the authorities who have to decide on granting permits of energy generation or energy infrastructure projects can be accelerated.** This may allow issues to be dealt with more quickly. Examples such as the establishment of specific councils or state committees in the field of energy generation or energy infrastructure can be included in the evaluation study.
4. **Create an infrastructure (i.e. data safe houses) to help member states to facilitate more efficient sharing of information between industries, grid operators and authorities** within renewables acceleration areas. The regulation for competition within the European Union has to enable this sharing of information.
5. **Share best practices with member states to speed up the development of projects and permitting processes within acceleration areas.** Start every project with a joint project organization, staffing, governance, planning etc.. Part of this is also a public participation plan, in which it becomes clear which stakeholders are involved in each phase of a project. Also align the already announced guidance and best practices from the European Commission for tender criteria for offshore renewable energy (including system integration) with the renewable acceleration areas guidance.

6. **Help Member States organizing their Judiciary to speed up appeal procedures related to projects in acceleration areas.** i.e. by reforming appeal procedures, expert pools, etc.
7. **Ensure that efforts to develop acceleration areas, do not impede on capacity that is designated to processing permitting requests or increase bureaucratic procedures.** Inefficient use of this capacity can cause much delay.
8. **Investigate to what extent measures can be taken to safeguard against land speculation,** in order to avoid driving up the costs for further renewable deployment.

We would welcome changes in the definitive policy proposal of the Commission, considering our feedback. In case of any questions based on our feedback, please contact our policy officer Puck Sanders (pucksanders@nvde.nl).

The Netherlands Association for Renewable Energy (NVDE) is a member of the European Renewable Energy Federation (EREF) and promotes and stands for an energy system which is entirely based on renewable energy. We represent the whole Dutch renewable energy sector. The activities of the more than 1600 companies who are member of the NVDE have an accumulated yield of €43 billion euros and represent more than 200.000 employees.