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Renewable Electricity Section
Department of Climate, Energy and the Environment
Tom Johnson House
Haddington Road
Dublin
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10/10/2025

EPAC Reference Number: EPAC-3025

Re: Public Consultation on National Territory Mapping for Renewable Electricity

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to submit its views on the proposed National Territory Mapping for Renewable Electricity and acknowledges the importance of the national territory mapping exercise, mandated under Article 15b of the EU Renewable Energy Directive (RED III), as a foundational step in identifying Ireland's domestic potential and available areas for renewable energy deployment. As you are aware, Ireland is not on track to meet its emissions reduction obligations, and energy demand is growing strongly. Therefore, increasing the pace of delivery of large-scale renewable energy is imperative.

The EPA has reviewed your consultation document and highlights a number of recommendations in relation to the approach and outcome of the exercise to date. In summary, EPA recommends that the Department consider:

1. Alignment with the National Planning Framework
2. Adopting an alternative approach to mapping to optimise the identification of areas suitable for renewables based on a transparent evidence-based approach.
3. Providing for revision of mapping following revision of regional spatial and economic plans and development plans.

4. Strategic Environmental Assessment (SEA) in the context of this mapping limiting designation of areas as renewable acceleration areas.

Each of these points is developed further in the remainder of this submission.

Alignment with the National Planning Framework

The National Planning Framework is the Government's high-level strategic plan for future growth and development of Ireland to the year 2040 and the EPA notes that the revised Framework sets out in renewable electricity capacity allocations on a regional basis and obliges each Regional Assembly to plan for the delivery of their regional's renewable electricity capacity allocations for onshore wind and solar and to identify allocations for each of the local authorities in order to meet the overall national target.

Consequently, the EPA recommends that the Department would provide in its finalised mapping information on how the national mapping for renewable energy will meet the requirements of government policy under the National Planning Framework and aligns with the NPF regionalised targets ([Table 9.1. page 135](#)).

Approach to Mapping

The EPA notes that designation outcomes vary significantly between counties and it appears that many counties have clearly used different criteria for designation as the suitability of land for renewables changes along county boundaries in many areas. Furthermore, it would also appear that a significant number of counties have not published designations, especially for solar. As the suitability mapping for Ireland is both inconsistent and incomplete, there is a risk that the most optimum areas for Renewable Acceleration Areas (RAAs) could fail to be identified, or that RAAs could be identified in counties that have taken a more permissive view of classifying land as suitable and therefore not be located in counties which may, in fact, be more suitable for their establishment. This is particularly important given the streamlined planning process and use of 'imperative reasons of overriding public interest' (IROPI) within the RAAs and the potential environmental consequences of such designation. The EPA suggests the Department consider how land suitability can be classified in a consistent way between and across counties, and to ensure that all counties should be classified with none omitted. In this context, the EPA suggests that a harmonized, transparent, and criteria-based national framework be defined by the Department to support equitable and efficient identification of suitable areas for renewable energy projects. This would greatly assist regional authorities and local authorities to meet their obligations under the National Planning Framework.

In this context, the EPA would welcome engagement with the Department to address some of the potential research gaps through the EPA's Fast Track to Policy research funding programme, which provides for rapid turn-around evidence reviews to address urgent policy questions that might inform an optimised approach to suitability mapping.

Strategic Environmental Assessment (SEA)

The EPA suggests that as this mapping impacts on the planning for and designation of Renewable Acceleration Areas (RAAs) it should be considered in the context of the requirements of the SEA Directive as transposed by S.I. No. 435 of 2004. Article 9(1)(a) of this regulation states that an environmental assessment shall be carried out for all plans and programmes for energy (amongst other sectors listed therein), which set the framework for future development consent of projects listed in Annexes I and II of the Environmental Impact Assessment Directive.

Renewable Acceleration Areas

The EPA notes that this national mapping is not currently seeking to define Renewable Acceleration Areas (RAAs) for Ireland. However, the EPA considers that as RAAs are a subset of the national map for renewable energy that the current approach will potentially omit substantial areas of the country with significant wind resources from the potential to be subsequently identified as RAAs in the future. Given the obligations under the NPF, the EPA recommends that all counties be included in the RAA mapping exercise.

It is important that the designations and spatial assessment take potential co-benefits, constraints, and integrated land-use considerations into account in a robust and consistent manner in all counties. Existing land-use implications under other policy areas including water quality, nature restoration, flood risk management and climate resilience should be considered to ensure that the most effective use is made of limited land resources nationally and regionally.

Furthermore, due to this streamlined process, it is imperative that the following considerations are taken into account at the RRA mapping stage:

- **Biodiversity and Protected Areas:** Avoiding ecologically sensitive zones and ensuring compliance with Natura 2000 and national biodiversity strategies,
- **Landscape and Visual Impact:** Assessing cumulative effects on landscape character, especially in scenic or culturally significant areas.
- **Water and Soil Protection:** Preventing contamination or degradation from construction and operation activities.
- **Air Quality and Noise:** Evaluating impacts from turbine noise or construction emissions, particularly near residential zones.
- **Climate Resilience:** Ensuring infrastructure is robust against climate risks such as flooding or extreme weather.
- **Cultural Heritage:** Protecting archaeological and built heritage sites from disruption or degradation.
- **Cumulative and Interactive Effects:** Considering how multiple projects interact across environmental domains and over time.

In summary, in the context of planning and environmental assessment for the RAAs, the EPA therefore recommends that the appropriate designation of RAAs requires the mapping step to be completed consistently and comprehensively in the first instance.

Yours sincerely,



Dr. Conor Quinlan

Programme Manager, EPA Climate Programme