RE:FORM

Navigating the Maze of Procedures

How to Systemically Streamline the Permitting Process for Clean Energy Investments

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The following document is an executive summary of the Reform Institute's report, originally published in Polish. The full version is available here.

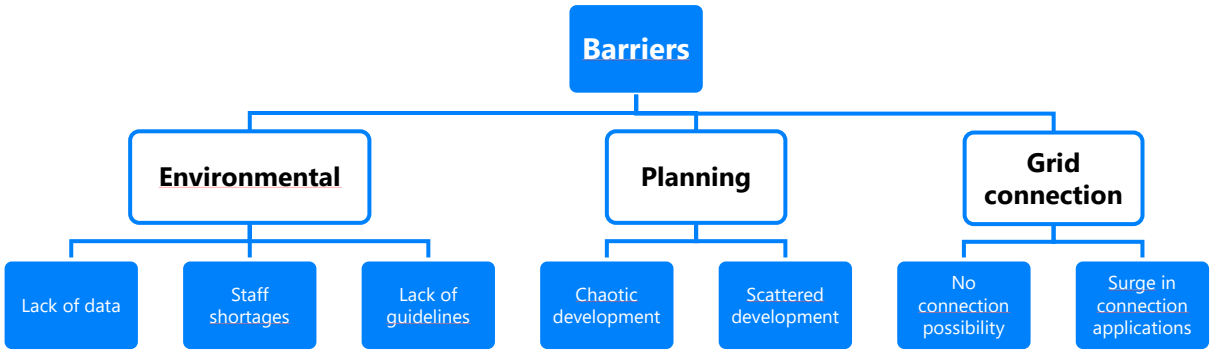
The Reform Institute is an independent think tank dedicated to the continuous improvement of public policies in Poland, Europe and the world. One of the Institute's key areas of activity is support for the energy transition and climate protection.

Spis treści

Executive Summary

The development of renewable energy sources in Poland is slowed down by lengthy procedures for issuing investment permits. Obtaining all approvals for onshore wind farms takes up to 7 years, and for photovoltaic farms around 3 years. **Problems mainly concern three areas: environmental, planning and network procedures.** These are investment obstacles that have not yet been systemically resolved.

Figure 1. Barriers to Investments in Renewable Energy Sources



Source: Own elaboration

Limitations on investments in renewable energy sources

Environmental procedures are one of the key areas causing delays. The reasons for this include staffing constraints and underinvestment in the Regional Directorates for Environmental Protection and the General Directorate for Environmental Protection. The new responsibilities assigned to these institutions have not been matched by adequate increases in staffing levels. Low salaries and high staff turnover undermine employment stability and make it difficult to build competent teams. Experienced employees are increasingly leaving public administration, which reduces the level of professionalism.

Another problem is the lack of a systematic collection of data on the state of the environment and the impact of existing investments.

The situation is exacerbated by chaotic and scattered development in Poland, resulting from years of neglect in spatial planning. The ongoing spatial planning reform may alleviate some of the problems by introducing new tools. One of them is a simplified procedure that, in some cases, allows the strategic environmental impact assessment to be omitted. Another new tool is an integrated investment plan – a special type of local plan developed for a particular project at the initiative of the

investor. In addition, the urban register currently being developed will enable the status of every plot of land in Poland to be verified.

Another key challenge is the limited possibility of connecting new installations to the power grid. The expansion and modernisation of transmission and distribution infrastructure is essential not only for the development of renewable energy sources, but also for the entire process of green electrification.

The need for systemic solutions

Legislative proposals are emerging that could shorten investment procedures. Some of them are specific and ad hoc, while others are an attempt at a more systemic approach to the issue.

Figure 2. Solutions that accelerate the permitting process

Point solutions

- ❑Shortening the deadline for issuing connection terms in the sustainable industry development zones
- ❑Simplified procedure for adopting or amending the Local Spatial Development Plan

Transitional solutions

- ❑Developing wind farms on the basis of the Integrated Investment Plan
- ❑Change in the procedure for reviewing applications for grid connection conditions
- ❑Renewable Acceleration Areas

Systemic solutions

- ❑Possibility of parallel processing of environmental decisions and local spatial plans
- ❑Digitisation of procedures:
  - electronic applications for environmental permits
  - urban planning register
  - Renewable Energy Information Portal

Source: Own elaboration

Renewable Acceleration Areas

The RED III Directive introduced Renewable Acceleration Areas (RAAs). In these areas, permitting procedures for renewable energy investments should not exceed 12 months.

RAAs were intended to be a systemic remedy for lengthy procedures. In practice, it quickly became clear that their introduction in Poland faces many challenges. Ongoing regulatory changes, a decentralised spatial planning system and scattered development make it difficult to identify areas where administrative procedures could be completed within the required 12 months.

The identified barriers will have a significant impact on the ability to fully exploit the potential of this solution in its first years of operation. **RAAs should therefore be treated as a testing ground that exposes bottlenecks in investment processes and used as an opportunity for broader improvements.** This requires systemic action and long-term solutions.

Parallel processing of environmental decisions and local plans

One of the key systemic solutions is allowing investors to process environmental decisions and local spatial plans in parallel.

In accordance with the provisions of Polish environmental law[1], an environmental impact assessment (or a decision on whether such an assessment is necessary) can only begin after the location of the project has been found to be compliant with the local spatial development plan. If there is no such compliance, no further steps are taken. The problem mainly concerns wind farms, which, unlike other renewable energy installations, must be built based on local spatial plans. Other renewable energy installations can be built either according to a local spatial plan or, if such a plan does not exist in a given municipality, based on a development conditions decision. However, most renewable energy installations with a capacity of more than 1 MW will soon require the existence of a local spatial plan.

Enabling entrepreneurs to participate in environmental and planning procedures (related to the creation or amendment of local spatial plans) in parallel could shorten the permitting process by two years – from 7 to 5 years.

[1] Act on access to information on the environment and its protection, public participation in environmental protection and environmental impact assessments.

Good practices

- In **Portugal**, if connection capacity is available, it is possible to obtain a licence for electricity production and a decision to connect the power plant to the grid at the same time.
- In **Austria**, developers can apply for multiple permits in parallel. At the same time, it is also possible to proceed with the site selection procedure and the application for connection to the power grid
- In **France**, it is possible to process several permits in parallel for wind farm projects, including environmental permits, permits related to aviation and military corridors, as well as licences for electricity production.
- In **Belgium** (**Flanders and Wallonia**), a "single permit" has been introduced, combining environmental and urban planning permit procedures, as well as simplifications for small-scale projects.

Sources: Speeding up renewable energy permitting in Europe: overcoming implementation challenges, REPORT October 2024 Catherine Banet, Filippo Donati; Guidance to Member States on good practices to speed up permit-granting procedures for renewable energy and related infrastructure projects, European Commission

Digitisation of procedures

One of the main barriers prolonging environmental procedures is the poor quality of documentation, which requires multiple revisions. The digitisation of procedures can significantly reduce this problem, forming the first step towards systemic management of the permit processes.

One of the key elements supporting digitisation is the Renewable Energy Information Portal. The platform will support users in preparing the necessary applications by enabling them to collect the required documents.

In the future, the urban planning register will also be a useful tool. The system will enable the creation, updating and sharing of spatial data in the field of planning and spatial development.

There are also plans to introduce the obligation to submit applications for environmental decisions exclusively in electronic form and to modernise the Environmental Impact Assessment (EIA) database, which will enable wider use of environmental data.

At the beginning of August 2025, the National Contact Point for Renewable Energy Sources was launched, which is a database of information on the administrative procedures necessary for a given RES project.

Good practices

- In **Finland**, the website of the environmental protection administration provides information on various environmental procedures, including information on access to justice.
- **Spain** has created a fully digital permitting process at all levels of administration for all renewable energy technologies. This has significantly streamlined administrative processes across the country.

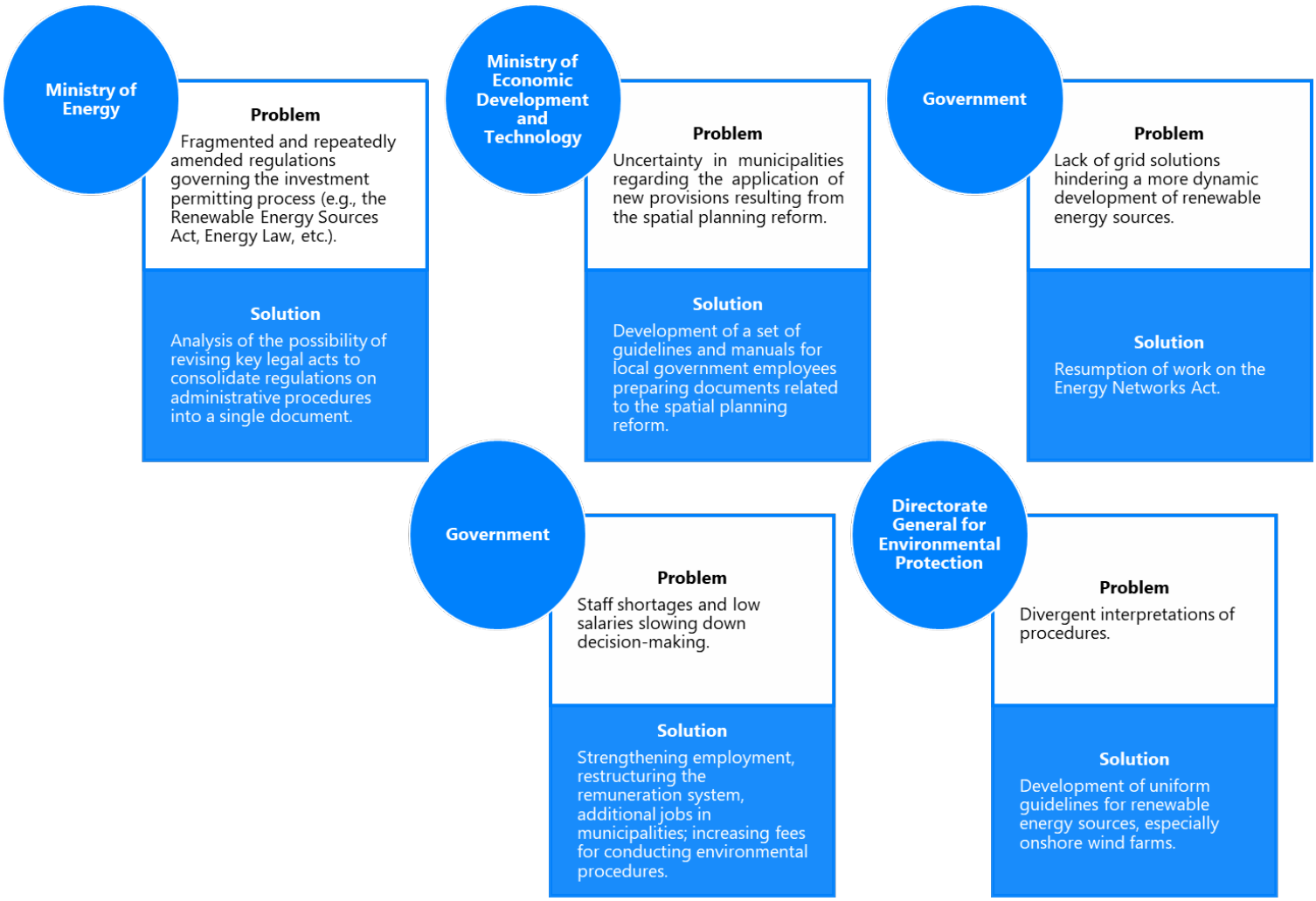
Source: Speeding up renewable energy permitting in Europe: overcoming implementation challenges, REPORT October 2024 Catherine Banet, Filippo Donati

Recommendations

The current situation in permitting processes requires urgent improvement. The time needed to obtain the necessary permits for renewable energy investments is too long, and the process is not transparent for investors. The system needs to be thoroughly reformed.

We propose the following actions:

Figure 3. Main Issues and Suggested Recommendations



Source: Own elaboration

A necessary horizontal measure supporting the energy transition process is the implementation of a nationwide information and education campaign. It should have two main objectives: to raise public awareness of the need to intensify investment in renewable energy sources, and to disseminate knowledge about the strategic assumptions of the national energy policy. Conducting this type of awareness-raising activities can significantly increase public acceptance of renewable energy projects, particularly in rural areas, which have particularly high development potential due to the availability of investment land. It will also help to reduce the problem of climate disinformation.

A close coordination of the digitisation of permitting processes will also play an important role. It will ensure that the developed solutions do not operate in isolation but form a coherent and collaborative ecosystem. The Renewable Energy Information Portal, the urban planning register and the modernised EIA database should be integrated with each other to enable the effective use of available data. This approach will ensure that digital tools complement each other, supporting stakeholders at many stages of the investment process.

Without removing barriers and speeding up permitting, Poland will not achieve its climate and energy goals and will not catch up on its path to cleaner and cheaper energy. Robust procedures and institutional support are a prerequisite for reducing emissions from electricity and heat, as well as for infrastructure development. Without systemic streamlining of the permitting process, there is a risk of delaying these investments, which would negatively impact the economy and citizens' quality of life. The coming years and the new division of responsibilities in the government provide an opportunity to approach this issue in a comprehensive manner.