



European Union (Planning and Development) (Renewable Energy) Regulations 2025 Circular

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To: Directors of Planning in each local authority

CC: Chief Executives
Senior Planners
An Coimisiún Pleanála
Office of the Planning Regulator
Directors of Regional Assemblies
Mayor of Limerick
Land Development Agency

European Union (Planning and Development) (Renewable Energy) Regulations 2025

Purpose of Circular

This circular is issued to support planning authorities in the implementation of the Renewable Energy Directive III (RED III). It clarifies four matters: the role of planning authorities in the initial identification of RED III projects, the categorisation of certain renewable energy technologies for the purposes of RED III, the distinction between repowering, life extension and ‘new build’ developments, and an update in respect of grid connection requirements for the March 2026 batch.

1. Designation of RED III Projects

With effect from 7 August 2025, the Planning and Development Act 2000 (as amended) includes statutory definitions of “renewable energy” and “renewable energy development” for the purposes of implementing the permit-granting procedures and timelines required by RED III. These are set out below:

renewable energy – “means energy from a renewable non-fossil source, namely wind energy, solar energy (including solar thermal and solar photovoltaic energy), geothermal energy, osmotic energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas or biogas”



renewable energy development – “means development the purpose of which is to generate renewable energy from one or more than one renewable non-fossil resource, and includes the building of renewable energy plants and any co-located energy storage, and any works necessary for the connection of such plants or storage to the grid, but does not include relevant solar energy development, small-scale solar energy equipment development and small-scale non-ground source heat pumps”

Where an application is made to a planning authority under section 34, the planning authority is the competent (permit-granting) authority and is responsible, in the first instance, for determining whether the proposal falls within those statutory definitions and is therefore to be processed as a RED III project, including the application of the completeness check and relevant decision-making timelines.

Prospective applicants should be strongly encouraged to engage with the planning authority at pre-application stage, including through the consultation arrangements under section 247. Such engagement can assist in identifying, on an informal basis, whether a proposal is likely to fall within the statutory definitions relevant to RED III, and in confirming the information required to facilitate the completeness check (including notice requirements). Notwithstanding any pre-application discussion, the formal determination as to whether an application falls within the statutory definitions (and is to be processed as a RED III project) remains a matter for the planning authority on receipt of the application, including for the purposes of carrying out the completeness check under section 34D.

2. RED III Technologies

S.I. 274 of 2025 gives effect to elements of RED III and introduces statutory definitions and procedural requirements into the Planning and Development Act 2000 (as amended), including definitions for “renewable energy” and “renewable energy development”. The assessment of any proposed development against these statutory definitions, and the determination of the applicable procedural pathway, remains a matter for the planning authority in each case.

As a general principle, developments that incorporate one or more technologies falling within the statutory definition of “renewable energy”, as outlined in section 1 of this circular, may constitute renewable energy developments and may therefore be subject to the relevant statutory decision-making timelines, including those provided for under RED III.



3. Repowering / Life Extension / New Builds

Planning authorities are reminded that the classification of a proposal is a matter for the competent authority, to be determined on the facts of each case having regard to the statutory definitions and the provisions of RED III. For these purposes, “repowering” is defined in EU law as *“renewing power plants... including the full or partial replacement of installations or operation systems and equipment... to replace or increase... efficiency or capacity”*, and the national definition mirrors this approach. Accordingly, proposals involving the replacement or renewal of an existing plant, whether or not accompanied by revised turbine locations or ancillary works, will generally be considered as repowering.

3.1. Life Extensions

A proposal seeking only an extension of the operational period, with no works or replacement of installations or equipment, will generally be treated as a life extension (that is, a renewable energy development other than repowering). Where it constitutes a “renewable energy development”, the applicable statutory decision-making timeline will depend on the electrical capacity of the development—30 weeks where the electrical capacity is less than 150 kW, and 52 weeks where the electrical capacity is 150 kW or more.

For the purposes of any environmental assessment (including EIA screening, where required), the baseline should reflect the current status of the environment and the site as it exists at the time of the application, rather than conditions prior to the existing renewable energy development being in place.

3.2. Repowering and New Renewable Energy Developments

As stated above, proposals involving the replacement or renewal of an existing plant (including the full or partial replacement of installations or operating systems and equipment), whether or not accompanied by revised turbine locations or ancillary works, will generally be considered as repowering. Where environmental assessment (including EIA screening or EIA) is required for repowering, it is to be limited to the potential impacts arising from the change or extension compared to the original project.

Proposals that add new turbines or generation capacity without replacing existing installations will generally be treated as new renewable energy development projects. Furthermore, while proposed alterations to the application site boundary do not definitively exclude an application from being treated as repowering (i.e. alterations to site access arrangements or amendments to ancillary aspects of the previously permitted development), proposals which, in substance, amount to new generation on areas beyond those assessed as part of the original project (whether or not such areas fall within an amended red line boundary) will also generally be treated as new renewable energy development. This distinction is intended to ensure that the concept of repowering is not applied so broadly as to undermine the RED III requirement that



environmental assessment for repowering be confined to the change or extension relative to the original development.

Where a proposal constitutes repowering, it will be subject to the statutory decision-making timeline of 30 weeks, as applicable. Where a proposal constitutes new renewable energy development, the applicable statutory decision-making timeline will depend on electrical capacity—30 weeks where the electrical capacity is less than 150 kW, and 52 weeks where the electrical capacity is 150 kW or more, as applicable.

4. Completeness Check and Grid Connection Applications

Following the introduction of the RED III requirements, the Commission for Regulation of Utilities (CRU) published its Electricity Connection Policy – Generation and System Services (ECP-GSS) Decision Paper (CRU/2024101). This policy provides for planning and grid applications to proceed concurrently to a greater degree, in order to comply with the mandatory permit-granting timelines prescribed in RED III.

Under ECP-GSS policy, a RED III project's planning application must first be acknowledged as complete by the relevant planning authority before a grid application may be submitted to the system operator (ESB Networks or EirGrid), rather than requiring the grant of full planning permission.

The requirement for the planning authorities to acknowledge the completeness of an application was stipulated in S.I. 274 of 2025.

On 19 November 2025, the Commission for Regulation of Utilities (CRU) advised that transitional arrangements, similar to those applied to the ECP-GSS batch that closed on 30 September 2025, will also apply to the 31 March 2026 ECP-GSS batch for projects that have not received an acknowledgement of completeness from the relevant planning authority.

In instances where a RED III project wishes to enter the March 2026 batch and has received, or does receive, acknowledgement of completeness by the relevant planning authority, the valid grid application must be submitted within fifteen calendar days following this acknowledgement (and by the 31 March 2026 Batch Closing Deadline) for the 'overall' RED III permit-granting timelines to apply.

Full details of the arrangements that apply to the March 2026 batch in all scenarios are set out at the following link: <https://www.cru.ie/publications/28742/>



5. Further Information

Additional guidance on the implementation of RED III is available through published resources, including An Coimisiún Pleanála's RED III guides for [planning authorities](#) and [prospective applicants](#), and the Department's RED III Further Information document ("RED III – Your Questions Answered", available at [this link](#)).

The Further Information document has been updated to include expanded clarification for planning authorities on the identification of RED III projects, including guidance on what does and does not constitute a RED III project, and further clarification on the distinction between repowering, life extension and new renewable energy development, as addressed in this circular.

Work is ongoing across Government to consider broader policy issues relating to the future of existing renewable energy developments. Any outcomes arising from this work may inform future policy and guidance, as appropriate.

Any enquiries regarding this circular may be submitted to the Department at environmentalplanningpolicy@housing.gov.ie.

Issued by:

A handwritten signature in black ink that reads "Lisa Clifford". The script is cursive and fluid.

Lisa Clifford
Principal
Climate and Environmental Planning Policy