

A Guide to Permitting a Solar Production Facility in Spain

A Structured Guide to the Multi-Layered Approval Process

Content Partner: J. v. G. technology GmbH

Turnkey solar module production lines — since 1997

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Technical Overview: Permitting Solar Production Facilities in Spain



Created as part of the PVKnowHow Knowledge Network



Prepared by J.v.G. Technology GmbH



European specialists in turnkey solar module production lines

Key Project Data

12–24mo

Process Duration

Realistic permitting timeline
from first consultation to
operating license

3

Regulatory Levels

National / Regional
(Autonomous Community) /
Municipal

5

Permit Stages

Site selection through final
inspections and operation

EIA

Key Bottleneck

Environmental Impact
Assessment – most common
source of delay

📄 Project type: Solar module production facility · Region: Spain · Source: PVKnowHow / J.v.G. Technology GmbH

Spain's Regulatory Structure: Three Levels

National Level


- Sets the general legal framework
- Law 21/2013 on Environmental Assessment
- Industrial safety and chemical storage standards
- Water Basin Authorities (Confederación Hidrográfica)

Regional Level (CCAA)

- Autonomous Communities define specific procedures
- Regional environmental body issues the EIA declaration (DIA)
- Industrial Safety Registration with regional Ministry of Industry
- Significant variation between Spain's 17 regions

Municipal Level

- Issues building license (Licencia de Obras)
- Issues activity license (Licencia de Actividad)
- Issues final operating license (Licencia de Funcionamiento)
- Urban planning compliance (Plan General de Ordenación Urbana)

 A permit granted at the municipal level is often contingent on prior approval from a regional environmental body. Coordination across all three levels is the investor's responsibility.

Key Challenge: Multi-Layered Approvals

Sequential Dependencies

- EIA declaration must precede construction license
- Construction license must precede activity license
- Activity license must precede final operating license
- One delayed stage cascades through the entire process

Inter-Agency Coordination Gap

- No single authority manages all approvals end-to-end
- Investor is responsible for information flow between bodies
- Municipal, regional, and national bodies operate independently
- Response times are legally defined but not always met

Regional Variability

- 17 Autonomous Communities — 17 sets of specific rules
- Procedures, required documents, and responsible bodies vary
- Local language requirements in some regions (Catalonia, Basque Country)
- Thorough due diligence on the target region is essential


Stage 1: Site Selection & Zoning

Zoning Requirements

- Land must be classified as **suelo industrial** (industrial use zone)
- Verify classification via the local *Plan General de Ordenación Urbana* (PGOU)
- Coastal and protected area restrictions may apply
- Rural or non-classified land requires reclassification — significant additional delay

Preliminary Consultation (Consulta Previa)

- Submit a project outline to the local council (Ayuntamiento)
- Obtain a formal Town Planning Report (*Informe Urbanístico*)
- Confirms feasibility and specific permits required
- Critical for de-risking the investment before major expenditure

 Failure to verify industrial zoning status early is one of the most costly mistakes an investor can make. Reclassification is possible but adds significant time and uncertainty.

Stage 2: Environmental Impact Assessment (EIA)

1

Submission of Environmental Impact Study

Detailed technical study of environmental and social consequences

Includes impacts on biodiversity, water, soil, air, landscape, and local community

2

Public Consultation Period

Mandatory public and stakeholder consultation phase

Public objections at this stage are the most common cause of delay

3

Inter-Agency Review

Regional environmental authority coordinates review with relevant bodies

Additional information requests (RFIs) from the agency extend the timeline

4

Issuance of Environmental Impact Statement (DIA)

Regional authority issues a binding Declaración de Impacto Ambiental (DIA)

Result: favorable, favorable with conditions, or unfavorable

⊗ A favorable DIA is a prerequisite for obtaining a construction license. An unfavorable DIA blocks the entire project. EIA is the single longest and highest-risk stage in the permitting process.


Stage 3: Construction & Activity Licenses

Building License — Licencia de Obras

- Authorizes physical construction of the factory building
- Requires a full *Execution Project (Proyecto de Ejecución)*
- Must be signed by a certified architect or engineer
- Must comply with national building codes (CTE) and local ordinances
- Issued by the municipality (Ayuntamiento)

Activity License — Licencia de Actividad

- Governs the industrial operations inside the building
- Requires detailed specifications of machinery, processes, and safety protocols
- Confirms compliance with health, safety, and environmental regulations
- Solar manufacturing is classified as a "qualified" industrial activity
- Recommended to pursue simultaneously with the building license

 The building license alone does not authorize the specific industrial activity. Both licenses are required before production can legally commence.

Stage 4: Sector-Specific Permits

Industrial Safety Registration

- Registration of pressure vessels, electrical installations
- Chemical storage facilities
- Managed by regional Ministry of Industry

Water Use & Discharge

- Required if factory draws from or discharges into a river or aquifer
- Permit from the relevant Water Basin Authority (Confederación Hidrográfica)
- National-level authorization

Waste Management Authorization

- Formal plan for handling, storage, and disposal of industrial waste
- Must be approved before operations begin
- Findings feed directly into facility design and layout planning

- ☐ Solar manufacturing is evaluated as a standard industrial facility — regulatory bodies assess chemical handling, water use, waste, and emissions regardless of the product's environmental benefit.

Stage 5: Final Inspections & Operation

Operating License (Licencia de Funcionamiento)

- Issued by the municipality following a final inspection
- Confirms that installed machinery and operations match approved plans
- Any deviation from submitted plans requires a formal modification permit
- Grants legal permission to begin commercial production

Final Inspection Requirements

- Municipal inspectors verify compliance with all permit conditions
- Completion certificate from architect/engineer submitted to Ayuntamiento
- Safety, fire, and environmental conditions verified on-site
- Sector-specific authorizations must already be in place

- ✔ Once all five stages are completed and the Licencia de Funcionamiento is issued, the facility is legally authorized to commence solar module production.

Timeline Realities: 12–24 Months



The EIA stage typically dominates the overall timeline. Public consultation delays and inter-agency review cycles are the primary drivers of schedule overruns beyond 18 months.

6–12mo

EIA Duration

Typical range from submission to DIA issuance — can extend further if objections arise

3–6mo

Construction License

Licencia de Obra Mayor processing time at municipal level

24mo+

Worst-Case Scenario

EIA objections + inter-agency delays + incomplete documentation

Key Risks & Delays

1

EIA Public Objections

Community or NGO opposition during the consultation phase can extend the EIA by months or indefinitely

2

Incomplete Documentation

Missing or non-compliant technical documents trigger RFIs — each adds weeks to months of delay across all stages

3

Cascade Effect

A delay at any single agency creates a sequential stall across municipal, regional, and national processes

4

Zoning Mismatch

Land not pre-zoned as *suelo industrial* requires reclassification — a process with no guaranteed timeline

Strategic Recommendations

1 Begin with Zoning Verification

Confirm *suelo industrial* classification and obtain an *Informe Urbanístico* before any major investment commitment

2 Integrate EIA with Facility Design

Environmental findings on waste, water, and safety must inform the final factory layout — avoid costly post-design modifications

3 Engage Expert Local Guidance

Region-specific regulatory knowledge is non-negotiable; international investors without local expertise face systematic delays

4 Pursue Parallel Tracks Where Possible

Building license and activity license applications should be submitted simultaneously; sector-specific permits should run in parallel

5 Budget the Full 24-Month Scenario

Financial models must accommodate the worst-case permitting timeline as a core project management assumption, not a contingency

FAQ Highlights

Do requirements differ between regions?

Yes — significantly. While national law sets the general framework, specific procedures, required documents, and responsible bodies are defined at the regional level. Due diligence on the target Autonomous Community is essential.

Does producing solar panels simplify the EIA?

No. Regulatory bodies evaluate the environmental impact of the manufacturing process — not the end product. A solar factory is subject to the same industrial standards as any comparable facility regarding chemical handling, water use, waste, and emissions.

Can permitting run in parallel with engineering?

Yes — and it should. The EIA process in particular should run alongside engineering and design. Findings from environmental studies must feed directly into the facility design to avoid expensive post-approval modifications.

What is the single most underestimated risk?

Incomplete technical documentation. Missing information in EIA submissions or license applications is the most common and most costly mistake, triggering official requests for additional information that stall the entire process.

Conclusion

□ The permitting process in Spain is rigorous but structured. With correct preparation, expert local guidance, and adequate time allocation, it provides a clear — if demanding — pathway to legal factory operation.

- Permitting is a **core project management task** — not an afterthought
- The **EIA is the critical path item** — start it first, resource it fully
- **Three regulatory levels** must be navigated in a coordinated, often simultaneous effort
- A proven turnkey manufacturing concept reduces the learning curve for new investors entering production
- Success depends on recognizing the 12–24 month timeline as a **business plan input**, not a risk factor

Source: PVKnowHow / J.v.G. Technology GmbH · Spain · Solar module production facility

About the Content Partner

📄 **J. v. G. technology GmbH** — The DESERT Company

Founded in 1997 in Bavaria, Germany. Family-owned engineering company specializing in turnkey solar module production lines.

More than 90 factory projects delivered worldwide.

On-site team training included — no prior manufacturing experience required.

Key areas:

Turnkey PV manufacturing lines | DESERT Technology® |
TÜV-certified module designs | Factory planning to production

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<https://www.pvknowhow.com/countries/spain/solar-factory-permitting-spain>

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