



29 Sept 2025

Re: ESB Submission to Proposed Variation No. 1 to the South Dublin County Development Plan 2022 – 2028.

A Chara,

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to Proposed Variation No. 1 to the South Dublin County Development Plan, relating to the preparation of a Local Planning Framework (LPF) for Clondalkin. ESB is a landowner and employer in South Dublin with property and infrastructural assets throughout the wider Dublin region.

ESB acknowledge the vision of the LPF to guide the sustainable growth of Clondalkin, ensuring it remains a vibrant urban village with strong commercial, cultural, and community facilities for its growing population. The plan also seeks to protect the historic character of the village and support its tourism and service industries, which rely on its unique heritage.

The proposed LPF aims to enable future compact growth of both residential and commercial development whilst safeguarding the cultural and historic heritage assets of Clondalkin. It supports the protection and development of a safe, secure and resilient electricity network to facilitate the sustainable development of Clondalkin. In this regard, below are observations from ESB that should be considered.

Overview of ESB Strategy

ESB is Ireland's foremost energy company and the largest supplier of renewable electricity in Ireland. Through innovation, expertise, and investment, ESB is leading the way in developing a modern, efficient electricity system that is capable of delivering sustainable and competitive energy supplies to customers in the 'all-islands market' (Republic of Ireland, Northern Ireland, England, Wales and Scotland). ESB operates a renewable energy portfolio that has a total of over 1.8GW of green energy generation connected to the grid.

To support transformation of the energy sector, ESB is embracing new technologies that are revolutionising the energy industry, including smarter electricity networks. We are investing in sustainable energy solutions that harnesses the power of solar, wind, wave, storage and green hydrogen to provide a cleaner future. Meanwhile we continue to play a key role in maintaining our existing operations to support security of supply for Ireland. Our objective is to develop and connect renewables to decarbonise the electricity system by 2040. ESB's progress towards achieving carbon net-zero operations is consistent with the objectives of the National Planning Framework (NPF) and Regional Spatial & Economic Strategy (RSES) for the Eastern and Midlands Region.

ESB Networks

ESB Networks is firmly committed to expanding electricity network capacity across Ireland to meet the demands of a growing population, accelerated housing development, industrial growth, and national climate objectives. As part of ESB Networks' Price Review 6 (PR6), the organisation proposes substantial infrastructure investments at all voltage levels—high, medium, and low—including upgrades to overhead lines, cables, transformers, and substations. Particular emphasis is placed on 110kV stations, which are currently overloaded due to rapid demand growth. The plan also includes converting 10kV medium voltage networks to 20kV to reduce losses and enhance capacity. These investments are strategically targeted to address current constraints while creating headroom for future growth.

In addition to physical upgrades, ESB Networks will deploy smart, flexible, and digitally enabled solutions to optimise asset utilisation and reduce reliance on traditional reinforcements. By 2030, the network will deliver 562 MW of firm transformer capacity at 110 kV in Dublin, 1.1 GW at 38kV nationwide, and 1.5 GW at medium



voltage nationwide. This will enable faster customer connections, facilitate maintenance and asset replacement, and support the electrification of heat, transport, and industry. These efforts are essential to ensuring a reliable, resilient, and future-proof electricity system that supports Ireland's transition to a Net Zero-ready energy network.

Electricity Transmission and Distribution

ESB Networks provides an essential service building and maintaining the electricity networks in South Dublin and throughout the Greater Dublin region. It is responsible for constructing all the sub-transmission, medium and low voltage electricity network infrastructure in the county and for managing this infrastructure, which is owned by ESB.

ESB owns and operates a 38kV substation situated centrally within the LPF boundary along Ninth Lock Road, known as Clondalkin 38kV substation. In addition, two 110kV transmission lines traverse the northern section of the plan area—one via underground cabling and the other as an overhead line. Collectively, these assets constitute a vital component of ESB's local and regional operations, supporting the secure and reliable delivery of electricity across the area.

At present, there are no proposals to redevelop or relocate the 38kV Clondalkin substation. This facility is strategically positioned at the centre of Clondalkin to effectively serve the area's electricity demand and ensure reliable supply to the local load centre. In this regard, the ESB note **CA11 Objective 2**:

"To explore with the ESB, the potential to relocate the existing substation on the Ninth Lock Road subject to it being feasible and maintaining the ability to cater for current and future electricity demands in the LPF area."

Relocating the Clondalkin 38kV substation is not considered feasible due to its critical operational role, the technical and logistical challenges of moving such infrastructure, and the absence of suitable alternative sites. The substation must remain in place and be accommodated in any future development plans for the area.

In addition to the measures outlined above, ESB is currently constructing the Yellow Meadows 110kV substation, located within the Clondalkin Industrial Estate approximately 800 meters northeast of the Clondalkin 38kV station. Once energised in 2027, Yellow Meadows 110kV station will facilitate partial offloading of Clondalkin 38kV station, which is already approaching capacity. This strategic development including the partial offloading of Clondalkin 38kV is designed to facilitate the anticipated increase in energy demand arising from significant residential growth within the Clonburris SDZ.

ESB request that CA11 Objective 2 is reconsidered to reflect the unfeasibility of relocating the 38kV Clondalkin substation from its central location within Clondalkin and the LPF boundary.

Deep reinforcement of the existing grid is essential to support the planned levels of sustainable growth in the South Dublin area. Upgrades to current infrastructure are needed to maintain adequate local and regional connectivity and to enable the integration of renewable energy sources into the network. In this regard, ESB welcome Policy Objective **CA11 Objective 1**:

"To protect the existing electricity infrastructure and support the development of a safe, secure and reliable supply of electricity and support the development of enhanced electricity networks where required, subject to the relevant environmental assessments"

ESB is continuously assessing and reviewing electricity network capacity in South Dublin to ensure it aligns with current and future development needs. Through ongoing studies and monitoring, the company identifies where reinforcements, upgrades, or new infrastructure may be required to support residential, commercial, and industrial growth. This proactive approach ensures that additional projects can be brought forward in a timely manner, as and when increased capacity is needed to facilitate further development in the region.

While we recognise that Proposed Variation No. 1 is relatively straightforward, ESB also notes the recent publication of the Section 28 Guidelines on National Planning Framework Implementation – Housing Growth Requirements (2025), as well as the approval of the Revised National Planning Framework in April 2025. ESB



is committed to proactively engaging with South Dublin County Council as these updated guidelines are incorporated into the County Development Plan in the near future. We are ready to meet with the Council to discuss the impact of revised housing growth requirements, particularly regarding new residential zoning and the planning of supporting infrastructure. This collaborative approach will help align development objectives with national housing targets and ensure the timely delivery of essential electricity infrastructure.

ESB welcomes opportunities to strengthen the future delivery of electricity infrastructure through closer collaboration with Local Authorities. Early engagement during the design phase of significant public projects—such as new roads, upgrades to public spaces, and the development of greenways—creates valuable opportunities to install ducting and underground cabling in the most cost-effective manner while minimising disruption to local services. To ensure ESB Networks' expertise is considered from the outset, we encourage you to contact your local ESB Networks Office at the earliest stage of project planning.

Conclusion

ESB is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. In this regard, we support the ambition of the Variation to address the growing need for enabling development to facilitate projected growth in demand for housing and jobs in South Dublin. We request that due consideration is given to the issues raised in this submission, most particularly:

- ESB requests that CA11 Objective 2 be reconsidered, as the relocation of the centrally positioned 38kV Clondalkin substation is not currently feasible due to the critical nature of its infrastructure and its role in supporting local electricity demand. Maintaining the substation at its present location is essential for ensuring the reliability and resilience of electricity supply within the LPF area.
- Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the level of operational activities ongoing at our high-voltage substations within South Dublin are protected.
- ESB seeks proactive engagement with South Dublin County Council to collaboratively determine the future requirements of the electricity grid to facilitate the projected levels of development to accommodate the economic and residential growth within the LPF boundary.
- Recognising the opportunities for early engagement with ESB in relation to the design and delivery of new roads, public realm upgrades or the delivery of public greenways and the provision of ducting/underground cabling.

If we can be of any further assistance, or if you wish to clarify any of the points raised, please do not hesitate in contacting the undersigned.

Yours sincerely,