

From: [Redacted]
To: [Development Plan](#)
Subject: Submission to Variation No.1 to the Clare County Development Plan 2023-2029
Date: Tuesday 7 April 2026 16:49:05
Attachments: [ESB SUB CLARE CDP VARIATION NO. 1 - ISSUED.pdf](#)

A Chara,

Please see attached PDF document for detailed submission.

Thank you.

Best Regards,

Keith O'Brien | Group Property Spatial Planner | Engineering and Major Projects | ESB

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7 April 2026

Re: ESB Submission to Proposed Variation No. 1 of the Clare County Development Plan 2023-2029.

A Chara,

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to Proposed Variation No. 1 of the Clare County Development Plan 2023-2029 (CDP). ESB is a landowner and employer in Clare with property and infrastructural assets throughout the County.

ESB acknowledges that Proposed Variation No. 1 to the Clare County Development Plan 2023–2029 has been prepared under Section 58 of the Planning and Development Act 2024 to align the plan with updated national planning policy and statutory guidance. The Variation implements the NPF Housing Growth Requirement Guidelines (2025), addresses zoning changes arising from the Residential Zoned Land Tax legislation, and updates settlement, housing and land-use policies across the county. The integration of the Ennis 2040 Economic and Spatial Strategy and the Ennis Local Transport Plan strengthens a plan-led, transport-informed approach to compact growth in Ennis, while SEA, Appropriate Assessment and updated flood risk mapping ensure environmental and climate considerations are fully embedded.

The provision of a secure, reliable, and efficient energy transmission and distribution infrastructure is fundamental to powering and heating homes and businesses, as well as supporting the decarbonisation of transport. The Government's new housing plan called *"Delivering Homes, Building Communities"* recognises that each new home constructed today requires roughly double the electrical capacity as those built before 2019. This increased reliance on electricity, combined with climate change impacts such as extreme weather events, are driving the need to enhance the reliability and resilience of the network. In the coming years, the electricity networks must be expanded and reinforced to support the delivery of 300,000 homes.

In this regard, below are observations from ESB that should be considered for this Proposed Variation.

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 large and expanding renewable energy portfolio, with in excess of 2 GW of installed green electricity generation capacity connected to the grid.

To support the transformation of the energy sector, ESB is embracing new technologies, including smarter electricity networks and flexible energy solutions. ESB continues to invest in sustainable energy technologies that harness solar, wind, wave, storage and green hydrogen, while maintaining existing assets to ensure security of supply. ESB's objective is to develop and connect renewable generation to decarbonise the electricity system by 2040, consistent with the objectives of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.

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), covering the period 2026 to 2030, 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.

Energy Infrastructure – Planning Policy

Ireland is embarking on a major expansion of its electricity infrastructure to address critical capacity shortages and support national growth objectives. Under the 2025 National Development Plan (NDP) Review, the Government has committed €3.5 billion in equity funding to ESB Networks and EirGrid to significantly enhance grid capacity and resilience. This investment is strategically aligned with the goal of delivering 300,000 new homes by 2030 and meeting Ireland's climate and competitiveness targets. The electricity network is increasingly strained by rapid population growth, urban development, and the electrification of heating, transport, and industry. As mentioned above, each newly constructed home now requires approximately twice the electrical capacity compared to those built prior to 2019. This increase combined with growing demand from other sectors has resulted in many high-voltage stations becoming overloaded, and forecasted demand for 2030 exceeds current capacity in key regions.

As outlined in the Delivering Homes, Building Communities 2025-2030, An Action Plan on Housing Supply and Targeting Homelessness, it is essential that Ireland's electricity networks are expanded and reinforced over the coming years to support the delivery of 300,000 new homes by 2030.

To address this, ESB Networks' PR6 Business Plan proposes a €13.4 billion programme, including €10.1 billion in baseline investment, to reinforce network capacity across all voltage levels, integrate 4.4 GW of utility-scale renewables, and deploy smart, flexible technologies to manage complex energy flows. The plan also introduces an Agile Investment Framework to manage delivery risks and avoid unnecessary upfront costs to customers. Together, these measures represent a decisive shift towards a future-proofed, Net Zero-ready electricity system that underpins Ireland's housing, economic, and climate ambitions.

Energy Infrastructure - Transmission and Distribution

ESB is continuously assessing and reviewing electricity network capacity in Clare to ensure alignment with current and future development needs. Through ongoing studies and monitoring, ESB 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 to facilitate further development in the region. In this context, we note the proposed amendments to the Housing Targets, set out in the Proposed Variation No. 1 and associated proposed land use changes across Clare County, including Ennis town. The proposed update to Volume 2 reflects the new guidance on the implementation of the NPF.

In this regard, ESB wishes to acknowledge the collaboration with Clare County Council in the delivery of electricity infrastructure to date. However, to address forthcoming challenges associated with the rapid deployment of essential infrastructure, ESB respectfully requests that Clare County Council and ESB intensify their coordination efforts. Closer collaboration will be necessary to identify and secure suitable sites for the development of key electricity infrastructure to support additional housing targets. Early identification and appropriate zoning of these sites will be vital to ensuring the timely and cost-effective delivery of infrastructure that supports regional growth objectives and advances climate action targets.

In addition, ESB would welcome opportunities to future-proof the delivery of electricity infrastructure through greater collaboration with Local Authorities. Early engagement at the design stage of key public infrastructure projects, such as new roads, public realm upgrades, and greenways, offers opportunities to incorporate ducting

and underground cabling in the most economically efficient way, while minimising disruption to local services. We encourage project teams to contact the local ESB Networks Office to ensure input from ESB Networks at the earliest stage of project design.

ESB currently owns and operates 28 high-voltage substations within the boundaries of County Clare. These facilities are strategically distributed throughout the county and constitute a critical element of ESB's operational infrastructure, both regionally and nationally. Notably, the Ennis 110kV installation serves as a key bulk supply point for Ennis town and the wider area, acting as a pivotal hub within the electricity transmission and distribution network. This site hosts significant high-voltage infrastructure, including primary transmission stations and an extensive network of circuits that have evolved in tandem with the region's development over several decades. As one of the principal nodes feeding Clare's distribution network, Ennis 110kV is essential for maintaining the resilience and long-term capacity of the grid. Furthermore, the operational lands at this location are indispensable in accommodating future infrastructure requirements, ensuring the continued reliability and growth of the electricity network.

Nonetheless, it is important to note that the existing electricity grid in the region currently has limited capacity to support new development. This constraint, if not addressed, will impede the realisation of the upwardly revised targeted growth and development objectives for County Clare. Presently, the grid is restricted by insufficient capacity to accommodate additional demand, highlighting an urgent need for significant reinforcement of both the transmission and distribution networks within Clare. Failure to resolve these limitations will hinder the achievement of the short to medium term future growth targets outlined by the proposed Variation No.1.

Several network reinforcement initiatives are currently underway or being evaluated throughout Clare to address substation capacity constraints and maintain security of supply. These include planned upgrades to the 38kV substations at Ennistymon and Shannon (Rineanna) to address substation capacity constraints, with delivery anticipated by 2030, and an uprating of the 110kV substation at Ennis by 2027 to support its role as a renewable energy hub, providing an additional 63 MVA of installed capacity. Network capacity constraints along the Tullabrack–Milltown Malbay–Ennistymon corridor are to be addressed through an uprating of the existing 38kV line by 2028, while asset replacement works are proposed along the Ennis–Clarecastle–Cranny–Drumquin–Kilrush 38kV circuit through refurbishment of the overhead line, also targeted for completion by 2028. Collectively, these projects form part of ESB Networks' pipeline of reinforcement measures to maintain security of supply and support the sustainable development of the county.

Additionally, works are underway to transfer medium voltage demand from Kilrush 38 kV Station to Tullabrack 110 kV Station via new cabling, with the high voltage design advancing and ongoing engagement with the Council. This route may also incorporate a 38 kV duct and cable to accommodate the currently tailed Kilkee 38 kV Station. At Drumline 110 kV Station in the Shannon area, the ongoing upgrade of the existing 38 MVA transformers to two units of 10 MVA is progressing, with plans for further expansion to two units of 15 MVA in the longer term. To optimise this enhanced capacity and facilitate continued commercial and industrial development on the eastern side of Shannon, future crossings of the M18 for medium voltage ducting are expected to be necessary. Similarly, an M18 crossing for medium voltage ducts is anticipated to enable more effective utilisation of the 110 kV transformers at Ennis 110 kV Station, thereby supporting much of the projected growth within Ennis town.

In this regard, ESB is committed to proactively engaging with Clare County Council as these revised housing targets are incorporated into the County Development Plan. 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.

Energy Infrastructure – Medium and Low Voltage Network

At a localised level, ESB Networks has undertaken a comprehensive review of the Medium and Low Voltage (MV/LV) network throughout County Clare. This assessment examined the distribution of customers across MV/LV unit substations to determine where upgrades or the provision of additional unit substations may be necessary. The objective is to support the decarbonisation of the electricity network and to facilitate the

transition of customers to Low Carbon Technologies including heat pumps, solar photovoltaic systems, and electric vehicle charging infrastructure.

This review has resulted in identified areas where additional MV/LV substations and upgrades to existing substations are required. New MV/LV (10kV/400V) unit substations require a space of approximately 3 square metres and are typically sited in public locations, subject to agreement with landowners and/or local authorities.

To guarantee the delivery of a secure, reliable, and efficient electricity network for customers in urban areas, it is essential that the Clare County Development Plan incorporates robust policy objectives supporting the reinforcement of the medium and low voltage (MV/LV) network. This will ensure that sufficient capacity is available to accommodate increasing demand. In this regard, ESB requests that Clare County Council support the recommended energy infrastructure developments set out in this submission, consistent with the following Development Plan Objective CDP11.46 in Section 11.8.3 Electricity Network, of the Clare County Development Plan.

“It is an objective of Clare County Council to facilitate improvements in energy infrastructure and encourage the expansion of the infrastructure within the county.”

To support this, ESB requests that Clare County Council and ESB coordinate closely to identify suitable sites for the delivery of key electricity infrastructure to address capacity issues in the MV/LV network. The proactive identification of suitable sites, along with the inclusion of provisions within the zoning matrix that allow for public utilities permissibility under all zoning objectives, is essential for the timely and cost-effective delivery of infrastructure. This approach will promote local and regional growth while advancing the achievement of climate action objectives.

Conclusion

Investment in infrastructure is crucial to the economic and social well-being of our country. There is a significant multiplier effect from investment in infrastructure which means that it stimulates growth in the local economy. This investment in infrastructure is also necessary to support the delivery of the Government target of 300,000 homes by 2030.

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. We request that due consideration is given to the issues raised in this submission, most particularly:

- 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 Clare are protected.
- A collaborative partnership between Clare County Council and ESB to proactively identify and secure appropriate sites for the development of essential energy infrastructure will allow both organisations to plan proactively, identify a viable strategic site, and ensure infrastructure keeps pace with the county’s long-term growth objectives.
- ESB respectfully requests that due consideration is given to the need for critical upgrades and capacity enhancements across Clare, as these are essential to address current grid constraints, support renewable energy integration, and enable sustainable residential and industrial growth.
- Ensuring that public utilities are permissible under all zoning objectives is critical to enabling timely, efficient delivery of network capacity upgrades and supporting sustainable local growth and climate goals.
- 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,

A handwritten signature in black ink, appearing to read 'Keith O'Brien'.

Keith O'Brien | Spatial Planner | Group Property | Engineering & Major Projects | ESB
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