



13 May 2026

Re: ESB Submission to Proposed Variation No. 1 of the Leitrim 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 Leitrim County Development Plan 2023-2029. ESB is a landowner and employer in Leitrim with property and infrastructural assets throughout the County.

ESB acknowledges that Proposed Variation No. 1 amends the Leitrim County Development Plan 2023–2029 to align with the revised National Planning Framework by updating population and housing targets, rezoning and adding lands for residential and enterprise development (including integrating the Carrick-on-Shannon JLAP zoning), making consequential text changes across the Core Strategy, settlement plans, transport, flood risk and development management standards, and rezoning a specific site in Kinlough.

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 Northern and Western 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 38 kV 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 Leitrim 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 Leitrim County. The Proposed Variation consists of amendments to the Written Statement (Volume 1) and the Settlement Written Statements and Settlement Maps (Volume 2) of the Leitrim County Development Plan 2023-2029. These amendments are intended to update the Core Strategy, settlement strategies, household allocations, population projections, land use zonings and settlement boundaries, as necessary, to ensure consistency with the NPF Implementation.

In this regard, ESB wishes to acknowledge the positive and productive collaboration with Leitrim County Council in the delivery of electricity infrastructure to date. To address forthcoming challenges associated with the rapid deployment of essential infrastructure, ESB respectfully requests that Leitrim 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.

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.

County Leitrim is served by the regional electricity distribution network comprising high-voltage and medium-voltage infrastructure that supplies the county's towns, villages and rural areas from interconnected bulk supply points and distribution substations operating as part of the wider north-west regional network. The existing network provides electricity supply to established residential, commercial, industrial and community development across the county and operates as an integrated system, with assets and capacity shared across administrative boundaries to maintain security of supply and operational resilience.



In order to address electricity network capacity constraints within County Leitrim, ESB Networks has planned a series of targeted reinforcement projects designed to resolve both current capacity limitations and asset condition issues across the county. Key initiatives include the construction of a new 110 kV substation at Carrick-on-Shannon, which will deliver an additional 63 MVA of installed capacity to alleviate substation constraints in the region. Further, the refurbishment of the existing 38 kV overhead line between Carrick-on-Shannon and Boyle is scheduled to address asset replacement needs, with completion expected by 2028. Another 38 kV overhead line refurbishment between Sligo and Manorhamilton will address infrastructure condition concerns in northern Leitrim, also targeted for completion by 2028. Collectively, these projects will enhance the electricity network in County Leitrim, improving capacity, resilience, and reliability to support both current demand and future growth.

In this context, ESB remains committed to proactive engagement with Leitrim County Council as revised housing targets are integrated into the County Development Plan. ESB stands ready to continue discussions with the Council to assess the implications of updated housing growth requirements, particularly in relation to new residential zoning and the planning of supporting infrastructure. This collaborative approach will facilitate the alignment of 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 Leitrim. 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 Leitrim 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 Leitrim County Council support the recommended energy infrastructure developments set out in this submission, consistent with the following Policy ENI POL 4, in Section 9.15 Energy Networks Infrastructure – Electricity and Natural Gas, of the Leitrim County Development Plan.

“To support the renewal, reinforcement and strengthening of the electricity transmission network with particular reference to the regionally important projects such as Renewable Integration Development Project.”

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:

- Safeguarding the long-term operational requirements of ESB's existing transmission and distribution assets—particularly high-voltage substations within County Leitrim - is essential to maintaining security of supply, network resilience, and the capacity to accommodate future growth arising from revised housing targets.
- A proactive, collaborative partnership between Leitrim County Council and ESB to identify, zone, and secure suitable sites for new electricity infrastructure is critical to ensuring that network reinforcement keeps pace with increased residential zoning and population growth envisaged under Proposed Variation No. 1.
- Revised housing growth requirements must be supported by timely and coordinated investment in electricity infrastructure. Critical network upgrades and capacity enhancements across transmission, medium-voltage, and low-voltage systems are essential to address existing constraints, facilitate renewable integration, and support sustainable residential and industrial development.
- Ensuring that public utilities are permissible under all zoning objectives is fundamental to enabling the efficient and cost-effective delivery of electricity infrastructure, reducing delivery risk, and avoiding delays that could undermine housing delivery and climate action commitments.
- Early engagement with ESB in the planning and design of roads, public realm works, and greenways should be explicitly supported, enabling the coordinated provision of ducting and underground cabling and minimising future disruption and whole-life costs.
- Continued investment in electricity infrastructure in County Leitrim is a prerequisite for achieving national objectives under the National Planning Framework, the Revised NPF housing targets, and Ireland's transition to a low-carbon, climate-resilient energy system.

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,

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