

	<h1>Greystones-Delgany &amp; Kilcoole LPF Variation No.4</h1>
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Who are you:	State Body
Name:	Electricity Supply board
Reference:	GDKLPF-121303
Submission Made	June 20, 2025 12:15 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

## Local Planning Framework PART A Strategy

- A.4 Overall strategy

## Local Planning Framework PART B Settlement Specific Objectives.

- B.7 Infrastructure, including transport and flooding

**Write your observations here:**

A Chara,

Please see attached PDF Document for detailed submission.

Best Regards,

**Please select which town you want to comment on:**

Greystones/Delgany

**Observation relevant to the settlement:**

A Chara,

Please see attached PDF Document for detailed submission.

Best Regards,

**Upload a File (optional)**

ESB SUB WICKLOW CDP VARIATION NO. 4 - ISSUED.pdf, 0.27MB



20 June 2025

**Re: ESB Submission to Proposed Variation No. 4 to the Wicklow County Development Plan 2022 - 2028.**

A Chara,

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028, relating to the Draft Greystones – Delgany & Kilcoole Local Planning Framework (LPF) 2025 - 2031. ESB is a landowner and employer in Wicklow with property and infrastructural assets throughout the County.

ESB acknowledge the aim of the Draft LPF to establish a land use framework that will guide the future sustainable development of the Greystones – Delgany & Kilcoole area. We recognise that the LPF will be informed by the hierarchy of planning documentation, particularly the Wicklow County Development Plan 2022 – 2028.

ESB welcome the recognition in Section A2.8 of the Draft LPF that *“Adequate infrastructure is vital for the facilitation to future development of Greystones – Delgany and Kilcoole”*. In relation to energy infrastructure this section also states.

*“Facilitate and promote the delivery of reliable and effective water, drainage, energy, waste management and communications infrastructure to service the existing and future development needs of the settlements in the LPF area, in particular: to promote energy efficiency and the development of renewable energy projects”*

ESB asserts that the development of critical electricity infrastructure should be a focal point in the LPF. Presently, there is inadequate capacity within our networks servicing the specified areas. It is imperative for the LPF to address these deficiencies and facilitate the requisite enhancements to the electricity network through the provision of promoting policies. Below are the key strategic considerations that must be taken into account during the preparation of the final Local Planning Framework.

### **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 Midland Region.

### **Electricity Transmission and Distribution**

ESB Networks provides an essential service building and maintaining the electricity networks in Greystones – Delgany & Kilcoole and throughout Co. Wicklow. 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.

To support sustainable development in the plan area, ESB recommends that Section B.7 of the Local Planning Framework include wording and policies aligned with the objectives set out in Chapter 16, Section 16.3 of the Wicklow County Development Plan 2022–2028. This alignment ensures consistency between county-level strategy and local implementation, enabling local development to contribute effectively to broader regional and national sustainability goals.

ESB owns and operates 3 No. 38kV substations within the boundaries of the Draft LFP, 2 No. substations are located within Greystones, with 1 No. located in Kilcoole. These assets form a critical element of ESB operations locally and regionally. The electricity grid within the region currently possesses limited capacity to accommodate new development. This constraint, until resolved, will impede the attainment of the target of 1,953 new dwellings and the desired economic growth in Greystones – Delgany & Kilcoole.

Significant reinforcement of the existing transmission grid is urgently needed in the Greystones–Delgany and Kilcoole areas, including the development of at least one new 38kV substation within the LFP boundary and close to Greystones itself. In addition, a new 110/38kV will be required in the area west of Greystone, along with a new 220/110kV station close to the existing 220kV circuit, west of the N11. These interventions are required to meet future residential and economic demand. Currently the Draft LFP does not address this critical infrastructure requirement in either Section A2.8 Service Infrastructure or Section B.7 Infrastructure and Services.

ESB requests early collaboration with Wicklow County Council to identify optimal locations for the infrastructure identified within the Greystones – Delgany area. In the interim, it would be prudent for the Council to identify the need for a provisional site adjacent to the proposed development zone. Furthermore, ESB advises the incorporation of a policy within Section B.7 of the plan that acknowledges the necessity for these additional substations. A clear policy that includes the text below, along with an area identified on the map, would be helpful.

***“It is a policy of this Local Planning Framework to safeguard the reservation of lands, as identified by the Council, for the provision of a new 38kV ESB Substation within the plan area.”***

In addition to a new 38kV substation, deep reinforcement of the existing grid is essential to support the planned levels of sustainable growth in the Greystones–Delgany and Kilcoole areas. Upgrades to current infrastructure are needed to maintain adequate local and regional connectivity and to enable the integration of renewable energy sources, such as offshore wind generation, into the network.

ESB would welcome opportunities to future proof delivery of electricity infrastructure through greater collaboration between ESB and Local Authorities. Early engagement at design stage of key public infrastructure projects, e.g., new roads, public realm upgrades, and greenways, offer opportunities to provide ducting/underground cabling in the most economically efficient way and limit disruption to local services. Please contact the local ESB Networks Office to ensure input from ESB Networks at an early stage of project design.

### **Electric Vehicles**

With Ireland's natural advantages in terms of wind and other renewables a large proportion of the power used by electric cars will be carbon free in the future. The Irish Government's Climate Action Plan 2024 has set stretching targets for EV adoption in Ireland to address energy demand and reduce emissions from Transport including achieving:

- 845,000 passenger vehicles by 2030.
- 150,000 electric vans and trucks by 2030.
- Procuring 1,200 low-emissions buses for public transport in cities.
- Building the EV charging network to support the growth of EVs at the rate required and develop our fast-charging infrastructure to stay ahead of demand.



- New scheme for 200 on-street public charge points per year for electric vehicles

The above targets demonstrate that EV's (incl. plug-in hybrid electric vehicles PHEV's) are central to Government targets for zero carbon emissions transportation systems. The establishment of EV infrastructure by ESB and the associated EV usage aligns with the key principles and benefits of sustainability and the National Climate Change Strategy on reduction of emissions. There are currently over 84,000 EVs and Plug-in hybrids registered on Irish roads, so while the number has improved, the pace of uptake must increase over the coming years to achieve our fleet electrification targets.

In this regard, ESB calls for the reinforcement of County Development Plan Strategic Objectives TM10 and TM11 in the LPF.

***“Promote and facilitate the provision of EV Charging infrastructure in appropriate locations throughout the county.”***

***“Ensure that all new development comply with national guidelines on EV infrastructure provision.”***

### **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 Draft LPF to deliver a land use framework that will guide the future sustainable development of the Greystones – Delgany & Kilcoole area. We request that due consideration is given to the issues raised in this submission, most particularly:

- The incorporation of a policy within Section B.7 of the LPF that acknowledges the necessity for a new 38kV substation within the LPF area.
- ESB requests early collaboration with Wicklow County Council to identify the optimal locations for new substation infrastructure within the wider Greystones – Delgany area.
- The reinforcement of County Development Plan Strategic Objectives in relation to EV charging in the LPF.

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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