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IHBA Submission to the ESB Distribution Network Development Plan (DNDP) Consultation

24/09/25

INTRODUCTION

The Irish Home Builders Association (IHBA), a constituent body of the Construction Industry Federation, welcomes the opportunity to comment on ESB Networks' Distribution Network Development Plan (DNDP). Housing delivery is a core pillar of the Government's Housing for All strategy, and adequate, timely, and affordable access to electricity infrastructure is critical to enabling sustainable residential development.

We note that the DNDP explicitly recognises national policy frameworks, including Housing for All, the National Development Plan and the Climate Action Plan, as drivers for network investment and demand forecasting. The IHBA supports this alignment but wishes to highlight several areas where delivery risks remain for housing projects and where ESB Networks' approach could be strengthened.

HOUSING DELIVERY

1. Forecasting Assumptions on Residential Demand

- ESB's demand growth scenarios incorporate ESRI housing projections across base, conservative, and aggressive scenarios. However, home builders frequently experience a mismatch between projected demand and local network readiness.

2. Capacity Constraints and Connection Delays

- The DNDP and DNDR identify significant reinforcement needs at substation and 38 kV levels across multiple zones. Many of these reinforcement projects are in "pipeline" or "development" stages, with delivery timelines extending into the late 2020s and 2030s. For housing delivery, this poses a real risk: homes cannot be occupied until electricity connections are available, and delays in reinforcement projects directly stall housing supply.

3. Interaction with Planning and Authorisation Processes

- ESB Networks highlights the delays associated with planning approvals, land acquisition, and wayleave negotiations. Similar bottlenecks affect home builders, creating compounded risks when both housing and electricity infrastructure face lengthy approval processes.

4. Flexibility and Interim Solutions

- The DNDR outlines the potential role of flexibility services and interim measures (e.g., flexible connections, demand-side response, or storage) in meeting short-term needs. IHBA supports wider application of such solutions to enable earlier connection of housing developments, especially in high-demand zones such as the Greater Dublin Area and major regional growth centres.

IHBA POSITION & RECOMMENDATIONS

The IHBA calls for the DNDP to strengthen its focus on enabling housing delivery. We recommend:

1. Prioritisation of Housing-Linked Capacity Projects

- Reinforcement and substation projects critical to new housing zones should be given explicit priority, with published timelines aligned to Housing for All delivery targets. In previous submissions to ESB Networks we called for a plan-led approach, and continue to do so.
- A clear "housing impact" filter should be included in project appraisal criteria to ensure that electricity infrastructure investment keeps pace with residential development demand.

2. Transparency on Local Capacity

- Home builders require early, reliable, and accessible data on available local capacity.

- While capacity heatmaps and workbooks are referenced, these should be enhanced to provide clear signals to the residential construction sector on connection lead times and constraints at local substation level.
- 3. Interim Connection Pathways
 - ESB Networks should expand the use of temporary and flexible connection agreements, particularly in urban areas where reinforcement timelines extend beyond immediate housing needs.
 - This will ensure homes can be delivered and occupied in advance of long-term upgrades being completed.
- 4. Closer Alignment of Housing and Energy Planning
 - IHBA urges structured coordination between ESB Networks, local authorities, Uisce Eireann, and planning bodies to synchronise housing development pipelines with network capacity expansion.
 - A joint forecasting and delivery framework would reduce the risk of housing projects being completed but left unconnected.

CONCLUSION

IHBA welcomes ESB Networks' commitment to a net-zero ready distribution network and acknowledges the extensive work in preparing the DNDP. However, without timely alignment of electricity infrastructure and housing delivery, national housing targets risk being unmet.

We therefore urge ESB Networks and the Commission for the Regulation of Utilities (CRU) to prioritise integrating housing delivery requirements into network planning and investment approval.

The IHBA looks forward to continued engagement with ESB Networks, government, and regulators to ensure that Ireland's homes of the future are supported by a resilient, timely, and affordable electricity network.