

AN COIMISIÚN PLEANÁLA	
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Time: <i>1:15</i>	By: <i>Hear</i>

Carrig National School
Carrig
Birr
Co. Tipperary
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Re: Case Reference PAX92.324279 – Proposed Ballincor Wind Farm Development and Associated Road and Infrastructure Works

Observer: Board of Management, Carrig National School

Dear Sir/Madam,

Carrig National School is a small rural primary school whose catchment and access roads lie along the line of the proposed Grid Connection Route (GCR) for the Ballincor Wind Farm development. The roads on which our children travel to and from school each day are not merely in the general vicinity of the proposed construction zone – they are on the corridor through which 12.23 km of cable trench is proposed to be excavated, progressing over what the applicant's own figures indicate will be close to 50 consecutive weeks. The Board of Management submits this formal expression of concern on behalf of the pupils, staff, and families of the school.

We wish to be clear from the outset that this letter does not take issue with the principle of renewable energy development. The Board makes no comment on energy policy. What we are concerned with is narrower and more immediate: the practical effect of a sustained, rolling programme of road trenching and traffic management on the roads used daily by school buses and families to bring children to and from this school.

These concerns are compounded by a further material consideration that An Coimisiún Pleanála must take into account. Planning permission has already been granted for a separate seven-turbine wind farm development in this community. That development will also require a grid connection, and the connection route for that permitted development shares a significant portion of the same local road network and GCR corridor that is the subject of this application. The Board of Management wishes to place on record that the cumulative effect of two grid connection trenching programmes on the same roads — whether overlapping or sequential — represents a level of sustained disruption to this school community that goes far beyond what any single planning assessment has considered. The children of Carrig NS face the prospect of their school roads functioning as a construction corridor not for one building programme, but for two.

The proposed Grid Connection Route spans 12.23 km from the wind farm site through County Tipperary and into County Offaly. The applicant confirms that trenching will progress at a rate of approximately 250 metres per week, with up to 100 metres of open trench active at any one time. At this rate, the works will take close to 50 weeks to complete. The applicant acknowledges that these works will require temporary road closures of local roads along the GCR corridor, with trench lines backfilled using temporary surfacing material at the end of each working day. The roads within Carrig NS's catchment and serving its school bus routes sit within this corridor. For the duration of those 50 weeks, the daily school run for the children of Carrig NS will take place through an active, rolling construction zone.

Carrig NS is served by narrow rural roads typical of this part of the country: 3 to 4 metres of usable carriageway in most places, no footpaths, soft verges, and sightlines restricted at

various points by hedgerows and bends. There are no formal set-down or parking areas at the school. School buses pick up and drop off children at the roadside, and parents collecting children by car do so on or partially within the live carriageway. These are the daily working conditions of the school's transport network. What the proposed GCR construction programme will add to that environment – for the best part of an academic year – is what this submission addresses.

Having reviewed the application documentation, we set out below the specific concerns that arise for the safe daily operation of Carrig NS.

- Fifty weeks of rolling road disruption on school bus routes: The applicant's own figures indicate that the GCR trenching programme will extend across approximately 50 consecutive weeks of working. During this period, up to 100 metres of open trench will be active at any one time, advancing through the road network at 250 metres per week. The applicant acknowledges this will require temporary road closures of local roads and the use of temporary surfacing material as daily backfill. For the families of Carrig NS, this is not a one-off disruption or a short-term inconvenience. It means that for the majority of a full academic year, the roads their children travel on each morning and afternoon will be subject to active works, stop-and-go traffic management, temporary closures, and degraded road surfaces. The cumulative effect of 50 weeks of this on school bus reliability and child safety at collection points is, in the Board's view, wholly unacceptable as an unmitigated outcome.
- Safety of children at roadside collection points during active works: Each afternoon, children from Carrig NS wait at the roadside on narrow local roads to be collected by bus or by family car. There are no footpaths, no formal waiting areas, and no physical separation between a waiting child and passing traffic. On an ordinary day, this arrangement works because the roads carry manageable volumes of familiar local traffic. What the GCR construction programme introduces into that environment is an advancing works zone: plant machinery, construction crew, temporary signals, and the additional vehicles associated with active civil engineering works. The interaction between children waiting at the roadside and an active trench works operation progressing along the same road is a foreseeable and serious risk that the application does not specifically address.
- Temporary road closures and school bus routing: The applicant confirms that temporary road closures of local roads will be required as the GCR works progress. School buses operating fixed routes on a fixed timetable cannot absorb unplanned road closures without disruption to collection schedules. A closure on a narrow rural road network with limited alternative routing means buses may face extended diversions or may be unable to serve collection points at the times families expect. For young children waiting at the roadside, a late or absent bus is not merely an inconvenience. In poor weather and poor light, it is a child safety issue. The application contains no school-specific assessment of how bus routing for Carrig NS will be protected during periods of temporary closure on the GCR corridor.
- Temporary trench backfill and road surface condition: The applicant proposes to backfill open trenches with temporary surfacing material at the end of each working day. The applicant's own assessment acknowledges that GCR works will produce a "moderate negative temporary effect" on road conditions, while simultaneously characterising this as "not significant." On a road used daily by a school bus, a moderate negative effect on the running surface is not insignificant. Temporary fills settle and can fail rapidly under repeated bus loading, particularly in wet weather. A settled or broken trench fill creates an uneven surface, a degraded road edge, and in some cases a condition where a bus driver cannot safely pull in to allow a child to board. Over a 50-week trenching programme on school bus routes, the cumulative

effect of daily temporary backfill is a sustained deterioration of the road environment that the children of Carrig NS must navigate.

- Traffic Management Plan – inaccurate school hours and no GCR-specific provision: The Traffic Management Plan submitted with this application defines primary school peak hours as 08:15–09:15 in the morning and 17:00–18:00 in the afternoon. Both figures are wrong for a rural primary school. Morning arrival at Carrig NS is typically between 08:40 and 09:10. The afternoon collection window runs from approximately 13:30 to 15:00 – a period that falls entirely within normal construction working hours and which does not appear in the Traffic Management Plan at all. This omission means that the period of greatest risk – children at the roadside waiting for collection in the early afternoon – has not been factored into the management of construction traffic along the GCR corridor. Beyond the inaccurate hours, the Traffic Management Plan contains no specific provisions for managing the interaction between GCR trenching operations and school transport on roads within the Carrig NS catchment.
- No engagement with Carrig NS: The Board of Management received no contact from the applicant or its agents at any stage of the planning process, despite the school's bus routes running through the GCR corridor. A Traffic Management Plan and a GCR works programme that will affect school bus routes for up to 50 weeks was prepared and submitted without any engagement with the school whose children use those roads. The inaccurate school peak hours in the Traffic Management Plan are a direct and predictable consequence of that failure.

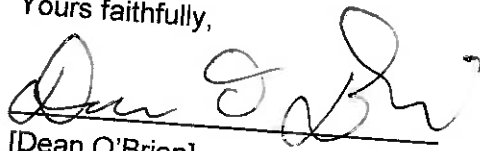
The applicant concludes that residual effects on the road network will be "imperceptible / not significant." The Board of Management of Carrig NS does not accept that characterisation. The applicant's own documentation acknowledges a "moderate negative temporary effect" on road conditions from the GCR works, and a trenching programme that will take 50 weeks to complete across 12.23 km of local road network. There is nothing imperceptible about 50 weeks of rolling road closures, temporary backfill, and advancing works on the roads that school buses use to bring children to and from Carrig NS every school day. The label "not significant" reflects a desktop assessment. The lived experience of families, bus drivers, and children on those roads will be something considerably different.

If planning permission is granted for this development, the Board of Management asks that the following be attached as enforceable conditions:

- That the developer's Traffic Management Contractor engage directly with the Board of Management and school transport operators serving Carrig NS before any GCR works commence on roads within the school's catchment, to produce and agree a written School Safety Protocol covering the management of school bus routes and roadside collection points for the full duration of works on those roads.
- That no open trench, temporary traffic management, or road closure be in place on roads used by Carrig NS school buses during morning drop-off (08:15–09:30) or afternoon collection (13:15–15:45), Monday to Friday during school term, and that the developer give a minimum of 72 hours' written notice to the school of any scheduled works, closure, or restriction on roads within the school catchment during these hours.
- That any temporary road closure on the GCR corridor affecting roads used for Carrig NS school transport be subject to a pre-agreed, signposted alternative route communicated to the Board and to school transport operators before the closure takes effect, with sufficient notice for alternative arrangements to be made.

- That the Traffic Management Plan be formally revised to correctly reflect primary school operating hours, including the afternoon collection period, and that Carrig NS be formally consulted in the preparation of the revised plan.
- That all trench backfill on roads used by Carrig NS school buses be restored to a full permanent running surface standard within a defined and short timeframe following the completion of works on each section, with independent monitoring of road surface condition on school bus routes throughout the construction period.
- That guaranteed and unimpeded emergency vehicle access to the school be maintained at all times during the construction period, with pre-agreed emergency access routes communicated in advance to the HSE, the National Ambulance Service, and An Garda Síochána.

Yours faithfully,



[Dean O'Brien]

Chairperson, Board of Management

Date: 22/06/26