

**ACP Case Reference: Ballincor Wind Farm and Associated Infrastructure
PAX92.324279**

located within the townlands of located within the townlands of Cloonaheen, Ballincor Demesne, and Curralanty, County Offaly,
and Clonfree, Castletown and Cronekill, County Tipperary.

FRANCIS KEARNS

Kearns Transport

Woodfield

Birr

Co. Offaly

R42RF86

0579120124

29th May 2026

AN COIMISIÚN PLEANÁLA
LDG- 08837-26
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Dear Sir/Madam,

Kearns Bus operates private school transport services on a daily basis across the local road network surrounding the proposed Ballincor Wind Farm development and along the Grid Connection Route proposed in the above-referenced application. A number of school routes will be directly affected, serving Shinrone NS, Carrig NS, Killeen NS and St Brendan's Community School, Birr.

We write to register our serious concerns regarding the potential impact of the proposed construction traffic, turbine deliveries, road works and associated traffic management measures on the safe and reliable operation of school transport services in the area. This correspondence is not intended as a formal objection to the development itself, nor as a comment on renewable energy policy. Our concerns relate specifically and entirely to road safety, the welfare of the children in our care, and the practical operation of bus services during what is proposed to be an extended and intensive construction phase.

The roads within this area are typical narrow rural roads with soft verges, limited hard shoulders and restricted visibility at various locations. The R492, which is identified in the application as the primary construction haul route, is particularly constrained in places, with bends, limited passing opportunities and poor sightlines. We note that the applicant's own documentation acknowledges the R492 is "relatively narrow, with limited hard shoulders and several bends." The humpback and double-bridge section close to the proposed site access is an existing pinch point that already demands significant caution from bus and agricultural drivers.

School buses operating these routes already encounter operational difficulties when passing agricultural machinery and delivery vehicles on the narrower stretches. During wet weather, road edges and verges can become soft and unstable, particularly where larger vehicles are required to pull off the carriageway. These existing constraints will be severely compounded by the volume and frequency of construction traffic proposed.

School transport operations involve regular roadside pick-up and drop-off points where children may be waiting adjacent to or very close to the live carriageway, frequently during the darkness and poor weather conditions of the winter months. There are no footpaths or formal set-down areas along these country roads. Buses are required to stop partially within the carriageway while children board or alight, creating a situation that demands absolute predictability and safety in the surrounding traffic environment.

Against this background, and having reviewed the roads and transportation material submitted by the applicant, we have specific concerns regarding the following:

- The applicant's own assessment confirms that the peak construction phase between July and September 2027 will see a minimum of 54 heavy vehicle movements per day on the R492, with a heavy vehicle passing through this corridor every 6.6 minutes during continuous turbine foundation concrete pours. This frequency of HGV traffic is incompatible with the safe operation of school buses on these roads.
 - The proposed Grid Connection Route (GCR) spans 12.23 km across the local road network, progressing at a rate of only 250 metres per week, with up to 100 metres of open trench active at any one time. This equates to approximately 50 weeks of rolling road restrictions and temporary road closures directly affecting roads used by our school routes. The application documentation confirms this will include sections of the R492 and R439, as well as local roads currently served by our buses.
 - Temporary traffic management, stop-and-go arrangements, and rolling closures will cause unpredictable delays to school collection and drop-off schedules. Arriving late for school or, critically, leaving children stranded at roadside collection points during periods of traffic disruption are outcomes that cannot be accepted as minor or manageable effects.
 - The applicant proposes night-time turbine delivery convoys with Garda escorts outside normal construction hours. While these do not directly overlap with school transport times, the preparation activities, road preparation works, and any residual road surface damage or signage disruption from night-time operations will affect the safety of the road network for our early morning school runs.
 - Prolonged heavy construction traffic, particularly concrete trucks and aggregate haulage, causes progressive deterioration of road edges, verges, and surface texture. The applicant's proposed mitigation measures in this regard are generic and do not adequately address the particular vulnerability of narrow rural roads with soft verge profiles that our bus routes rely upon.
 - The Blackbull crossroads (N62/R492) is identified in the application as accommodating the majority of development-related traffic, with peak flows of 685 vehicles in the AM period and 747 in the PM period. This junction is a critical node on our school transport network. The traffic extensification and queuing predicted at this location poses a direct conflict with our morning school run schedules.
- We note that the applicant's transport assessment concludes that residual effects on the road network will be "imperceptible / not significant." We strongly disagree with this characterisation as it applies to school transport operations. The proposed construction programme will impose an extended and intensive burden on a road network that already presents safety challenges for buses carrying schoolchildren. The cumulative effect of HGV traffic, All deliveries, open trenching, temporary closures and road surface deterioration over a 24-month construction period is, in our assessment, highly significant.
- Should the Board determine to grant permission for this development, we respectfully request that the following matters be addressed as conditions of any grant:
- That direct engagement take place between the developer's appointed Traffic Management Contractor and school transport operators using the affected routes before any construction works commence, with a view to agreeing route-specific protocols for the duration of the construction phase.
 - That no abnormal load deliveries or major construction HGV convoys be permitted on the R492 or adjoining local roads during the school transport peak hours of 07:30–09:30 and 14:30–17:00, Monday to Friday during school term.
 - That the developer provide a minimum of 72 hours' advance notice to school transport operators of any planned road closure, temporary restriction, or abnormal

load movement on roads forming part of school bus routes, to allow alternative arrangements to be made.

- That the developer fund and maintain safe road surfaces and verge conditions on all school bus routes passing through the construction zone throughout the construction period, with an independently verified remediation protocol following each phase of construction.

We trust that the safety of schoolchildren travelling on public roads in the vicinity of this development will be treated as a matter of the highest priority by An Coimisiún Pleanála in its assessment of this application.

Yours faithfully,

Francis Kearns
Kearns Transport
0579120124

A handwritten signature in black ink, appearing to read 'Francis Kearns', with a stylized flourish at the end.