

AN COMMISSION PLEANÁLA
 LDG- 088 9419 -26
 ACP-
 02 JUL 2026
 Fee: € 22 Type: car
 Time: 11:15 By: uch

Killeen National School

Birr

Co. Offaly

Roll No: 171790

Tel: 057 9121682

Email: office@killeennationalschool.com

Re: Case Reference PAX92.324279 – Proposed Ballincor Wind Farm Development and Associated Road and Infrastructure Works

Observer: Board of Management, Killeen National School

Dear Sir/Madam,

Killeen National School is located at the junction of the R489 and the L5045. We write because that junction sits directly on the line of the proposed Grid Connection Route (GCR) for the Ballincor Wind Farm development. The proposed cable trench will pass through or immediately alongside the road junction at our school gate. Of all the schools in the area affected by this development, Killeen NS is uniquely and most acutely exposed to the physical works proposed under this application. The Board of Management submits this letter of formal concern on behalf of the pupils, staff, and families of the school.

This submission does not challenge the principle of renewable energy development. Our concern is not with what the wind farm will produce. Our concern is with what will happen at the gate of a primary school during the process of building it.

The application documentation confirms that the GCR spans 12.23 km in total, running from the wind farm site through County Tipperary (8.54 km) and into County Offaly (3.66 km), before joining the R439 Birr–Banagher Road for its final 2.44 km. The applicant states that progress along this route will be approximately 250 metres per week, with up to 100 metres of open trench left active at any one time. At that rate, the trenching programme will take close to 50 weeks to complete – the equivalent of a full academic year of continuous ground works along the public road network.

For other schools in the surrounding area, the GCR is a concern about bus routes passing through or near a rolling construction zone. For Killeen NS, the position is more direct than that. The R489/L5045 junction where our school stands is on the GCR alignment. When the trenching works reach this point, the active construction zone will be at our school gate. The junction itself – the point where children arrive by bus and by car each morning and depart each afternoon – will be the working site. The Board considers this a matter that goes beyond the general traffic and transport concerns although we share those concerns too.

We note that Killeen National School is specifically named in the applicant's own planning documentation. Section 14.5.4 of Chapter 14 of the EIAR sets out the proposed Grid Connection Route in eight numbered sections. Section 5 of that route – a 1.7 km stretch along the L5045 – is described in the applicant's own words as follows: "The L5045 runs past Killeen National School to the L1077/L70065. Full closure may be needed at points." The applicant is therefore fully aware that the GCR passes this school. The applicant acknowledges that full road closure may be required on the road that runs past the school gate. And yet no consultation with the school took place at any stage, no school-specific traffic management provision appears anywhere in the application documents, and no assessment of the impact on school access, child safety, or emergency vehicle access has been carried out. A developer who can name a national school in their EIAR but omit any consideration of that school's daily operation from their Traffic Management Plan has not discharged the obligations that come with that acknowledgement.

- The position of Killeen NS is further compounded by the fact that the GCR for this development does not operate in isolation. The same road corridor – the L5045, R489, L1071, and R439 – that carries the Ballincor Wind Farm grid connection past the school gate also forms a substantial part of the grid connection route for the Carrig Wind Farm (Tipperary County Council Ref 2360763, ACP Ref. 318689), which was granted planning permission by An Coimisiún Pleanála in June 2025. The applicant's own Chapter 14 acknowledges that the Carrig Wind Farm cable route uses a similar route to the Dallow 110 kV substation along the N52 and R489. The cable infrastructure of both developments will run through or in close proximity to the R489/L5045 junction at this school's gate. Killeen NS therefore faces exposure not to one grid connection construction programme but potentially to two – on the same roads, at the same junction, over an extended and overlapping period. This school is also close to St Brendan's Community School, Birr, which has raised its own formal concerns about the cumulative impact of both developments on the wider road network. The roads affected – the L1071, R489, L5045, and R439 – serve both schools and connect both catchments. The Board of Management of Killeen NS notes that neither the individual impact on this school nor the cumulative impact of both wind farm developments on the roads that serve it has been assessed in any meaningful way in the application before the Board.

We set out below the specific concerns that arise from the school's position on the GCR alignment and from the proposed construction methodology more generally.

- Active trench works in proximity to the school entrance: The applicant confirms that up to 100 metres of open trench will be active at any given time as the GCR works progress. When that active section reaches the R489/L5045 junction, the road close to the school entrance will be subject to open excavation, temporary traffic management, and partial or full road closure. The applicant describes these closures as "temporary" and "of very short duration." However, at a rate of 250 metres per week, the active works will remain in and around this junction for a number of working days. A junction that is the primary point of arrival and departure for every child at Killeen NS cannot be treated as a routine traffic management location during that period. It requires a specific, agreed, and independently monitored plan for maintaining safe school access before, during, and after the trenching works at this precise location.
- Construction along the GCR will affect the school for many weeks or months as families and their pupils try to access the school as the trenchwork takes place in the vicinity. Our students come from within a 3-4km catchment which is directly affected by the GCR route.
- Morning drop-off and afternoon collection during trench operations: Killeen NS, like all rural primary schools, has limited formal set-down area and limited off-road waiting space. Parents delivering children by car use the road junction. School buses stop at or near the junction to set down and collect children. The presence of an active trench, plant machinery, temporary traffic controls, and construction crew at this exact location during school arrival and departure times creates a direct and serious risk to child safety. The applicant has provided no school-specific assessment of how drop-off and collection will be managed safely at Killeen NS while the GCR works are active at the R489/L5045 junction.
- Road closure at the school junction: The applicant acknowledges that the GCR works will require temporary road closures of local roads. A closure of the R489 or the L5045 at or near the school junction would sever the primary access route to Killeen NS. Unlike a closure further along a road network, where traffic can reroute at some distance from a school, a closure at the school's own junction removes access entirely unless a specific and pre-agreed alternative route is in place. The Board has received no communication from the applicant regarding how access to the school

would be maintained during any such closure, and the application documentation contains no school-specific access plan.

- **Temporary trench backfill at a road junction:** The applicant's proposed methodology is to backfill open trenches with temporary surfacing material at the end of each working day. At a straight rural road section this is inadequate. At a junction, it is more problematic still. A junction requires vehicles to turn, which concentrates load at the road edge and across the trench line. Temporary backfill at a junction settles unevenly, creates cross-fall irregularities, and can produce edges and lips that are hazardous to smaller vehicles, cyclists, and pedestrians. The applicant's own assessment acknowledges that GCR works will cause a "moderate negative temporary effect" on road conditions. A moderate negative effect on the road surface at a school junction, used daily by children stepping from buses and cars, is not a temporary inconvenience. It is a foreseeable safety hazard.
- **Construction HGV traffic on school bus routes:** Beyond the GCR works at the school gate, Killeen NS is also served by bus routes using the R492 and its connecting roads, which form the primary construction haul route for the wind farm. The applicant's own figures confirm a minimum of 54 HGV movements per day on this network at peak construction, rising to 186 movements on concrete pour days – one heavy vehicle every 6.6 minutes. The school therefore faces a double exposure: active trench works at its own entrance, and a sustained HGV programme on the roads that serve it. Neither the GCR works nor the haul traffic has been assessed in combination as it applies to this school. The Board also wishes to draw the attention of An Coimisiún Pleanála to the fact that planning permission has already been granted for a separate seven-turbine wind farm development whose grid connection route shares a significant portion of the same GCR corridor that will pass through the R489/L5045 junction at this school's gate. The cable infrastructure serving both developments will run through or adjacent to this junction. This means the disruption to the school entrance is not bounded by a single construction programme. Killeen NS faces the prospect of its gate junction bearing the infrastructure burden of two separate wind energy developments, and that cumulative impact has not been assessed.
- **Traffic Management Plan failures:** The Traffic Management Plan submitted with the application defines primary school peak hours as 08:15–09:15 and 17:00–18:00 in the evening. The figures are inaccurate for a rural primary school. The afternoon collection window runs from approximately 13:30 to 15:30 – a period that falls entirely within normal construction working hours and which does not appear anywhere in the applicant's Traffic Management Plan. More critically, the Traffic Management Plan contains no specific provisions for managing traffic at the R489/L5045 junction during the period when GCR trench works will be active at that location. For a school whose gate is on the GCR alignment, a generic Traffic Management Plan is not sufficient.
- **Emergency access:** If an emergency requiring ambulance or fire service attendance arises at Killeen NS while active trench works are in progress at the R489/L5045 junction, the ability of emergency services to reach the school could be directly compromised. There is no secondary access to the school that could be assumed as an automatic alternative. The applicant's documentation contains no emergency access protocol specific to Killeen NS, and no pre-agreed arrangement with the emergency services for access during the period when the junction is under active construction.
- **Absence of engagement with the school:** Killeen NS received no contact from the applicant at any stage of the planning process, despite the school's gate being located at a junction that is on the proposed GCR alignment. The Board finds it very difficult to understand how a Traffic Management Plan and GCR works programme could be designed and submitted without any engagement with a school whose

entrance is at a junction directly on the route. The absence of a school-specific access plan for Killeen NS is, we submit, a material gap in the applicant's assessment.

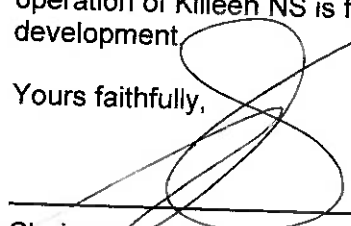
The applicant concludes that residual effects on the road network will be "imperceptible / not significant." The Board of Management of Killeen NS does not accept that this conclusion can be applied to a school whose entrance gate is on the GCR alignment. For the families and children of Killeen NS, the works proposed under this application are not a background effect on a distant road network. They will occur at the junction where every child in the school arrives and departs every school day. The applicant's own documentation acknowledges that the GCR works will produce a "moderate negative temporary effect" on road conditions. At a school gate, a moderate negative effect is not a planning abstraction. It is a physical condition that children must navigate.

The Board of Management asks that, if permission is granted for this development, the following be attached as specific and enforceable conditions of that permission:

- That a specific, written School Access and Safety Plan for Killeen NS be prepared by the developer's Traffic Management Contractor in advance of any GCR works reaching the R489/L5045 junction, setting out in detail how safe vehicular and pedestrian access to the school will be maintained for the full period during which active trench works are within 300 metres of the school entrance, and that this plan be agreed with the Board of Management, the relevant school transport operators, and the local authority road safety officer before works commence at that location.
- That no open trench, temporary traffic management, or road closure be in place at the R489/L5045 junction during morning school arrival (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 the date on which GCR works are scheduled to reach the school junction, to allow the Board to make alternative arrangements where necessary.
- That any temporary road closure of the R489 or L5045 at or near the school entrance be subject to a pre-agreed, signposted, and operationally tested alternative access route for school buses and parents, communicated in writing to the Board of Management before the closure takes effect.
- That the trench backfill methodology at the R489/L5045 junction be subject to a higher standard than temporary surfacing, given the junction geometry and the daily use of this location by school buses and children on foot, and that the permanent reinstatement of the junction surface be completed to a certified structural standard before the GCR works move on from this location.
- That no construction HGV movements on roads forming part of Killeen NS school bus routes be permitted during morning drop-off (08:15–09:30) or afternoon collection (13:15–15:45), Monday to Friday during school term, without a minimum of 72 hours' advance written notice to the school.
- That guaranteed and unimpeded emergency vehicle access to Killeen NS be maintained at all times during the construction period, with a pre-agreed emergency access route communicated in advance to the HSE, the National Ambulance Service, and An Garda Síochána before any works begin at or near the R489/L5045 junction.
- That the Traffic Management Plan be formally revised to correctly reflect primary school operating hours, that a school-specific annex be prepared for Killeen NS addressing the junction works, and that the Board of Management be formally consulted in the preparation of both.

No other school in the area affected by this development shares the position of Killeen NS. Our school gate is at a junction on the proposed Grid Connection Route. That is a specific and material fact, and it requires a specific and material response from the planning process. We ask An Coimisiún Pleanála to recognise that distinction and to ensure that the safe daily operation of Killeen NS is fully and individually protected in any permission granted for this development.

Yours faithfully,



Chairperson, Board of Management
Killeen National School

Date: 22.06.2026