

# TBR8 - Lighting

## Curraghinalt, Gortin

December 2025

### Response to Transboundary Consultation Representations – [REDACTED] (Hoare Lea)

Representation Ref	Comment/Issue	Addressed in applicant's submissions to date?	Applicant's Response
TBA1493 - An Taisce - pg 17-18	We note that the subject site is located within the OM Dark Sky Park and Observatory, which is a key cultural resource for stargazing as well as a refuge for nocturnal flora and fauna. Therefore, it is crucial that the applicant's industrial lighting design specifications are assessed with regard to guidance provided by environmentally friendly lighting experts. <sup>8 9 10 11</sup>	Yes in part. The concerns raised are addressed in the Lighting Impact Assessment and see in particular paras 5.1 to 5.3 on page 26 of Appendix 3 of TR8.  Four notes/ guidance listed in the footnotes have not been expressly referenced.	The four additional notes/ guidance listed in the footnotes were as follows –  <b>8. Dark Sky Ireland. Environmentally Friendly Lighting Guide</b> <b>9. South Downs National Park. 2021. Dark Skies Technical Advice Note</b> <b>10. Government of Wales. 2025. Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales</b> <b>11. Friends of the Lake District. 2023. Good Lighting Technical Advice Note</b>  In each case the documents tend to cover the same, core, principles for controlling the various aspects of light pollution both in generalised and, specific, terms. Below is a brief overview of what each document covers –

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***Dark Sky Ireland. Environmentally Friendly Lighting Guide***

This guidance discusses what light pollution is, giving examples of areas with high and low levels of artificial light at night. It then proceeds to give visual guidance of light principles for minimising light pollution using graphic illustrations to show good and bad practise. Finally, it gives case studies of night-time environments where poor lighting, which caused light pollution, has been replaced reducing light impact at night.

All elements of the submitted LIA information (TR8, App 3) follow the principles for minimising light pollution set out by the ILP in their various documents and therefore the submitted lighting scheme, shown in Appendix 2 of TR8 adheres to the Dark Sky Ireland guidance.

***South Downs National Park (SDNP). 2021. Dark Skies Technical Advice Note***

This Note has more technical content and its guidance is more prescriptive. Its beginning section covers the current 'dark skies' nature of the SDNP and sets out measured, numerical based, SQM values currently recorded across the Park. Such values were also recorded around the proposed development site during the Baseline Survey for this project and the results can be seen on page 67 in Appendix 1 of TR8

The guidance goes on to discuss what light pollution is and again uses graphic illustrations to show good and bad practise. It then has a technical section which gives very specific check lists, and technical objective criteria all copied for existing ILP guidance, on exterior lighting design. Its final section is a list of

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further reading references which contain all the ILP's guidance documents.

Page 47 of the guidance has a table showing acceptable values for lighting levels in different Environmental Zones (E). Existing E zones in and around the proposed development site were determined following the Baseline Survey, pages 69 of **Appendix 1 of TR8** and, following the modelling exercise of the proposed lighting scheme shown in **Appendix 2 of TR8**, the resultant post operational values, on page 19 to 22 of **Appendix 3 of TR8**, show there will be no change to existing E zones once the lighting scheme is installed and operational.

All elements of the submitted LIA information follow the principles for minimising light pollution and therefore the submitted lighting scheme, shown in **Appendix 2 of TR8**, adheres to the South Downs National Park guidance

***Government of Wales. 2025. Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales***

This document is more in-depth than those previously discussed and has detailed information about the current levels of light pollution which exists across Wales as well as giving specific guidance on ways on minimising light pollution and is split into six sections.

The first two sections cover an introduction and executive summary to the documents before clarifying the elements which, collectively, go to form light pollution. Like the SDNP document, it tries to qualify current light pollution across

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Wales but, unlike the SDNP, it uses a different metric Nanowatts/cm<sup>2</sup>/sr. Both metrics are helpful in understanding current light pollution across an area.

The next two sections of the document cover current planning process and policies relating to minimising light pollution as well as details of potential sensitive receptors including ecology (birds, bats etc) and the impacts of light at night on landscape character. Again, helpfully on page 48, it has a table showing SQM values related to E zones. As per previous comments on the South Down National Park guidance the proposed lighting scheme will not change the current E zone classifications as per pages 69 of **Appendix 1 of TR8** and the resultant post operational values, on page 19 to 22 of TR8 Appendix 3.

The final two sections again have graphic illustrations of good and bad practise, before and after examples of lighting installations which have reduced light pollution and conclude with technical and further reading references which contains ILP guidance documents.

All elements of the submitted LIA information follow the principles for minimising light pollution and therefore the submitted lighting scheme, shown in **Appendix 2 of TR8**, adheres to the Government of Wales Good Practice Guidance in terms of objective criteria. Regarding its guidance on tranquillity please see comments from the LVIA consultant.

***Friends of the Lake District. 2023. Good Lighting Technical Advice Note (DDM – Full, online, Version 2 July 2025)***

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This document was updated in July 2025 (V2). It is very comprehensive and, like the Governmental of Wales guidance, has sections covering all aspects of light pollution and advise on minimising its impact.

The first four cover what constitutes light pollution. Like some of the other documents there is specific reference to Zones (“E Zones” – please see page 6 in Appendix 1 of TR8 for exact definition) which should be allocated by the Local Authority or, failing such allocation, can be determined through professional judgement following a baseline site survey.

There is also specific refence to Sky Quality Meter (“SQM”- please see page 67 in **Appendix 1 of TR8** for exact definition) readings in order the give guidance on assessing an areas’ current night time lit environment..

Finally, this section shows examples of the type of lighting design information which should be submitted within an LIA. For clarity, although the information shown in **Appendix 2 of TR8** differs slightly to the examples of information shown on pages 15 & 16 under the ‘Planning Process, Lighting Assessment and Design’ heading, all the recommended information is present in the submission.

Again, all guidance in this part of the document has been followed in the submitted LIA

The next section covers good practice, with this document being the source of the graphic illustrations regarding good

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and bad practise shown in the Dark Sky Ireland, Environmentally Friendly Lighting Guide.

Finally, there is a very comprehensive technical and codes and standards Appendix. Of particular note is Page 38 of the guide, 'Relevant Standards and Professional Guidance Documents', as three of the recommended documents shown (not a comprehensive list) are also referenced throughout the submitted LIA in **Appendix 1 of TR8**, page 4 to 10, and in **TR6, Appendix 3**, page 5.

Finally, as stated previously, although the exact presentation of the proposed lighting scheme for the site, found in Appendix 2 of TR8, differs from the example shown in the back of this guide all required information for the assessing of the schemes ability to minimise light pollution is found across all three submitted documents which, when combined, form the complete LIA.

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An Taisce – pg 17-18

As currently proposed, we have concerns that the proposal is likely to adversely impact upon insects, nocturnal animals, plants and human health due to the emitting of excess light from LED sources. As outlined by Dark Sky Ireland in their 'Environmentally Friendly Lighting Guide', "there is a substantial growing body of evidence that shows that the colour temperature, CCT, of lights can be particularly disruptive to circadian rhythms, sleep patterns and the production of melatonin"

Yes

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In accordance with current guidance on minimising light pollution impact on all the receptor grounds mentioned horizontal and vertical illuminance (lux) off site has been kept to a minimum, see the calculated results in the orange columns on pages 17 to 20, and the table on page 22, **in Appendix 3 of TR8**.

These show that there will be no spill light from the proposed development lighting to any areas past the site boundary. On the issue of Correlated Colour Temperature (CCT measured in Kelvin (K)), in accordance with current recommendations, all luminaires will have a of 2700K: please see the table at the

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			bottom of page 2 in Appendix 2 of TR8 which shows the recommended CCT for all luminaire types.
TBA1603 - Environmental Justice Network Ireland- pg 7	light pollution and negative impact on the OM Dark Skies observatory	Yes	Similar comments made by other objectors and addressed in submitted LIA and RR8 with further clarification in TR8.
Pg 7 footnote 12	The HED Division (NIEA) notes in its SoC that “Lighting of the proposal would have an adverse impact on the dark skies of this part of the Sperrin AONB, impacting on the existing landscape character within an extensive visual envelope around the site	Yes	Similar comments made by other objectors and addressed in submitted LIA and Rebuttal Statement (TR8, Appendix 3) with further clarification in TR8.
TBA0750 – pg 1	The OM Dark Skies observatory is about 10km from the site and according to impact assessments the Dark Skies will be negatively affected by the construction of the mine and the powerlines. This is contrary to maintaining the special character of the AONB.	Yes	Similar comments made by other objectors and addressed in submitted LIA and RR8 Rebuttal Statement with further clarification in TR8.
TBA1177 – pg 1	It is absolutely out of the question that mining should be permitted in an AONB, RAMSAR site, Dark Sky Observatory, ASSI, ASAI and SPA.	Yes	Similar comments made by other objectors and addressed in submitted LIA and RR8 with further clarification in TR8.
TBA1557 – Feminist Communities for Climate Justice – pg 12	Impact on dark sky observatory	Yes	Similar comments made by other objectors and addressed in submitted LIA and RR8 with further clarification in TR8.
TBA1575 – pg 1	As a visitor to the Sperrins I find it difficult to believe that this is being considered by NI Authorities - The Sperrins landscape is one of the last refuges on the island for visitors wishing to connect with nature, in a tranquil place, with dark skies and no light pollution.	Yes	Agree with the statement that there is currently ‘no light pollution’ in the area. However in terms of the potential, subjective, visual impression of sky glow in certain atmospheric conditions identified in the LIA (para 3.4.5, page 67 in Appendix 3 of TR8), such effects are already present in the area. there are other lighting installations in the immediate vicinity of the proposed site that create a similar lit effect at night as the operational lighting is likely to do. Both Greencastle and Rousky have street lighting, on throughout the hours of darkness, and both these installations also create the effect described in certain atmospheric conditions. It should again be noted that this temporary, atmospheric related, phenomenon is not regarded as light pollution.

			Please see, "Responses to comments received to Rebuttal Statement", titled 'Responses to Dfl further comments on light pollution', specifically responses 29 to 35, for further information on this effect, it's likely visual impression and transient nature.
TBA-0195 & TBA0341 – pg 1	The OM Dark Skies observatory is about 10km from the site and according to impact assessments the Dark Skies will be negatively affected by the construction of the mine and the powerlines. This is contrary to maintaining the special character of the AONB.	Yes	Generic response prepared by other objects and used by this individual. Similar comments made by other objectors and addressed in submitted LIA and RR8 with further clarification in TR8.