Inspector's Report ABP-320506-24

Question	Whether the installation of twelve external wall mounted light installations at Tarmon National School is or is not development or is or is not exempted development
Location	Tarmon National School, Ballinphuill, Castlerea, Co. Roscommon
Planning Authority	Roscommon County Council
Planning Authority Reg. Ref.	DED/724
Owner/Occupier	Board of Management Tarmon NS
Planning Authority Decision	Is development and is exempted development
Referrer	Claire Larkin.
Type of Case	Section 5(3) Referral

Observer(s)	Dark Sky Roscommon
Inspector	Fergal Ó Bric.

1.0 Introduction

1.1 This case pertains to a Section 5 referral submitted by a local resident Miss Claire Larkin who asked the question whether the installation of 12 external wall mounted light installations at Tarmon National school is exempted development.

1.2 Roscommon County Council issued a Section 5 declaration on the 12th day of July 2024 which determined that the 12 external wall mounted lights at Tarmon National school is development and is exempted development in accordance with the provisions of Section 4 (1) (h) of the Planning and Development Act 2000, as amended. As part of its assessment the Planning Authority determined that the development would not be likely to have a significant effect on any European site, individually or in combination and that no Appropriate Assessment (AA) nor Environmental Impact Assessment report (EIAR) was required.

1.3 Specialist external ecological advice was requested from the Environmental team within An Coimisiún Pleanála in terms of the necessity, or not, for the submission of an Appropriate Assessment screening report to the Coimisiún. The core of the screening report relates to the consideration of the possibility of significant impacts arising upon the Greenland White Fronted Goose species, the single qualifying interest species associated with the Bellanagare Special Protection Area. The Specialist external ecological advice is included as Appendix 2 at the end of this report.

1.4 By way of background and something strongly referenced by the referrer and the observer, An Coimisiún Pleanála received notification by means of a High Court Order, dated 21st day of July 2023 setting out that the planning decision issued by the Coimisiún under reference number 310323-21 on the 18th day of January 2022 had been quashed. That development pertained to the installation of twenty-one flood light poles ranging in in height from six metres to ten metres used to illuminate the astro turf playing pitch and walking/running track and car

parking area located adjacent to and north-east of the Tarmon National school building.

2.0 Site Location / Description

2.1 Tarmon National School is located in the townland of Ballinphuill, and is accessed from a local road, the L-1616, approximately 2.5 kilometres northeast of the settlement of Castlerea, Co. Roscommon. The school building comprises a single storey split level structure which is elevated above the levels of the adjoining public roadway to the south-west and the school surface car park and set-down area to the west of the site. The school has been extended on a number of occasions and comprises multiple classroom wings.

2.2 The twelve external light installations are wall-mounted bulkhead fittings fixed to the perimeter walls of the school building. Based on the information submitted, the lights (the subject of this referral) are mounted at approximately 3.7m above ground level on the external perimeter walls, with the school building itself elevated above the levels of the adjacent public road and the surrounding landscape. The immediate surrounding landscape is rural in nature and comprises agricultural grassland, hedgerows and mature trees and a number of rural one-off dwellings.

3.0 The Question

3.1 The question posed to the Planning Authority by the third-party referrer was:

Whether the installation of twelve external wall mounted light installations at Tarmon National School is or is not development or is or is not exempted development.

4.0 **Planning Authority Declaration**

4.1 Roscommon County Council issued a Section 5 declaration on the 12th day of July 2024 which determined that the 12 external wall mounted lights at Tarmon National school is development and is exempted development in accordance with the provisions of Section 4 (1) (h) of the Planning and Development Act 2000, as amended. As part of its assessment the Planning Authority determined that the development would not be likely to have a significant effect on any European site, individually or in combination and that no Appropriate Assessment (AA) nor Environmental Impact Assessment report (EIAR) was required. AA or EIAR was required.

4.2 **Planning Authority Reports**

4.2.1 Planning Report

4.2.2 The Roscommon County Council (RCC) Planner's Report describes the lights as affixed to the external walls of the school at approximately 2.5m above ground level (a measurement contested in the referral). The planner characterised the lighting as comparable in design and intensity to domestic security lighting and relied upon the reported low frequency of use, the possible abandonment of the Bellanagare Bog SPA by the Greenland White-fronted Goose combined with the separation distance of approximately three kilometres as the basis for excluding any likely significant effect on the protected Goose species, the sole qualifying interest species associated with this European site.

4.2.3 The Planning Authority (PA) firstly considered whether the external lights comprise ‘works for the maintenance, improvement or other alteration of any structure’. The PA determined that the external lights would represent an

'alteration' but that 'in principle Section 4 (1) (h) would confer an exemption for the proposal'.

4.2.4 The Planning Authority (PA) set out that a second relevant consideration to the applicability of Section 4 (1) (h) is whether the proposals would 'consist of works which only affect the interior of the structure, or which do not materially affect the external appearance of the structure such as to render itself inconsistent with itself or with neighbouring structures'. The PA did not consider 'the lighting installations would materially affect the appearance of the structure such as to render it inconsistent with itself or with neighbouring structures'.

4.2.5 The PA noted the restrictions provided for in Article 9 of the Planning and Development Regulations 2001, as amended, relates to exemptions provided under Article 6 of the Planning and Development Regulations, 2001, as amended. Article 9 of the Planning and Development Regulations 2001, as amended. The PA deemed that these restrictions are not pertinent in this instance'.

4.2.6 The PA noted the provisions provided for under Section 4(4) of the Planning and Development Act sets out that development shall not be exempted development if an environmental impact assessment or an appropriate assessment of the development is required.

4.2.7 In terms of EIA, the PA determined that the development described does not fall within a class of development set out in Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended, and, therefore, is not subject to EIA requirements.

4.2.8 In terms of Appropriate Assessment (AA) the PA noted that the closest European sites to the development are the Bellanagare Bog SPA (site code 004105) and the Bellanagare Bog SAC (site code 000592) which are both located circa three

kilometres north of the subject site. The issue of AA will be addressed later within this assessment and within Appendix 1 at the end of this report.

4.3 Other Technical Reports

None received.

5.0 Planning History

There is a complex planning history associated with the subject site. However, the most relevant applications/appeals are considered to include the following:

PA ref 23/53 Planning permission and planning permission for retention of the following: Retention of temporary car park, permission for additional car parking, construction of extension to rear, demolition of storage area, upgrade of wastewater treatment system and surface water system and all associated site works. The Planning Authority decision was upheld under reference 318876-24 by An Coimisiún Pleanála (ACP) in August 2024.

PA. Ref. 21/131 & ABP. Ref. 310323-21 – Permission granted for floodlighting to astroturf pitch and lighting to illuminate existing running track, walkway and car park and all associated site works.

The High Court quashed the decision of ACP following a judicial review. A key consideration in that judgement was the likelihood of significant effects on the Greenland White Fronted Goose, the sole qualifying interest species associated with the Bellanagare Special Protection Area (SPA). The site-specific conservation objective of this SPA is 'To restore the favourable conservation condition of Greenland White-fronted Goose in the Bellanagare Bog SPA'

PA. ref. 19/608 & ABP. Ref. 306701-20 – Permission for retention granted for (i) changes to development previously granted under PA. Ref. 15/402, including parking, changes to access road, elevations, and (ii) changes to the development

granted under PA. Ref. 14/256 including changing rooms/storage to classrooms, elevational changes. Permission also granted for a single storey ASD classroom block.

PA. Ref. 15/402– Permission GRANTED for extension to school, car parking, new entrance, astroturf pitch and new wastewater treatment system.

6.0 Policy Context

6.1 The applicable Development Plan for this area is the Roscommon County Development Plan 2022 – 2028. The subject site is located within a rural area as defined within the Development Plan. The landscape character of the area is designated under LCA 28 (Tulsk and Rathcroghan Plateau), an area of classified as being of Exceptional Landscape Value.

6.2 Natural Heritage Designations

6.2.1 The closest European sites to the development are the Bellanagare Bog SPA (site code 004105) and the Bellanagare Bog SAC (site code 000592) which are both located approximately 3.1 kilometres north of the subject site.

7.0 The Referral

7.1 Referrer's Case

The referrer (Ms. Larkin) raised a number of as part of her Section 5 referral as follows:

- That the twelve external wall mounted lights were not included within the drawings as permitted by the PA/ABP under planning reference numbers 15/402 or 19/608 or 306701-20.

- The appeal site is located within Landscape Character Area (LCA) number 28 as per the current Roscommon Dev. Plan, where a landscape classification of exceptional value is attributable to this area.
- The subject site is located approximately three kilometres (south-east) from the Bellanagare SAC and SPA European sites.
- The determination of the Planning Authority fails to comply with Sections 4(4) and 177 U of the P & D Act and Article 6(3) of the Habitats Directive in failing to address the specific conservation objective of the SPA.
- The Planner has no grounds to determine that the lights 'are comparable in design and intensity to domestic security lighting' nor to determine 'that the 'lighting which is of comparable nocturnal intensity to dwelling security lighting and of lower intensity than village street lighting and not of an intensity which could reasonably be argued to cause migratory birds to avoid the site, and that likely significant impacts including avoidance or displacement of QI species can reasonably be excluded'.
- The impact of the lighting on the bat population has not been considered within the Planning Authority's (PA's) determination.
- The High Court judge, in the judicial review of Board decision 310323-21, noted the comments of the ecologist (Dr. McLaughlin) who acted on behalf of the notice party (the BoM of Tarmon NS) and found 'that any significant effects on the on the Bellanagare SPA and that any effect on the geese will be avoided as they are no longer at the site and are now likely to avoid the area…. the lights will be used at night when the majority of birds are inactive. Some geese do fly at night however, the light emitted will not have any significant effect upon them and they may simply avoid the spillage and glare. The lights will shut off at 10pm so usage of same will not be significant. The Greenland White Fronted Goose has abandoned the Bellanagare SPA'.
- Dr. McLaughlin set out that there 'will be no significant effects upon any protected species arising from the installation of the lights or operation of the lights. The lights will have no significant effects upon the Greenland

White-fronted goose, which no longer uses the habitats of the Bellanagare Bog SPA'.

- The Dr. Ni Bhroin report, submitted by the applicant (Dark Sky Roscommon) to the High Court confirms 'the importance of birds flying in winter (including Geese) not being distracted by bright lights. She says that birds fly between locations to forage during the winter months and the floodlights will lead to an illumination of an existing dark sky which could have a significant impact on the receiving environment and the wildlife the environment supports'.
- The Planning Inspector, in the assessment of case reference 310323-21, had access to two ecological reports (prepared by Dr Ni Bhroin and Dr McLaughlin). The Inspector endorsed Dr McLaughlin's observations that the geese, if they returned, would be 'likely to avoid the area' and 'simply avoid the spillage and glare'. The inspector's conclusion seems to have set aside Dr Ni Bhroins' ecological report and observations.
- The judge found that the stance adopted by the inspector could not be consistent with achieving the conservation objective of 'restoring the conservation status of the geese'. Judge Bolger sets out that the geese avoiding the SPA site does not equate to 'no significant impact' on the geese species having regard to Dr. Ni Bhroins' observation that 'birds move from location to location to forage during winter months',
- Miss Larkin sets out that a bat and bird survey was conducted by 'Wild on Foot Ecological services' and has established the presence of bats within one hundred metres of the Tarmon school site including Soprano Pipistrelle, Common Pipistrelle, Leisler's bat and Myotis. (A copy of Bat and bird survey is included as Appendix 5 of the referrers appeal submission).
- Miss Larkin states that the NPWS have informed her that Tarmon NS should have sought a derogation license in relation to the erection of the external wall mounted lighting. (No evidence of correspondence from the NPWS has been submitted).

7.2 **Planning Authority Response**

None received.

7.3 **Observation(s).**

An observation on this Section 5 referral was received from Dark Sky Roscommon which included the following:

- The elevated location of the site combined with the lack of natural shielding means that the external wall mounted lighting may be visible from a significant distance.
- Data available from the National Biodiversity Data Centre (NBDC) demonstrates that there are four species of bat recorded in this area.
- That artificial light at night can be a driver for biodiversity decline in this area, classified as being of exceptional landscape value.
- The Planning Officer within Roscommon County Council (RCC) has not followed the correct procedure in relation to AA screening of Natura 2000 sites within a 15km radius of the subject site.
- The Qualifying Interest of the Bellanagare SPA is the 'Greenland White Fronted Goose' who fly between locations to forage during the winter months. Birds that migrate and hunt at night navigate by moonlight and starlight. Artificial light can cause them to wander off-course. Artificial light can cause them to migrate too early or too late and miss ideal climate conditions for nesting and foraging.
- The external wall mounted lights on the school building are of a substandard design and a source of light pollution.
- The lighting has been assessed by Redmond Analytical Management Services who have stated 'that lighting produced by luminaries of this nature is not appropriate in a location such as Tarmon, as it will have a considerable negative impact on the environment, over a considerable distance, due to the amount of light pollution they produce'.

- Reference is made to the High Court case of Dary Sky Roscommon v ABP, in a judicial review of Board decision 310323-21, where the primary issue under consideration was the potential impact of proposed lighting at the Tarmon school site on the Greenland White Fronted Goose, the Qualifying Interest species of the Bellanagare SPA.
- The High Court in its decision set out that the 'low frequency of use' and the 'possible abandonment 'of the Bellanagare SPA site does not remove the obligation of the LA to take measures to achieve the site-specific conservation objective of the Bellanagare SPA 'To restore the favourable conservation condition of the bird species'. The High Court quashed the Boards planning decision in July 2024.
- Disregarding this obligation undermines conservation efforts and amounts to an inappropriate use of the exempted development provision.

7.4 **Further Responses**

7.4.1 The Coimisiún issued a notice on the 7th day of November 2025 under Section 129 of the Planning and Development Act 2000 as amended, notifying the Board of Management (BoM) of Tarmon National School (NS) that an appeal had been received by ACP and that they may make a submission to ACP within a period of up to four weeks.

7.4.2 ACP received a response from the Consultant Engineers representing the BoM on the 1st day of December 2025. This response was made in relation to the issues raised by the referrer and the observers

7.4.3 The Coimisiún subsequently issued a notice on the 5th day of December 2025 under Section 132 of the Planning and Development Act 2000 as amended, seeking further information from the landowner/occupier regarding the current status of the external lighting installed elsewhere within the school site and associated lands and in particular the lighting/floodlighting associated with the adjacent playing pitches, astro-turf pitch, running track, walkway and car park

area, whether such lighting is operational/in-use and the hours of operation of such lighting, where such a use arises.

7.4.4 ACP received a response to the Section 132 request from the Consultant Engineers on behalf of the BoM on the 17th day of December 2025, where they state that the external lights on the perimeter school walls 'are permitted development'. They state that this was implicit within the five planning permissions granted at the school site over the last twenty-year period. References in those permissions were made to 'connections to services and associated site works' in the orders made by Roscommon County Council. The erection of lights in/on buildings is a universal feature of many buildings in the Country and are accepted as an integral part of normal development. The BoM set out that 'the provision of lighting in and around a development, in this case the school and is attendant grounds is a pre-requisite to ensure that the development can function in a safe manner and is fit for purpose. In granting fire safety certificates, the fire authority assumes that the development is designed in conformity with the Building Regulations. The design of an adequate lighting system is taken as a given in terms of conformity. In this instance we ask that ACP consider that the provision of lighting would fall into class 41(e) of the Planning and Development Regulations'.

7.4.5 In terms of the frequency of use the BoM set out the following 'The use of the lighting is infrequent and sporadic. External lights are not used on weekends and are generally not in use after 3.30pm on school days, except when required for safety. The school year consists of 182 in-school days, and the vast majority of these days do not involve evening lighting or the use of the external wall lights in question. There are typically 10-15 after hours meetings which take place each year. These include Board of Management meetings and Parents Association meetings and 'in the normal course of events these meetings do not extend beyond 10pm. Lighting is used only, when necessary, for the shortest duration possible, and never for decorative or non-functional purposes. The school

currently does not operate external lighting for security purposes and consequently the school is in darkness for night-time hours'. The BoM set out that 'the impact from the lighting is minuscule in the context of lighting installations already extant in the area e.g. Castlerea prison and Castlerea Floodlit playing pitches. The provision of the building lighting should in this instance be considered as exempt/permitted development as to do otherwise would mean that the vast majority of development in the country with external lighting would theoretically find themselves categorised as un-authorised development. It is also stated that no lighting is currently operational on the adjoining playing pitches, astro-turf surface, running track, walkway, or car park. Google Street View imagery, submitted by the BoM, shows the school building with the wall-mounted lights visible in daytime but no pitch or ground-level lighting infrastructure evident as operational.

7.4.6 The BoM response observed that the previous High Court decision in 2024 which specifically pertained to the retention of twenty-one floodlighting pole installations (ranging in height from 6 metres to ten metres) along the perimeter of the adjacent astro turf playing pitch, lighting for the running/walking track and car park area. These lighting structures are high intensity and by virtue of their height would impact a wide area. However, the current question as posed by the referrer relates to twelve wall mounted lights on the perimeter of the school building, which is fundamentally different and in no way comparable to the floodlighting development, subject to the 2024 High Court decision.

8.0 **Statutory Provisions**

8.1 **Planning and Development Act 2000 (as amended)**

Section 2(1)

In this Act, except where the context otherwise requires—

"works" includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal and, in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint, wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.

Section 3(1)

In this Act, "development" means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land.

Section 4(1)

The following shall be exempted development for the purposes of this Act - …

(h) development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures;

Section 4(4)

development shall not be exempted development if an Environmental Impact Assessment or an Appropriate Assessment of the development is required.

8.2 **Planning and Development Regulations, 2001 (as amended)**

PART 2 - Exempted Development

Article 6(1)

Subject to Article 9, development of a class specified in column 1 of Part 1 of Schedule 2 shall be exempted development for the purposes of the Act, provided that such development complies with the conditions and limitations specified in column 2 of the said Part 1 opposite the mention of that class in the said column 1.

Article 9(1)

Development to which Article 6 relates shall not be exempted development for the purposes of the Act –

(a) if the carrying out of such development would –

(i) contravene a condition attached to a permission under the Act or be inconsistent with any use specified in a permission under the Act, …

(viii) consist of or comprise the extension, alteration, repair or renewal of an unauthorised structure or a structure the use of which is an unauthorised use,

9.0 Assessment

9.1 Introduction

The scope of the referral:

This referral question posed is whether the installation of 12 external wall mounted light installations at Tarmon National School is or is not development or is or is not exempted development.

9.2 **The Question of Development**

9.2.1 As per the statutory provisions set out within Section 8 of this report above, works are defined in Section 2(1) of the Planning Act as including any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal. I consider that the installation of twelve external wall mounted lights may reasonably be determined to comprise 'works' in accordance with the definition set out under Section 2(1) of the Planning and Development Act 2000 (as amended). Thus, the installation of the lights has resulted in an 'alteration' to the school building and are considered to constitute 'works'.

9.2.2 The lighting installations would have involved the carrying out of works to the external perimeter school walls which may reasonably be determined to comprise 'works on, in, over or under land' and would, thereby, constitute "development" in accordance with Section 3 of the Planning and Development Act, 2000 (as amended).

9.3 **The Question of Exempted Development**

9.3.1 The Planning Authority relied on the provisions of Section 4 (1) (h) of the Planning and Develoepmnt Act 2000 to confer an exemption for the external wall mounted lighting installations. This section of the legislation sets out that 'development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures'. From Section 9.2 above, I am satisfied that the works (installation of wall mounted lights) on site constitutes development. I consider that the lighting installations represent an alteration of the school building structure. The next question to be considered for an exemption under Section 4(1) (h) of the Planning Act is do the lights 'materially affect the external appearance of the structure so as to render the

appearance inconsistent with the character of the structure or of neighbouring structures'.

9.3.2 In this regard, I refer to the further information response received by the Coimisiún from the BoM of Tarmon NS which set out the following information in relation to the use of the external wall mounted lights**'.** The BoM state that **'**the use of the lighting is infrequent and sporadic. External lights are not used on weekends and are generally not in use after 3.30pm on school days, except when required for safety. The school year consists of 182 in-school days, and the vast majority of these days do not involve evening lighting or the use of the external wall lights in question. There are typically 10-15 after hours meetings which take place each year. These include Board of Management meetings and Parents Association meetings and 'in the normal course of events these meetings do not extend beyond 10pm. The BoM state that the external wall mounted lighting is used only, when necessary, for the shortest duration possible, and never for decorative or non-functional purposes. The school currently does not operate external lighting for security purposes and consequently the school is in darkness for night-time hours'.

9.3.3 The BoM set out that 'the impact from the lighting is minuscule in the context of lighting installations already extant in the area e.g. Castlerea prison and Castlerea Floodlit playing pitches. The provision of the building lighting should in this instance be considered as exempt/permitted development as to do otherwise would mean that the vast majority of development in the country with external lighting would theoretically find themselves categorised as un-authorised development. It is also stated that no lighting is currently operational on the adjoining playing pitches, astro-turf surface, running track, walkway, or car park. Google Street View imagery, submitted by the BoM, shows the school building

with the wall-mounted lights visible in daytime but no pitch or ground-level lighting infrastructure evident as operational.

9.3.4 Given the relatively minor nature of the wall mounted external lights distributed along the external elevations of the school, I would concur with the PA that the wall mounted lights would not have a material impact upon the appearance of the building in that the height, bulk nor scale of the building has not been altered and the lights are affixed to the walls at a height of approximately 3.7 metres above ground level. They were not illuminated on the day of my site inspection. Having regard to the intervening topography and landscape which comprises agricultural grassland, mature hedgerow and trees, I do not consider that the wall mounted light features themselves could be described as features which are prominent within the local landscape. The school building itself, would be the feature of prominence within the local landscape, however that is not the question that is the subject of this referral. This referral specifically relates to the twelve external wall mounted lights, and this assessment will specifically focus on these particular features.

9.3.5 The Roscommon County Council (RCC) Planner's Report characterised the lighting as comparable in design and intensity to domestic security lighting and relied upon the reported low frequency of use, the possible abandonment of the Bellanagare Bog SPA by the Greenland White-fronted Goose combined with the separation distance of approximately three kilometres as the basis for excluding any likely significant effect on the protected Goose species, the sole qualifying interest species associated with this European site.

9.3.6 The Planning Authority (PA) set out that a second relevant consideration to the applicability of Section 4 (1) (h) is whether the proposals would ‘consist of works which only affect the interior of the structure, or which do not materially affect the external appearance of the structure such as to render itself inconsistent with itself or with neighbouring structures’. The PA did not consider ‘the lighting

installations would materially affect the appearance of the structure such as to render it inconsistent with itself or with neighbouring structures'.

9.3.7 On this basis, Roscommon County Council issued a Section 5 declaration on the 12th day of July 2024 which determined that the 12 external wall mounted lights at Tarmon National school is development and is exempted development in accordance with the provisions of Section 4 (1) (h) of the Planning and Development Act 2000, as amended. The Planning Authority (PA) firstly considered whether the external lights comprise 'works for the maintenance, improvement or other alteration of any structure'. The PA determined that the external lights would represent an 'alteration' but that 'in principle Section 4 (1) (h) would confer an exemption for the proposal'. I would concur with the determination issued by the PA in this instance that the twelve external wall mounted lights be conferred an exemption under Section 4 (1) (h)as they have resulted in an alteration to the school, building but I am satisfied that they do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures.

9.3.8 The referrer and observer make reference (photographic images of wall mounted lights illuminated as night submitted to the adverse impacts arising from the illumination of the wall mounted school lights at night. I refer to the information included within the specialist AA screening report ((See appendix 1) at the end of this report. The Consultant Ecologist specifically references referenced the nocturnal light environment in the area to an online tool lightingpolutionmap.info (Stare 2026) which is stated to provide a 'a reliable indication of relative artificial sky brightness at the landscape scale' and is a data sourced referenced in the Dark Sky Roscommon observation to the Coimisiún. This online tool identifies that the local nocturnal skyline is illuminated from the lights associated with Castlerea prison, the urban settlement of Castlerea and its associated street lighting and the Castlerea Floodlit playing pitches, which generate significant

levels of illumination within the local skyline. Therefore, the school site is not located within a completely dark rural landscape, but in the perimeter of an existing urban light influence. The wall mounted school lights are considered to represent an incremental addition to a partially illuminated local environment rather than the first introduction of artificial light to this school site. The intensity of the nocturnal lighting experienced in Castlerea town (located approximately 2.5 kilometres south-west of the school site) is considered to be far in excess of any illumination that the external bulk head lights at Tarmon NS generate, when being used.

9.3.9 In Conclusion, based on the information submitted originally by the BoM, the referrer, the observers, and from the response from the BoM received in relation to the appeal and the response to the Section 132 further information request issued by the Coimisiún, I consider that the infrequent and sporadic use of the lights, their distribution along the external school, perimeter walls, Given the relatively minor nature of the wall mounted bulk head lights spread distributed along the external elevations of the school, I would concur with the PA that the wall mounted lights would not have a material impact upon the appearance of the school building in that the height, bulk nor scale of the building has not been altered and the lights are affixed to the walls at a height of approximately 3.7 metres above ground level. Having regard to the intervening topography and local landscape which comprises agricultural lands, mature hedgerow and trees, I do not consider that the wall mounted light features themselves could be described as features which are prominent within the local landscape. The school building itself, would be the feature of prominence within the local landscape. However, that is not the question that is the subject of this referral. This referral specifically relates to the twelve external wall mounted lights, and this assessment has specifically focussed on these particular features. I am also

satisfied that no material change of use arises and no development has taken place on site such that planning permission would be required.

9.4 Restrictions on Exempted Development

9.4.1 I note that Section 4(4) of the Planning and Development Act 2000, as amended, provides that development shall not be exempted development if an Environmental Impact Assessment (EIA) or an Appropriate Assessment (AA) of the development is required. In terms of EIA, the external lighting installations do not fall within a class of development outlined within Schedule 5, Part 1 or 2 of the Planning and Development Regulations 2001, as amended. The need for environmental impact assessment can, therefore, be excluded at pre-screening stage and a screening determination is not required in this instance.

9.4.2 In terms of Appropriate Assessment (AA) the PA noted that the closest European sites to the development are the Bellanagare Bog SPA (site code 004105) and the Bellanagare Bog SAC (site code 000592) which are both located circa three kilometres north of the subject site. The issue of AA is addressed below and within Appendix 1 and Appendix 2 at the end of this report.

10.0 Appropriate Assessment

10.1 An Appropriate assessment (AA) Screening has been prepared by Dr Gavin Fennessy of Ecology Ireland Wildlife Consultants Ltd. (Ecology Ireland) pursuant to the Brief of Work issued by An Coimisiún Pleanala (ACP). This specialist report is included as Appendix 1 at the end of this report. The AA screening provides specialist ecological and ornithological expertise to assist the Coimisiún in completing a screening for Appropriate Assessment (AA) under Article 6(3) of the Habitats Directive (Council Directive 92/43/EEC) and Section 177U of the Planning and Development Act 2000 (as amended), in respect of this Section 5

referral concerning the installation of twelve wall mounted light installations at Tarmon National School (NS), Ballinphuill, Castlerea, Co. Roscommon.

10.2 While bats are referenced in the third-party referral, these are not Qualifying Interest species associated with the European site(s) within the Zone of Interest (ZOI) of the site and, therefore, will not be considered within the screening for AA. It is also noted that the referrers make reference to ecological reports prepared in respect of reference number ABP-310323-21, which related to a development of a different nature and scale to that, the subject of this referral. Greater weight is, therefore, placed on the specialist report (See Appendix 1 at the end of this report) prepared for the Commission in this instance. I have reviewed and concur with the conclusions of this specialist report.

10.3 The two most proximate Natura 2000 sites to the school site are the Bellanagare Bog SPA (side code 004105) and the Bellanagare Bog SAC (site code 000592) both located approximately 3.1 kilometres north of the subject site. These are both considered to be within the Zone of influence (ZOI). The Lough Gara SPA (004048), at approximately 15.4km distant from the school site, lies beyond the 15km radius ordinarily applied to the European site search. However the specialist report screened in this Natura 2000 site in Section 5.6 ‘for the avoidance of doubt, on account of the documented ecological linkage between the Lough Gara SPA and the Bellanagare Bog SPA recorded in the conservation objectives for the latter site (CO004105, NPWS 2025) ‘.No other sites were considered to fall within the zone of influence of the development.

Conclusion:

10.4 I have considered the development in light of the requirements S177U of the Planning and Development Act 2000 as amended. The Bellanagare Bog SPA is located approximately 3.1km north of the subject site. The site overlaps with the

boundary of the Bellanagare Bog SAC (000592). The sole qualifying interest and Special Conservation Interest is:

- A395: Greenland White-fronted Goose.

The site-specific conservation objective for the Bellanagare Bog SPA is:

> "To restore the favourable conservation condition of Greenland White-fronted Goose in Bellanagare Bog SPA".

10.5 Having considered the nature, scale, and location of the matter, the subject of this referral, I am satisfied that it can be eliminated from further assessment because there is no likelihood of significant effects on this or any other European Site(s). The reason for this conclusion is as follows:

- The modest scale of the development, which relates to the installation of twelve wall mounted light installations on the external elevations of a school building,
- The separation distance from the nearest European site(s).
- The AA screening exercise conducted by the Planning Authority which concluded that that the twelve external light installations would not be likely to have a significant effect individually or in combination with other plans or projects on a European Site and the need for further Appropriate Assessment can be excluded.
- The information submitted by the referrer, the Board of Management of Tarmon NS and their Consultant Engineers, the specialist information submitted by the external lighting specialists and
- The conclusion of the Appropriate Assessment Screening Report prepared by the Consultant Ecologist engaged by the Coimisiún, that 'on the basis of objective information that likely significant effects on that objective and on all other qualifying interests of European sites within 15km, can be excluded'.

10.6 I conclude, that on the basis of objective information, the development would not have a significant effect on any European site either alone or in combination with other plans or projects. Likely significant effects are excluded and, therefore, Appropriate Assessment (Stage 2) under Section 177V of the Planning and Development Act 2000 (as amended) is not required. An independent Appropriate Assessment screening exercise and an examination and identification of any potential significant effects of the development, alone, or in combination with other plans or projects on European sites has been completed. The screening is supported by a review of National Parks and Wildlife Service (NPWS) datasets, Ordnance survey mapping and aerial photograph.

11.0 Conclusion and Recommendation

The twelve external wall mounted lights at Tarmon National school is development and is exempted development under Section 4 (1) (h) of the Planning and Development Regulations 2001, (as amended). The likelihood of significant effects on European sites can be excluded.

WHEREAS the following question has arisen as to whether:

The twelve external wall mounted lights at Tarmon National school at Tarmon, Co. Roscommon is or is not development or is or is not exempted development.

AND WHEREAS Roscommon County Council issued a declaration on the said question to the referrer on the 12th day of July 2024, stating that the wall mounted external lighting is development and is exempted development in accordance with the provisions of Section 4 (1) (h) of Planning & Development Act 2000, as amended.

AND WHEREAS An Coimisiún Pleanála, in considering this referral, had regard particularly to –

(a) Section 2 (1) of the Planning and Development Act, 2000, as amended,

(b) Section 3 (1) of the Planning and Development Act, 2000, as amended,

(c) Section 4 (1) (h) of Planning & Development Act 2000, as amended,

(d) Section 4 (4) of Planning & Development Act 2000, as amended,

AND WHEREAS An Coimisiún Pleanála has concluded that –

- The erection of the twelve wall mounted external lights is development for the purposes of Section 3 of the Planning and Development Act 2000, as amended.
- The development is exempted development under Section 4 (1) (h) of the Planning and Development Act 2000, as amended.
- The likelihood of significant effects on the conservation objectives of European sites within the zone of influence of the subject development can be excluded.

NOW THEREFORE An Comision Pleanála, in exercise of the powers conferred on it by Section 5 (1) of the 2000 Act, hereby decides that:

(a) The erection of the twelve wall mounted external lights is development: and

(b) The erection of the twelve wall mounted external lights is exempted development.

At Tarmon National School, Tarmon, Co. Roscommon

I confirm that the report represents my professional planning assessment, judgment and opinion on the matter assigned to me and that no person has influenced or tried to influence, directly or indirectly, the exercise of my professional judgment in an improper or inappropriate way.

_____

Fergal Ó Bric

Planning Inspectorate

30th day of July 2026

Appendix 1

AA Screening

Specialist Report informing AA Screening Report in Appendix 1 above

1.0 Scope of Review and Documentation Reviewed

This report has been prepared by Dr Gavin Fennessy of Ecology Ireland Wildlife Consultants Ltd. (Ecology Ireland) pursuant to the Brief of Work issued by An Coimisiún Pleanala (ACP) under reference ABP-320506-25. Its purpose is to provide specialist ecological and ornithological expertise to assist ACP in completing a screening for Appropriate Assessment (AA) under Article 6(3) of the Habitats Directive (Council Directive 92/43/EEC) and Section 177U of the Planning and Development Act 2000 (as amended), in respect of a Section 5 referral concerning 12 external light installations at Tarmon National School (NS), Ballinphuill, Castlerea, Co. Roscommon. The report is structured as follows: Section 2 provides a summary of each document on the case file and identifies key issues; Section 3 reviews the findings of the High Court in Dark Sky Roscommon v An Bord Pleanála [2024] IEHC 318 and their relevance to this referral; Section 4 sets out the baseline environment; Section 5 provides the AA screening assessment for each European site and qualifying interest within 15km; Section 6 addresses cumulative and in-combination effects; and Section 7 sets out the overall screening conclusion and recommendation. A reference list is provided at the end of the document.

The following documents have been reviewed in preparing this report:

- Brief for Consultancy Services, ABP-320506-25, An Coimisiún Pleanála, October 2025.

- Documentation from Roscommon County Council (DED 724): application letter (Claire Larkin, 16th June 2024); planning search details; site layout plan; Planner's Report (Alan O'Connell, Senior Executive Planner, 12th July 2024); Chief Executive's Order; and Notification of Decision.
- Section 5 referral submitted by Claire Larkin (7th August 2024) and five appendices: Appendix 1 - RCC Notification of Decision; Appendix 2 - Planner's Report; Appendix 3 - Lighting Report (Redmond Analytical Management Services Ltd., 3rd August 2024); Appendix 4 - High Court Judgment [2024] IEHC 318; Appendix 5 - Bat and Bird Survey (WildonFoot Ecological Services, July 2020).
- Observation, Dark Sky Roscommon (6th August 2024).
- Response, Collins Boyd Engineers and Architects on behalf of the Board of Management (1st December 2025).
- Supplementary Response, Collins Boyd Engineers and Architects (17th December 2025), with Google Street View imagery (August 2019).
- Letter from the Board of Management, Tarmon National School (28th November 2025).
- NPWS Site Synopses and Conservation Objectives for Bellanagare Bog SPA (004105), Bellanagare Bog SAC (000592) and other relevant European sites within 15km.
- Published scientific literature on artificial light at night (ALAN) and its effects on birds, including on geese and waterbirds, referenced in Section 5 below.

2.0 Summary of Case Documentation

Roscommon County Council – DED 724 (Planner's Report and Declaration, 12th July 2024)

Roscommon County Council determined, by declaration signed by the Senior Executive Planner on 12th July 2024, that the twelve external light installations at Tarmon National School constitute development but are exempted development

under Section 4(1)(h) of the Planning and Development Act 2000 (as amended). The County Council further determined that the development would not be likely to have a significant effect on any European site, individually or in combination and that no AA or EIAR was required.

The Planner's Report describes the lights as affixed to the external walls of the school at approximately 2.5m above ground level (a measurement contested in the referral). The planner characterised the lighting as comparable in design and intensity to domestic security lighting and relied upon the reported low frequency of use or possible abandonment of the Bellanagare Bog SPA by the Greenland White-fronted Goose, combined with the separation distance of approximately 3km, as the basis for excluding any likely significant effect.

Key issues: The Council planner's reasoning in the AA screening is substantively the same reasoning that was found by the High Court in [2024] IEHC 318 to be legally defective in the context of the earlier, larger floodlighting proposal at the same site. The High Court held that the absence of the geese from the SPA does not discharge the obligation to consider the development's potential effect on the conservation objective of restoring the qualifying interest. ACP, as the competent authority in this referral, is required to carry out its own AA screening and cannot simply adopt the Council's screening conclusion. That screening is addressed in Section 5 of this report.

2.2 Section 5 Referral: Claire Larkin (7th August 2024)

The referral raises seven grounds contesting the Council's declaration. These are summarised below, together with an assessment of their material relevance to the AA screening.

Ground 1 – AA obligation (material): The planner's screening fails to comply with Section 4(4) and Section 177U of the Planning and Development Act 2000 and Article 6(3) of the Habitats Directive by not addressing the SPA conservation objective of restoring the Greenland White-fronted Goose. The referrer relies directly on [2024] IEHC 318. This ground raises a procedural and legal point: ACP

must conduct its own screening addressing the restoration objective (see Section 5 of this report).

Ground 2 – Lighting characterisation (material): A report from Redmond Analytical Management Services Ltd. (Appendix 3) concludes that the luminaires are bulkhead fittings designed to maximise light distribution in the horizontal plane and that the Council planner's comparison to domestic security lighting is not professionally supportable. This is relevant to the character of the development as described for screening purposes and is accepted in principle in this assessment, whilst noting that the absolute light output of twelve wall-mounted building fittings remains substantively different from a floodlit sports pitch installation.

Ground 3 – Article 9(viiB) (material): The referrer argues that the Council planner erred in treating Article 9 of the 2001 Regulations as inapplicable because the exemption derives from Section 4(1)(h) rather than Article 6 of the Regulations. This is a planning law matter for ACP to determine. It is noted that Section 4(4) of the 2000 Act provides an overarching exclusion from exempted development status where AA is required and this is not limited to Regulation-based exemptions.

Ground 4 – Section 4(1)(h) characterisation (less material to ecological assessment): The argument that the Section 4(1)(h) exemption is fundamentally flawed because of the mischaracterisation of the lighting intensity is primarily a planning law matter. For ecological screening purposes, the character of the development is taken from the physical evidence: twelve wall-mounted bulkhead fittings on the school building perimeter, used infrequently and not beyond 10pm.

Ground 5 – Bat species (material): The WildonFoot Ecological Services survey (2020) recorded four bat species including confirmed roosts of two species in the granary at Ardass, immediately adjacent to the school. The Council planner did not consider bat species. This is addressed in Section 5 of this report.

Ground 6 – Height measurement (less material): The referrer contends the lights are 3.7m above ground level, not 2.5m as stated by the planner. The

difference is not material to the ecological assessment at the scale of the separation distances involved.

Ground 7 – Landscape character (planning matter): The location within LCA 28 (area of Exceptional Landscape Value) and impacts on visual amenity are primarily planning policy matters outside the scope of this specialist ecological report.

2.3 Observation: Dark Sky Roscommon (6th August 2024)

Dark Sky Roscommon's observation supplements the referral with reference to published scientific literature on ALAN and biodiversity decline, light pollution mapping for the area, the Redmond Analytical report and the High Court judgment. The group also draws attention to the Rural Development Policy 2021-2025 commitment to a Dark Skies Strategy and the designation of the LCA 28 area as having exceptional landscape value.

Key issue: The observation reinforces the scientific and policy context for considering ALAN effects in rural dark-sky areas but does not introduce species-specific evidence going beyond the material already before the Court in the earlier case. The absence of GWFG-specific monitoring data for the school site vicinity or the Bellanagare Bog SPA in recent years is noted.

2.4 Redmond Analytical Management Services – Lighting Report (3rd August 2024)

This report, prepared by Patrick Redmond (IEng MILP MSLL), critiques the Council planner's comparison of the subject luminaires to domestic security lighting and to village street lighting. The report confirms that the luminaires are horizontal bulkhead fittings designed to project high-intensity light in the horizontal plane away from the wall, making them visible from a considerable distance at night and that domestic security lighting is itself among the largest contributors to unregulated light pollution.

Assessment: The report is technically authoritative on the character and design of the specific luminaires installed. Its relevance to the AA screening is that it establishes the development produces more light spillage than a well-designed, cowled wall fitting would produce. However, even accepting the Redmond characterisation, the absolute output of twelve building wall fittings, used intermittently, is substantially different in scale from the 21-light floodlighting installation considered by the High Court. This distinction is central to the ecological assessment in Section 5.

2.5 **WildonFoot Ecological Services – Bat and Bird Survey (July 2020)**

The survey was conducted at the granary building at Ardass House, adjacent to the school, by Barbara McInerney (Bat Licence No. DER/BAT 2019-12). Four bat species were recorded: Common Pipistrelle *(Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Leisler's Bat (*Nyctalus leisleri*) and a *Myotis* sp. Common Pipistrelle and a *Myotis* sp. were confirmed roosting in the granary.

Assessment: All Irish bat species are Annex IV of the Habitats Directive and are subject to strict protection under SI No. 477 of 2011 and the Wildlife Acts. The presence of roosting bats in a structure immediately adjacent to the school, with confirmed commuting routes that may pass through or alongside the school site, is a material ecological consideration. The potential for the wall lights to affect bat commuting and foraging behaviour is assessed in Section 5.

2.6 **Board of Management Letter (28th November 2025)**

The BoM response states that the school operates for 182 in-school days per year and that the external lights are used on approximately 10-15 occasions annually for after-hours meetings, not extending beyond 10pm. It is further stated that lighting is not used for decorative or security purposes and is off at weekends, and that the split-level nature of the school building makes lighting a safety requirement on those limited occasions when after-hours events take place. The response records an enrolment of 276 pupils, including 5 Autism classes.

2.7 Response of the Board of Management: Collins Boyd Engineers and Architects (1st and 17th December 2025)

Two additional letters were submitted on behalf of the Board of Management of Tarmon NS. The principal contentions are: that the lighting constitutes permitted or exempted development inherent to the use of any building; that the lights were installed in 2018 and the exemption provisions applicable at that time should be determinative; that use is infrequent and confined to approximately 10-15 after-hours events per year; that no lighting is currently operational on the playing pitches; and that the impact of the building lights is negligible in the context of other lighting in the area, specifically Castlerea prison and Castlerea floodlit playing pitches. An invitation to conduct a nocturnal site visit was extended.

Assessment: The BoM submissions are relevant to the AA screening in establishing the pattern of use: the lights are used infrequently, not after 10pm, not on weekends and there is no pitch lighting operative in combination. This information is material to the LSE assessment and is considered further in Section 5 of this report. The argument that the exemption endures from 2018 is a legal matter for ACP; however, the legal framework under Section 177U requires the competent authority to consider likely significant effects at the time of the decision and this report therefore assesses the development as currently described.

3.0 High Court Findings: Dark Sky Roscommon v An Bord Pleanála [2024] IEHC 318

3.1 Background and Development at Issue

The High Court case concerned a decision by An Bord Pleanála (18th January 2022) to grant planning permission under PD 21-131 for a 21-light floodlighting installation at Tarmon NS, comprising floodlights to the astro-turf pitch and lighting to the running track, walkway and car park, mounted on 6m and 10m poles. The planning permission was quashed on judicial review.

It is important to note what was before the Court. The development involved a high-intensity, wide-area floodlighting installation on 6m and 10m poles designed

to illuminate large outdoor sports surfaces. The ecological report of Dr Ní Bhroin described the proposal as 'floodlighting of a rural area with 6m and 10m light stands entailing 17 light stands in total'. This is materially different in scale and character from the twelve wall-mounted bulkhead fittings that are the subject of the present referral.

3.2 Key Legal Principles Established

The restoration obligation: At paragraph 14 of the judgment, Ms. Justice Bolger held that the current absence of the Greenland White-fronted Goose from the Bellanagare Bog SPA does not remove the obligation to consider the development's potential effect on the conservation objective of restoring the qualifying interest. The SPA has not been 'delisted' and the conservation objective of restoration is operative. This principle applies to the present referral and requires ACP to address the restoration objective in its screening, regardless of the geese's current status at the SPA.

The standard of screening: The judgment, at paragraph 17, confirms the established principle that AA screening is not a balance between competing expert views but an exercise in excluding all reasonable scientific doubt. The test is whether a reasonable expert could have a reasonable scientific doubt as to whether there could be a significant effect on a European site (applying Reid v An Bord Pleanála [2021] IEHC 362 and Kelly v An Bord Pleanála [2019] IEHC 84).

CJEU protection of abandoned sites: At paragraph 21, the judgment confirms CJEU authority that the departure of a species from a designated site does not dilute the protection of that species or the designation, citing the Hamster case (C-477/19), Commission v Austria (C-535/07) and Commission v French Republic (C-383/09).

The restoration objective: At paragraph 18, Ms. Justice Bolger drew on the reasoning of Mr. Justice Hogan in People Over Wind v An Bord Pleanála [2015] IECA 272 to the effect that a development which made the objective of restoration appreciably more difficult might be likely to have significant effects in respect of the

site. The Court did not hold that any conceivable effect on a restoration objective suffices; the test requires that the effect on restoration must be real rather than theoretical.

3.3 Relevance to the Present Referral

The legal framework established in the judgment requires ACP, as the competent authority, to conduct a screening that addresses the conservation objective of restoring the Greenland White-fronted Goose at the Bellanagare Bog SPA. That screening cannot simply adopt the Council's reasoning, which was found by the Court to be legally defective in the earlier and larger case.

However, the judgment does not predetermine the outcome of the present screening. The Court's finding was that the Board failed to carry out a proper screening, not that the development inevitably required full AA. The question for the present screening is whether, on the basis of objective information, likely significant effects on the conservation objectives of European sites within the zone of influence of the development can be excluded. That question is addressed in Section 5 of this report.

Two significant distinctions from the development before the High Court must be kept in mind throughout. First, the subject development is twelve wall-mounted building lights, not a 21-light floodlighting installation on 6m and 10m poles. Second, the BoM has confirmed that use is limited to approximately 10-15 after-hours occasions per year, not extending beyond 10pm, with no lighting on the playing pitches. These are material differences in scale and in temporal pattern that are relevant to the ecological assessment.

4.0 Baseline Environment

4.1 Development Site

Tarmon NS is a large primary school in the townland of Ballinphuill, Information accessed online from Local Primary Road L-1616, approximately 2.5km northeast of Castlerea, Co. Roscommon. The school building is a substantial modern structure with a modulated elevation comprising multiple classroom wings. The site is on elevated ground relative to the adjacent road to the west and the neighbouring Ardass House property.

The twelve external lighting installations are wall-mounted bulkhead fittings fixed to the external walls of the school building. Photographic evidence in the referral shows the lights at approximately 3.7m above ground level on the western and southern aspects, with the school building itself elevated above the adjacent road and surrounding landscape. The lights are distributed on the north, south, east and western aspects. According to the Board of Management, the lights are used on approximately 10-15 occasions per year for after-hours meetings, not extending beyond 10pm and are not operated at weekends. It is stated that no lighting is currently operational on the playing pitches, astro-turf surface, running track, walkway or car park.

The immediate surrounding landscape is rural agricultural grassland with hedgerows and scattered mature trees. Google Street View imagery, submitted by the BoM, shows the school building with the wall-mounted lights visible in daytime but no pitch or ground-level lighting infrastructure evident as operational. The landscape character of the area is designated under LCA 28 (Tulsk and Rathcroghan Plateau), an area of Exceptional Landscape Value.

4.1.1 Existing Light Environment

The existing nocturnal light environment in the area has been examined by reference to lightpollutionmap.info (Stare 2026), an online tool which displays VIIRS/NPP Day Night Band satellite radiance data derived from NASA/NOAA

Suomi National Polar-orbiting Partnership (Suomi NPP) satellite measurements. This dataset provides a reliable indication of relative artificial sky brightness at the landscape scale and is the data source referenced in the Dark Sky Roscommon observation.

The lightpollutionmap.info display for the relevant area of Co. Roscommon shows a number of features that are material to this assessment. Castlerea town, approximately 2.5km southwest of the school, appears as a distinct light signature on the VIIRS display, confirming the presence of a meaningful existing artificial light source in close proximity to the school site. Tarmon NS is located on the northeastern periphery of the Castlerea light signature. The school site is therefore not situated in a completely dark rural landscape but at the outer edge of an existing urban light influence. The school wall lights represent an incremental addition to a partially illuminated local environment rather than the first introduction of artificial light to a pristine dark-sky area.

The area to the north and northeast of the school, in the direction of the Bellanagare Bog SPA, transitions to lower radiance values. The landscape is not uniformly dark, however: Frenchpark and Bellanagare village contribute low-level lighting to the north and there is a diffuse ambient contribution from the Castlerea light signature itself.

The wider regional landscape contains several substantial existing light sources: Roscommon town approximately 20km to the south-southeast; Carrick-on-Shannon approximately 30km to the northeast; Boyle approximately 28km to the north; Ballaghaderreen approximately 22km to the northwest; and Longford town to the east. These constitute the ambient light background within which the Bellanagare Bog SPA catchment sits and collectively demonstrate that the Bellanagare area is not ecologically isolated from ALAN at the regional landscape scale.

Castlerea Prison, at Harristown on the southern side of Castlerea town, is identifiable as a distinct institutional light source associated with the town signature to the southwest of the school. It lies on the opposite side of the town from the

school and from the Bellanagare Bog SPA and so does not form part of the intervening landscape between the school and the SPA. It is noted here as a further existing artificial light source within the established Castlerea light signature rather than as a feature of the landscape in the direction of the SPA.

The VIIRS data confirms that the school site exists at the outer margin of an established light signature centred on Castlerea town and that multiple significant existing light sources are present throughout the wider landscape. These factors are directly relevant to the in-combination assessment in Section 6 of this report and to the evaluation of whether the incremental addition of twelve intermittently used school wall lights could materially alter the light environment experienced by any qualifying interest of European sites in the area.

4.2 European and Nationally Designated Sites Within 15km

The following designated sites have been identified within 15km of the development. Due consideration was given to the potential for likely significant effects on more distant Natura 2000 sites using the Source-Pathway-Receptor (SPR) model. No likely significant effects on more distant sites were identified. Table 1 provides the full listing of European and nationally designated sites within 15km of Tarmon NS. Sections 4.3 and 4.4 describe the qualifying/special conservation interests of the relevant European sites.

Table 1: Designated Sites Within 15km of Tarmon National School, Ballinphuill, Castlerea, Co. Roscommon

Site Name	Site Code	Min. Distance (km)
European Designated Sites (Natura 2000)		
Bellanagare Bog SPA	004105	3.1
Bellanagare Bog SAC	000592	3.1

Site Name	Site Code	Min. Distance (km)
Corliskea/Trien/Cloonfelliv Bog SAC	002110	6.3
Cloonchambers Bog SAC	000600	6.4
Drumalough Bog SAC	002338	7.6
Mullygollan Turlough SAC	000612	8.2
Cloonshanville Bog SAC	000614	11.2
Kilsallagh Bog SAC	000285	12.5
Carrowbehy/Caher Bog SAC	000597	12.9
Croaghill Turlough SAC	000255	14.5
Callow Bog SAC	000595	14.7
Lough Gara SPA	004048	15.4
Nationally Designated Sites (NHA / pNHA)		
Bellanagare Bog pNHA	000592	3.1
Corliskea/Trien/Cloonfelliv Bog pNHA	002110	6.3
Cloonchambers Bog pNHA	000600	6.4
Castleplunket Turlough pNHA	000598	6.4
Drumalough Bog pNHA	001632	7.6
Mullygollan Turlough pNHA	000612	8.1
Carrowneagh Turlough pNHA	001624	8.3
Moorfield Bog/Farm Cottage NHA	000221	8.4
Brierfield Turlough pNHA	000594	8.6
Rathnalulleagh Turlough pNHA	000613	8.6
Lough Glinn pNHA	001644	8.9
Bracklagh Bog NHA	000235	9.7
Newtown Turlough pNHA	001646	9.9

Site Name	Site Code	Min. Distance (km)
Lough Namucka Bog NHA	000220	11.0
Cloonshanville Bog pNHA	000614	11.2
Shad Lough pNHA	001648	11.9
Lough O'Flynn pNHA	001645	12.0
Kilsallagh Bog pNHA	000285	12.5
Ardagh Bog pNHA	001222	12.6
Carrowbehy/Caher Bog pNHA	000597	12.9
Corbally Turlough pNHA	001627	13.5
Belle Bridge Bog NHA	000591	13.7
Croaghill Turlough pNHA	000255	14.5
Lough Gara pNHA	000587	14.6
Cornaveagh Bog NHA	000603	15.0

The Lough Gara SPA (004048), at approximately 15.4km, lies marginally beyond the 15km radius ordinarily applied to the European site search. It is nonetheless included in this table, and screened in Section 5.6, for the avoidance of doubt, on account of the documented ecological linkage between the Lough Gara SPA and the Bellanagare Bog SPA recorded in the conservation objectives for the latter site (CO004105, NPWS 2025) and because the Lough Gara flock of Greenland White-fronted Goose is discussed elsewhere in this assessment.

4.3 Bellanagare Bog SPA (Site Code 004105)

The Bellanagare Bog SPA is located approximately 3.1km north of the development site. The site overlaps spatially with Bellanagare Bog SAC (000592). The sole qualifying interest and Special Conservation Interest is:

- A395: Greenland White-fronted Goose (*Anser albifrons flavirostris*).

4.3.1 Conservation Objectives

The site-specific conservation objectives for Bellanagare Bog SPA are set out in NPWS (2025) Conservation Objectives: Bellanagare Bog SPA 004105, Version 1 (CO004105, dated 18th April 2025). The overarching objective is:

"To restore the Favourable conservation condition of Greenland White-fronted Goose in Bellanagare Bog SPA"

This objective is defined by the following seven attributes and their associated targets (NPWS 2025):

Attribute	Measure	Target
Winter population trend	Percentage change in number of individuals	Long-term winter population trend is stable or increasing
Winter spatial distribution	Hectares, time and intensity of use	Sufficient number of locations, area and availability of suitable habitat to support the population target
Disturbance at wintering site	Intensity, frequency, timing and duration	Disturbance occurs at levels that do not significantly impact the achievement of targets for population trend and distribution
Barriers to connectivity and site use	Number, location, shape and hectares	Barriers do not significantly impact the wintering population's access to the SPA or other ecologically important sites outside the SPA
Forage spatial distribution, extent and abundance	Location, hectares and forage biomass	Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target
Roost spatial distribution and extent	Location and hectares of roosting habitat	Sufficient number of locations, area and availability of suitable

		roosting habitat to support the population target
Supporting habitat: area and quality	Hectares and quality	Sufficient area of utilisable habitat available in ecologically important sites outside the SPA

Several notes within the CO are directly relevant to the AA screening for the present case and are recorded here:

- The national population of wintering Greenland White-fronted Goose in Ireland declined by 13% from 1985 to 2018 (EEA 2019). The Lough Gara flock, which is identified in the CO as the flock historically associated with the Bellanagare Bog SPA, declined by 77% in population size between 1994/95 and 2022/23 (NPWS 2025).
- Greenland White-fronted Goose has not been recorded using the SPA in recent decades, coinciding with a general shift by the species from foraging on peatland sites to grassland sites. The CO notes that this shift may be related to weather and/or land-cover conditions (citing Schindler *et al*. 2024).
- The foraging distance of wintering Greenland White-fronted Goose from night roosts is estimated at 5-8km (citing Scottish Natural Heritage 2016). The Lough Gara roost is over 15km from the school site, which is well in excess of this range. The Bellanagare Bog SPA is 3.1km from the school site; however, the SPA is not currently being used as a roost.
- The CO notes that the SPA overlaps with Bellanagare Bog SAC (000592) and that the conservation objectives for the two sites should be understood in conjunction with one another.
- The CO was accompanied by the publication, also in 2025, of a separate conservation objectives document for Lough Gara SPA (004048), reflecting the ecological linkage between the two sites.

4.3.2 **Species Account**

The Greenland White-fronted Goose (*Anser albifrons flavirostris*) is a subspecies breeding exclusively on the west coast of Greenland and wintering almost entirely in Ireland and Scotland. The global wintering population has declined significantly in recent decades, from approximately 35,500 in 1999 to approximately 18,000 birds. Approximately 7,800 wintered in Ireland in 2023 (Wexford Wildfowl Reserve 2024). The largest concentration in Ireland (up to 9,000 birds) is at the Wexford Slobs. The nearest active known concentration in Co. Roscommon is Lough Gara SPA (004048), approximately 15.4km to the north-northwest of the school site. The River Suck / Shannonbridge area of Co. Roscommon is also an important site.

The GWFG is primarily a diurnal grazing species. Wintering birds spend the daylight hours foraging on improved grasslands, wet pastures and occasionally bog or turlough surfaces. Movements between roosting and foraging sites typically occur at dawn and dusk. Overnight roosting habitat mainly consists of permanent waterbodies such as lakes. The CO notes that daytime roosting is also common, where birds minimise activity levels to conserve energy. The estimated 5-8km foraging distance from night roosts reflects the species' typical diurnal ranging rather than routine nocturnal flights between distant sites. While geese can make inter-site flights at night under conditions of energetic stress or disturbance, this is not a routine daily behaviour pattern in Irish wintering populations.

4.4 **Bellanagare Bog SAC (Site Code 000592)**

The Bellanagare Bog SAC is co-located with the SPA and is approximately 3.1km north of the development. Bellanagare is the largest western or intermediate raised bog remaining in Ireland. It is classified as a western/intermediate raised bog, displaying features of both raised bog and blanket bog, underlain by muddy Carboniferous limestone. The site is of considerable scientific and conservation significance for its botanical diversity, large size and status as an intermediate raised bog.

The three qualifying interests are:

- [H7110] Active Raised Bogs (priority habitat)
- [H7120] Degraded Raised Bogs still capable of natural regeneration
- [H7150] Depressions on Peat Substrates of Rhynchosporion

4.4.1 Conservation Objectives

The site-specific conservation objectives are set out in NPWS (2015) Conservation Objectives: Bellanagare Bog SAC 000592, Version 1 (CO000592, dated 27th November 2015). The overarching objective for the SAC is:

"To restore the favourable conservation condition of Active raised bogs in Bellanagare Bog SAC"

The CO notes that separate objectives are not required for H7120 and H7150 as achieving favourable conservation condition for H7110 will, as a consequence, deliver favourable condition for the related habitats. The site-specific objectives for H7110 are defined by the following attributes and targets:

Attribute	Target	Current Baseline (2013/14 data)
Habitat area	Restore to 139.1ha	49.6ha (2014); 73.8ha potentially restorable by drain blocking
Habitat distribution	Restore distribution and variability of ARB across the SAC	ARB includes central/sub-central ecotope, active flush and soak system
High bog area	No decline in extent of high bog	879.1ha (2012)
Hydrological regime: water levels	Restore appropriate water levels throughout. Mean water level near or above surface of bog lawns; seasonal	Compromised by drain network and peat cutting

Attribute	Target	Current Baseline (2013/14 data)
	fluctuation not to exceed 20cm	
Hydrological regime: flow patterns	Restore appropriate high bog topography, flow directions and slopes	Drainage network identified in 34km of drains (map 4)
Transitional areas between high bog and adjacent mineral soils	Restore adequate transitional areas	No natural marginal habitats along affected margins
Vegetation quality: central ecotope, active flush, soaks, bog woodland	Restore 69.6ha (minimum 50% of ARB target to be high quality)	Two small areas of central ecotope and active flush present
Vegetation quality: microtopographical features	Restore adequate cover of high-quality hummock and hollow microtopography	Well-developed on Bellanagare Bog
Vegetation quality: bog moss (Sphagnum) species	Restore adequate Sphagnum cover to ensure peat-forming capacity	Variable; hummock-forming species including *S. austinii*, *S. capillifolium* present
Typical ARB species: flora	Restore, where appropriate, typical ARB flora	Range of typical species present including *Drosera* spp., *Eriophorum* spp., *Rhynchospora alba*
Typical ARB species: fauna	Restore, where appropriate, typical ARB fauna	Includes Irish Hare, Red Grouse, Greenland White-fronted Goose (listed as typical bog fauna)
Elements of local distinctiveness	Maintain features of local distinctiveness subject to natural processes	Active flush (infilling lake/soak) with *Sphagnum* cover 76-90% in mid-eastern lobe
Negative physical indicators	Negative physical features absent or insignificant	Bare peat, algae-dominated pools, marginal

Attribute	Target	Current Baseline (2013/14 data)
		cracks, subsidence features
Native negative indicator species	At insignificant levels	Abundance of *Narthecium ossifragum*, *Trichophorum germanicum*, *E. vaginatum* forming tussocks indicates drying
Non-native invasive species	At insignificant levels, not more than 1% cover	*Pinus contorta* (18.1ha), *Rhododendron ponticum*, *Sarracenia purpurea* present
Air quality: nitrogen deposition	Total N deposition not to exceed 5kg N/ha/yr	Current estimated level approximately 10.1kg N/ha/yr (Henry and Aherne 2014) — exceeds target
Water quality	Water quality on high bog and transitional areas close to natural reference conditions	Influenced by atmospheric inputs; soak system also influenced by interaction with underlying substrate

4.4.2 Conservation Measures

The conservation measures for Bellanagare Bog SAC are set out in NPWS (2025) CM000592 (November 2025). The document identifies the following pressures and threats to the qualifying interests, with their EU rankings:

- PL02 Drainage (Medium pressure): addressed through statutory planning regulation, agricultural drainage consent (SI No. 456/2011), EU Habitats (Bellanagare Bog SAC) Regulations 2021, physical drain blocking (approximately 34km, equivalent to 30% of the drain network), dam construction (3,790 structures) and preparation of a Drainage Management Plan, all under the Bellanagare Bog SAC Restoration Plan (NPWS 2023).

- PC05 Peat extraction (High pressure): addressed through the EU Habitats (Bellanagare Bog SAC) Regulations 2021, the Cessation of Turf Cutting Compensation Scheme (192 people on the scheme; 7 plots still being cut within the site in 2024), the Voluntary Bog Purchase Scheme (34 acres of turbary rights and 137 acres of freehold purchased), the Protected Raised Bog Restoration Incentive Scheme and the Peatlands and Natura Community Engagement Scheme.
- PB01 Conversion to forest/afforestation (Medium pressure): addressed through Forestry Regulations 2017, EU Habitats Regulations 2021 and the removal of 18.1ha of plantation forest as per the Restoration Plan.
- General threats: addressed through CAP Conditionality farm inspections, Ireland's Climate Action Plan 2024 and public information dissemination.

Note: Artificial lighting or light pollution is not identified as a pressure or threat to the qualifying interests of Bellanagare Bog SAC at any ranking in the conservation measures document. None of the nineteen conservation measures prescribed relate to lighting or ALAN. This is directly relevant to the AA screening: the factors that threaten the SAC's qualifying interests are hydrological in nature (drainage, peat extraction, afforestation) and the measures to address them are correspondingly focused on hydrology, land management and peat-forming vegetation. There is no plausible pathway by which building wall lighting on a school 3.1km from the SAC boundary could affect any of the attributes of favourable conservation condition set out in the CO or impede the delivery of any of the conservation measures prescribed in the CM document.

4.5 Turlough SACs

Mullygollan Turlough SAC (000612, 8.2km) and Croaghill Turlough SAC (000255, 14.5km) are designated for Turlough habitat (H3180 Natural Eutrophic Lakes with Magnopotamion or Hydrocharition vegetation and/or H6410 Molinia meadows). Turloughs are a uniquely Irish karst wetland type supporting characteristic

communities of flora and fauna. They are documented as potentially important foraging and roosting habitats for wintering waterbirds.

4.6 Bog SACs

Seven bog SACs are situated within 15km: Corliskea/Trien/Cloonfelliv (6.3km), Cloonchambers (6.4km), Drumalough (7.6km), Cloonshanville (11.2km), Kilsallagh (12.5km), Carrowbehy/Caher (12.9km) and Callow Bog (14.7km). All are designated for raised bog habitat interests (H7110, H7120, H7150).

4.7 Bat Species – Annex IV

Four bat species were recorded in the WildonFoot survey (July 2020) at Ardass House immediately adjacent to the school: Common Pipistrelle, Soprano Pipistrelle, Leisler's Bat and a *Myotis* sp. Common Pipistrelle and a *Myotis* sp. were confirmed as roosting in the Ardass granary at bat access points in the rear wall.

All Irish bat species are Annex IV species under the Habitats Directive and are protected under SI No. 477 of 2011 (Regulation 54) and the Wildlife Acts.

It is noted that the WildonFoot survey was conducted in July 2020 in relation to the Ardass granary, not specifically in relation to the school lighting. The survey nonetheless establishes the local bat assemblage and the granary is within approximately 50-100m of the school building and its lighting. The relevance to any European site designation is indirect: none of the bat species recorded are qualifying interests of the European sites listed in Table 1. The primary assessment of bat impacts therefore falls under the Article 12 (strict protection) framework rather than the Article 6(3) AA framework.

5.0 Appropriate Assessment Screening

5.1 Legal Framework and Approach

Under Article 6(3) of the Habitats Directive and Section 177U of the Planning and Development Act 2000 (as amended), ACP as the competent authority is required to screen the proposed development for likely significant effects on European sites. The competent authority shall determine that an AA is not required if it can be excluded, on the basis of objective information, that the development individually or in combination with other plans and projects will have a significant effect on a European site.

The screening threshold is low: the possibility of significant effect is sufficient to require AA. However, the test is not whether any conceivable effect can be articulated. As confirmed in Reid v An Bord Pleanala [2021] IEHC 362, the question is whether a reasonable expert could have a reasonable scientific doubt. Where the available objective information allows likely significant effects to be excluded to scientific certainty, AA is not required.

In applying this test, the following parameters of the development are treated as established:

- Twelve wall-mounted bulkhead light fittings, distributed on the north, south, east and western aspects of the school building.
- Used on approximately 10-15 occasions per year for after-hours meetings, not extending beyond 10pm.
- Not used on weekends. Generally extinguished by 3:30pm on school days.
- No lighting operational on playing pitches, running track, walkway or car park.
- The luminaires are horizontal bulkhead fittings producing high-intensity light in the horizontal plane with limited downward direction.

The AA screeni1ng for each European site and qualifying interest within 15km is set out in Table 2 below, followed by narrative justification for each qualifying interest where a pathway of effect requires consideration.

Table 2: AA Screening Summary – European Sites Within 15km

European Site	Qualifying Interest / Conservation Objective	Pathway of Effect?	Screening Conclusion
Bellanagare Bog SPA (004105) 3.1km	[A395] Greenland White-fronted Goose – maintain or restore favourable conservation condition	Considered below (Section 5.2)	**LSE EXCLUDED – see Section 5.2**
Bellanagare Bog SAC (000592) 3.1km	[H7110] Active Raised Bogs [H7120] Degraded Raised Bogs [H7150] Depressions on Peat Substrates	None identified	**LSE EXCLUDED – see Section 5.3**
Corliskea/Trien/Cloonfelliv Bog SAC (002110) 6.3km	[H7110] Active Raised Bogs [H7120] Degraded Raised Bogs	None identified	**LSE EXCLUDED – see Section 5.4**
Cloonchambers Bog SAC (000600) 6.4km	[H7110] Active Raised Bogs [H7120] Degraded Raised Bogs	None identified	**LSE EXCLUDED – see Section 5.4**

European Site	Qualifying Interest / Conservation Objective	Pathway of Effect?	Screening Conclusion
Drumalough Bog SAC (002338) 7.6km	[H7110] Active Raised Bogs [H7120] Degraded Raised Bogs	None identified	**LSE EXCLUDED – see Section 5.4**
Mullygollan Turlough SAC (000612) 8.2km	H3180 Turloughs H6410 Molinia meadows	None identified	**LSE EXCLUDED – see Section 5.5**
Cloonshanville Bog SAC (000614) 11.2km	[H7110] Active Raised Bogs [H7120] Degraded Raised Bogs	None identified	**LSE EXCLUDED – see Section 5.4**
Kilsallagh Bog SAC (000285) 12.5km	[H7110] Active Raised Bogs [H7120] Degraded Raised Bogs	None identified	**LSE EXCLUDED – see Section 5.4**
Carrowbehy/Caher Bog SAC (000597) 12.9km	[H7110] Active Raised Bogs [H7120] Degraded Raised Bogs	None identified	**LSE EXCLUDED – see Section 5.4**
Croaghill Turlough SAC (000255) 14.5km	[H3180] Turloughs [H6410] Molinia meadows	None identified	**LSE EXCLUDED – see Section 5.5**
Callow Bog SAC (000595) 14.7km	[H7110] Active Raised Bogs [H7120] Degraded Raised Bogs	None identified	**LSE EXCLUDED – see Section 5.4**

European Site	Qualifying Interest / Conservation Objective	Pathway of Effect?	Screening Conclusion
Lough Gara SPA (004048) 15.4km	[A395] Greenland White-fronted Goose – maintain or restore favourable conservation condition	None identified (beyond foraging range; movement axis away from site)	**LSE EXCLUDED – see Section 5.6**

5.2 Bellanagare Bog SPA (004105) – Greenland White-fronted Goose

5.2.1 Conservation Objectives and the Restoration Requirement

The conservation objective of the Bellanagare Bog SPA is to maintain or restore the favourable conservation condition of the Greenland White-fronted Goose. As confirmed by the High Court in [2024] IEHC 318, the geese's apparent abandonment of the SPA does not remove this obligation. ACP is required to address the potential effect of the development on the restoration objective, not merely on the current presence of the species at the site.

The question is therefore: on the basis of objective information, can it be excluded that the 12 wall-mounted building lights at Tarmon National School, as described, would have a likely significant effect on the conservation objective of restoring the Greenland White-fronted Goose to the Bellanagare Bog SPA?

5.2.2 Character of the Development in the Context of GWFG Ecology

The Greenland White-fronted Goose is a grazing herbivore. Its winter ecology is well documented in the published scientific literature and is directly relevant to the assessment of whether artificial lighting of the type and frequency described could plausibly affect the conservation objectives of the SPA.

Daily activity pattern and nocturnal behaviour: Greater White-fronted Geese are predominantly diurnal, with daily activity organised around foraging during daylight hours and roosting overnight on open waterbodies. Shimada (2002), in a detailed study of the daily activity patterns of Greater White-fronted Geese wintering in Japan, found that flight timing and daily behaviour were governed by light intensity and other environmental factors, with the geese departing roost sites on waterbodies to forage in adjacent agricultural fields during daylight hours and returning to roost at dusk. That study found the daily activity pattern of the species to be similar to that of other geese wintering in temperate areas. The European GWFG populations, which include the Greenland subspecies, have been documented by GPS/GSM tracking to winter within farmland landscapes using

wetlands almost exclusively as safe night roosts (Deng *et al*. 2021). Nocturnal activity is therefore principally stationary roosting on waterbodies, not inter-site movement. The AEWA International Species Management Plan (Stroud *et al*. 2012), which is specific to the Greenland White-fronted Goose, records that while some nocturnal feeding occurs at night-time roost sites under certain conditions, this is supplementary to the primary diurnal foraging pattern and is not characterised as involving routine inter-site flights. There is no published evidence of routine nocturnal inter-site flights between distant wintering sites in the GWFG.

Site fidelity and intra-winter movements: A defining feature of GWFG ecology is extreme winter site fidelity. Wilson *et al*. (1991) published a study of GWFG winter site fidelity, based on long-term ringing of individually marked birds and found that 85% of birds returned to the same wintering sites in successive winters and that within the same winter, fewer than 1% of geese moved between sites, with most such moves associated with autumnal staging en route to final destinations. Geese also showed individual and highly specific preferences for restricted parts of their feeding areas, a pattern confirmed by Warren *et al*. (1992) from ringing and resighting data at the Wexford Slobs. Fox (2003) characterises the species as showing high cultural fidelity to sites, with learnt site knowledge transmitted within family groups over multiple generations. This extreme site fidelity directly bears on the present assessment. The probability of GWFG from the Lough Gara flock re-establishing use of the Bellanagare Bog SPA is, on the basis of the published evidence, low. In addition, the spatial relationship between the three locations is such that any future movement of birds between the Lough Gara SPA and the Bellanagare Bog SPA would not bring them into the vicinity of the school. The Lough Gara SPA lies to the north-northwest of the school, the Bellanagare Bog SPA lies roughly to the north of the school and to the southeast of Lough Gara, and the school site lies a further 8km or more to the south of the Bellanagare Bog SPA. Birds moving on the documented Lough Gara to Bellanagare axis (a northwest to southeast movement of approximately 6.5km, well within the documented 5-8km foraging range) would remain to the north of the school and would therefore travel away from, and not past, the school site.

Foraging range: The NPWS Conservation Objectives document (CO004105, NPWS 2025), citing Scottish Natural Heritage (2016), estimates the foraging distance of wintering GWFG from night roosts at 5-8km. The Lough Gara roost, the nearest active GWFG concentration, is >15km from the school site, well in excess of this foraging range. No night roost used by GWFG is known to exist within the foraging range of the school site.

Habitat at the development site: The key GWFG foraging habitats listed in CO004105 (NPWS 2025) include peat bogs, wet grasslands, arable stubble and winter cereal fields. The immediate surroundings of the school site are hedgerow-bounded agricultural grassland at the suburban fringe of Castlerea, not qualitatively distinctive GWFG foraging habitat and without any recorded GWFG use. The intervening landscape between the nearest active GWFG concentration at Lough Gara and the Bellanagare Bog SPA does not correspond to a documented movement corridor or inter-site flight route for the species.

5.2.4 Evaluation of ALAN effects in relation to GWFG

The scientific literature on ALAN effects on birds is substantial and growing, but careful attention to the nature of the evidence base is required before it is applied to the specific facts of this case.

The most dramatic experimental evidence of ALAN effects on migrating birds involves high-intensity, sustained, wide-area light sources. Van Doren *et al*. (2017), in a PNAS study of the 9/11 Memorial's Tribute in Light installation in New York City. The study demonstrated that powerful vertical searchlight beams active over multiple nights induced significant disorientation in migratory songbirds, with densities exceeding baseline by up to twenty times and effects detectable to 4km altitude. This installation involved beams of exceptional intensity in an already heavily light-polluted urban environment.

Research at the broader landscape scale (McLaren *et al*. 2018; La Sorte *et al*. 2018) demonstrates that the sky-glow of large metropolitan areas attracts migrating songbirds during flight at regional scale, whilst at fine scale

(approximately 1km) birds avoid the most brightly lit areas for stopover. These findings concern urban agglomerations and regional sky-glow, not individual rural buildings.

The ALAN literature relevant to geese is more limited and mostly addresses deterrence (using lights as a tool to move birds away from airfields or agricultural land) rather than disruption to conservation-relevant movements. A study of Canada Goose avoidance responses (published 2023) examined light wavelength and pulsing effects in the context of aircraft collision avoidance, not habitat selection or inter-site movement.

The study by Gauthreaux and Belser (2006) and the review by Longcore and Rich (2006) document the disorientation and collision risks for passerine migrants attracted to powerful isolated light sources, particularly on overcast nights. Whilst these studies are cited in the ecological reports in the broader case, they do not directly address large-bodied waterbirds such as geese, which tend to navigate at much lower altitudes, in diurnal or crepuscular movement patterns and over short inter-site distances.

Adams *et al*. (2021), in a systematic map of ALAN effects on bird movement and distribution, note that species which avoid illuminated areas face reduced habitat availability as ALAN increases. However, they also acknowledge that the evidence base is dominated by studies of strong light sources in urban or coastal contexts and that the relevant response thresholds in terms of light intensity and spatial extent are not well established.

There is no published empirical evidence that wall-mounted building lights of the type and pattern described in this case (12 bulkhead fittings, operational approximately 10-15 times per year, not beyond 10pm, in a rural location) have been shown to affect the movements or habitat use of wintering geese at any distance, let alone at 3.1km.

5.2.5 **Assessment against the LSE test**

The LSE test requires that likely significant effects be excluded on the basis of objective information. The following objective factors are material to this determination:

1. The GWFG is absent from the Bellanagare Bog SPA and has been absent for a number of years. No current use of the SPA or of the landscape between the SPA and the school site by GWFG has been documented.
2. The Lough Gara flock, the nearest known GWFG concentration, is located >15km from the school site. The foraging landscape used by that flock is remote from the development site.
3. The school lights are used on approximately 10-15 occasions per year, not extending beyond 10pm. During the GWFG wintering season (October to April), geese are largely inactive or roosting. The lights are therefore operational on very few occasions and for limited durations during the period when the species is present in Ireland.
4. The habitats immediately surrounding the school site are not GWFG foraging habitat. There is no documented or probable GWFG use of the school grounds or its immediate surroundings.
5. The absolute light output of twelve wall-mounted building fittings, used intermittently, is orders of magnitude below that of a floodlit sports pitch installation, a motorway service area, or the urban agglomerations studied in the ALAN literature. The comparison of scale with the floodlighting installation before the High Court (21 lights on 6m and 10m poles designed to illuminate large outdoor sports surfaces) is therefore not direct. The expert evidence before the High Court (the McLoughlin report) related to ecological concerns specifically about the illumination of the wider landscape by high-intensity floodlighting.

6. Research demonstrates that ALAN effects on bird behaviour diminish rapidly with distance from the light source and are negligible at 3.1km for all but the most intense urban-scale sky-glow sources.
7. Van Doren *et al*. (2017) found that behavioural disruptions disappear within minutes of lights being extinguished, confirming that intermittent, limited-duration lighting does not produce persistent habitat effects.

Professional assessment: Applying the LSE test to these objective factors and having regard to each of the seven CO attributes for the Bellanagare Bog SPA (NPWS 2025), it is the professional judgement of the author that likely significant effects on the conservation objectives can be excluded on the basis of objective information. Addressing each attribute in turn: (i) Winter population trend is governed by demographic factors e.g. relating to breeding productivity in Greenland and not by building lighting in Co. Roscommon. (ii) Winter spatial distribution is governed by food availability and habitat quality at active wintering sites; the SPA is not currently used. (iii) Disturbance at wintering site: the lights are used 10-15 occasions per year not beyond 10pm; the CO notes that intensity, frequency, timing and duration must all be considered; all four parameters are low or negligible for this development. (iv) Barriers to connectivity: the CO requires that barriers do not significantly impact access to the SPA or other ecologically important sites; a school building with lights used 10-15 times per year does not constitute a barrier to connectivity within the meaning of this attribute; the existing Castlerea town lighting is a more substantial continuous feature in the same landscape and is not identified as a barrier. (v) Foraging distribution: the CO notes foraging distances of 5-8km from night roosts; the Lough Gara roost is >15km from the school, well outside this range. (vi) Roost distribution: overnight roosting is typically on permanent waterbodies; no relevant roost site is proximate to the school. (vii) Supporting habitat: the CO requires sufficient habitat outside the SPA; this attribute is not affected by school wall lighting. The conservation objective of restoration does not create an obligation to exclude every conceivable theoretical effect; it requires the competent authority to satisfy itself that the development does not make restoration appreciably more difficult (following the People Over Wind

judgement). This development, at this scale and frequency of operation, does not meet that threshold.

It is noted that this conclusion is reached upon the basis of the development as described and confirmed by the Board of Management. Any material change to the nature or operation of the subject lighting may give rise to a requirement for further review.

Screening conclusion: Likely significant effects on the Bellanagare Bog SPA are Excluded.

5.3 Bellanagare Bog SAC (000592) – Bog Habitats

The site-specific conservation objectives for the Bellanagare Bog SAC (CO000592, NPWS 2015) set quantified targets for 12 attributes of favourable conservation condition for H7110, including habitat area (restore to 139.1ha), hydrological regime, vegetation quality and composition, typical ARB flora and fauna, nitrogen deposition (not to exceed 5kg N/ha/yr) and water quality. Separate objectives are not set for H7120 and H7150 as achieving favourable condition for H7110 will deliver favourable condition for the related habitats.

The conservation measures for the SAC (CM000592, NPWS 2025) identify three categories of pressure: drainage (medium), peat extraction (high) and afforestation (medium). Nineteen site-specific conservation measures are prescribed, all of which relate to: statutory regulation of drainage, peat cutting and afforestation; physical bog restoration (drain blocking, dam construction, plantation removal); and agri-environment and compensation schemes for landowners. Artificial lighting is not identified as a pressure or threat to any of the 12 CO attributes at any ranking. No conservation measure relating to lighting is prescribed.

The assessment against the AA screening standard is straightforward: there is no plausible pathway of effect between wall-mounted building lighting 3.1km from the SAC boundary and any attribute of the site-specific conservation objectives. Artificial lighting does not cause hydrological disruption, alter peat-forming

processes, change water or air chemistry, introduce invasive species, or affect any of the physical, vegetative or hydrological attributes that determine the conservation condition of Active Raised Bog. The development involves no ground disturbance, drainage works, extraction or other physical intervention.

Screening conclusion: Likely significant effects on the qualifying interests of Bellanagare Bog SAC are excluded.

5.4 **Bog SACs – Corliskea/Trien/Cloonfelliv (6.3km), Cloonchambers (6.4km), Drumalough (7.6km), Cloonshanville (11.2km), Kilsallagh (12.5km), Carrowbehy/Caher (12.9km), Callow Bog (14.7km)**

All seven of these sites are designated for raised or degraded bog habitats (H7110, H7120 and associated interests). None have bird or mammal qualifying interests. The same analysis applies as for the Bellanagare Bog SAC: there is no plausible pathway of effect from wall-mounted building lighting on a school to the conservation condition of bog habitats at these distances. The development involves no physical works, hydrological modification or habitat change.

Screening conclusion: Likely significant effects on the qualifying interests of all seven bog SACs are excluded.

5.5 **Turlough SACs – Mullygollan (8.2km) and Croaghill (14.5km)**

Both sites are designated for turlough habitat [H3180] and associated meadow types [H6410]. Turloughs are ephemeral wetlands formed by groundwater fluctuation in karst limestone. Their conservation condition is governed by groundwater hydrology and grassland management. Wall-mounted building lighting has no pathway of effect on these processes.

Turloughs are known to support wintering waterbirds including, historically, GWFG. However, neither site has a bird qualifying interest and the same reasoning as applies to GWFG at the Bellanagare Bog SPA i.e. that occasional,

limited-duration, low-intensity building lighting cannot plausibly impede the use of wetland sites 8-15km distant. This conclusion applies here with even greater force, given the greater distances involved.

Screening conclusion: Likely significant effects on the qualifying interests of Mullygollan Turlough SAC and Croaghill Turlough SAC are excluded.

5.6 Lough Gara SPA (004048) – Greenland White-fronted Goose

The Lough Gara SPA (004048) lies approximately 15.4km to the north-northwest of the school site and is designated for, among other interests, the Greenland White-fronted Goose. It is the nearest active known concentration of the species in Co. Roscommon and is identified in the conservation objectives for the Bellanagare Bog SPA (CO004105, NPWS 2025) as the flock historically associated with the Bellanagare Bog SPA. A separate conservation objectives document for the Lough Gara SPA was published in 2025, reflecting the documented ecological linkage between the two sites. Although the Lough Gara SPA lies beyond the 15km threshold ordinarily applied to the European site search and well in excess of the documented foraging range of the species, it is screened here explicitly, for the avoidance of doubt, in light of that documented connection and because the Lough Gara flock is discussed elsewhere in this assessment.

Three factors are determinative. First, the separation distance of approximately 15.4km is well in excess of the documented foraging range of wintering GWFG from night roosts, estimated at 5-8km (CO004105, NPWS 2025, citing Scottish Natural Heritage 2016). The school site lies far outside the foraging landscape of the Lough Gara flock, and no GWFG night roost or foraging concentration is known to exist within foraging range of the school site. Second, the documented ecological linkage between the Lough Gara SPA and the Bellanagare Bog SPA runs along a northwest to southeast axis, with the two sites separated by approximately 6.5km (GIS-measured). The school site lies a further 8km or more to the south of the Bellanagare Bog SPA. Any movement of birds on the Lough Gara to Bellanagare axis would remain to the north of the school and would

therefore travel away from, and not toward or past, the school site, as set out in Section 5.2.2. There is consequently no pathway by which the development could affect the use of, or movement between, these sites. Third, the development consists of occasional, limited-duration, low-intensity wall-mounted building lighting used on 10-15 occasions per year, not beyond 10pm, with no pitch lighting. The reasoning applied to GWFG at the Bellanagare Bog SPA in Section 5.2 applies here with even greater force, given the substantially greater distance involved.

Screening conclusion: Likely significant effects on the Lough Gara SPA are excluded.

5.7 Bat Species – Annex IV (not European site qualifying interests)

As noted in Section 4.7, the bat species recorded in the immediate vicinity of the school site are Annex IV rather than Annex II species and are not qualifying interests of any of the European sites listed in Table 1. Assessment of potential impacts on bats therefore falls outside the scope of the Article 6(3) AA screening and falls instead under the Article 12 strict protection regime (European Communities (Birds and Natural Habitats) Regulations 2011, Regulation 54).

For completeness, it is noted that the lighting of the school building perimeter with horizontal-projecting bulkhead fittings has potential to affect bat foraging and commuting behaviour in the immediate vicinity of the school. Research has demonstrated that *Myotis* bats and Leisler's Bats, in particular, are sensitive to artificial lighting and tend to avoid illuminated corridors (Stone *et al*. 2009; Stone *et al*. 2012). The Common Pipistrelle, by contrast, is a known beneficiary of insect aggregations around light sources. The potential for the lighting to affect the commuting routes of the *Myotis* sp. and Leisler's Bat populations recorded in the vicinity is a matter that should be addressed by the BoM under the Wildlife Acts and SI No. 477 of 2011 separately from the AA process.

This does not affect the AA screening conclusion for any European site.

6.0 Cumulative and In-Combination Assessment

6.1 Scope of In-Combination Assessment

Article 6(3) of the Habitats Directive and Section 177U of the Planning and Development Act 2000 require the competent authority to assess likely significant effects both individually and in combination with other plans and projects. An in-combination assessment must consider the subject development alongside other plans and projects that could, together with the subject development, contribute to effects on European sites. This section addresses the in-combination assessment for the qualifying interest of primary concern, the Greenland White-fronted Goose at the Bellanagare Bog SPA and for the bog habitat qualifying interests of the SACs within 15km.

6.2 Existing Light Environment

As established in Section 4.1.1, VIIRS/NPP satellite radiance data available from lightpollutionmap.info (Stare 2026) confirms that the existing nocturnal light environment in the area already includes: the Castlerea town light signature (the most proximate source, approximately 2.5km southwest of the school, and incorporating Castlerea Prison on the southern side of the town); and a regional constellation of town-scale light sources including Roscommon, Carrick-on-Shannon, Boyle and Ballaghaderreen, all of which contribute to the ambient light background of the landscape within which the Bellanagare Bog SPA sits.

The Bellanagare Bog SPA is therefore not ecologically isolated from ALAN. The satellite data shows that the SPA catchment already experiences background light influence from multiple directions at the regional scale. A development that adds incrementally to a landscape already characterised by this ambient light background is assessed differently from one that would introduce artificial lighting to a landscape of zero prior light exposure.

The twelve school wall lights, used on approximately 10-15 occasions per year and not beyond 10pm, represent a negligible increment to the existing cumulative light

environment. Their aggregate annual contribution to the ambient light budget of the area is materially smaller than the continuous overnight operation of the existing Castlerea town lighting alone, which is itself already present in the VIIRS data without any record of ecological impact on GWFG restoration to the SPA having been attributed to it.

6.3 Relationship with the Previous Floodlighting Permission (PD 21-131)

The planning permission for the 21-light floodlighting installation (PD 21-131) was quashed by the High Court in May 2024. The BoM confirms that no lighting is currently operational on the playing pitches, running track, walkway or car park. There is no operational pitch or grounds lighting with which the subject development must be considered in combination.

The distinction between the subject development (building wall lights) and the quashed floodlighting installation (sports pitch floodlights on 6m and 10m poles) is significant for in-combination purposes. The quashed permission is not an operative plan or project and cannot be included in the in-combination baseline. Should pitch or grounds lighting be proposed in the future, that proposal would require its own AA screening and could not rely on the present screening conclusion, Other Plans and Projects

No other plans or projects have been identified that would, in combination with the subject development, materially add to the light environment in the zone of influence of the Bellanagare Bog SPA in a way not already captured by the existing baseline described above. The national policy commitment to a Dark Skies Strategy (Rural Development Policy 2021-2025) is a policy aspiration rather than a specific plan or project and does not alter this assessment.

6.4 In-Combination Assessment for GWFG at Bellanagare Bog SPA

The in-combination question is whether the twelve school wall lights, considered alongside all existing and proposed lighting in the relevant zone, would likely have

a significant effect on the conservation objective of restoring GWFG to the Bellanagare Bog SPA.

The baseline light environment already includes Castlerea town lighting (which incorporates the contribution of Castlerea Prison on the southern side of the town) and the wider regional constellation of town-scale sources. The Castlerea town light signature has been present and persistent for decades, throughout the entire period of the GWFG's progressive redistribution from bog to grassland sites. If this continuous, proximate, town-scale light source has not prevented the conservation management of the SPA, or been identified as a barrier to potential GWFG recolonisation, there is no objective basis on which to conclude that the addition of 12 building wall lights, used 10-15 times per year, would make restoration appreciably more difficult within the meaning of People Over Wind v An Bord Pleanala [2015] IECA 272.

The abandonment of peatland sites by GWFG in Ireland is documented in the literature as attributable to bog habitat deterioration through peat extraction, drainage and vegetation succession, combined with the improved nutritional quality and increased availability of improved agricultural grassland (Fox 2003; Fox *et al*. 2019; Stroud *et al*. 2012). The global population decline of the subspecies is attributed to reduced breeding productivity linked to weather conditions in Greenland and interspecific competition with Canada Geese (Fox and Leafloor 2018; BTO 2024). Restoration of the species to the Bellanagare Bog SPA, should it occur, will be governed by bog habitat condition, food availability and population-level demographic recovery, not by the intermittent illumination of a school building.

In-combination conclusion: Likely significant in-combination effects on the qualifying interests of any European site within 15km is excluded.

7.0 Overall Screening Conclusion and Recommendation

7.1 Screening Conclusion

Having regard to the character and scale of the development as described, the ecology of the qualifying interests of the European sites within 15km, the available scientific literature on ALAN effects on waterbirds, as well as the spatial and temporal context of the development and the absence of any demonstrated or probable pathway this assessment has concluded that there is no likelihood of significant effects on any European designated sites in the wider receiving environment.

Table 3: Overall AA Screening Conclusion

Screening Question	Conclusion
Likely significant effects on the Bellanagare Bog SPA (GWFG) individually	**Excluded on the basis of objective information**
Likely significant effects on the Bellanagare Bog SAC (bog habitats)	**Excluded**
Likely significant effects on all other bog SACs within 15km (habitat interests)	**Excluded**
Likely significant effects on turlough SACs within 15km (habitat and waterbird interests)	**Excluded**
Likely significant in-combination effects on any European site within 15km	**Excluded**
Full Appropriate Assessment required?	**NOT REQUIRED on the basis of this screening**

7.2 Recommendation

It is recommended that ACP determine, on the basis of this specialist screening report, that a full Appropriate Assessment of the twelve external light installations at Tarmon National School is not required. The screening has been carried out in accordance with Article 6(3) of the Habitats Directive, Section 177U of the Planning and Development Act 2000 (as amended) and the legal principles established in Dark Sky Roscommon v An Bord Pleanala [2024] IEHC 318. This conclusion addresses the conservation objective of restoring the Greenland White-fronted Goose at the Bellanagare Bog SPA, as required by the High Court judgment and determines on the basis of objective information that likely significant effects on that objective and on all other qualifying interests of European sites within 15km, can be excluded.

This conclusion is reached upon the basis of the development as described and confirmed by the Board of Management. Any material change to the nature or operation of the subject lighting may give rise to a requirement for further review.

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