Bat Derogation Licence Application

Knocknacran West Mine, Co. Monaghan

October 2026

Prepared for:

SAINT-GOBAIN

O'DONNELL ENVIRONMENTAL

CIEEM REGISTERED PRACTICE 2025-2026

QUALITY I.S. EN ISO 9001:2015 NSAI Certified

Summary

Project: Consented Knocknacran West Open-Cast Mine, Co. Monaghan.

Report by: Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM.

Company Profile: O'Donnell Environmental Ltd. is an independent environmental consultancy established by Tom O'Donnell BSc (Hons) MSc CEnv MCIEEM in 2019. Since then, O'Donnell Environmental has established itself as a provider of quality, Client-focused ecological and environmental services to public and private sector Clients nationwide. O'Donnell Environmental is a Chartered Institute of Ecology and Environmental Management (CIEEM) 'Registered Practice' which demonstrates our commitment to high professional standards and accountability. O'Donnell Environmental maintains an ISO 9001:2015 certified Quality Management System, ensuring consistent quality and customer focus.

Statement of Competence: Tom O'Donnell is a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Environmental and Earth System Science [Applied Ecology] in 2007 and an MSc in Ecological Assessment in 2009, both from UCC. Tom has over 15 years professional experience in the environmental industry, including working on projects such as windfarms, overhead power lines, roads, cycleways and residential developments. Tom is licenced by NPWS for roost disturbance, to capture bats, and to photograph bats.

Colm Breslin BSc (Hons) is a Qualifying member of the Chartered Institute of Ecology and Environmental Management. He was awarded a BSc in Biological, Earth and Environmental Sciences [Ecology and Environmental Biology] in 2023 from UCC. Colm has experience in habitat mapping, bat activity surveys and preliminary roost assessments for a variety of windfarm and residential developments. Colm is licenced by NPWS for roost disturbance, to capture bats, and to photograph bats.

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1 Introduction

O'Donnell Environmental were commissioned by Saint-Gobain Mining to provide bat survey services in relation to the proposed Knocknacran West Open-Cast Mine, Co. Monaghan. Saint-Gobain Mining (Ireland) Limited have successfully applied to Monaghan County Council/An Comisiún Pleanála for planning permission for the Knocknacran West project (Monaghan Planning Ref. 2360045; ACP Planning Ref: 319006) following the withdrawal of the proposed development from Judicial Review proceedings on 12th January 2026.

Due to the depletion of the gypsum resource from the existing Knocknacran Mine, permission was sought to develop and recover the gypsum remaining in the former Drumgoosat Underground Mine by open-cast mining methods. The location of the permitted development is shown in **Figure 1.1**. The project also includes a provision for the further development of a Community Sports Complex located adjacent to the existing Knocknacran Open-Cast Mine site and for the restoration of the existing mine with material from the proposed Knocknacran West Open-Cast Mine. The planning application was accompanied by an Environmental Impact Assessment Report (EIAR).

The existing Knocknacran Mine (open-cast) and the adjacent Drummond Mine (underground) produce gypsum as a raw material for the manufacture of an extensive range of plasterboards, plasters and cement rock. The gypsum is processed through a series of crushing circuits, before being homogenised and subsequently dispatched from the site. The mines typically produce between ca. 250,000 and 500,000 tonnes of gypsum (calcium sulphate dihydrate – $CaSO_4$ ($2H_2O$)) per annum, depending on market conditions. Gypsum reserves at the existing Knocknacran Mine and Drummond Mine are being depleted in line with demand. A new supply of gypsum is required in the near future to maintain the viability of the Irish gypsum industry as the existing gypsum operations at the site represent the only gypsum operation in the country.

A bat derogation license was issued to Saint-Gobain Mining in 2021 (DER-BAT-2021-124) and 2023 (DER-BAT-2023-40) in order to facilitate the project. Specifically, the derogation license was issued i) in relation to the loss of three structures in which bat roosting has been identified and ii) to permit alterations to an additional existing structure in which bat roosting has been identified for the purposes of providing a bespoke bat roosting feature. Due to the aforementioned judicial review proceedings which have since been withdrawn, works were unable to be carried out within the permitted time periods of the previous licenses. A 'null' license return was issued to NPWS Wildlife Licensing Unit on expiration of both licenses on behalf of Saint-Gobain Mining.

The current derogation license application is intended as a renewal of the previously granted derogation licences and seeks a 36-month period for the completion of the same proposed works.

This report pertains to four buildings located onsite, of which roosting by bats was identified within all. To enable the development of the consented mine, three buildings will be demolished (B1-B3). The fourth building (B4) will be retained and renovated as a permanent roosting space for bats, in addition to the construction of a new roost structure. The previous derogation discussed a fifth structure, a derelict shed which was confirmed to not host roosting bats and was demolished in the interim, therefore no longer remaining relevant to the current report.

A mitigation and enhancement strategy is proposed, and the effectiveness of this strategy will be monitored for two years post-construction. All details of mitigation will be integrated into an

Environmental Management Plan (EMP). This will include, for example, Construction Method Statements, Pre-construction Works and use of Ecological Clerk of Works to oversee implementation of ecological requirements. Should a bat derogation license be granted, any required measures will be detailed within the EMP and mitigation works described in the derogation licences would be delivered in a phased approach on receipt of the licences and planning permission.

1.1 LEGAL STATUS OF BATS

All bat species and their roosting sites are strictly protected under both national and international law. The purpose of this legislation is to maintain and restore bat populations within their natural range. Where human activities have the potential to compromise bat populations, measures are required to be put in place to avoid impacts or compensate and mitigate for those impacts. A grant of planning permission does not constitute a licence or permit to disturb bats or interfere with their breeding or resting places.

The key legislation which provides protection to bats is as follows:

- Wildlife Act (1976) and subsequent amendments which makes it unlawful to intentionally disturb, injure or kill a bat or disturb its resting place without a licence to derogate from Regulation 23 of the Habitats Regulations 1997, issued by NPWS.
- The EU Habitats Directive (which has been transposed into Irish law with the European Communities (Birds and Natural Habitats) Regulations 2011) which seeks to protect rare species, including bats, and their habitats and requires that appropriate monitoring of populations be undertaken. All Irish bat species are listed in Annex IV, while Annex II provides additional protection for the Lesser Horseshoe Bat.

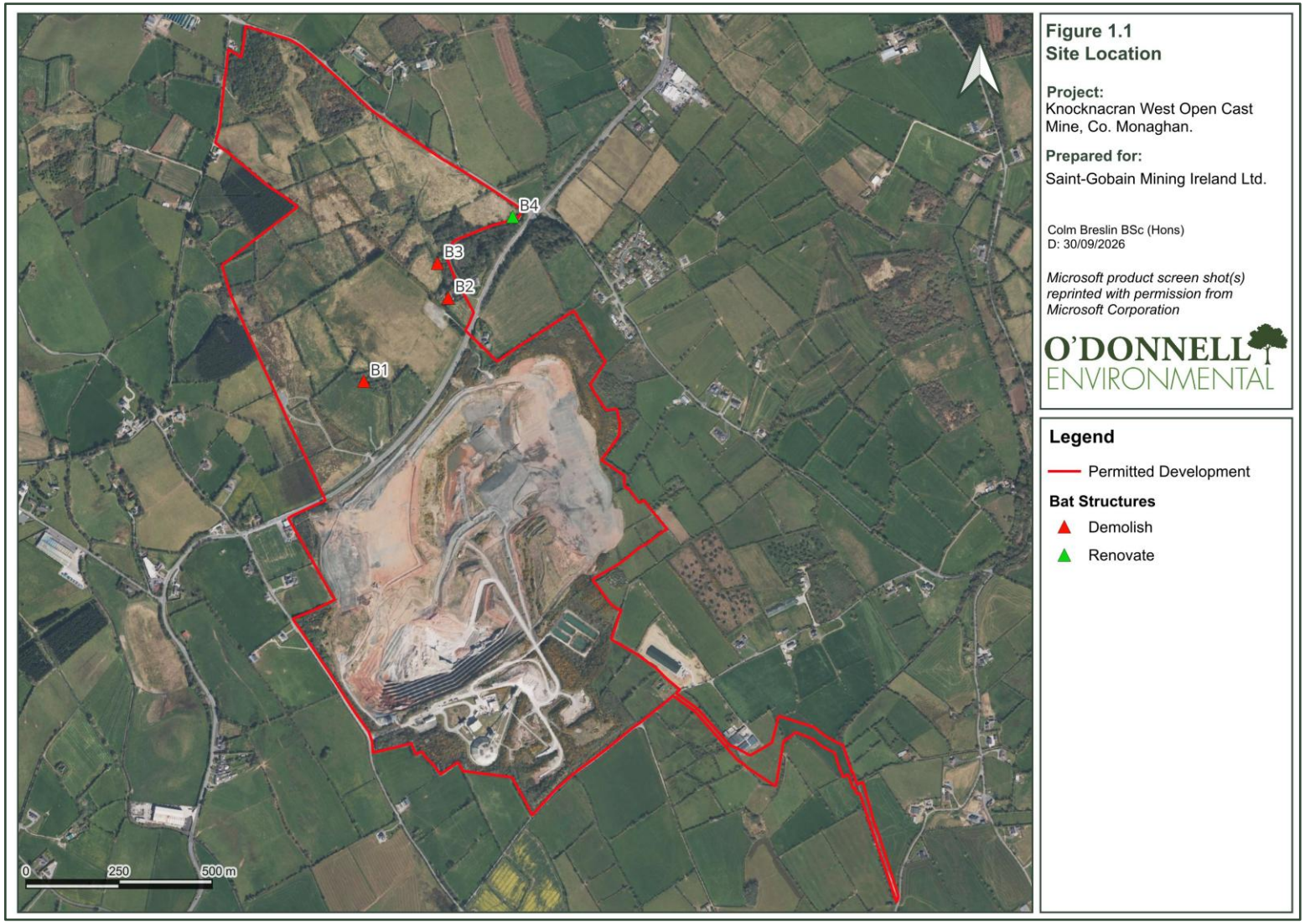


Figure 1.1
Site Location

Project:
Knocknacran West Open Cast Mine, Co. Monaghan.

Prepared for:
Saint-Gobain Mining Ireland Ltd.

Colm Breslin BSc (Hons)
D: 30/09/2026

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Legend

Permitted Development

Bat Structures

Demolish

Renovate

2 Methodology

Bat surveys of all four structures were carried out through desk study, daytime assessment of structures, and emergence surveys. Each of these are described below.

All surveys were carried out with cognisance of industry standard best practices, including the following:

- Bat Conservation Trust guidelines Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition (note that the guidelines were recently updated to 4th edition) (Collins, 2023).
- Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes (NRA (now TII), 2005b).
- Guidelines for the Treatment of Bats during the Construction of National Road Schemes (NRA (now TII), 2006b).
- Bat Mitigation Guidelines for Ireland (Marnell et al., 2022).

As presented within the supporting documents of the previously granted Regulation 54 Derogation for the consented development (DER-BAT-2021-124; DER-BAT-2023-40), a robust survey effort was conducted on all discussed structures between 2021 and 2022. While the data is now considered invalid following guidance presented by NPWS and in line with CIEEM (2019), relevant results pertaining to species and counts are presented and considered to further inform the ecological context of the site.

2.1 DESK STUDY

A desktop review of publicly available relevant data was undertaken on the National Biodiversity Data Centre (NBDC) and National Parks & Wildlife Service (NPWS) websites to identify any rare or protected species records located within the relevant national grid squares encompassing the site.

The NBDC was reviewed for relevant bat data, specifically i) existing species records for the 10km square in which the study site is located (N89,H80) and ii) an indication of the relative importance of the wider landscape in which the study site is located, based on Model of Bat Landscapes for Ireland (Lundy et al., 2011). In the latter, the index ranges from 0 to 100, with 0 being least favourable and 100 most favourable for bats.

Designated international and national nature conservation sites relevant to bats within the wider hinterland of the proposed redevelopment were identified through a desktop review. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) form part of a European Conservation network known as Natura 2000 sites. SACs are designated under the EU Habitats Directive[1] while SPAs designated under the EU Birds Directive[2]. Nationally designated conservation sites include Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs). While NHAs are legally protected by the Irish Wildlife Acts (1976 as amended), pNHAs are not.

2.2 DAYTIME ASSESSMENT

Daytime assessments were carried out by Colm Breslin BSc (Hons), Freddy Jones BSc (Hons) MSc and Kieran Cowhig BSc (Hons) MRes to identify the suitability of structures at Knocknacran West for

[1] Council Directive 92/43/EEC on the conservation of natural habitats and wild flora and fauna, as amended by Council Directive 97/62/EC.
[2] Directive 2009/147/EC (Birds Directive) on the conservation of wild birds (the codified version of Council Directive 79/409/EEC as amended).

roosting bats following Collins (2023). The surveys were non-destructive, and relevant Potential Roost Features (PRFs) were visually inspected from ground level to identify any evidence of bat roosting. Where accessible, potential roosting features were investigated using an endoscope. Signs of bat use include bat droppings, feeding remains, potential bat access points identified by characteristic staining and scratches, noise made by bats etc. Potential Roost Features (PRFs) are described according to the scheme outlined in **Table 2.1**, below.

Table 2.1. Scheme for describing the potential suitability of features for bats.

Suitability	Description
Negligible	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
Low	No obvious habitat features likely to be used by roosting bats, but a degree of uncertainty remains as seemingly unsuitable features may be used on occasion.
Moderate	A feature with one or more potential roost sites that could be used by individual bats opportunistically. Potential roost sites which do not provide appropriate conditions and / or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).
High	A structure with one or more potential roost sites that could be used by bats due to characteristics and surrounding habitat but unlikely to support a roost of high conservation status.

After 'Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition)', Collins (2023).

2.3 EMERGENCE SURVEYS

Targeted emergence surveys were conducted on each structure in July and August 2026 (see **Table 2.2**). Surveyors were positioned to maximise views of the structures, in combination with night vision aids (NVAs) following best practice guidelines (Collins, 2023). Particular attention was applied to any identified access/egress points noted during previous daytime visual roost assessments. Guide IR Pro 19 thermal imaging cameras and Nightfox infrared camera were positioned to optimise views of structures, following Collins (2023). Echolocation recordings were made on handheld Echo Touch Meter Pro 2 and Anabat Scout full spectrum recorders. Additionally, WA Song Meter Mini full-spectrum detectors were placed within the viewsheds of night vision aids to correlate any potential emergence with echolocation data. Surveys were carried out during suitable weather conditions.

Table 2.2 – Emergence survey details

Date	Structure	Sunset	Survey times	Weather Conditions
13th July 2026	B1; B4	21:55	21:30 – 23:25	20°C; F2; 1 Oktas; No rain.
14th July 2026	B2; B3	21:54	21:30 – 23:23	19°C; F2; 1 Oktas; No rain.
17th August 2026	B1; B4	20:54	20:25 – 22:30	17°C; F1; 8 Oktas; Light mist at sunset (brief).
18th August 2026	B2; B3	20:52	20:35 – 22:20	13°C; F1; 8 Oktas; Light mist at 30 and 90 mins after sunset (brief).

2.4 LIMITATIONS

Interior access was not possible at all structures due to safety concerns (building degradation) and general inaccessibility (bricked up windows and doors). Considering all aspects of all structures were fully covered on multiple dates with night vision aids (thermal cameras) from the exterior following best-practice guidance (Collins, 2023), and the extensive historic data, the lack of interior access is not considered a limitation of the current report.

3 Results

The consented Knocknacran West development encompasses four structures relevant to bats. These structures are located within the context of mature trees and pockets of woodland, with the surrounding landscape characterised by agricultural pastures and mature hedgerows subject to minimal light pollution. The development site is considered of 'high' suitability for foraging and commuting bats following Collins (2023).

3.1 DESK STUDY

No internationally designated sites containing Lesser horseshoe bat as a conservation interest are located within 15km of the proposed development. Additionally, no nationally designated sites (NHA/pNHA) listed for bat species were present. As such, no designated sites of international or national importance are considered further.

National Biodiversity Data Centre holds previous records of bat presence from within the 10km squares (N89,H80) in which the development site is located. These records are for:

- Common pipistrelle (*Pipistrellus pipistrellus*).
- Soprano pipistrelle (*Pipistrellus pygmaeus*).
- Daubenton's bat (*Myotis daubentonii*).
- Natterer's bat (*Myotis nattereri*).
- Brown long-eared bat (*Plecotus auritus*).
- Leisler's bat (*Nyctalus leisleri*).

The overall bat suitability index value (39.67) according to 'Model of Bat Landscapes for Ireland' (Lundy et al., 2011) suggests the landscape in which the locality of the study area is of high suitability for bats in general. Species specific scores are provided in **Table 3.1**. The development site is located outside of the known range of Lesser horseshoe bat. All bat species in an Irish context are of 'Least Concern' within Marnell et al. (2019). The most recent Article 17 report (NPWS, 2025) states the conservation status of all bat species are 'favourable', except for Lesser horseshoe bat which is 'inadequate and declining' due to declines in Limerick and North Kerry populations specifically.

Table 3.1 - Suitability of the study area for the bat species according to 'Model of Bat Landscapes for Ireland' (Lundy et al., 2011).

Common name	Scientific name	Suitability index
All bats		*39.67*
Soprano pipistrelle	*Pipistrellus pygmaeus*	54
Brown long-eared bat	*Plecotus auritus*	46
Common pipistrelle	*Pipistrellus pipistrellus*	54
Lesser horseshoe bat	*Rhinolophus hipposideros*	4
Leisler's bat	*Nyctalus leisleri*	56
Whiskered bat	*Myotis mystacinus*	27
Daubenton's bat	*Myotis daubentonii*	51
Nathusiius pipistrelle	*Pipistrellus nauthusii*	19
Natterer's bat	*Myotis nattererii*	46

3.2 STRUCTURE B1

The results for daytime assessment and emergence surveys for B1 are described separately below.

3.2.1 Daytime Assessment

B1 is an unoccupied (derelict) residence and associated outbuildings constructed of stonework and natural slate roof. The entire structure is permeable to bats through open windows and doors. There is a partially accessible attic space. Access to the upper floors of this building was not possible due to the degradation of the staircase. Numerous gaps are present in the stonework of the structure, in addition to where the slates sit on the wallplate. Numerous slates are missing, providing access to the attic. Dense ivy and scrub was encroaching on the rear and western gables. Based on visual inspection of accessible areas of the structures, B1 remains of 'Moderate' suitability to roosting bats (following Collins, 2023).

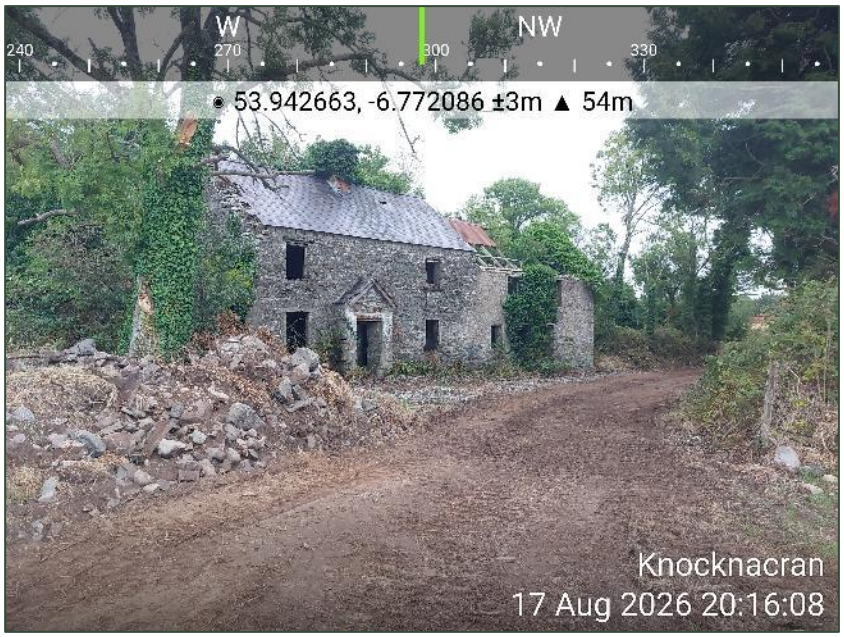


Plate 3.1 – Exterior view of B1.



Plate 3.2 – Interior view of B1.

3.2.2 Emergence Surveys

Previous surveys undertaken in 2021 and 2022 identified roosting by three Soprano pipistrelle, observed emerging from the apex on the eastern gable. Further emergence surveys were undertaken on B1 on the 13th July and 17th August 2026.

On the 13th July 2026, a single Soprano pipistrelle was observed emerging from the from window lintel (blue). This individual commuted offsite to the east following emergence. A single Soprano pipistrelle was observed shortly after from offsite and foraged locally in short bouts for approximately 40 minutes after sunset. A maximum of two individuals were observed simultaneously foraging. Activity largely stopped after 60 minutes.

On the 17th August 2026, four Soprano pipistrelle were observed emerging from different locations. Three of these individuals emerged from the stonework of the western gable (red), and a single individual emerged from the front where the slates join the wallplate (green). The individual from the front slates commuted north, and the thermal on the rear of the structure recorded it entering the structure again through the rear window and utilising the upper floors throughout the night. Activity markedly declined around 40 minutes after sunset.

Based on current information, B1 did not change in terms of its ecological context and remains a non-significant roost for small numbers of Soprano pipistrelle.



Plate 3.3 – Thermal camera view of B1 showing emergence locations on the western gable (red), window lintel (blue) and slates (green).



Plate 3.4 – Thermal camera view of rear of B1.

3.3 STRUCTURE B2

The results for daytime assessment and emergence surveys for B2 are described separately below.

3.3.1 Daytime Assessment

B2 is an occupied single storey bungalow, composed of modern blockwork and synthetic tiles. The structure is well-maintained and intact, with no obvious forms of damage. There are minor gaps on the chimney flashing and the southern ridge tiles. B2 remains of 'Moderate' suitability to roosting bats (following Collins, 2023).



Plate 3.5 – Exterior view of B2.

3.3.2 Emergence Surveys

Previous surveys undertaken in 2021 and 2022 identified non-significant roosting by Soprano pipistrelle, with a maximum of five individuals recorded emerging from the southern ridge tiles. Further emergence surveys were undertaken on B2 on 14th July and 18th August 2026.

On the 14th July 2026, three Soprano pipistrelle were observed emerging from the southern ridge tiles near the chimney (red). Following emergence, low levels of foraging activity was observed around the house by a small number of individuals infrequently. Pre-sunset activity was recorded by Soprano pipistrelle which came from offsite to the southeast.

On the 18th August 2026, ten Soprano pipistrelle were observed again emerging from the southern ridge tiles (red). Following emergences, there was notably less activity surrounding the house relative to the previous survey date. Soprano pipistrelle were observed re-entering the ridge tiles around 40 and 60 minutes after sunset. Pre-sunset activity was recorded by Leisler's bat which was observed commuting high overhead.

Based on current information, B2 did not change in terms of its ecological context and remains a non-significant and transitional roost for small numbers of Soprano pipistrelle.



Plate 3.6 – Thermal camera view of B2 showing emergence location at ridge adjacent to chimney (red).



Plate 3.7 – Thermal camera view of rear of B2.

3.4 STRUCTURE B3

The results for daytime assessment and emergence surveys for B3 are described separately below.

3.4.1 Daytime Assessment

B3 comprises an intact derelict residence and associated outbuildings. Open windows provide clear access to the lower floors of both the house and outbuildings. The roof of the house is damaged in multiple locations with loose chimney flashing and slipped tiles on the front and back. The outbuilding is of stonework construction with steel roof. The interior wood joinery provides suitable roosting crevices. The modern blockwork lean-to is used for firewood storage and is comprised of a steel roof only. There are suitable crevices in the blockwork from degraded mortar. B3 remains of 'Moderate' suitability to roosting bats (following Collins, 2023).



Plate 3.8 – Exterior view of B3, including residence and lean-to.



Plate 3.9 – Exterior view of B3 outbuilding.

3.4.2 Emergence Surveys

Previous surveys undertaken in 2021 and 2022 identified a maximum of 11 Soprano pipistrelles emerging from the front western portion of the roof, in addition to a single pipistrelle from a crack in the lean-to masonry on the north, and a single non-breeding female Brown long-eared bat in stonework outbuilding. Further emergence surveys were undertaken on B3 on 14th July and 18th August 2026.

On the 14th July 2026, 31 Soprano pipistrelle were observed emerging from the residence. 28 of these individuals emerged from a single location on the western gable ridge (red), two emerged from the loose slates on the front roof (blue), and one emerged from the western gable wall plate (purple). The majority of Soprano pipistrelles left the site immediately, with brief foraging bouts around 30 and 60 minutes after sunset. Individuals began to re-enter the main roosting location (red) around 75 minutes after sunset. No individuals emerged from the outbuilding or lean-to.

On the 18th August 2026, there was a marked reduction in numbers compared to the previous survey, with 5 Soprano pipistrelles emerging on this occasion. Roosting locations were more diffuse, with no individuals emerging from the main location (red). Instead, one emerged from the front chimney flashing (green), two emerged from the east gable (orange), one from the loose front slates (blue), and one from the rear chimney flashing (black). Activity was minimal during the course of this survey with the exception of brief emergence activity. No individuals emerged from the outbuilding or lean-to.

Based on current information, B3 has changed in terms of its ecological context and is now considered a maternity roost of Soprano pipistrelle.



Plate 3.10 – Thermal camera view of front of B3 showing emergence location at western gable ridge (red), loose slates at the front (blue), chimney flashing (green) and eastern gable (orange).



Plate 3.11 – Thermal camera view of rear of B3 showing emergence location at western gable ridge (red), chimney flashing (black) and gable wallplate (purple).



Plate 3.12 – Thermal camera view of B3 outbuilding.

3.5 STRUCTURE B4

The results for daytime assessment and emergence surveys for B4 are described separately below.

3.5.1 Daytime Assessment

B4 comprises a derelict stonework structure with natural slate roof. A large portion of the southern aspect has fallen in which allows light and water ingress, with the northern aspect remaining mostly intact with some missing slates that provides suitable crevices. There are suitable roosting features in the form of gaps between the roof and slates, stonework masonry and dense ivy. B4 remains of 'Moderate' suitability to roosting bats (following Collins, 2023).



Plate 3.13 – Exterior view of B4..

3.5.2 Emergence Surveys

Previous surveys undertaken in 2021 and 2022 identified roosting by Soprano pipistrelle re-entering at dawn through the front wallplate underneath the slates. Further emergence surveys were undertaken on B4 on 13th July and 17th August 2026.

On the 13th July 2026, a single Soprano pipistrelle was observed emerging from the front wallplate (red). Additionally, a single Soprano pipistrelle was observed night-roosting when it entered the western gable wallplate (blue), rested for 12 minutes and left again. Sustained foraging by individual and small numbers were observed throughout the night along the treeline and woodland bordering B4.

On the 17th August 2026, eight Soprano pipistrelle were observed emerging from B4. A single individual emerged again from the front wallplate (red). Seven individuals emerged from the western gable stonework in three locations. Of these seven individuals, five emerged from a single crack.

Based on current information, B4 did not change in terms of its ecological context and remains a non-significant night roost and transitional roost for small numbers of Soprano pipistrelle.



Plate 3.14 – Thermal camera view of front of B4 showing emergence location at front wallplate (red).



Plate 3.15 – Thermal camera view of rear of B4 showing emergence location at western gable wall (green), and gable wallplate (blue).

3.6 SUMMARY OF RESULTS

The current report details the results of further surveys undertaken for the consented Knocknacran West Open-Cast Mine development in support of a Regulation 54 Derogation to facilitate the proposed works. A detailed and robust survey effort following Collins (2023) was employed, and new ecological information was recorded. The ecological baseline as reported in 2021 and 2022 for the previously granted Derogations (DER-BAT-2021-124; DER-BAT-2023-40) remains largely as described.

All structures remain used as a roosting location by bats, with a number of additional specific roosting locations identified through full coverage by thermal cameras. The increase in numbers observed emerging from B3 in 2026 has changed the classification of this roost to maternity status. All individuals observed roosting in all structures were Soprano pipistrelle. Out of an abundance of caution, all species recorded during previous surveys and included within granted Regulation 54 Derogations are included within this report also.

4 Potential Impacts and Mitigation

Potential impacts and mitigation measures are discussed separately below.

4.1 POTENTIAL IMPACTS

Non-significant roosting by small numbers of Pipistrelles and Brown long-eared bat have been identified in three structures within the proposed development (B1, B2, B4). Maternity roosting by Soprano pipistrelle was identified within B3. A derogation license is sought to i) allow the removal of man-made structures within which bat roosting has been identified (B1-B3), and ii) permit the alteration/renovation of B4 to provide a permanent bat roost. Please refer to **Figure 1.1** for locations of structures.

B1 and B4 are in an advanced state of disrepair and is expected to be lost entirely as a bat roost in the short term (1-7 years). B2 and B3 are currently in good repair and B2 is occupied, however due to subsidence associated with historic mining at the Knocknacran West site, neither structure is suitable for long-term occupation and in the absence of intervention would fall into dereliction and disrepair.

4.2 MITIGATION

A mitigate-by-design approach was adopted for the approved Knocknacran West development, and O'Donnell Environmental collaborated with the Client to incorporate avoidance, mitigation and enhancement measures in the emerging design. Provision has been made for all bat species identified within the four structures. Bats and their roosts are protected by legalisation, and the proposed works may only proceed following the grant of a derogation license issued under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations (2011). Notwithstanding any conditions of that license, should it be granted, the following measures will be implemented to minimise risks to bats:

4.2.1 Seasonal Avoidance

B3 was identified as a small maternity roost of Soprano pipistrelle, a common and widespread species. Following Marnell et al. (2022), B3 is considered of 'moderate' conservation significance. Due to the maternity status of B3, a seasonal restriction on demolition works is considered warranted in order to avoid direct effects on the maternity colony and the vulnerable pups within. No demolition works will be conducted between May and September inclusive on B3. Due to the overriding priority of the maternity roost, no other seasonal restrictions are considered warranted for B3.

Three structures (B1, B2, B4) were recorded as non-significant/'low' conservation status roost used by low numbers of bats. Following Marnell et al. (2022) and Reason and Wray (2025), no restrictions on timing of works are considered warranted for 'low' conservation significance roosts, although the optimal time for building or reroofing works is during the autumn or spring when bats are active and least vulnerable to disturbance.

4.2.2 Pre-demolition Surveys/Supervision of Works

Emergence/Re-entry surveys will be completed the night/morning before demolition works to confirm the presence/absence of roosting bats. Any additional specific roosting locations than have been identified within this report will be marked up by the Ecologist and communicated to the construction team.

A bat licensed Ecologist will be engaged to advise in relation to the exclusion of bats in advance of works. All accessible roosting features outlined within **Section 3.2-3.5** will be checked and excluded 24 hours in advance of demolition works. Features that cannot be fully accessed and excluded will be communicated to the construction team on the day of works and will be subject to supervision during removal. On the day of any proposed demolition works for each structure, a bat licensed Ecologist will provide a toolbox talk and repeat daytime inspections will be carried out to confirm they do not contain bats. Demolition works that interact with identified roosting locations will be supervised by a bat licensed Ecologist and carried out with hand tools to minimise the potential impact to any bats roosting within.

As an additional deterrent measure, illumination may be installed by a bat-licensed Ecologist to deter bats from roosting the night before demolition works commence. The lighting will be first illuminated at night when bats are active and have left the roost. Lighting will take the form of high-powered construction luminaires.

4.2.3 Alternative Roosting Locations

The proposed mitigation plan allows for two permanent structures to be used solely for the purposes of providing bat roosting features; the renovated B4 structure and an additional structure at the site of the former ticketing office. Both structures will benefit from suitable planting and landscape management to provide for screening, foraging habitat and connectivity to the wider landscape. Additionally, bat boxes are proposed throughout the development.

B4 (Shirley House) is currently unused. Roosting opportunities will be provided externally and internally to provide multiple roosting opportunities throughout the year for bats. The building will be solely retained for use by bats and will be capable of hosting a maternity roost of different species. The specific access egress points identified in **Section 3.5** will be retained. The maternity roosting feature along the roof ridge identified within B3 will be replicated within B4. All replacement materials utilised in the renovation will be tailored for use by bats. Natural slate and traditional 1F bitumen roofing membrane will be used only. Any timbers must be pressure treated offsite. Onsite application of wood preservative should be avoided, and if necessary, only products certified to be 'bat safe[3]' will be used.

A bespoke roost will be provided at the location on the north of the site on the site of the former ticketing office. This bespoke roost will be block-built, plastered inside and out and will be roofed with natural slates laid on traditional 1F bitumen roofing membrane. Appropriate access and egress points will be provided, and a variety of roosting opportunities will be provided externally and internally to provide roosting opportunities which will be of use to bats throughout the year. The building will measure a minimum internal dimensions of 4m x 2.5m and will be solely provided for use by bats. Bat boxes will be integrated into the blockwork.

Both the renovation of B4 and the new purpose-built bat structure are intended to cater for the loss of roosting locally as a result of the Knocknacran development. Specifically, both structures will sufficiently replace the loss of the maternity roosting space within B3.

Bat boxes will also be provided throughout the operation of the proposed project. Loss of foraging habitat at the Knocknacran West site will be offset by remediation of the existing

[3] https://www.gov.uk/government/publications/bat-roosts-insecticides-and-timber-treatments/timber-treatment-products-suitable-for-use-in-or-near-bat-roosts

Knocknacran and Drummond Mines. The installation of bat boxes at suitable locations within the development site will maximise the benefit of the area to bats. As recommended in Marnell et al. (2022), 'woodcrete' bat boxes will be used as they are durable, long-lasting and do not require maintenance. A mixture of bat box types should be used to cater for seasonal and species requirements. The following products (or similar) are suitable:

- Schwegler 1FS/2FS/3FS Colony Bat Box.
- Schwegler 2F Universal Bat Box.
- Schwegler 2FN Bat Box.

A minimum of 15 bat boxes will be installed at appropriate locations. The boxes will be installed on trees which are in good health. The selection of bat box locations will be decided in consultation with an Ecologist and with cognisance of the following:

- Bat boxes should be installed at a minimum height of 4 metres above ground level, and in locations which are inaccessible to unaided climbing (to minimise risk of vandalism).
- Two bat boxes should be installed on each of the most suitable trees.
- Locations should be chosen which are not vulnerable to artificial light pollution.
- Boxes will be installed so that they have southern or westerly aspects and preferably in locations where they will receive some direct sunlight.

4.2.4 Foraging/Commuting

Suitable screening and planting will take place in proximity to the proposed roosts and connectivity between the roosts and surrounding landscape will be maintained. Planting along the L4900 will provide a corridor connecting B4 (Shirley House) to the woodland area in the north that will be largely retained (south of Drumgoosat Village).

4.2.5 Lighting

For any external lighting prescribed under the proposed project, a suitable lighting strategy will be developed, under advice from a suitably qualified Ecologist. The lighting strategy will maintain any opportunities within the site for nocturnal and crepuscular species by using timers, cowls and hoods to maintain dark skies and avoid illuminating features such as bat roosts, woodland and hedgerow habitat.

4.2.6 Monitoring

Monitoring of bespoke roosts and bat-boxes will be carried out by an Ecologist licensed by NPWS for roost disturbance and bat handling in years 1, 3 and 5 post-works, to determine the success of the mitigation scheme. Monitoring of the establishment and success of the proposed landscaping measures of relevance to bats will be carried out regularly throughout the operational period of the proposed Knocknacran West mine.

5 Derogation License Application

Direct impacts on bat roosts as a result of the project have been identified. Saint-Gobain Mining request that a new bat derogation license is issued in order to facilitate the project, specifically a derogation license is required i) in relation to the loss of three structures in which bat roosting has been identified and ii) to permit alterations to an additional existing structure in which bat roosting has been identified for the purposes of providing a bespoke bat roosting feature. For the purpose of this derogation, the maximum emergence count from each structure and all species recorded during historic and current surveys are considered.

Bespoke and appropriate mitigation measures have been outlined in **Section 4.2** above following robust data gathered over multiple seasons and years. No additional measures are considered feasible in terms of further reducing the impact of the scheme on bat species locally.

A 36-month licensing period is requested in order to allow sufficient time post-planning to complete the works, which may need to be carried out in a phased basis as part of an overall project schedule.

5.1 TEST 1 – REASON FOR DEROGATION

The reason for the current derogation is contained within Option 2(c) "*In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment*"

A derogation license is sought under Regulation 54 (2) (c) of the Birds and Natural Habitats Directive due to the economic importance of the proposal to the local and national economy and Ireland's construction industry. The proposed development at Knocknacran West Mine provides a source of high-quality gypsum for future infrastructural requirements nationally.

Open-cast mining is considered to be the only viable option to facilitate extraction of the highest quality qypsum reserves available at the Knocknacran West site and retention of B1, B2 and B3 are not compatible with open-cast mining of the site. The current proposal enables the continued extraction of gypsum at the site and allows for the restoration of the Knocknacran Mine site to original ground contours, where possible, and also allows for the continuation of use of the existing processing plant at Kingscourt. This will ensure the extraction and utilisation of a valuable national resource with good local access in terms of employment, its contribution to the local and national economies, manufacture of products for sale and revenue contributions to the both local and national authorities. Knocknacran West Mine site contains good quality workable gypsum. Manufacturing facilities are well established and located close to the extraction activities in Kingscourt, Co. Cavan. No intensification of mining activities is planned for the proposed development.

5.2 TEST 2 – ABSENCE OF ALTERNATIVE SOLUTIONS

Alternative solutions are considered below and detailed as to their suitability.

5.2.1 Alternative 1 – Do Nothing

In the 'Do Nothing Scenario' the existing Knocknacran and Drummond Mines would cease operations once the current permitted extractable reserves are exhausted in 2026 and 2033

respectively. The supply of local gypsum to the Kingscourt factory for plaster product production would also cease and an alternative supply of material would need to be found for the factory to remain in production. This supply of gypsum would most likely be sourced from abroad as there is currently no proven alternative sources of gypsum within the country to maintain the viability of the factory. After final restoration of the Knocknacran and Drummond Mines there would be a loss of ca. 30 direct jobs and a potential loss of ca. 140 jobs from the Kingscourt factory if no cost-effective alternative supply was found to maintain the viability of the factory. Indirectly the mines and factory employ many people as subcontractors and suppliers.

Market demand for plaster products nationally would remain regardless of the closure of the mines. This demand would have to be met through the supply of another source of gypsum to the factory and the gypsum would need to have a similar quality as Knocknacran, Drummond and Knocknacran West gypsum. If a supply could not be found which maintains the high quality and low cost of the Irish gypsum, then the factory site would be unlikely to remain in production.

In the event that an alternative supply of gypsum is not found then the 'Do Nothing Scenario' would require all services offered by the existing and proposed mines to be met at another mine site abroad. This would require an intensification of HGV movements on the local, national and international transport networks as the supply will be brought to Ireland from abroad, arrive at a port and then be trucked to Kingscourt. This would create an operating cost pressure on the factory making it less secure into the future. This scenario is considered to be '*Moderate Adverse'* depending on the condition of the road networks.

Additionally, the existing Knocknacran West Mine site has had recent issues with subsidence and there is a risk that in the 'Do Nothing Scenario' the site would remain a brownfield site and structures contained within will be lost to roosting bats in the short to medium terms.

5.2.2 Alternative 2 – Development of Alternative Greenfield Site for Gypsum

At present, the gypsum in Co. Monaghan is the only proven reserve of gypsum in the country. The development of a greenfield site for gypsum mining would require the establish of extensive exploration programs which would have to 'prove-up' new gypsum reserves (to ensure their viability) before any planning/permitting application would be made. This would take several years, if not decades, before a viable gypsum reserve could be proven in this country, if indeed it exists. A gap in supply may result.

The establishment of a new facility with associated processing infrastructure would be considerably more costly than the current proposal. Significant cost would be incurred through the exploration for suitable deposits, the acquisition of new lands, and the generation of the relevant planning documents including site specific surveys.

Depending on the greenfield site and underlying geology, there may be surface water, groundwater and biodiversity issues which are less favourable than the current proposal. The sourcing of a greenfield site, importation of materials and relocation of operations would result in such a site being situated further away from the manufacturing factory in Kingscourt, Co. Monaghan; thus, increasing the journey lengths and knock-on effects to road infrastructures.

5.2.3 Alternative 3 – Relocation of Mining Operations Abroad and Importation

The alternative seeks to import gypsum from other mines abroad in order to maintain production of the associated services at the Kingscourt Factory. In this alternative the existing mines at

Knocknacran and Drummond would close. The existing Knocknacran West Mine site has had recent issues with subsidence and there is a risk that in this scenario that the site would remain a brownfield site and structures contained within will be lost to roosting bats in the short to medium terms

Additionally, in this scenario the loss of jobs at the existing mines and processing facilities would occur once the current reserves are exhausted. This is estimated to occur in 2025 (Knocknacran Mine) and 2033 (Drummond), depending on market conditions. The economic feasibility of this scenario is limited by the transport costs of importation and increased haulage on the national and local road networks to reach the factory site. This scenario risks, unmitigated loss of bat roosts to subsidence, the continuation of the factory at Kingscourt, and employment at that site.

5.2.4 Alternative 4 – Recover Remaining Gypsum (Consented Development)

Due to the depletion of the gypsum resource from the existing Knocknacran Mine, development consent was granted in January 2026 to develop and recover the gypsum remaining in the former Drumgoosat Underground Mine by open-cast mining methods. The location of the permitted development is shown in **Figure 1.1** above. A new supply of gypsum is required in the near future to maintain the viability of the Irish gypsum industry as the existing gypsum operations at the site represent the only gypsum operation in the country.

Baseline studies carried out by O'Donnell Environmental at the Knocknacran West site have identified bat roosting in all structures (B1-B4). To enable the development of the proposed mine, three structures (two with identified non-significant roosts; one with maternity roost) would need to be demolished. Under a do-nothing scenario, these roosts will inevitably be lost to subsidence. Robust mitigation is discussed in **Section 4.2** above, involving seasonal restrictions, retention of the fourth structure (confirmed roost known as the Shirley House), construction of bespoke roost and extensive bat box installation.

Alternative 4 was considered the most suitable option in this instance.

5.3 TEST 3 – IMPACT OF A DEROGATION ON CONSERVATION STATUS

Disturbance/loss of confirmed bat roosts cannot be avoided. Non-significant/'low' conservation significance roosting has been identified within B1, B2 and B4. Maternity roosting of 'moderate' conservation significance has been identified within B3. B4 will be retained and renovated, with temporary disturbance effects only envisioned on this roost. All identified species within an Irish context are considered of 'Least Concern' (Marnell et al., 2019). The most recent Article 17 report (NPWS, 2025) states the conservation status of such species as 'favourable'.

The mitigation stipulated within **Section 4.2** follows Marnell et al. (2022), involving seasonal avoidance, pre-construction surveys, supervision of works, the construction of a new roost, retention and improvement of an existing roost, and extensive bat box installation scheme, are considered sufficient to effectively offset the loss of all identified roosts as a result of the demolition of the three structures. The outlined mitigation will sufficiently compensate for the loss of the maternity roosting and cater for all species roosting preferences.

Considering the above, the proposed derogation is not considered to be detrimental to the maintenance of the populations of the species to which the Habitats Directive relates at a favourable conservation status in their natural range.

5.4 MONITORING

Monitoring of bespoke roosts and bat-boxes will be carried out by an Ecologist licensed by NPWS for roost disturbance and bat handling in years 1, 3 and 5 post-works, to determine the success of the mitigation scheme. Monitoring of the establishment and success of the proposed landscaping measures of relevance to bats will be carried out regularly throughout the operational period of the proposed Knocknacran West mine.

6 References

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Appendix A - Previous Derogation Licenses

An Roinn Tithíochta,
Rialtas Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Licence No.: DER/BAT 2021 – 124

EUROPEAN COMMUNITIES (BIRDS AND NATURAL HABITATS) REGULATIONS, 2011 (S.I. No 477 of 2011)

DEROGATION LICENCE

Granted under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, hereinafter referred to as "the Habitats Regulations".

The Minister for Housing, Local Government and Heritage, in exercise of the powers conferred on him by Regulation 54 of the Habitats Regulations hereby grants to **Saint-Gobain Mining** supervised by **Tom O'Donnell BSc MSc CEnv MCIEEM of O'Donnell Environmental**, a licence. It is stated that:

(A) In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment

(B) There is no satisfactory alternative, and the action authorised by this licence will not be detrimental to the maintenance of the population of **bats** referred to below at a favourable conservation status in their natural range.

The licence is issued in respect of the following **bat species**:

- **common pipistrelle** ***Pipistrellus pipistrellus***
- ***soprano pipistrelle*** ***Pipistrellus pygmaeus***

. This licence authorises the following:

(a) Roost disturbance;

(b) Damage or destruction of breeding sites or resting places;

(c) Actions authorised within the licence

This licence is subject to the terms and conditions set out overleaf.

Terms and Conditions

1. This licence is granted solely to allow the activities specified in connection with the **demolition works** located at **Knocknacran West Mine, Co. Monaghan** for **Saint-Gobain Mining.**

2. All activities authorised by this licence, and all equipment used in connection herewith, shall be carried out, constructed and maintained (as the case may be) so as to avoid unnecessary injury or distress to any species of **BAT**.

3. This licence may be modified or revoked, for stated reasons, at any time.

4. The mitigation measures outlined in the application report (**Bat Derogation Licence Application, pgs.18-20**), together with any changes or clarification agreed in correspondence between NPWS and the agent or applicant, are to be carried out. Strict adherence must be paid to all the proposed measures in the application.

5. No work can begin before **November 5th 2021** and must be completed by **March 31st 2022.**

6. The works will be supervised by a licensed bat specialist **Tom O'Donnell.**

7. This licence shall be produced for inspection on a request being made on that behalf by a member of An Garda Síochána or an authorised NPWS officer appointed under Regulation 4 of the Habitats Regulations.

8. The local National Parks and Wildlife Service field officer **Eoin Connolly, Eoin.Connolly@housing.gov.ie, 0858074134** should be contacted prior to the commencement of any activity, and if bats are detected on site during the course of the work, under the terms of this licence.

9. A report shall be submitted to Wildlife Licensing Unit, National Parks and Wildlife Service Department of Housing, Local Government and Heritage, R. 2.03, 90 North King Street, Smithfield, Dublin 7, D07 N7CV on completion of the actions which this licence authorises, describing the activities carried out in pursuance of this licence.

Claire Crowley
(a person authorised by the Minister to sign on his behalf)

05/11/2021

Wildlife Licensing Unit
National Parks and Wildlife Service
Housing, Local Government and Heritage
R. 2.03
90 North King Street
Smithfield
Dublin 7
D07 N7CV



NOTES (1 to 2).

- This licence is granted for the period specified and subject to compliance with the conditions specified. Anything done other than in accordance with the terms of this licence may constitute an offence.

- This licence applies to **bats** and to no other species.

An Roinn Tithíochta,
Rialtas Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Licence No.: DER/BAT 2023 – 40

EUROPEAN COMMUNITIES (BIRDS AND NATURAL HABITATS) REGULATIONS, 2011 (S.I. No 477 of 2011)

DEROGATION LICENCE

Granted under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011, hereinafter referred to as "the Habitats Regulations".

The Minister for Housing, Local Government and Heritage, in exercise of the powers conferred on him by Regulation 54 of the Habitats Regulations hereby grants to **Hannah McGillycuddy C/O SLR Consulting Ireland, 35 Friary Street, Co. Kilkenny R95 FP62** supervised by **Tom O'Donnell of O'Donnell Environmental Ltd, 103 Cube Building Monaghan Road, Cork City, Co. Cork T12 H1XY**, a licence. It is stated that:

(A) In the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.

(B) There is no satisfactory alternative, and the action authorised by this licence will not be detrimental to the maintenance of the population of **bats** referred to below at a favourable conservation status in their natural range.

The licence is issued in respect of the following **bat species**:

- **brown long-eared bat** — **Plecotus auritus**
- **common pipistrelle** — **Pipistrellus pipistrellus**
- **soprano pipistrelle** — **Pipistrellus pygmaeus**

This licence authorises the following:

(a) Roost disturbance;

(b) Actions authorised within the licence

This licence is subject to the terms and conditions set out overleaf.

Terms and Conditions

1. This licence is granted solely to allow the activities specified in connection with the **demolition of four derelict buildings** located at **Knocknacran West, Co. Monaghan**, for **Hannah McGillycuddy/SLR Consulting Ireland.**

2. All activities authorised by this licence, and all equipment used in connection herewith, shall be carried out, constructed and maintained (as the case may be) so as to avoid unnecessary injury or distress to any species of **BAT**.

3. This licence may be modified or revoked, for stated reasons, at any time.

4. The mitigation measures outlined in the application report (**Bat Derogation Licence Application Knocknacran West Mine, pgs.23-24**), together with any changes or clarification agreed in correspondence between NPWS and the agent or applicant, are to be carried out. Strict adherence must be paid to all the proposed measures in the application.

5. No work can begin before **May 1st 2023** and must be completed by **April 31st 2026.**

6. The works will be supervised by bat ecologist **Tom O'Donnell.**

7. This licence shall be produced for inspection on a request being made on that behalf by a member of An Garda Síochána or an authorised NPWS officer appointed under Regulation 4 of the Habitats Regulations.

8. The local National Parks and Wildlife Service field officer **Maurice Eakin,** Maurice.Eakin@npws.gov.ie **, +353 18883221** should be contacted prior to the commencement of any activity, and if bats are detected on site during the course of the work, under the terms of this licence.

9. On completion of the activities authorised by this licence, a report will be submitted to Wildlife.reports@NPWS.gov.ie as well as wildlifelicence@npws.gov.ie detailing results of works and success of mitigation.

Claire Crowley
(a person authorised by the Minister to sign on his behalf)

11/04/2023

Wildlife Licensing Unit
National Parks and Wildlife Service
Housing, Local Government and Heritage
R. 2.03
90 North King Street
Smithfield
Dublin 7
D07 N7CV



NOTES (1 to 2).

- This licence is granted for the period specified and subject to compliance with the conditions specified. Anything done other than in accordance with the terms of this licence may constitute an offence.

- This licence applies to **bats** and to no other species.

O'DONNELL
ENVIRONMENTAL