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Email: [redacted]

10th October, 2025

By Registered Post and Email
RL 0227 4344 7IE

RE: PCRE'S CONTINUED EVASION AND STAKEHOLDER ENGAGEMENT FAILURES

Dear [redacted],

Your letter of 6th October represents a continuing refusal to address fundamental stakeholder engagement failures that have characterised this project from the outset, whilst simultaneously revealing the patronising attitude underlying PCRE's approach to community consultation.

PCRE's Patronising Attitude to Community Engagement

Your statement that "this consultation process is non-statutory and voluntary" reveals the fundamental contempt underlying your approach to community engagement. This condescending observation suggests you view consultation as an optional favour bestowed upon the local community rather than a professional obligation to those whose lives will be permanently altered by your proposed industrial development. Such an attitude explains the systematic inadequacies that have characterised your engagement efforts from the outset.

Tacit Confirmation of Refusal to Engage

Your persistent refusal to provide written answers to four straightforward questions posed repeatedly since 22nd August can now only be interpreted as tacit confirmation that PCRE has no intention of conducting fit-for-purpose community engagement. These questions require no commercial sensitivity, no technical expertise, merely a basic commitment to transparent process:

- What methodology will be employed to comprehensively identify all affected stakeholders?
- How will direct engagement be ensured with those most significantly impacted?
- What steps will be taken to align consultation practices with modern stakeholder engagement standards?
- How will the consultation gaps identified to date be addressed?

Your characterisation of these fundamental governance questions as having been "answered" in previous correspondence is demonstrably false and represents a breach of the guidance requirement for "open and transparent" consultation. No methodology has been disclosed, no engagement standards referenced, no gap analysis provided.

Damning Evidence of Consultation Failures

The evidence now conclusively demonstrates the inadequacy of your approach. Despite claims of notifying "just over 500 properties falling within a 1km radius," only a handful of residents from our 900-strong petition membership received notification letters. Several recipients reside in Monivea Village - over 2.5km from your nearest project site - directly contradicting your stated methodology and exposing the fundamental flaws in your notification system.

Furthermore, these letters, dated 19th June and received on 23rd June, provided recipients with a mere two working days to understand and respond to your complex proposal - a timeline that demonstrates either incompetence or deliberate exclusion of meaningful community input.

Systematic Breach of ISEA Best Practice Guidance

Your approach represents a fundamental breach of the Best Practice Guidance Report for Large Scale Solar Energy Development (2023), prepared by Fehily Timoney & Company for the Irish Solar Energy Association and supported by SEAI. This guidance explicitly emphasises that "Encouraging and facilitating ongoing dialogue should be the focus of the process."

PCRE's "fait accompli" approach – presenting a finalised design with an implied ultimatum to "take it or leave it" – directly contradicts the guidance requirement that "applicants and stakeholders need to be clear about what elements of the community benefit package can be shaped by the consultation and what cannot." You have provided no indication of what aspects remain open to community input, effectively rendering your consultation meaningless.

The guidance mandates "A fair and transparent process should be employed to identify the appropriate groups to consult," yet you have persistently refused to disclose your stakeholder identification methodology. The guidance recommends consultation within "approximately 500m of the proposed solar farm" with "A larger radius may need to be used for larger scale solar farms," yet your notification of residents over 2.5km away whilst missing those within 500m demonstrates fundamental incompetence in implementing basic professional standards.

Archaeological Heritage Violations and Due Diligence Failures

The enforcement proceedings initiated by Galway County Council against your Oakwood South landowner represent a catastrophic breach of Section 5.2.4 of the ISEA Best Practice Guidance. The guidance explicitly states that "No construction groundworks of any kind (including geotechnical investigations) can be carried out within either type of buffer zone" around archaeological monuments, and that "mitigation measures that promote the preservation of archaeological heritage in situ are the preferred mitigation method."

Whether this bulldozing of land within the buffer zone of a recorded monument occurred under PCRE's direction or was undertaken independently by the landowner following your contractual agreements, it demonstrates fundamental failures in your project management and due diligence processes. The ISEA guidance places clear responsibility on applicants to ensure proper archaeological assessment and protection throughout the development process.

This violation represents either:

1. Complete failure in due diligence: PCRE entered contractual arrangements without proper archaeological screening or landowner briefing on heritage protection obligations
2. Inadequate project oversight: PCRE failed to monitor or control activities on contracted land parcels
3. Deficient stakeholder management: PCRE failed to ensure contracted landowners understood and complied with archaeological protection requirements

Any scenario raises fundamental questions about PCRE's competence in managing complex infrastructure projects and commitment to regulatory compliance, directly contradicting the guidance requirement for proper archaeological assessment and protection. Professional developers are expected to maintain rigorous control over all aspects of their projects, including ensuring contracted parties comply with heritage protection obligations.

Site Planning Failings

Your own Bellville Solar Farm Project Site Location Plan initially showed two Oakwood South homes sitting squarely inside the red line boundary – directly contradicting your assertion that “no residential properties fall within the red line boundary.” Whilst you have since corrected this error, this act has caused immense stress to local families, undermining their security, belonging, and dignity as fundamental human needs, and creating hurt and division within the community.

Shifting Project Parameters

Your project's credibility is undermined by inconsistent and incomplete information that breaches the guidance requirement for clear communication. The Bellville Solar website FAQ provides conflicting messages: the proposed community benefit fund has dropped from €20m to €8m, while key project details remain undisclosed. No map was included in your promotional brochure, and the official locations of the substation and BESS have not been disclosed – information essential for meaningful community assessment under the ISEA guidance. Your latest FAQ’s evasive language regarding property values (“Studies have shown that property values are correlated to a range of factors”) replaces your previous dismissive stance, underscoring your apparent awareness of the potential economic impact on the local community.

False Claims About Project Benefits

Your claimed project benefits (“This project will boost the local economy, including a Community Benefit Fund”) represent a fundamental mischaracterisation. The only beneficiaries will be PCRE, Omnes Capital, Infranity, and a small cohort of local landowners, whilst the broader community faces widespread property and land devaluation, landscape destruction, and social disruption on an unprecedented scale.

Insistence on Open, Transparent Community Engagement

AMASS operates as an open, representative community group dedicated to transparency and the collective interest of all affected residents. It is fundamentally inappropriate for PCRE to seek piecemeal or private meetings with a small committee. Genuine consultation, in line with the ISEA Best Practice Guidance, must be conducted openly, with opportunities for the public to attend, ask questions, and directly witness the proceedings of any engagement. PCRE's preference for closed-door or selective meetings further undermines community confidence and suggests a desire to control the narrative rather than pursue true dialogue. AMASS will not participate in, nor legitimate, any engagement process that is not fully public, inclusive, and conducted on-the-record for the benefit and protection of the wider community.

Conclusion

PCRE's systematic failure to adhere to the ISEA Best Practice Guidance – evident in your "fait accompli" approach to consultation, refusal to answer basic stakeholder questions, and disregard for pre-application community engagement standards – demonstrates contempt for genuine dialogue and professional obligations.

Furthermore, the archaeological heritage violations at your Oakwood South site – whether due to PCRE's failure of due diligence or landowner actions under your contractual control – confirm a critical breakdown in project oversight and regulatory compliance, directly contradicting the guidance requirement for in situ preservation and proper buffer zone protection.

Until you provide substantive, written answers to the four outstanding questions and demonstrate genuine commitment to transparent, inclusive engagement that treats affected residents as stakeholders rather than obstacles, any further correspondence will be viewed as a continuation of this pattern of bad faith. However, AMASS remains open to you commencing a meaningful public consultation with the wider community, conducted transparently and in accordance with ISEA Best Practice Guidance, should PCRE commit to a date and format that ensures full community participation and on-the-record proceedings.

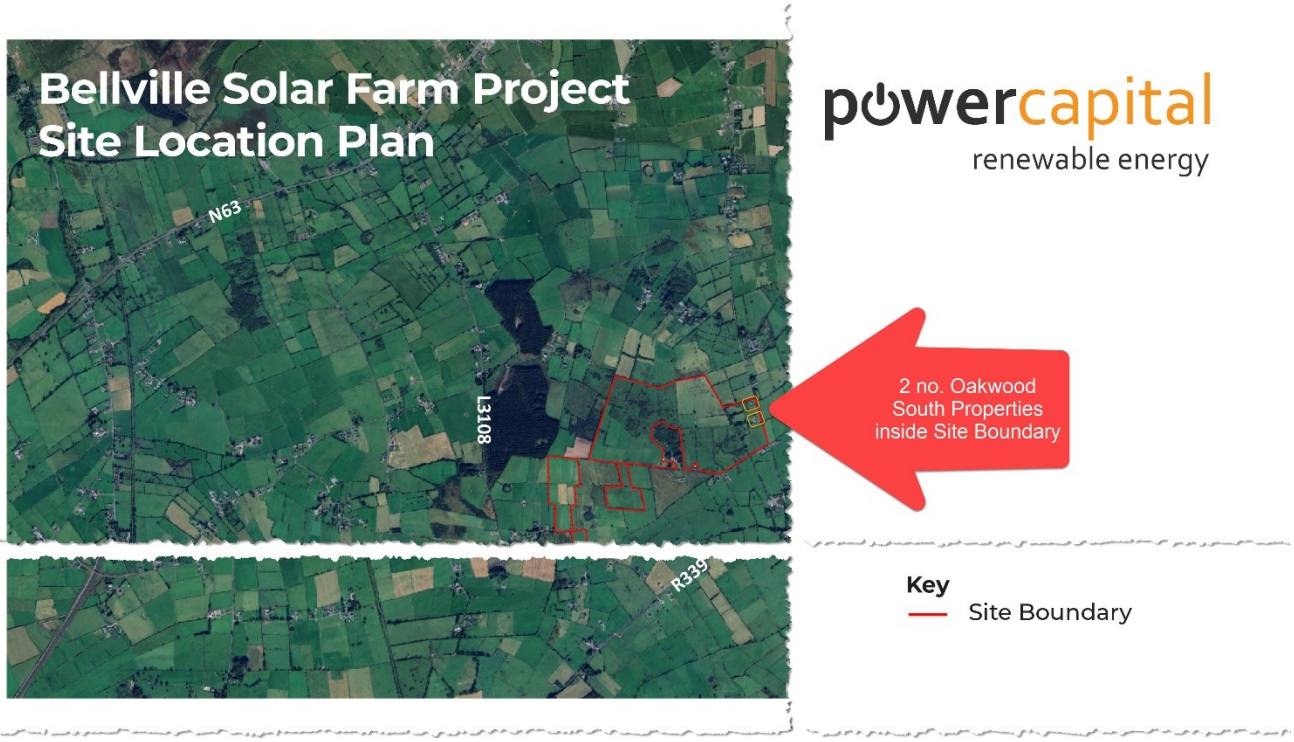
Yours faithfully,

Brendan Cronin

Brendan Cronin
Chairman, AMASS

Encl. Original red line map showing Oakwood South properties included in the proposed development

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