National Monuments Service
Department of Housing, Local Government and Heritage
Custom House
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13th October 2026

RE: FORMAL COMPLAINT – RECORDED MONUMENT GA058-078, OAKWOOD SOUTH, CO. GALWAY; NMS DAMAGE CASE NM08188; GALWAY COUNTY COUNCIL ENFORCEMENT NOTICE EN25/202; PLANNING APPLICATION 26/61362

A Chara,

I write on behalf of Abbeyknockmoy and Monivea Against Solar Sprawl to make a formal complaint concerning the omission of documented damage to Recorded Monument GA058-078 at Oakwood South from the Department's archaeological observations of 10 September 2026 on planning application 26/61362, and to seek clarity on the present status of National Monuments Service case NM08188.

AMASS first wishes to acknowledge the important work undertaken by the National Monuments Service following reports of damage at Oakwood South. The Service inspected the site on 17 July 2025 and produced a detailed report dated 22 August 2025. That report recorded extensive land clearance immediately surrounding the monument, groundworks extending to its base, and five discrete areas of recent impact. It also confirmed that the monument remained in situ, while recording the visible damage and disturbance affecting it.

The inspection was a necessary and valuable intervention. We also acknowledge that NMS issued an enforcement complaint notice to Galway County Council on 20 August 2025. This helped bring the works within the Council's planning-enforcement process, which subsequently resulted in Enforcement Notice EN25/202. Residents appreciate that NMS did not ignore the initial report and took steps to have the matter addressed.

Our concern is that the Service's documented findings do not appear to have been carried forward into the Department's subsequent planning advice on the same lands.

The Department's submission of 10 September 2026 on planning application 26/61362 properly found the applicant's archaeological assessment to be "deficient and incomplete" and warned against deferring archaeological investigation to a post-consent stage. However, it made no reference to Recorded Monument GA058-078, the damage recorded by NMS in July 2025, damage case NM08188, or Enforcement Notice EN25/202.

This omission is difficult to understand. Galway County Council's planner expressly identified both the location of the Recorded Monument and the unauthorised-development/enforcement case on lands proposed for the future grid connection and substation. The Council's planning report states that the indicative substation location lies within the Oakwood South red-line boundary. Yet the Department's archaeological observations did not disclose that a Recorded Monument on or adjoining those lands had already been the subject of an NMS damage investigation.

We further understand that PCRE made an application to EirGrid in June 2026 in respect of a grid connection involving the Oakwood South folio on which GA058-078 is located. We do not suggest that an application to EirGrid determines the planning status, final design or ultimate location of any grid infrastructure. It does, however, underline the continuing relevance of these lands to the Bellville project's grid strategy. In those circumstances, it is particularly important that NMS's documented findings on the monument damage, the current protection requirements and the status of case NM08188 are available to, and considered by, all relevant planning and regulatory decision-makers.

The point is not that the Department should prejudge a planning application or assume the outcome of any enforcement process. It is that a planning decision-maker should receive the relevant heritage context where development is proposed on lands affected by a documented monument-damage case.

The value of NMS's initial inspection and referral depends on clear follow-through. If recorded damage is omitted from later planning advice, and the community cannot establish the outcome of the damage case or the current safeguards for the monument, there is a risk that heritage protections will appear to have little practical consequence. That risks undermining

confidence in the deterrent effect of the National Monuments Acts and in the system intended to protect recorded archaeological heritage.

We respectfully request that NMS:

1. **Review this complaint** and explain why the Department's archaeological observations of 10 September 2026 did not refer to GA058-078, NM08188, the NMS inspection findings or Enforcement Notice EN25/202.
2. **Confirm whether the officer or officers preparing the planning observations had access to, or were made aware of, the NMS damage case and inspection report** before the observations were issued. If not, please explain what arrangements exist to ensure that NMS damage and enforcement records are considered when the Department responds to a planning referral involving the same lands.
3. **Confirm the present status of NMS case NM08188**, including, insofar as may lawfully be disclosed:
    - Whether the Service has reached a decision on action under the National Monuments Acts;
    - What continuing measures are considered necessary to prevent further damage to GA058-078; and
    - Whether any restrictions, advice or conditions have been communicated to the landowner, Galway County Council, the applicant or other relevant parties.
4. **Confirm the status of the archaeological report prepared for the landowner in connection with Enforcement Notice EN25/202.** We understand that the report recommends no remedial works, subject to NMS acceptance. Please confirm:
    - The date on which NMS received the report;
    - Whether it has been reviewed;
    - Whether NMS intends to accept, reject or seek further information on its recommendations; and
    - Whether NMS will undertake, or require, a further independent site inspection before accepting any conclusion that no remedial works are required.
5. **Confirm how NMS will ensure that the documented damage and the heritage-protection requirements for GA058-078 are brought to the attention of the appropriate planning decision-maker** in any appeal of planning application 26/61362, or in any subsequent application affecting the proposed Oakwood South substation, battery storage, grid connection or associated infrastructure. Where a formal submission is not procedurally available, we ask the Department to place the information formally on the relevant planning file by the appropriate route.

AMASS does not seek personal information about third parties. This complaint concerns the Department's own statutory functions, the interaction between its damage investigation and its planning advice, and the measures necessary to protect a Recorded Monument.

We ask that this letter be placed on file NM08188 and acknowledged as a formal complaint, with a named contact and reference number. Given the possibility of a planning appeal in relation to application 26/61362, and the ongoing relevance of the Oakwood South lands to proposed energy infrastructure, we request an initial response by **21 October 2026** on the matters requiring immediate clarification. We would also appreciate confirmation of the date by which a full response will issue.

Residents reported the damage, NMS documented it, and NMS's referral contributed to the Council's enforcement response. We now ask the Service to ensure that its own findings properly inform any future decision affecting the monument and the lands around it.

Is mise le meas,

Brendan Cronin
Chairman, AMASS

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