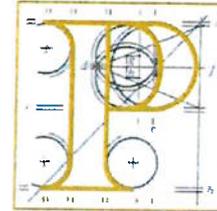


Our Case Number: ABP-318701-23



**An
Bord
Pleanála**

Teresa Fagan Chairperson of Lacken Ballycastle Protection Gr
Lacken Enterprise Centre
Banagher
Carrowmore- Lacken
Ballina
Co. Mayo
F26K2V4

Date: 26 February 2024

Re: 10 year planning permission for the proposed wind energy development consisting of 22 wind turbines and all associated infrastructure located in the townlands of Glenora, Altderg, Keerglen, Ballykinlettragh, Ballycastle, Ballyglass, Killeena, Glencullin and Lugnalettin, Co. Mayo. (www.glenorawfplanning.com)

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Lauren Murphy
Executive Officer
Direct Line: 01-8737275

PA04

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16th February 2024.

Lacken Ballycastle Protection Group,
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lackenballycastleclpg@gmail.com
Teresa Fagan (Chairperson of Lacken
Ballycastle Protection Group)

An Bord Pleanála,
FAO: Strategic Infrastructure Developments,
84 Marlborough Street,
Dublin 1.

Re: **CASE REFERENCE PA-16-318701**
10 Year Planning Permission for Proposed Wind Energy Development Consisting of 22
Wind Turbines and All Associated Infrastructure

Dear Sir/Madam,

We wish to make an observation on Case Reference PA16-318701 – Glenora Wind Farm, Co. Mayo. The fee of 50 euro enclosed.

Our group represents concerned locals that live within 5 km surrounding area of the proposed Glenora Wind Farm. The community have serious concerns about the impact of this proposed wind farm on the local area. We would like to make the following observations.

Impact on Visual Amenity

We observe that at 180m, these turbines will totally dominate the local landscape. Photomontage 3 view, point 3 of the application while demonstrating that the proposed turbines will actually be visible from historic site such as Downpatrick Head – the actual visual impact is significantly understated given the height and number of turbines proposed. Downpatrick Head is a vitally important tourist amenity for the north Mayo area, according to Mayo County Council there were estimated over 60,000 people visit the site in 2023. Downpatrick head is a signature point along the Atlantic way and was the chosen site of Red Bull for their world cliff diving event in 2021 which was broadcast to much acclaim on TV channels across the world showcasing the wonderful scenery the area has to offer. The wild Atlantic way and in particular Downpatrick head has raised the profile of our area and given hope for emergence of a sustainable tourist industry to flourish going forward. The presence of wind turbines and large-scale industrial development will seriously impact on the skylines, the visual and scenic amenities this area has to offer which are among the best in Ireland. The views from this site should not be allowed to be destroyed by the imposition of these turbines. In the records of meeting held by An Bord Pleanála (ABP315864-23 first meeting) the Bord representees “reminded the prospective applicants to be cognisant of the sensitive landscape of the area.”

Downpatrick Head is not the only historical site in the area that will be negatively visually impacted if the proposed development is allowed to go ahead. The windfarm is being proposed for a significantly historic area of Mayo, which includes the Ceide fields. The Ceide Fields complex takes in not only the immediate area around the interpretative centre but also as confirmed through various archaeological surveys the panoramic hill views of Rathlacken, Lacken Hill, Gallishill, suifinn and the Ballingen Hills all of which it has been established have the unique under the peat field systems from 6000 years ago and all unique to this area. The wind farm is being proposed for a significantly historic area of Co. Mayo, which includes the Ceide Fields. Given the size and scale of the proposed wind farm there will be an impact on the scenic views and historic landscape of Ceide – while the application suggests that the wind farm will have no impact on the historic site either visually or physically, Ceide has a vast site and area that has yet to be fully assessed and properly chartered and developments of such significant wind farms will only go towards the destruction of what has been a carefully preserved heritage and history down up until now. An Bord Pleanála should satisfy itself that the safeguarding of our national heritage is paramount at all times particularly with regard to the vulnerability of this archaeology to developments of this nature and the visual integrity of the area should be in keeping with its heritage.

The group makes the observation that the Bord should satisfy itself that all road infrastructure required for the transportation of the turbines does not negatively impact on any historical significant area particularly regarding any road widening areas surrounding the Ceide Fields environs. Also, on its proposed route to Glenora there are various historical monuments and ring forts whose vulnerability is also of concern to this group.

COVID Restrictions

The group makes the observation that the Bord should satisfy itself that all field works and studies were conducted in line with all COVID restrictions that were in place in Ireland during the period of March 2020 to January 2022.

On the 2nd of September 2020 letters were hand delivered to the local community regarding the project, which were in breach of covid regulations at the time. Consulting and public relations were none essential services due to restrictions, only county travel was permitted. It also did not state whether residents who received the hand delivered letter were informed that the number of turbines had increased from 16 stated on said letter to 22 in the planning application. If not then a full community engagement did not take place. In the Glenora community report they stated, that they communicated with the Westport/Belmullet Municipal District with regards an update to the development and the approach to the community benefit fund. As the proposed development encompasses two municipal districts, the second one being Ballina Municipal District. One would question as to why no communication was had with representatives from Ballina Municipal District with the same? A full engagement with council representatives of affected communities surrounding the windfarm development did not therefore take place.

Also while restrictions were imposed this should not reduce the level of onsite field work that the applicant should be required to carry out. Given that the proposed developments is largely on a peat site, on-site field work would be essential and desk surveys/audits would not be a sufficient replacement. We note that in minutes to meeting with An Bord Pleanála (ABP-310528-21 and ABP-310529-21) “that desktop constraints study has been undertaken,” the Bord needs to satisfy itself that this is entirely sufficient and appropriate given the area of sensitivity involved.

Impact on Western Way Trail

The group would like to make the observation that the proposed site “traverses” THE WESTERN WAY TRAIL” (which the group notes has been currently closed on the boundary of the proposed site) and as such the Bord must satisfy itself that the proposed development will not negatively impact this vital and attractive tourist amenity. The group would also bring to the boards attention the applicants proposed use of this trail for construction and site works as per the applicant’s application.

Cumulative Impact

We make the observation that Mayo County Council has a development plan which includes guidelines in relation to designated wind farm areas and the Bord should satisfy itself that the proposed development aligns itself with this development plan. It is our observation that a significant portion of the site is unzoned for wind farm development, while another portion is only open to consideration. As a community group we would be concerned about the cumulative impact that these wind farms have on our area, and while some of the turbines within this plan may perhaps be in the areas that Mayo County Council or even the Strategic Infrastructure Development Plan consider appropriate, it should be incumbent on the Bord to ensure that the overall cumulative impact on the inhabitants of the area are not so negatively affected that it would reduce their current living standard.

We make the observation that north Mayo area and the Ballycastle/Lacken area in particular, has seen increased applications in relation to wind farms and in the decisions that An Bord Pleanála make it should be cognisant on the overall impact of all the applications. Wind farms despite applicant best intentions have a negative impact on the scenery of the area. Currently the Lacken Ballycastle coastline is relatively undisturbed by industrial infrastructure, and the Bord should ensure that its decisions reflect the importance of both our historic, cultural, visual landmarks and coastlines. Once our areas are destroyed by the industrialisation of the wind that blows in our areas there will be no reinstatement of what has been lost.

Archaeology

We contend that the proposed wind farm development at Glenora has the potential to cause serious detriment to the precious, ancient archaeology of this area. We also contend that the Archaeology section of the application is inherently flawed and is not fit for purpose as we will demonstrate.

The Potential of the Glenora Fields

In its report, the applicant confirms that the Ceide Fields surveyed field walls measure merely 1km to the east of the nearest proposed turbine. In section 13.3.2.6, the applicant confirms that the Ceide Fields is such that further walls could potentially be uncovered during construction activities associated with the proposed development. There is a clear acknowledgement that previous, unrecorded archaeological finds/ features are located within the site and that these could be impacted by construction phase activity.

Potential of the Ceide Fields and Surrounding Areas for World Heritage Site Status

It is acknowledged worldwide that beneath the boglands of this area of North Mayo lies a system of fields, dwelling areas and megalithic tombs which together make up the most extensive stone age monument in the world. The stone walled fields, extending over hundreds of hectares, are the oldest known globally, older than the Pyramids and Stonehenge. The site has been described

as the most extensive Neolithic site in Ireland. For good reason the site was placed on the UNESCO's Worlds Heritage Tentative List. The intricate remains of our ancestors prehistoric farming lives, fields, cattle byres and burial tombs lie perfectly cossetted in peat around thousands of acres (not just the existing Ceide Fields Visitor Centre site) from Rathlacken in the east to Glenamoy in the west. This area also incorporates Ballinglen Hills including Suifinn/Annaghmore, Ballykinletteragh and Gunnane adjacent to Glenora and extend south to Blanemore Forest in Moygownagh which itself is 6 km south of Glennora. This clearly demonstrates the extent of this unique archaeology which is recognised by expert archaeologists as part of the Ceide Fields complex. Blanemore lies almost in direct line south of Glenora with much of its known archaeology and underfield systems lying beneath forestry which similar to Glenora was planted a number of years ago. The buried landscapes of North Mayo are iconic for Irish and European archaeology and an obvious candidate for World Heritage Site Status.

The Ceide Fields has earned massive international respect as an area of great cultural and archaeological significance; described by the New York Times as "A Pompeii in Slow Motion", by Seamus Heaney as a "sacred landscape fossilized" by Professor Richard Bradley of the University of Reading as "deserving the widest national and international acclaim "expressing his astonishment at the unparalleled sheer scale of the Ceide Fields".

The highly acclaimed English architect, Francis Pryor, best known for his discovery of the famous Flag Fen archaeological site near Peterborough and author of several books on archaeology summed up the Ceide Fields as follows, "it has always struck me as both odd and ironic that one of the earliest field systems in northern Europe was found at the extreme edge of the continent at the point where the last feeble ripples of the Neolithic wave of advance merged with the rolling swell of the Atlantic Ocean. The fields in question were discovered in Co. Mayo... What makes these fields so remarkable is their great antiquity; they have their origins in the fourth millennium BC and were used throughout the third. Can we match that in England? I only wish we could." (*Francis Pryor, Farmers in prehistoric Britain, (Stroud, Gloucestershire, 2006), p. 73*)

According to Professor Seamus Caulfield in his article, "Ceide Fields and Belderrig Valley, Four Score Years of Research" in the book Mayo History and Society (Moran & O Muraille), he describes the Ballyglass Neolithic House "as the most substantial neolithic house and the only multi-roomed house of the neolithic period known from these islands at that time. "He also states that in the townlands of Aghoo, Ballinglen and Ballykinletteragh, (adjacent to Glenora), stone walls were identified. In the same article Mr Caulfield states, "It seems reasonably plausible that the extensive tracts of forests in the area (which obviously includes the Glenora Forest) contains an extension of the Ceide Fields system of stone walls." This is clear evidence from the esteemed Professor, who is the leading authority in the area, that the Glenora Site contains the Ceide Fields network of stone walls. Considering this fact, it is our strong contention that it would be unconscionable and constitute cultural and archaeological sacrilege to grant planning permission for a large windfarm in a location that almost certainly constitutes an extension of the Ceide Fields and shares its incalculable and priceless heritage. The proposed development will clearly have a detrimental impact on the archaeological and cultural heritage of the area and therefore would not be in accordance with proper planning and sustainable development of the area.

The North Mayo Boglands constitute an open-air laboratory with a unique, natural human history archive contained within them. This ancient, pristine, unadulterated treasure trove of monuments in an area of great cultural heritage significance is well worthy of World Heritage Status and demands to be protected by the appropriate organs of the state.

It is our belief that in any other jurisdiction other than Ireland absolutely no large wind farm would be countenanced in such close proximity to such a culturally significant heritage site.

The archaeological monuments of North Mayo in this location represent a living manuscript of changes over a period in excess of six thousand years of human habitation covering all periods from the Mesolithic Age to the current times. Past generations of its inhabitants have bequeathed a rich and rare heritage, and this and future generations can pass on no greater legacy to posterity than to leave untouched the many fine archaeological treasures including those still lying dormant under our precious boglands that adorn the areas landscape.

In circumstances wherein archaeological excavations prove that the under-bog system of stone fields extends to Rathlacken in the east and Blanemore to the south, it is more probable than possible that the Glenora site contains the self-same system. For example, extensive stone-wall field systems, in association with megalithic tombs have been discovered and surveyed in Rathlacken and adjoining areas to the east. (Greta Byrne, 2018: Ballycastle/Lacken). For the applicant's archaeological report to avoid highlighting the significant archaeology of Rathlacken, Blanemore and other adjacent areas, germane to the application, is at best disingenuous and, at worst a misrepresentation. We attach the archaeological field survey map, which demonstrates the relevant excavations.

It is our contention that the applicant had a duty of care to have arranged proper archaeological excavations to have been carried out before making this strategic infrastructure application especially in circumstances wherein they concede that "further walls could potentially be uncovered during construction activities associated with the proposed development" and also in circumstances wherein the Glenora site is adjacent to the Ceide Fields site. Construction activity on such an industrial scale would not be tolerated in other jurisdictions on sites of this importance and the wording used by the developer is a matter of concern to this group. Furthermore, we believe it contravenes all European regulations and directives regarding the identification and protection of our national monuments and the responsibilities placed on member states to ensure the safeguarding of our national heritage. The unique archaeology of the Ceide Fields complex must be explored and surveyed by expert archaeologists only and is deserving of a similar status to Pompeii; thus, ensuring all works are carried out by the subject experts as a work in progress for generations to come. This group contends that the sites identification and their surrounds should be preserved in their current state so as to ensure no further damage occurs to our rich and unique heritage.

Ballyglass Megalithic Court Tomb and House

The applicant, in its Archaeology Report, has virtually ignored the archaeological status and significance of the Ballyglass Megalithic Court Tomb and House. This monument is located near the Ballyglass Road, which is the designated route access for the entire proposed Glenora development. Thousands of tons of steel iron, and concrete, and tens of thousands of litres of oil will potentially pass by within metres of this outstanding monument. Mass movement of heavy vehicles has the potential to cause serious harm to the archaeology of the area. This significant monument has been the subject of considerable research in the past and is also subject to ongoing research by the UCD School of Archaeology and the National Museum of Ireland.

Excavations at Ballyglass in 1970 by the leading archaeologist of that time, Sean O Nuallain, uncovered a court tomb from the neolithic period. A rectangular timber multi roomed neolithic house was also uncovered beneath the tomb. The house dates from a considerable earlier time

than the tomb, although both are estimated by archaeologists to be roughly 3,000 BC. According to Bernard Wailes in Irish Archaeology Vol 16, No 3 (Originally Published 1974) "The house was one of a very few neolithic house known to archaeologists in the entirety of Ireland and Great Britain". As a result, the discovery was very important. Mr Wailes opined further "This site discovery clearly shows the enormous potential for further research under the blanket bogs of North Mayo. According to Sean O Nuallain, the tomb was of central significance as "for the first time, we have uncovered houses used by tomb builders ". The Ceide Fields interpretive centre contains an impressive diorama, a scale model of the Ballyglass house, which gives a poignant and revealing glimpse of our ancient prehistory.

Ballyglass Court Tomb and House have been the subject matter of several academic articles testifying to its importance. For example, Jeccica Smyth, in an article: "House of the Living. House of the Dead. An Open and Shut case for Ballyglass" points out the uniqueness and central importance of the discovery in archaeological terms. She also states that the area around Ballyglass brings an important dimension to the site and in interpreting its trajectory " Ballyglass forms part of an extraordinary dense cluster of thirty court tombs in the surrounding area." Sean O Nuallain in Irish Archaeology Vol 21, No 3 (Originally published 1979) also highlights the unusual highly concentrated number of court tombs more so than in any other part of the country in the region of Bunatrahair (Ballycastle) Bay. The applicant's archaeology report fails to highlight this important and self-evident fact and crucially and negligently, in our opinion, fails to attribute any archaeological significance to it.

The Ballyglass Archiving and Publications Report by leading UCD archaeologists received funding under the 2022 Royal Irish Academy Archaeology Legacy Grant Scheme to enable access of the site to the National Museum of Ireland. It is anticipated that this access will occur later this year.

Proposed Site Delivery Route

Another issue of note is that the proposed delivery route of the turbines and blades is along the North Mayo Coast Road. In this regard it will be necessary for the delivery to navigate the extremely acutely narrow hair pin bend at Glenlossera which as it presently stands is difficult for ordinary trucks / heavy vehicles to pass. No information has been given by the applicant as to how this feat of intrinsically tight navigation can be accomplished, and /or how much road widening/acquisition of land will be required and what the potential archaeological implications of this would be.

UNESCO Heritage Tentative List

At a number of areas, the Archaeology report states that no UNESCO World Heritage Site or those on the Tentative List are located in or in close proximity to the proposed development and that the nearest such site is 55km away at Carrowkeel in Sligo. Astonishingly, the report fails to highlight the great significance of the fact that the very site in question, Glenora, as part of the Boglands of North and West Mayo/Ceide Fields was on the UNESCO Tentative List between 2010 and 2022.

In its County Development Plans 2014 to 2020 and 2022 to 2028, Mayo County Council sets out as one of its core objectives to:

"Protect the tentative World Heritage Site in Mayo on the UNESCO Tentative List – Ireland 2010, The Ceide Fields and Boglands of North and West Mayo from inappropriate development and support its nomination to World Heritage Status."

It is manifestly evident that Mayo County Council failed in this objective and for whatever unknown reason failed to respond to correspondence from The Department of Housing and Heritage or to ensure that an application was lodged to maintain the Ceide Fields and Boglands of North and West Mayo on the tentative list. The Council appears to blithely indicate that there was not sufficient local support but have not provided a scintilla of evidence to validate this. There is no evidence to suggest that Mayo County Council took any real meaningful action or steps to garner community support or indeed to engage constructively with the local community to protect the status of the site, in clear and blatant contradiction of its own stated objectives.

In the event that the UNESCO status had been retained as it ought to have, then the application for a wind farm development in Glenora would be redundant.

It is the duty of An Bord Pleanála to uphold the principles of good planning and to promote sustainable development. In this regard, the Bord must establish unequivocally the real reasons why Mayo County Council failed in its stated objective of protecting the tentative World Heritage Site Status of the Ceide Fields and what steps, if any, it is now taking to have the status restored. In the context of our cultural heritage, the Ceide Fields is the oldest known and established archaeological site in the North West. We have clearly set out in this submission its inestimable and incalculable cultural and heritage value. In that capacity and in the context of the Wild Atlantic Way tourism promotion, it features regularly in local, national and international tourism promotion. With its proximity to Downpatrick Head and at a pivotal position on the Wild Atlantic Way, it is nothing short of sacrilegious and cynical to consider that the status of the Ceide Fields and the surrounding areas could be so flippantly ignored and ceded, in order to facilitate the development of an industrial scale wind farm in an unsuitable area. On account of the seriousness of this issue and the enormous consequences of the decision of Mayo County Council not to retain the UNESCO Heritage status, we are committed to seeking a judicial review in the event that planning permission is granted to the applicant.

Peat Movement and Instability

There is evidence of previous peat slides at the location of the proposed wind farms. As a result, we have serious concerns of future slides which could potentially cause considerable degradation to the environment.

Peatland environments are the Earth's largest terrestrial carbon store and act as carbon sinks. It is widely known in scientific circles that the development of wind farms on peat lands is affecting their morphology, hydrology, ground-level climate conditions, carbon functions and vegetation. As a result, it is critical that the long-term consequences of this need to be assessed in the context of the proposed development. As we have seen in the Derrybrien fiasco, establishing large wind farms on peat land is highly risky and has the potential to cause serious damage. To-date there has not been any proper scientific assessment of the long-term impact of wind farms in peat land areas to ensure that efforts to meet energy targets result only in carbon sequestration and do not jeopardize eco system services. Peat lands such as those in north Mayo represent a particularly vulnerable habitat which need to be protected. The Irish government, in its headlong rush to speed up renewable energy, have not taken any steps to properly assess the current extent of blanket bog wind farms developments in order to minimise the impact on this protected and recognised habitat and to inform site selection to prevent further degradation of natural carbon storage and carbon sinks in the pursuit of green energy.

In the scientific report "The Extent of Wind Farm Infrastructure on Recognised European Blanket Bogs" by Guaduneth Chico, T Clewer and others it states : "Due to the recent European Union policy changes that promote renewable energy and aim for carbon neutrality by 2050, there is a need to report the current extent on wind farm developments on blanket bogs and to assess further the implications and long-term impacts that these developments have on peat lands."

Scientific evidence supports the negative impact of windfarm developments on the critical habitat of peatlands.

Despite several researchers highlighting the importance of excluding vulnerable peat land eco systems in future developments, new areas of wind farms have been built in Ireland affecting further recognised blanket bogs.

"The lack of recognition on blanket bog habitat in combination with the promotion of wind energy production across the island of Ireland could affect further areas of blanket bogs, increasing the degradation of blanket bogs. An urgent review of inventories needs to be promoted in both countries, the Republic of Ireland and Northern Ireland, to fully assess the impact of the extensive areas of wind farms across the whole island." Chico, Clewer & Others: (As Above). Regrettably, no such review has been carried out.

Granting permission to the Glenora Development would represent an unacceptable level of risk of peat slides and despoilation of the natural environment.

Landslides

The group makes the observation that the Bord should ensure that sufficient consideration is given to the volatility and instability of the proposed site. There is documented evidence of significant landslides in the area, of and surrounding the proposed site. We would draw your attention to www.gsi.ie which has records of landslides in the area and also to the local newspaper articles i.e. The Western People which details landslides that have occurred. In the minute with An Bord Pleanála (ABP-310528-21 and APB-310-529-21) "buffers have been created around" historic landslide areas but our group would question both how are these "buffers" going to be continuously monitored. We also note that another peat slippage event occurred on site on November 2022. The Bord must ensure that given the volatility of the peat land that the measures the applicants are proposing are sufficient for not only the extent of the proposed development but also post development activities.

The group makes the observation that given the increase in rain fall levels in the north west area, consideration should be given to the impact of this increased rain and subsequent water level on these peat lands and therefore the volatility of same.

The group note that regardless of the modelling applied in relation to measuring the risks for peat slippage it is the amount of rainfall into the future which ultimately impacts the potential for major events to happen. It is a fact that rainfall levels have and are increasing with regards to climate change and this can be seen already in the increased flooding in the Ballinglen areas. The fact major slippage events have occurred in the Glenora area should not be ignored.

The Power imbalance Issue

It is unfortunate regarding major strategic infrastructural wind development's that it is the wind farm companies/developers who directly engage the environmentalists and other professional experts who produce these crucially important and critical reports on the proposed development. In an ideal world these reports would be comprehensive, neutral and unbiased and favour neither the wind farm company nor the local community. However, in the real world, individuals and communities have not the resources financially or otherwise to employ the level of expertise necessary to put their case forward and advocate on their behalf. This very often puts them in a very dis-advantageous position from the outset and it generally considered by them that important information that is unfavourable to the company/developer results may be overlooked, omitted, or indeed minimised by the agents employed directly by the developer. Therefore, communities are also placed at a significant disadvantage when faced with evaluating these voluminous complex reports having to do so by themselves without access to professional advisors. This is due to the fact that environmentalists, ecologists, engineers, etc often find themselves working directly or indirectly for wind farm companies and are therefore reluctant to act for communities, as it may negatively impact on their own careers despite often agreeing in principle with the communities' concerns. Lay people with no formal training or expertise then find themselves scrambling to try to deal with complex issues that are negatively impacting their environment and their quality of life. It is only fair and equitable that this major power imbalance should be factored into the considerations and decisions of the adjudicator.

We as a group look forward to your response to our observations.

Your faithfully,

Teresa Fagan (Chairperson of Lacken Ballycastle Protection Group)

Beltra,

Carrowmore lacken,

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F26 KD7Y

