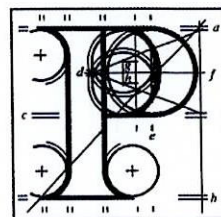


Our Case Number: ABP-313892-22



An
Bord
Pleanála

Anna Lalor
13 The Waxworks
Rathborne Village
D15 YX92

Date: 21 July 2023

Re: Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme
Blanchardstown to Dublin City Centre

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 note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

AA02

Teil	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhride	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Anna Lalor

Eimear Reilly

From: LAPS
Sent: Tuesday 11 July 2023 12:49
To: Eimear Reilly
Subject: FW: Bus Connects Blanchardstown to City Centre Ref ABP-313892-22
Attachments: 202307 BusConnects ABP 313892 22.pdf

From: [REDACTED]
Sent: Monday, July 10, 2023 5:04 PM
To: LAPS <laps@pleanala.ie>
Cc: Bord <bord@pleanala.ie>
Subject: Fwd: Bus Connects Blanchardstown to City Centre Ref ABP-313892-22

Dear Sir/Madam

Please find my submission below which I had sent to the general email address yesterday but am now sending the the laps address following a phone call to you earlier.

Many thanks

Kind regards

Anna

----- Forwarded message -----

From: [REDACTED]
Date: Mon, 10 Jul 2023 at 00:24
Subject: Bus Connects Blanchardstown to City Centre Ref ABP-313892-22
To: <bord@pleanala.ie>

Dear Sir/Madam

I was invited to to make a further submission in relation to the Bus Connects Blanchardstown to City Centre scheme (ABP-313892) under section 217B of the Planning and Development Act 2000, as amended.

I have taken the opportunity to do so and attach my submission.

Could you let me know if you also require a hard copy of my submission, noting that the closing date for submissions is 12 July and I would need to send it by post?

Kind regards

Anna

Eimear Reilly

From: LAPS
Sent: Monday 10 July 2023 10:26
To: Eimear Reilly
Subject: FW: Bus Connects Blanchardstown to City Centre Ref ABP-313892-22
Attachments: 202307 BusConnects ABP 313892 22.pdf

From: SIDS <sids@pleanala.ie>
Sent: Monday, July 10, 2023 9:47 AM
To: LAPS <laps@pleanala.ie>
Subject: FW: Bus Connects Blanchardstown to City Centre Ref ABP-313892-22

From: Bord <bord@pleanala.ie>
Sent: Monday, July 10, 2023 9:44 AM
To: SIDS <sids@pleanala.ie>
Subject: FW: Bus Connects Blanchardstown to City Centre Ref ABP-313892-22

From: [REDACTED]
Sent: Monday, July 10, 2023 12:25 AM
To: Bord <bord@pleanala.ie>
Subject: Bus Connects Blanchardstown to City Centre Ref ABP-313892-22

Dear Sir/Madam

I was invited to to make a further submission in relation to the Bus Connects Blanchardstown to City Centre scheme (ABP-313892) under section 217B of the Planning and Development Act 2000, as amended.

I have taken the opportunity to do so and attach my submission.

Could you let me know if you also require a hard copy of my submission, noting that the closing date for submissions is 12 July and I would need to send it by post?

Kind regards

Anna

Anna Lalor
13 The Waxworks
Rathborne Village
Ashtown
Dublin 15
D15 YX92

Eimear Reilly
Executive Officer
An Bord Pleanála
64 Marlborough St
Dublin 1
D01 V902

Re: Bus Connects Blanchardstown to City Centre – ref ABP-313892-22

Dear Eimear

I welcome the opportunity to make a further submission in relation to the Bus Connects Blanchardstown to City Centre scheme (ABP-313892) under section 217B of the Planning and Development Act 2000, as amended.

Firstly, I am supportive of Bus Connects and other measures to reduce car use and make high quality public transport a more viable mode of travel, alongside active modes of travel.

However, I do not feel that genuine consideration has been given by the NTA to genuine concerns and observations made by myself and others based on the content I have read in its response to all submissions on the application site¹. The responses I have reviewed appear to reiterate and repeat the contents of the consultation documentation, offering limited new information and no remedies. Therefore, I believe that An Bord Pleanála needs to require changes to the plan, where relevant, by the National Transport Authority (NTA).

I ask An Bord Pleanála to exercise its powers under section 217B paragraph 4(b) of the Planning and Development Act 2000 (as amended) to notify the NTA of the following alternations necessary in order for the scheme to be approved:

1. To achieve significantly reduced tree removal or significantly increased replanting along the Navan Road from the entrance to Kempton to Skreen Road so that the number and placement of trees is consistent with Design Manual for
2. Urban Roads and Streets (DMURS) guidance of at least every 14-20 meters apart².
3. Where replanting is the chosen option that a diversity of trees are planted, while disease susceptible trees such as Sorbus Aria are avoided.

¹ <https://www.pleanala.ie/en-ie/case/313892>

² Section 4.2.2 https://www.dmurs.ie/files/ugd/f378bf_2ba506a453e64283a97b3a1d5c5bc7ad6.pdf

4. That signs approaching the junction of the Navan Road and Castleknock Road at Ashtown (as per drawing BCIDC-ARP-TSM_GA-0005_XX_00-DR-CR-0021³) from the west, east and south include directions to the areas of Rathborne and Royal Canal Park which are situated to the North of the Navan Road at that junction.

I have provided below each of the issues I raised in my initial observation made in December 2021, the NTA response⁴ to each and follow up observations for each, where relevant.

Grounds for initial observation:

My observations focused on four aspects of the proposed scheme:

- Loss of trees on the Navan Road between Ashtown Road and Old Cabra Road
- Inclusion of relevant signage on approach to Ashtown Road directing to the areas of Rathborne and Royal Canal Park
- Potential for traffic to divert onto Skreen Road - Improvements to pedestrian and cycle crossing at Ashtown Road/Navan Road and the entrance to the Phoenix Park at Ashtown gate.

Permanent loss of trees on the Navan Road between Ashtown Road and Old Cabra Road

December 2021 submission

I recognise efforts to plant trees where there are areas of greater free space. However, believe that greater efforts need to be made to retain or replace existing trees. In particular I note the significant loss of trees on the Navan Road between Ashtown Road to Old Cabra Road, particularly on the south side of the road⁵.

The Design Manual for Urban Streets (DMURS) 2019⁶ highlights that “street trees are an integral part of street design as they contribute to the sense of enclosure, act as a buffer to traffic noise / pollution and enhance place. A traffic-calming effect can also be achieved, where trees are planted in continuous rows and their canopies overhand, at least in part, the vehicular carriageway. ...

The planting of trees should be considered as an integral part of street design. In general the size of the species selected should be proportionate to the width of the street. ...

To be effective, trees should be planted at intervals of 14-20m. This may be extended to facilitate the installation of street facilities, such as lighting. Designers should also consider the impact of

³ [https://www.pleanala.ie/publicaccess/EIAR-NIS/313892/Supplementary%20Information/Preliminary%20Design%20Report%20\(PDR\)/Appendices/Appendix%20B8%20-%20Traffic%20Signs%20and%20Road%20Markings.pdf](https://www.pleanala.ie/publicaccess/EIAR-NIS/313892/Supplementary%20Information/Preliminary%20Design%20Report%20(PDR)/Appendices/Appendix%20B8%20-%20Traffic%20Signs%20and%20Road%20Markings.pdf)

⁴ <https://www.pleanala.ie/publicaccess/Responses/313892/Blanchardstown%20CBC%20-%20NTA%20response%20to%20ABP%20submissions.pdf>

⁵ See

- pages 26-30 <https://blanchardstownscheme.ie/wp-content/uploads/sites/6/2022/06/5.-Landscaping-General-Arrangement-2.pdf>
- pages 15-16, 23-24, 31-32 and 35-36 <https://blanchardstownscheme.ie/wp-content/uploads/sites/6/2022/06/Figure-17.2-1.pdf>

⁶ https://www.dmurs.ie/_files/ugd/f378bf_583444499f9f4095aaa4d5e05c3cf4b2.pdf

root growth. Tree roots may need to be contained within individual tree pits, continuous soil planting strips or using other methods to restrict growth under pavements/towards services.”

The Dublin City Tree strategy 2016-2020⁷ also highlights the importance of trees in the city where they provide the following eco-system services, including:

- Shading and cooling
- Storm water attenuation, where they help to reduce localised flooding;
- Improving air quality
- Biodiversity and habitat
- Storing carbon
- Physical and mental wellbeing
- Aesthetic and improved property values
- Energy saving for adjacent buildings”

Other benefits identified in other research include increased preference for walking, as well as a protective barrier effect for pedestrians on footpaths.

In particular from in the context of climate change, the following features are particularly important when it comes to tree lined streets:

- climate resilience - water attenuation and shading and cooling
- climate transition - encourages walking and cycling vs car use for local journeys

In addition, DMURS places pedestrians, followed by cyclists and then public transport at the top of the road user hierarchy. The removal of trees to facilitate public transport, could reduce the incentive for pedestrian and cycle travel, particularly for local trips, as the shading and protective benefits of trees would not be available.

The current trees along this route have co-existed with the utilities under the pavement to date and the emphasis in DMURS is on co-existence rather than prioritising utilities over trees. Indeed, the Dublin City Tree Strategy highlights the need to protect trees when work is being undertaken by utility providers. Where a significant conflict is determined to exist, between utilities and existing or proposed trees an alternative to tree removal or non-replacement of trees would be to move utilities under the road rather than footpath.

I note that along the Navan Road where replanting does occur, that there is little diversity with many trees being Sorbus Aria Majestica White Beam. A feature of the Dublin City Tree Strategy is for greater diversity of trees in the city to encourage resilience to disease, which is becoming a greater issue with climate change.

NTA response

Responses are provided in section 2.2.3 and 2.8.3 of the report which combines a response to a number of submission.

Excerpts from 2.2.3 regarding loss of trees

1. Table 14.1 of the Preliminary Design Report in the Supplementary Information notes that there will be 793 new trees planted, along with 0.96 ha (9,600 m²) of woodland trees,

⁷ https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-08/Dublin_City_Tree_Strategy_2016-2020.pdf

resulting in an overall net increase of 92% in individual trees and 2.9% of woodland trees as a result of the Proposed Scheme.

2. As shown on the Landscape General Arrangement drawings in Volume 3 of the EIAR, it is noted that approximately 230 street trees are proposed between Parkway station and Navan Road / Old Cabra Road junction, with the proposed removal of approximately 180 street trees, resulting in a net gain of approximately 50 trees along this section of the Proposed Scheme. Approximately 190 trees are being retained along this section.
3. Figure 2.2.23 shows the proposed view from Navan Road looking northeast along the road from the southern side of the road at the entrance to St Vincent's Centre, which is visible in the foreground. The primary changes in the view are the widening of the road corridor to the north, realignment of garden boundaries, loss of verges and street trees. There is a change to the St Vincent's entrance in the foreground with the replacement of the existing bitmac surface with concrete block paving, and a segregated cycle tracks has been added to each side of the road.

Trees are lost to both sides of the road, however, there is some replacement street tree planting to the north side of the road. **There is an overall reduction in the visibility of vegetation in the view and the built elements become more visually dominant. There is a substantial negative change to the character and visual amenity of the view.**

July 2023 – further comments

Again, I welcome that overall there will be an increase in trees along the BusConnects route. However, the NTA choice of the stretch of road for which statistics were provided in its response to highlight tree planting from Parkway station downplays the extent of tree removal along footpaths on the Navan Road between the Halfway House and Old Cabra Road. About 60% of the 230 trees mentioned in the NTAs response are proposed to be planted between Navan Road Parkway and the current Ashtown Roundabout (sheets 18-21⁸) or are not directly along the footpath where existing trees will be removed. Within the current proposals, the 2.5km segment of the Navan Road between the Halfway House and Old Cabra Road will have a significant amount of tree removal, with limited replacement trees (sheets 22 to 27).

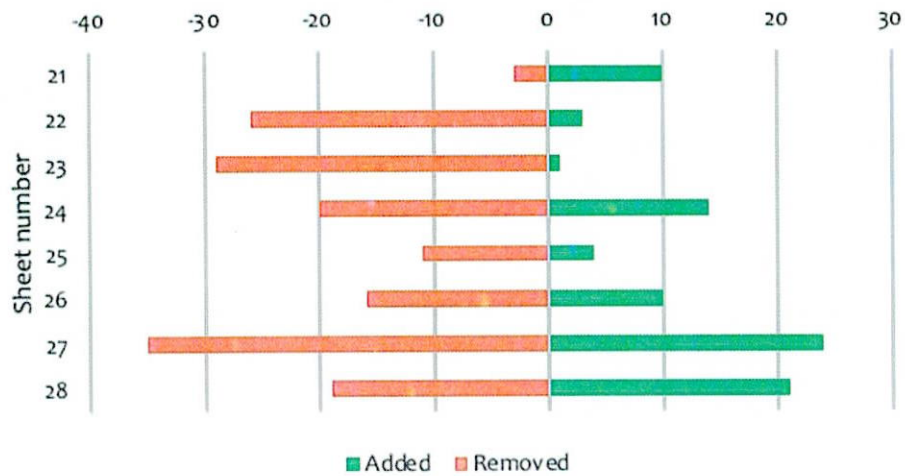
This part of the BusConnects route is expected to have 38.5% of tree removal for the whole scheme but only 11% of replacement tree planting⁹. The issue is particularly severe for the south side of the Navan Road where I estimate 84 trees are planned to be removed but only 20 replaced (a 76% reduction), with replanting concentrated outside the Belvedere sports grounds and outside the Eir premises near Hampton Green. See annex 2 for a summary of the relevant maps.

The significant impact of the loss of trees has been recognised by the NTA in relation to sheet 23/23 at least (see above regarding figure 2.2.23), however, no additional efforts to mitigate the impact have been proposed.

⁸ [https://www.pleanala.ie/publicaccess/EIAR-NIS/313892/Supplementary%20Information/Preliminary%20Design%20Report%20\(PDR\)/Appendices/Appendix%20B5%20-%20Landscaping%20General%20Arrangement.pdf](https://www.pleanala.ie/publicaccess/EIAR-NIS/313892/Supplementary%20Information/Preliminary%20Design%20Report%20(PDR)/Appendices/Appendix%20B5%20-%20Landscaping%20General%20Arrangement.pdf)

⁹ Analysis focuses on roadside planting and excludes clusters of trees away from the road.

Tree removal and replacement



Sheet	Navan Rd segment	Net gain/(loss)	Estimated distance	Comment
21	Portion – Ashtown roundabout to no. 385 Navan Rd	7	90m	
22	No. 383 Navan Rd, near Kempton entrance to 367 Navan Rd, before Ashtown Grove entrance	-23	350m	
23	365 Navan Road, before Ashtown Grove entrance to 305 Navan Rd	-28	330m	
24	303 Navan Rd to 243 Navan Rd, after Kinvara Ave/Baggot Rd junction	-6	350m	Most planting on North side of Rd
25	241 Navan Rd to 175 Navan Rd, after petrol station	-7	330m	Planting on South side of road
26	173 Navan Rd to Garda Station after Nephin Rd junction	-6	350m	All planting on North side of road
27	Garda station to Hampton Green entrance	-11	390m	Planting mainly on North side except near Hampton Green
28	Hampton Green entrance to Old Cabra Rd junction	2	350m	All planting on North or centre of road with 8 trees removed from South side
	Total	-72		


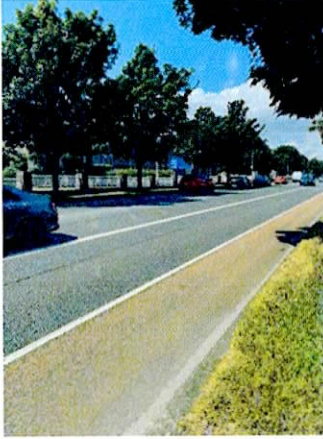

The following stretches of road, under the current plan, would have a significant change in their character and would appear to be completely mis-aligned with stated policy objectives under DMURS in relation to street trees. If implemented as planned, it is likely that people along the route would be more likely to use their cars rather than walk or cycle and would lose the positive impacts in terms of air quality, shade, mental wellbeing and safety when using the road:

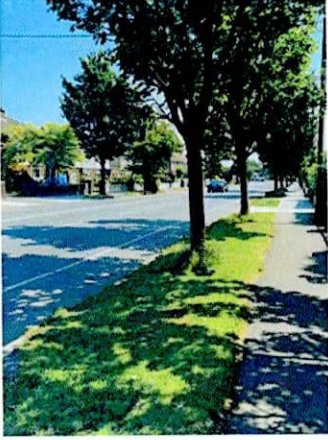
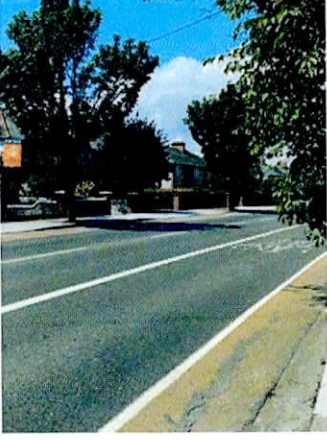
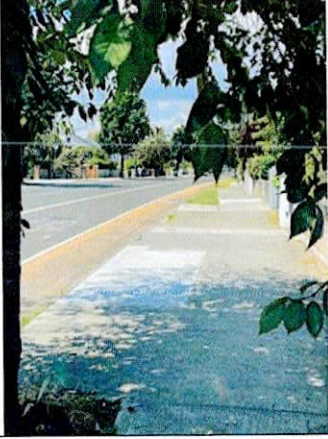
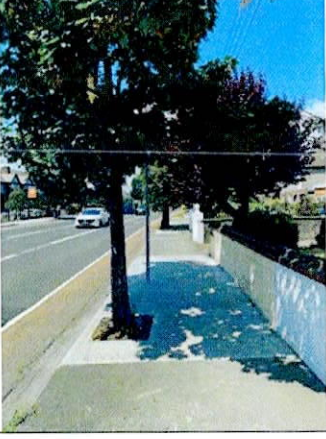
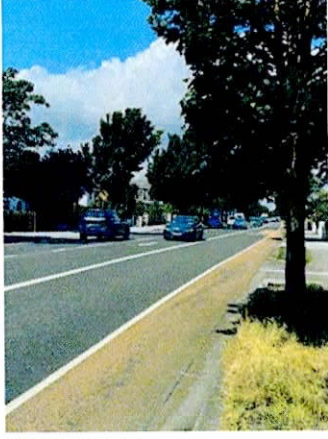
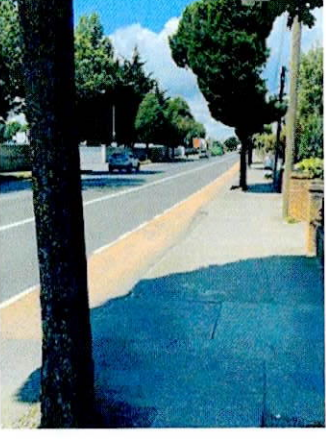
- Kempton entrance to Kinvara Ave/Baggot Rd junction, in particular the South side of the road where there is no new replacement tree planting
- Garda station to Tesco, on the South side, bar planting away from the path near the entrance to Hampton Green
- Parts of the North side of the road between Kinvara Ave junction and 157 Navan Rd

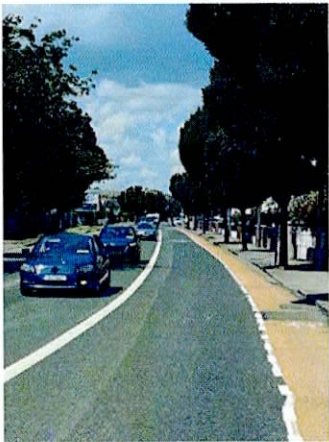
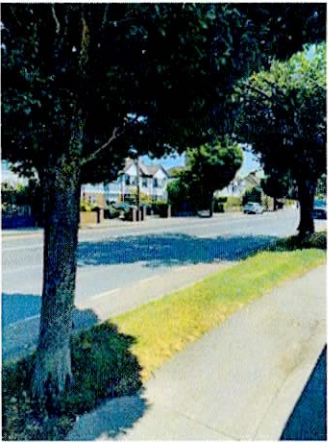
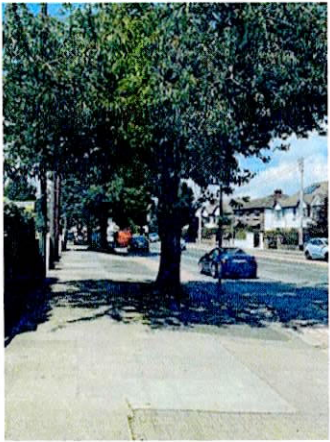

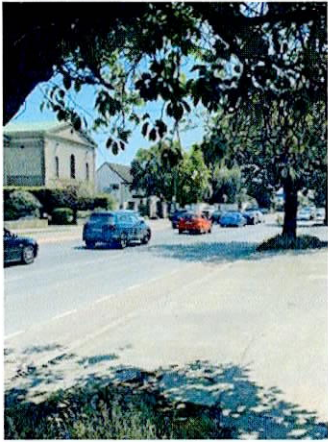

Many of the photomontages for the proposed view within the NTA response include images of double decker buses that obscure the view and do not make it clear whether there would be replacement trees behind where the bus is shown – e.g. Figures 2.2.27, 2.2.29, 2.2.31, 2.2.33 and to a lesser extent Figures 2.2.23 and 2.2.25.


As an alternative to the photomontages presented by the NTA, photos of current trees along segments of the Navan Road are provided below. All of these trees are proposed to be removed with most not replaced. These pictures also demonstrate the benefits of the trees in terms of:

- Shade
- Barrier to the road
- Visual amenity

Sheet	Read left to right	
23	<p data-bbox="523 891 649 922">North side</p>  <p data-bbox="413 1364 766 1395">South viewed from North side</p> 	<p data-bbox="1031 891 1157 922">South side</p>  

Sheet	Read left to right	
23 / 24	<p data-bbox="519 255 649 286">South side</p> 	<p data-bbox="915 255 1276 286">South viewed from North side</p> 
24	<p data-bbox="523 831 653 862">North side</p> 	
Both sides		
		

Sheet	Read left to right	
24/25	<p data-bbox="519 253 649 286">North side</p> 	
25	<p data-bbox="519 824 649 857">South side</p>  	 <p data-bbox="1031 1301 1161 1335">Both sides</p> 

Sheet	Read left to right	
		

I reiterate the observation from my original submission that **utilities need to co-exist, not take priority over trees** and the need to meet DMURS objectives in relation to street trees. I also recognised other submissions quoted by the NTA in their response:

- “A submission suggested that due to the limited lifespan of utility services, notably natural gas, An Bord Pleanála (ABP) should rule it inadmissible to use utilities as a reason to exclude tree planting or remove existing trees.”
- “Submissions affirmed that due to trees having a lifespan of several hundred years it is more important to place trees in the right location or keep them in their current locations and divert the utilities locally to facilitate tree planting especially where the utility involved has a limited life such as natural gas.”

In relation to **diversity of trees in order to encourage resilience to disease** I note that the predominant species that has been selected for replacement of removed trees along the Navan Road between the entrance to Kempton Estate and Cabra Garda station (1.7km) is Sorbus Aria Majectica or Whitebeam. Sorbus Aria is vulnerable to fireblight. In July 2022, an outbreak of fire blight, largely in Sorbus Aria, resulted in a decision by Dublin City Council remove and destroy 113 trees in Riverston Abbey which is adjacent to the section of the Navan Road¹⁰ where the concentration of replanting with Sorbus Aria is proposed. This is also relevant for the whole scheme, where diversity of trees is critical to their longevity, in particular where replacing healthy mature trees.

Directional signage approaching the junction of Navan, Ashtown and Castleknock Roads

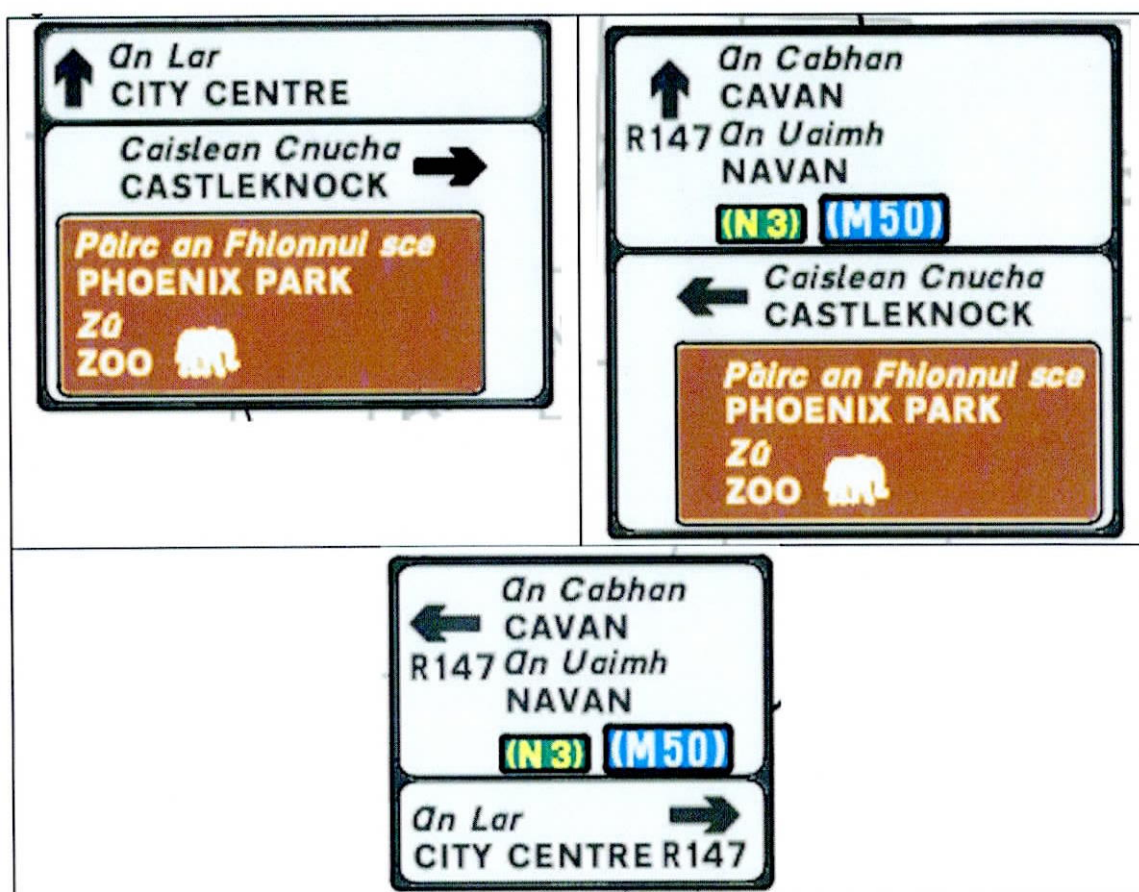
December 2021 submission

I note that directional signage approaching the junction of Navan Road, Ashtown Road and Castleknock Road does not make reference to the areas of Rathborne and Royal Canal Park which are accessible via Ashtown Road¹¹. With a population of close on 6,000, which will rise above this based on current planning permissions, it is important that Rathborne and Royal Canal

¹⁰ <https://www.dublincity.ie/residential/parks/news-and-events/fireblight-outbreak-riverston-abbey-ashtown-dublin-7>

¹¹ Page 23 <https://blanchardstownscheme.ie/wp-content/uploads/sites/6/2022/06/8-Traffic-Signs-and-Road-Markings-1.pdf>

Park are included on relevant signage. It may also be relevant to include Ashtown train station on these signs¹².



NTA response

The proposed directional signage on approach to the Ashtown junction will match existing signage, i.e., Cavan, Navan, City Centre, Castleknock and Phoenix Park.

July 2023 – further comments

No rationale has been given by the NTA for their refusal to include Rathborne and Royal Canal Park on relevant signage.

As of the 2016 census there were 4,778 people living in the area¹³. The 2022 census, for which small area statistics are not yet available, noted a 1,446 increase in those living in the Ashtown A electoral division¹⁴ and it is reasonable to assume that most of this growth has been in Rathborne

¹² Similarly for Navan Road Parkway station for which there is no road signage – see pages 19 and 21 at above link.

¹³ <https://data.cso.ie/table/SAP2016T1T1ASA> (small areas: 267041015, 268006020, 268006031, 268006040/02, 268006029, 268006027, 268006028, 268006032, 268006039, 268006038, 268006040/01, 268006024, 268006025, 268006026, 268006021, 268006022, 268006023, 268006033, 268006035 and 268006034).

¹⁴ <https://data.cso.ie/table/FP009>

and Royal Canal Park given significant new development since 2016, while there has been no new development in the rest of the electoral area which is more mature. Therefore, the population of Rathborne and Royal Canal Park can be reasonably estimated to be in the region of 6,200, similar to Westport or Kells. With further housing completions in the past year and planning permission for a number of additional high density apartment blocks under the strategic housing development process, the number of additional homes is close to 1,000¹⁵. Assuming a conservative 1.5 occupants per house / apartment would increase the population further to 7,700. This would mean the area would have a population equivalent to Monaghan or Lusk.

It is inconceivable that Westport, Kells, Monaghan or Lusk would not have signage to direct road users towards them. Therefore, it is difficult to understand the logic behind the NTAs refusal to include Rathborne and Royal Canal Park on relevant road signage on the Navan Road as part of the BusConnects Scheme. See annex 1 for a list of towns with a population of between 2,000 and 7,000.

I would note also that when this issue was raised with Dublin City Council at the Navan Road / Pelletstown Community Policing Forum in 2016 it was highlighted that it would be addressed once the BusConnects scheme happened.

Skreen Road – traffic and speed limit

December 2021 submission

I have some concerns that changes to traffic patterns resulting from the closure of Old Cabra Road and much of Stoneybatter to car traffic could result in greater use of Skreen Road by traffic. I suggest that the road be changed to 30km an hour speed limit with the inclusion of relevant signage.

NTA response

A detailed response on the forecasted traffic figures for Skreen Road is provided in section 2.2.3.1 of this report. Skreen Road does not fall within the scheme boundary and as such altering the speed limit is outside the scope of the Proposed Scheme.

Ashtown Roundabout removal

December 2021 submission

While saddened at loss of trees on roundabout at Ashtown, the pedestrian and cyclist road improvements here and at the junction of Castleknock Road, Blackhorse Avenue and the Ashtown Gate entrance to the Phoenix Park are long awaited and will mark a significant improvement in the safety of access to the Phoenix Park from surrounding areas and as part of the Greater Dublin Area Cycle Network, linking the Royal Canal and Tolka Greenways with the Phoenix park and greenways to the south of the park.

NTA response

Provided in section 2.2.3 and 2.8.3 of the report

¹⁵ Application refs: DCC reg no.2596/20 & ABP ref no. ABP-308477-20; DCC reg no. SHD0016/20 & ABP ref no. TA29N.307656; DCC reg no. SHD0003/21 & ABP Ref TA29N.309318.

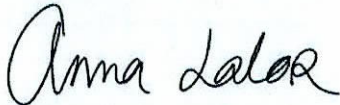
Conclusion

Thank you for taking the time to review this submission. The issues raised are not intended to detract from the proposed scheme, which I welcome, but to ensure that:

- its implementation does not result in deviations from important policies such as DMURS, which according to Ministers Varadkar and O'Sullivan's introductions aim that to "Better street design in urban areas will facilitate the implementation of policy on sustainable living by achieving a better balance between all modes of transport and road users. It will encourage more people to choose to walk, cycle or use public transport by making the experience safer and more pleasant. It will lower traffic speeds, reduce unnecessary car use and create a built environment that promotes healthy lifestyles and responds more sympathetically to the distinctive nature of individual communities and places."¹⁶
- simple and pragmatic changes that can have an impact on day to day lives of people and their sense of place are implemented, such as putting the areas of Rathborne and Royal Canal Park on appropriate directional road signs.

Should you have any queries you can contact me by email at [REDACTED] or by phone on [REDACTED]

Yours sincerely



Anna Lalor

¹⁶ https://www.dmurs.ie/files/ugd/f378bf_583444499f9f4095aaa4d5e05c3cf4b2.pdf

Annex 1 - List of towns from 2016 census with a population of 7,000 or lower¹⁷

Size band	Towns of note
6,000 – 7,000	Bandon, Buncrana, Ballinasloe, Kinsealy-Drinan, Newcastle West, Fermoy, Westport, Ceanannas Mór (Kells), Kilcock
5,000 – 6,000	Roscommon, Sallins, Passage West, Carrick-on-Suir, Loughrea, Blessington, Roscrea, Kinsale, Carrigtwohill, Carrickmacross
4,000 – 5,000	Oranmore, Tipperary, Ardee, Ballybofey-Stranorlar, Listowel, Mountmellick, Tullow, Clonakilty, Athenry, Cashel, Birr, Rathcoole, Monasterevan, Kilcoole, Duleek, Carrick-On-Shannon, Dunshaughlin
2,000 - 4,000	Rathluirc (Charleville), Macroom, Mitchelstown, Kilcullen, Claremorris, Castleblayney, Cahir, Courtown Harbour-Riverchapel-Ardamine, Rathnew, Stamullen, Kill, Clara, Enfield, Saggart, Newcastle, Gort, Annacotty, Muinebeag (Bagenalstown), Newtownmountkennedy, Ballinrobe, Skibbereen, Moate, Kinnegad, Bantry, Kilrush, Bailieborough, Ballyjamesduff, Virginia, Ballina, Sixmilebridge, Donegal, Rathangan, Crosshaven-Churchbay, Boyle, Blarney, Kingscourt, Castleisland, Callan, Thomastown, Athboy, Kenmare, Ballyhaunis, Kanturk, Prosperous, Ballyshannon, Killorglin, Clogherhead, Baltinglass, Meathas Truim (Edgeworthstown), Dingle-Daingean Uí Chuis, Abbeyfeale, Balrothery

¹⁷ <https://data.cso.ie/table/SAP2016T1T1ASET> - not all towns included

