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BY EMAIL: boundarycommittee@housing.gov.ie

Secretary

Local Electoral Area Boundary Committees 2017

Room 1.67

Custom House

Dublin 1

D01 W6X0

18 February 2018

Dear Secretary,

Re: **Committee No. 2**
Dublin City – Cabra Finglas LEA

This submission is made on behalf of Royal Canal Park Community Association ("RCPCA") and Rathborne Community Association ("RCA") in relation to the configuration of Local Electoral Areas ("LEAs") in Dublin City.

Residents involved in the Committees of RCPCA and RCA ("the Associations") are representative of the views of the wider population of approximately 2,500 dwellings in the Pelletstown/Ashtown area ("the Area"). The Area is bounded by the Royal Canal to the south, Ashtown Road to the west, River Road (R102) to the north and Ratoath Road (R103) to the east. The Associations are non-political organisations, led by voluntary committees.

1. Introduction

The Area is within the Ashtown Area A and Ashtown Area B Local Electoral Divisions ("LEDs"). These LEDs are in the 7 seat Cabra-Finglas LEA of Dublin City.

Until the implementation of the changes under the Local Electoral Area Boundary Committee Report of 2013, the Area was in the then five seat Cabra-Glasnevin LEA.

The thrust of this submission is that the LEA boundaries be amended, broadly to reinstate the Cabra-Glasnevin LEA. To cater for population growth in the Area, the new Cabra-Glasnevin should have six seats. This position is broadly consistent with our submission of 22 January 2013 to the then Local Electoral Area Boundary Committee- contained in Appendix I.

Royal Canal Park Community Association

Royal Canal Park Community Association,

2. Proposed Changes

We propose the reconstitution of the former Ballymun-Finglas and Cabra-Glasnevin LEAs into two new LEAs, namely "Ballymun-Finglas" and "Cabra-Glasnevin" as follows-

CURRENT LEA	NEW LEA	+LED	-LED	NET LED	POPULATION	SEATS
Ballymun	Ballymun-Finglas	+7	-5	+2	+21,839	7
Cabra-Finglas	Cabra-Glasnevin	+5	-7	-2	-17,458	6

For the avoidance of doubt, LEDs Ashtown Area A and Ashtown Area B would be located in the newly constituted Cabra-Glasnevin LEA.

The proposed transfers of LEDs to form the new LEAs are as follows-

LED	FROM	TO	POPULATION ¹
Finglas North A	Cabra-Finglas	Ballymun-Finglas	3,319
Finglas North B	Cabra-Finglas	Ballymun-Finglas	2,874
Finglas North C	Cabra-Finglas	Ballymun-Finglas	3,464
Finglas South A	Cabra-Finglas	Ballymun-Finglas	2,904
Finglas South B	Cabra-Finglas	Ballymun-Finglas	4,206
Finglas South C	Cabra-Finglas	Ballymun-Finglas	2,645
Finglas South D	Cabra-Finglas	Ballymun-Finglas	2,427
Botanic A	Ballymun	Cabra-Glasnevin	3,174
Botanic B	Ballymun	Cabra-Glasnevin	3,481
Botanic C	Ballymun	Cabra-Glasnevin	2,222
Drumcondra South A	Ballymun	Cabra-Glasnevin	3,517
Drumcondra South C	Ballymun	Cabra-Glasnevin	5,064

These changes will align-

- Ballymun-Finglas LEA within the Dublin North West Dáil constituency
- Cabra-Glasnevin LEA within the Dublin Central and Dublin West Dáil constituencies

As noted below, this is in line with Term of Reference No. 5.

These proposals are in keeping with Term of Reference Nos. 2 and 3, as to variance from individual average local authority representation within the range of plus or minus 10%, and councillors (seats) per LEA respectively.

3. Detailed Observations

3.1. Alignment of Council boundaries with Dáil constituencies

The current Cabra-Finglas LEA straddles four Dáil constituencies-

- Dublin Central ("DC")
- Dublin North West ("DNW")
- Dublin South-Central ("DSC")²
- Dublin West ("DW")

¹ http://www.cso.ie/en/media/csoie/census/census2016/census2016boundaryfiles/SAPS2016_ED3409.csv

² A very small part of Phoenix Park LED, south of a line drawn along Chapelizod Road, Conyngham Road and Parkgate Street, is within DSC. However, for Local Electoral Boundary purposes this configuration respects the natural boundary of the River Liffey; no change is proposed in this regard, i.e. Phoenix Park LED will be within the reconstituted Cabra-Glasnevin LEA.

See the Schedule to the Electoral (Amendment) (Dáil Constituencies) Act 2013
<http://www.irishstatutebook.ie/eli/2013/act/7/enacted/en/print.html>

This arrangement is unsatisfactory, and it is not in keeping with the Committee's Term of Reference No. 5-

"The committee should take account of the desirability, where it may be possible to do so, of aligning local electoral area boundaries with Dáil constituency boundaries."

The new Cabra-Glasnevin would align the LEA within three Dáil constituencies, i.e. DC, DSC and DW.

It is submitted that this will give greater coherence and effectiveness to electoral representation in the area. It will mitigate the confusion between Dáil and Council boundaries caused by the current unwieldy and unfamiliar LEA configuration.

3.2. Community/Neighbourhood coherence and linkages

We note Term of Reference No. 4-

"Local electoral areas should be designed, as far as possible, around urban villages or have a neighbourhood focal point (or points), taking due account of local and community identities and linkages and the need to facilitate the effectiveness of the governance and representational roles of elected members, including, in particular, the need to avoid designating local electoral areas which are territorially very large or extend over very long distances or over multiple urban villages, or which divide individual urban villages or natural communities."

Cabra-Finglas lacks geographical coherence because it straddles a major natural feature, the River Tolka. It is submitted that this configuration is not in keeping with the Committee's Term of Reference in this regard, i.e. that natural communities be respected.

We submit that the proposed Cabra-Glasnevin LEA has geographical continuity through the Cabra and Navan Road areas, and along the Royal Canal.

We submit that our proposals are in keeping with Term of Reference No. 4, in that our changes will-

- Respect the coherence of the mature Cabra and Navan Road urban villages, and the developing Ashtown/Rathborne/Royal Canal Park urban village- the Navan Road/Pelletstown Community Policing Forum is a demonstration of this coherence
- Reflect the coherence of the Navan Road/Ashtown/Cabra area along the N3 road transport corridor
- Reflect the linkages between the Navan Road/Ashtown/Broombridge/Cabra areas along the Maynooth rail and LUAS Cross City rail transport corridors.
- Reinstate the traditional coherence of the Finglas and Ballymun urban villages, including across the Ballygall area
- Reinstate linkages of Ballymun and Finglas around the N1 and N2 road transport corridors
- Better reflect Ballymun and Finglas linkages around proposed rail projects under Ireland 2040

3.3. Population increases in Ashtown LEDs

This submission takes account of the population changes from Census 2011 to 2016.

It is important to point out that the population of the Area continues to grow very rapidly-

- Approximately 100 new homes built and occupied in Royal Canal Park
- Construction of a further 300 homes underway in Royal Canal Park
- 208 new home starts are imminent in Rathborne Park
- Capel Developments Limited (In Receivership) has planning permission for an additional 320 homes approximately

Considering these population increases, and other housing developments underway in the wider LEA (e.g. Navan Road/Nephrin Road site), it may be advisable to provide for 7 seats in the new Cabra-Glasnevin LEA.

4. Polling place for Pelletstown

While not a matter for the Committee, we submit that the responsible authorities should provide a polling station for the Area (currently about 2,500 homes rising to 4,000 when built out). The current arrangement of voting in a polling station on the Navan Road (approximately an hour's walk away from eastern Pelletstown) is not satisfactory because it is a practical barrier to voter participation.

The Associations have communicated with the Dublin City Returning Officer, the Dublin County Returning Officer, Fingal County Council and others and remain to receive a satisfactory response on the matter.

5. Conclusion

The Associations welcome the opportunity to make this submission. We wish the Committee well in its deliberations.

Kind regards,

Yours sincerely,

*[*By email/bears no signature]*

David Rouse
Chairman RCPCA

cc by email Rathborne Community Association

Appendix I – Associations' 2013 Submission to Local Electoral Area Boundary Committee



BY EMAIL

The Secretary
Local Electoral Area Boundary Committee
Room 1.77
Custom House
Dublin 1

Date of Submission: 22 January 2013

Dear Secretary,

1.0 INTRODUCTION

I, David Rouse, on behalf of Royal Canal Park Community Association and Rathborne Community Association ("the Associations") wish to make observations in relation to the configuration of local electoral areas in Dublin City Council.

Residents involved in the Associations are representative of the views of the wider population of approximately 2,000 dwellings in the Pelletstown/Ashtown area ("the Area"). The Area is bounded by the Royal Canal to the south, Ashtown Road to the west, River Road (R102) to the north and Ratoath Road (R103) to the east. The Associations are non-political organisations lead by voluntary committees, and in the interests of efficiency this document has been prepared jointly by the Associations.

The Area (within Electoral Divisions Ashtown Area A and Ashtown Area B) is part of the Cabra/Glasnevin Electoral Area of Dublin City.

While a matter separate from the deliberations of the Local Electoral Area Boundary Committee, it is noted that under the recent Dáil constituency review (www.constituency-commission.ie/report.htm) the Constituency Commission recommended the transfer of the Electoral Divisions Ashtown Area A and Ashtown Area B from the constituency of Dublin Central to the constituency of Dublin West.



2.0 OBSERVATIONS

The key submission by the Associations is that the Area should remain within the remit of Dublin City Council, and within the Cabra/Glasnevin Electoral Area.

2.1 Geographic coherence

The Cabra/Glasnevin Electoral Area is bounded by a number of natural and infrastructural features, including the Liffey and Tolka rivers, Phoenix Park, etc. It is submitted that these long-established and coherent boundaries be respected.

2.2 Established identities and linkages

The majority of the population of the Area has taken up residence since 2005. Community Policing Forums, Joint Policing Committees, relationships with Dublin City Council and other formal interactions and linkages have been developed in recent years within the context of the current DCC Electoral Area.

Similarly, the Associations have formed strong connections with established community groups within the Cabra/Glasnevin Electoral Area, including Cabra Community Council and Navan Road Community Council. Links with local elected representatives have been established also.

A change to the existing configuration of the Electoral Area would adversely affect the successful working relationships and linkages built up through these structures by new communities in the Area.

2.3 Infrastructural developments under auspices of DCC

A number of key infrastructural and planning projects under the auspices of DCC are currently underway in the Area; these include-

- Pelletstown Local Area Plan
- Realignment of Ratoath Road
- Pelletstown railway station
- Royal Canal Study Group
- Planning matters with respect to idle lands in the area



It is submitted that any change that would transfer the Area from the responsibility of DCC would adversely affect the progress of these key projects.

It is also noted that development levies have been paid to DCC by developers in the Area; a transfer of the Area from the remit of DCC would seem incongruous with the status of development levies already paid.

2.4 Urban setting

Under the Dublin City Development Plan 2011-2017, the Area is designated a Key Developing Area ("KDA"), with an urban character. A transfer of the Area from the responsibility of DCC would be inconsistent with the established planning and other development designations.

3.0 SUMMARY AND CONCLUSION

As stated at the start of this submission, the Associations submit that the Area should remain with the Cabra/Glasnevin area of Dublin City.

The Associations welcome the opportunity to make observations on the Committee's work, and wish it well in the formulation of its recommendations.

Yours sincerely,

**sent by email, bears no signature*

David Rouse

RCPCA Committee

On behalf:

Royal Canal Park Community Association

Rathborne Community Association