



BY EMAIL

constituency.commission@housing.gov.ie

The Secretary
Constituency Commission
Room 1.65
Custom House
Dublin 1
D01 W6X0

Sub 16/226

9 January 2017

Dear Secretary,

**Re: Invitation for written submissions
Constituencies of Dublin West and Dublin Central
Electoral Divisions of Ashtown A and Ashtown B**

Royal Canal Park Community Association (“RCPCA”) is a voluntary, non-party political community organisation comprised of residents with views representative of the wider population of Royal Canal Park, Pelletstown/Ashtown, Dublin 15.

Royal Canal Park is a relatively new (2006) and expanding residential estate of 1,000 homes approximately, made up of apartments, duplexes and townhouses. We are located in an area bounded to the north by the River Road/Tolka River, to the east by Ratoath Road, to the south by the Royal Canal and to the west by the Rathborne estate and some as yet undeveloped lands.

Since its foundation in October 2006 RCPCA has been active in planning, transport, civil society and other matters affecting the quality of life of residents of the estate, and the wider Pelletstown area.

Submission context

We refer to the Public Notice given in September 2016 inviting written submissions in relation to matters which should be considered in your reporting on constituencies. This submission concerns the following areas (“the subject areas”) in the city of Dublin:

- the electoral divisions of Ashtown A and Ashtown B

f Royal Canal Park Community Association
t @rcpca1
✉ rcpca@hotmail.com
🏠 Royal Canal Park Community Association,
c/o Management Suite,
Royal Canal Park,
Dublin 15

- that part of the electoral division of Phoenix Park situated north of a line drawn along Chapelizod Road, Conyngham Road and Parkgate Street.

Royal Canal Park is located in the electoral division of Ashtown A, see Local Electoral Area boundaries- <http://www.boundarycommittee.ie/reports/Dublin-City-Council-Map.pdf>

Under the Electoral (Amendment) (Dáil Constituencies) Act 2013 (“the 2013 Act”) the subject areas were moved from the constituency of Dublin Central (“DC”) to the constituency of Dublin West (“DW”). At the same time DC was changed from a four seat to a three seat constituency.

Submission details

We submit that for the reasons outlined below, the subject areas should be located within a reformed and expanded four-seat DC constituency.

1. DC, as currently configured, constitutionally is under-represented in Dáil Éireann, i.e. in terms of TD per 1,000 of population. The variance is +6.32%, as noted in the table on page 5 of the Constituency Commission Statement 2016 – Section 10(2) of the Electoral Act 1997 (“the 1997 Act”)-
http://www.constituency-commission.ie/docs/Constituency_Commission_Statement_2016.pdf

DC ranks fourth worst nationally of all constituencies in terms of under-representation.

In a reconfigured DC, with four TDs, the level of representation would be much closer to the constitutionally required ratio. Moving the subject areas to within a reformed DC would help to address the current variance from the constitutional requirements of Article 16 of the Constitution.

2. A review of the various Electoral Amendment Acts indicates that since the early 1980s the subject areas have always been located in an incarnation of a broadly DC constituency (before that in "Dublin Cabra"). The move to DW, after almost 40 years in DC, is a recent anomaly arising under the 2013 Act and marked a break with long-standing convention. It also fails to have regard to the provision of Section 6(2)(f) of the 1997 Act concerning the need for chronological continuity in relation to the arrangement of constituencies.
3. Royal Canal Park has geographical continuity with DC through the suburb of Cabra, which stretches from Phibsboro to Ashtown. There is evidence that the Navan Road has historically been considered part of the wider west Cabra area, part of DC. We note in this regard that Section 6(2)(e) of the 1997 Act requires that in undertaking its functions the Constituency Commission shall have regard “...to geographic considerations including significant physical features and the extent of and the density of population in each constituency...”
4. There are geographical and infrastructural boundaries (e.g. N3, Phoenix Park) separating Ashtown A and B from the nearest DW major population areas (villages, if you like) of Castleknock, Blanchardstown, etc. and we note again S.6(2)(e) of the 1997 Act, as cited above.

5. Dáil constituency boundaries should to the greatest extent possible correspond with, respect and avoid breaching county boundaries (S.6(2)(c) of the 1997 Act- "*...the breaching of county boundaries shall be avoided as far as practicable...*").

As currently constituted, DW straddles the administrative areas of Dublin City Council and Fingal County Council.

The subject areas are within the Dublin City Council local authority area. Dublin City Council operates from the Civic Offices, Wood Quay and from other satellite offices, e.g. Cabra Area Office, 97 New Cabra Road. These offices are obviously located within DC. In contrast, the majority of the population of DW resides within the Fingal County Council local authority area, functioning primarily from Swords, and deals with population centres as diverse as Skerries, Balbriggan, West County Dublin, etc.

In regard to the breaching of local authority areas, the following factors and anomalies are relevant to this submission-

- a. All planning matters for the subject areas are administered by Dublin City Council, in particular the progression of the Ashtown/Pelletstown Local Area Plan (2014)-<http://www.dublincity.ie/ashtown-pelletstown-local-area-plan>.

The stronger economic, social and cultural ties of the subject areas are with Cabra, Phibsboro and the city centre, rather than with west Dublin.

- b. The Local Property Tax variation +/-15% for the subject areas is determined by Dublin City Councillors, whose ties are with DC, rather DW.
- c. It is Councillors on Dublin City Council (as noted, whose interests are tied with DC) that will make decisions about Taking-In-Charge of the road and related infrastructure in Royal Canal Park. DW public representatives, whose ties primarily are with Fingal County, have no direct statutory role in these matters.
- d. The LAP contemplates Ashtown/Pelletstown as high density urban in character, as is the majority of the current DC, being comprised of the city centre. Whereas in contrast DW is for the most part suburban and rural in character.

The character of Royal Canal Park is distinctly urban, with commercial/business units located in the same buildings as residential homes. We would note in this regard the requirement in S.6(2)(e) of the 1997 Act concerning the extent of and the population density of each constituency. Royal Canal Park should be within the urban DC.

- e. The Community Policing Forum for the Navan Road/Pelletstown area is convened by Dublin City Council not Fingal County Council.
- f. Amenities in the Ashtown area (Tolka Valley, etc.) are under the control of Dublin City Council rather than Fingal County Council.

We note also that current configuration of Dáil constituencies means that the Dublin City Council Local Electoral Area of Cabra-Finglas (incorporating Ashtown A and B Electoral Divisions) is divided across three Dáil constituencies- DC, DW and Dublin North West. Moving

the subject areas into DC improves the coherence of the administrative and political boundaries in the wider area, and reverses a recent fragmentation of established neighbourhoods caused by unfamiliar boundary changes.

6. Anecdotally, modes of transport flows including bus, rail, and car eastwards in the mornings indicate that a large proportion of the population of Royal Canal Park works in Dublin city centre, in DC, rather than in DW. It may be postulated therefore that the economic ties, connections and concerns of the preponderance of the population of Royal Canal Park are with the urban city centre rather than suburban west Dublin.

Polling station for Pelletstown

While not a matter for the Commission, we wish to take this opportunity to note that a polling station for the Royal Canal Park and wider Pelletstown area should be provided by the relevant authorities. There are currently 2,000 homes approximately in the Pelletstown area; this will reach almost 4,000 homes when all building is complete. At present Pelletstown residents vote in a polling station on the Navan Road. The polling station is approximately an hour's walk in each direction from the eastern part of Royal Canal Park. The distance from the polling station is detrimental to voter participation.

Conclusion

We thank the Constituency Commission for the opportunity to make a submission and trust that our views will be given due weight and consideration in your deliberations.

We should be obliged if you would confirm safe receipt of this submission in time for the deadline of Tuesday 10 January 2017.

Kind regards,

Yours sincerely,

*[*By email and bears no signature]*

David Rouse

Chairman RCPCA