

**To: The Secretary
Dublin and Cities Electoral Area Boundary Committee**

Submission on behalf of the Fine Gael Party

1. Committee's Terms of Reference

- 1.1. The Boundary Committee has been asked in the Terms of Reference to review boundaries of local electoral areas (LEAs), with the following objectives:
 - to try to achieve a variance from the average ratio of population to councillor in each council, within the range of +/-10%
 - to draw up areas with urban or neighbourhood focal points
 - to preserve natural communities or the hinterland of population centres
 - where possible, to align LEA boundaries with Dáil Constituency boundaries
 - to establish LEAs returning between 4 and 7 members, with 3 seat areas acceptable in exceptional circumstances
 - to maintain continuity
- 1.2. We suggest that it is actually impossible to meet all of these criteria in every county – and the Committee should accept that some of these requirements will take precedence over others, depending on the local circumstances.
- 1.3. With regard to the number of seats for each area, we suggest that the one example of a seven seat constituency in Dublin, Terenure/Rathfarnham, resulted in an area which straddles three Dáil Constituencies, and was almost as big as some Dáil constituencies – and in effect, proved to be grossly inconvenient, and in practical terms, resulted in Councillors acting almost as if it were still constituted as two separate areas divided by the River Dodder. This being the case, we have a stated preference for constituencies of four, five or six seats.
- 1.4. In addition, it is suggested that the last review of boundaries in 1998, succeeded in part, due to the recognition of Dáil boundaries – and the Committee should be conscious of this consideration in the course of its deliberations.
- 1.5. In respect of the 'continuity' argument, we would like to bring to the Committee's attention, the developments which have taken place in terms of organisation and delivery of services by Councils, following enactment of the Local Government Act, 2001. In many cases, structures have been put in place to deliver services on the basis of Area Committees, and whereas individual LEAs may appear to require attention in terms of meeting the various Terms of Reference as stated, the Committee should have due regard to the likely consequences which may ensue, depending on their recommendations – and should put a premium value on the continuity of services to the public.
- 1.6. In relation to the requirement to attempt to follow Dáil Constituency Boundaries, we would assert that the Report of the Constituency Commission to review Dáil and European Constituency Boundaries, as published in October, 2007 should be the basis for any determinations.

And, whereas there has been speculation regarding the possibility of Dáil boundaries being reviewed again, in advance of the next General Election, on foot of publication of preliminary Census figures, the Committee should note the reply of the Minister for Environment, Heritage and Local Government to Parliamentary Question Ref. No. 5690/08

"Work is underway on the drafting of the Electoral (Amendment) Bill 2008 which will, *inter alia*, provide for revision of Dáil and European Parliament constituencies in accordance with the recommendations of the Constituency Commission which reported in October 2007.

The Bill will also provide for the establishment of future Constituency Commissions on publication by CSO of the preliminary results in respect of a census of population and for the work of a Commission to be completed following publication of final population data relating to the relevant census."

1.7. This submission will seek to observe the above Terms of Reference.

2.0 Consideration of issues arising under current boundaries

Council	Recommendation
Cork City	South East LEA has a variance of 10.5%; all other areas meet the criteria in the Terms of Reference; the adverse variance here is marginal, and could be left as is, or addressed by a minor transfer to South Central, with no change in the number of seats.
Dublin City	<p>Ballyfermot, Ballymun Whitehall, Pembroke, South East Inner City and South West Inner City each have three seats – and it would appear difficult to argue for their retention on the basis of the Terms of Reference.</p> <p>Finglas, North Inner City, SEIC and SWIC each have variances outside the stated targets.</p> <p>There is a marginal case for transferring a seat from Northside to Southside – but probably not warranted. Moving a seat southwards would probably create too many changes, for the sake of change – and the continuity rule should prevail.</p> <p>South City:</p> <p>Pembroke, Rathmines and SEIC constitute Dublin SE, and together, have enough population to retain ten seats. We propose two five seat areas with Pembroke and Rathmines each extending north to the Liffey to incorporate parts of SEIC. It may be necessary to adjust the boundary between Pembroke and Rathmines, at the Milltown end.</p> <p>Ballyfermot, Crumlin/Kimmage and SWIC are all in Dublin SC; we suggest the merging of Ballyfermot and SWIC to form a new six seater, with Crumlin/Kimmage holding five.</p> <p>North City:</p> <p>Cabra Glasnevin and North Inner City are both in Dublin Central; a transfer of territory from NIC to C/G would allow for the retention of five seats in each case. The only obvious alternative is the creation of two three seat areas in NIC, but this would appear not to be possible under the Terms of Reference. A six seat area, however, would be feasible – except that it will inevitably have the effect of disturbing boundaries of other areas on the Northside to a gross extent.</p> <p>Ballymun/Whitehall and Finglas are both in Dublin NW; merge, and create new seven seater. A six seat area would be possible, but would necessitate too many knock on effects. In the interest of continuity, the two areas should retain seven seats. Any alternative plan would involve breaching LEAs in other neighbouring Dáil constituencies. The only other alternative, is to leave both areas as they stand.</p> <p>Artane, Clontarf and Donaghmede each meet the criteria laid down, and whilst they currently fall, for the most part, into two Dáil constituencies (and a small part of a third) - in the interest of continuity, each area should stay as is.</p>

Council	Recommendation
Dun Laoghaire Rathdown	<p>Glencullen and Stillorgan each have three seats; Dundrum has a marginally adverse variance, -10.1%, whilst Glencullen is significantly under-represented, with a variance of 24.1%. The new boundary between Dublin South and Dun Laoghaire uses the N11 as a guide, which results in part of Ballybrack now being in Dublin South.</p> <p>If the Committee decides to adhere strictly to Dáil boundaries, this will probably result in the reduction from six to five seats in Ballybrack, and an extra seat in Dublin South; Blackrock and Dun Laoghaire appear to fit with the criteria, although there is potential for a minor transfer between the two areas.</p> <p>If the Committee opts to prioritise continuity, then Ballybrack should retain its six seats.</p> <p>Glencullen is already very close to justifying four seats; if the N11 becomes an LEA boundary, then it could expand eastwards, to become a five seat area – thereby allowing Stillorgan and Dundrum to be merged, to form two four seat constituencies.</p> <p>The other option would be to merge most of Stillorgan with Glencullen and/or part of Ballybrack, transferring part of Stillorgan to Dundrum, thereby creating two six seat constituencies, or, possibly, a six and a seven seat area.</p> <p>Another alternative, focussing more on neighbourhoods, would be to extend Stillorgan south, to incorporate part of Ballybrack, creating a four seat area, and to transfer some territory from Dundrum to Glencullen, generating a five seat Dundrum, and four seat Glencullen.</p>
Fingal	<p>Howth has three seats, and a high variance of -33.2%. Malahide, Mulhuddart and Swords each have significant variances, of the order of -25.6%, 33.3% and 16.9% respectively.</p> <p>Howth and Malahide combined account for seven seats, but only have sufficient population to warrant five seats; it is suggested that both areas are combined, to form one five seat constituency. This frees up two seats, for allocation elsewhere.</p> <p>Mulhuddart justifies the addition of a seat, without any boundary change, although if the Committee so decides, a minor transfer to Castleknock from Mulhuddart would address the slight population imbalance – although Castleknock currently meets all criteria.</p> <p>On the basis of the current population, Swords would warrant an additional seat; however, considering that Lusk was split in 1998, for the purpose of making up the numbers, it would be possible to transfer some territory to Balbriggan (Lusk, and possibly Donabate) and give the extra seat to Balbriggan; this would also take into account the 47.9% increase in population in that area, since the 1996 Census, and would plan for future growth in the north of the County.</p>
South Dublin	<p>Lucan, Tallaght Central and Tallaght South have variances of 31.2%, -23.1% and 17.4% respectively.</p> <p>On the face of it, Lucan is entitled to an additional seat, without any boundary change.</p> <p>The variances in Tallaght could be addressed by an adjustment of the boundary between T/C and T/S – they currently each have ten seats, and their combined population warrants 9.7 seats.</p> <p>Tallaght Central, Tallaght South and Terenure Rathfarnham currently have 17 seats between them, but have a combined population for 16.1.</p> <p>Any number of options could be considered to address this situation; a simple reduction of one seat in T/R; the splitting of T/R, justifying a three seat area as an exceptional matter, and splitting 13 seats south of the River Dodder; or, the possibly transfer of Rathcoole and Saggart from Tallaght South to Clondalkin, and subsequent re-alignment of boundaries to address resulting variances.</p>

Council	Recommendation
Galway	The West and South Wards have variances of –22.1% and 14.0% respectively; it is suggested that territory be transferred from both the North and East Ward and also the South Ward, to the West Ward, to address the variances.
Limerick	Ward 1 currently has a variance of –10.9%, whilst Wards 3 and 4 are at –10.8% and 17.5% respectively. The proposed transfer of part of Bruff LEA to Ward 1 will address the variance there, and allow for subsequent transfers of territory from Ward 1 to 2, and from Ward 3 to 4 to address other variances.
Waterford	All three Wards have variances, with Ward 2 seriously under-represented; this could be rectified by a seat transferring from Ward 3 to Ward 2, and territory going from Ward 2 to Ward 1.