An Taisce
The National Trust for Ireland

15 November 2021

Submission of An Taisce in response to the Public Consultation on the
Draft Dublin Region Air Quality Plan

An Taisce welcomes the opportunity to contribute to the consultation phase of the development of a regional air quality plan for Dublin. In addition, we would like to recognise and commend the productive dialogue between the drafters of the draft plan and An Taisce over a number of months prior to the publication of this draft plan.

In general, An Taisce warmly welcomes the content of the draft plan, although we have a number of comments in relation to various specific proposals, which are detailed below. In general terms, we urge all the Dublin Councils to imbue the final draft of the plan and its subsequent implementation with the highest possible urgency. This urgency is necessitated by the twin crises that air pollution actions inherently address, those being public health and the climate crisis. All public authorities need to go further, faster than ever before to maintain any prospect of staying below a global temperature increase of 1.5 degrees Celsius. The Draft Plan identifies transport emissions as the main source of nitrogen dioxide emissions – transport also accounts for over 20% of Ireland's greenhouse gas (GHG) emissions. According to the Central Statistics Office, there are over 500,000 private cars registered in the Dublin area. The co-benefits of radical action on air pollution in Dublin with emissions reductions are therefore clear, and should be held as a central drafting principle in the preparation of any air pollution plan.

An Taisce's response to specific Proposed Measures:

Measure 1: Integration of 15 Minute Neighbourhoods in Development Plans

An Taisce fully supports the integration of the 15 Minute Neighbourhood across Dublin. In particular, the emphasis on liveability and vibrancy of urban centres is very welcome. The removal of the private car (whether combustion or electric) from city streets to the greatest extent possible is a key aspect of improving liveability, and An Taisce urges the four Councils to take bold action on permanent pedestrianisation of as many streets as possible in the shortest possible timeframe.

Measures 2, 3 & 4: Parking Controls

The Councils' ambition on parking controls in all aspects of life – public, residential and at the workplace – must be enhanced. In the text of the draft plan, the importance of parking controls is recognised on multiple fronts: to address demand management, decarbonisation, air quality and urban development. With these imperatives in mind, more ambitious action should be undertaken, and incorporated in to the draft plan.

Measure 6: EV Charging Strategy

Although EV charging infrastructure is a crucial piece of the air quality and decarbonisation puzzle, and combustion engines must be phased out with utmost urgency, any EV strategy should explicitly recognise the need to reduce the number of cars (including EVs) on our roads. EVs should be regarded in all respects as secondary and supplementary to active travel and public transport strategies.

Measure 9: Low Emission Zones

An Taisce fully supports the introduction of Low Emission Zones in Dublin, and endorse the call for delegated powers to local authorities to introduce them.

Measure 10: Remote Work

The climate and air quality benefits of robust remote working provisions are clear and manifest. The Councils should lead by example in this respect, and An Taisce welcomes the Councils' statement of intent.

Measure 12: Citizen Engagement

Meaningful Citizen engagement in environmental planning and decision-making is crucial to the development of successful, ambitious and far-reaching policy. An Taisce welcomes the emphasis on Citizen Engagement in the text of the Draft Plan, and we would be pleased to engage separately with the local authorities in exploring the establishment of a public forum on air quality. This intervention is particularly welcome in light of a general culture of poor facilitation of public ownership of decision-making at all levels of government in Ireland.

With this in mind, Section 10.4 of the draft plan is instructive. The overwhelming desire of participants in the Citizens' Assembly for radical, far-reaching and ambitious action is obvious, and should be honoured. An Taisce is happy to participate in any initiative that facilitates the action that people and planet desperately require.