

Climate Action, Environment & Energy Strategic Policy Committee
1st December 2021

The Dublin Region Air Quality Plan 2021

Public Consultation Submissions Report

Introduction

The public consultation on the Dublin Region Air Quality Plan, Air Quality Plan to improve Nitrogen Dioxide levels in Dublin Region was open for submissions from 18 October 2021 to 15 November 2021. A total of 219 unique submissions were received, 208 via the Consultation Portal and 11 by email. Only a small number of submissions were specifically related to the actual draft Air Quality Plan document itself and its requirements as set out by Europe. The majority were instead comments on air pollution in general, how it can be addressed and paying for it through taxes. While these submissions could not be directly incorporated into the Air Quality Plan itself at this time, they give a valuable insight into public feelings on the issue, and will feed into ongoing work in the area including the development of many of the measures included in the plan.

Appendix A to this report includes a report with graphs produced from the Consultation Hub which contained an online survey with 25 questions relating to the Air Quality Plan. The notes in the next section of this report cover questions 1 to 21 of the online survey. Questions 22 to 25 and emailed submissions have been reviewed, tagged by Theme and analysed against the measures in the plan. The subsequent section of this report, and the table in Appendix C, deals with the analysis of the consultation responses against these Themes and presents responses and any amendments made to the Plan.

Quantitative Summary of the Public Consultation Responses

There were 208 responses to the online Public Consultation on the AQP. These were mainly from private individuals, however, a list of organisations that responded is listed in Appendix B. Of those that responded approximately 52% resided in Dublin City with 18% in Fingal and 15% from Dun Laoghaire Rathdown, 10% from South Dublin. 4% of those that responded reside outside of Dublin County.

By far the main reason for driving, almost 64%, was for day-to-day getting around and travelling to shops and local services.

The vast majority of people had an understanding of the health impacts of elevated NO₂ levels and vehicular emissions were considered to be a greater contributor to NO₂ levels than agriculture, power plants or heating by about half of those responding. National Government led awareness campaigns were felt to be the best way to make the public aware of the health impacts of air pollution (specifically NO₂) and these were closely followed by restricting drop off locations at schools and publicity about high transport related emissions in local areas.

Approximately half of those who took part in the Public Consultation agreed with the recommendations of the Citizens' Assembly in relation to the climate actions that impact on air quality.

Almost 80% of responders support the idea of reviewing and strengthening Local Authority and Environmental Protection Agency (EPA) powers in relation to dealing with air pollution.

With regard to considering Low Emission Zones, over 75% of those who took part in the Public Consultation support this, as well as the possibility of a charge being levied on those with polluting vehicles. A similar number of responders support the Government amending existing legislation to delegate powers to the Local Authorities to introduce Low Emission Zones.

Over 85% of the public involved are familiar with 10-15 minute neighbourhoods and over 70% think Local Authorities should examine the concept.

80% of those who took part in the Public Consultation want an electrical vehicle-charging network developed in Dublin.

Almost 95% of those involved feel that the Irish workforce should be given the option of remote working for a portion of the week.

Around 70% of those involved believe that consideration should be given to incorporating air quality considerations into vehicle taxation and that the NCT emissions testing should have a role in periodic assessment of air pollution emissions, to inform better regulation of 'in use' vehicle emissions.

Analysis of Public Consultation Responses

In addition to the quantitative analysis of the submissions as set out in the previous section, all the submissions that contained free text and those that were received by email were analysed for the comments, views and suggestions expressed. Rather than respond to each view within each individual submission, all submissions were reviewed to identify common themes against which all the comments and views could be captured. A response against each theme has been provided which sets out how the Air Quality Plan and/or other Plans and Strategies address the issues covered by the Theme and also whether any amendments or actions within the Plan are proposed.

For a detailed overview of the Themes identified together with the responses and actions proposed please see table in Appendix C at the end of this report.

The draft Air Quality Plan included 14 measures as summarised below.

- Integrate “15 Minute Neighbourhoods” concept in City and County development Plans
- Public Parking Controls
- Residential Parking Standards
- Workplace Parking Standards
- Continue delivery of the Active Travel Programme
- Electrical Vehicle (EV) Charging Strategy
- Publication of National Clean Air Strategy
- Air Quality Enabling Legislation
- Introduction of Clean Air Zones / Low Emission Zones
- Remote / Flexible Working
- Enhanced Air Quality Monitoring and Modelling
- Air Quality – Citizen Engagement
- Air Quality and Health Research
- Behavioural Change Campaigns to Cleaner Fleets

These 14 measures remain within the Final Plan. While there were varying comments and levels of support for each, the responses did not warrant the removal or a significant change to any one measure. Modification to two measures are proposed as set out below;

- **Measure 9** of the Plan to be amended to include an action as follows; The UTRAP Working Group, which includes the Dublin Local Authorities, should commit to further investigations into the feasibility of Low Emissions Zones in Dublin.
- **Measure 12** to be modified to reflect Smart Cities involvement in citizen engagement project

Appendix A – Consultation Hub Responses Summary Report

Air Quality Plan to improve levels of nitrogen dioxide (NO₂) in ambient air

<https://consultation.dublincity.ie/environment/air-quality-plan-to-improve-levels-of-nitrogen-dio>

This report was created on Tuesday 16 November 2021 at 09:28

The activity ran from 18/10/2021 to 15/11/2021

Responses to this survey: **208**

1: What is your name?

Name

There were 202 responses to this part of the question.

2: What is your email address?

Email

There were 165 responses to this part of the question.

3: What is your organisation? (if applicable)

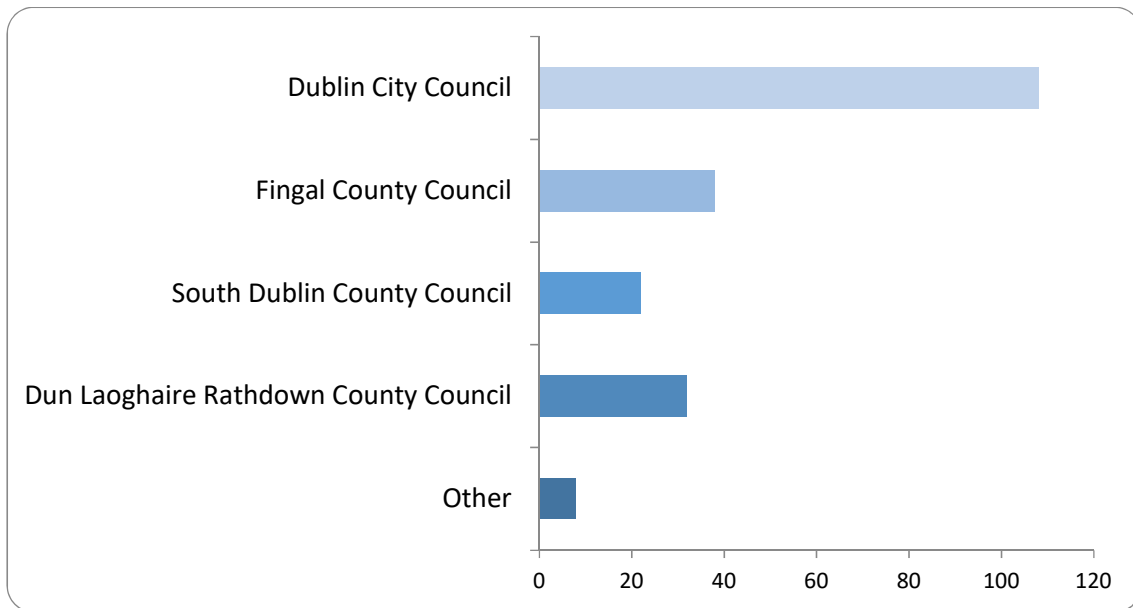
Organisation

There were 29 responses to this part of the question.

4: In which Local Authority area do you reside?

Local Authority

There were 208 responses to this part of the question.



Option	Total	Percent
Dublin City Council	108	51.92%
Fingal County Council	38	18.27%
South Dublin County Council	22	10.58%
Dun Laoghaire Rathdown County Council	32	15.38%
Other	8	3.85%
Not Answered	0	0.00%

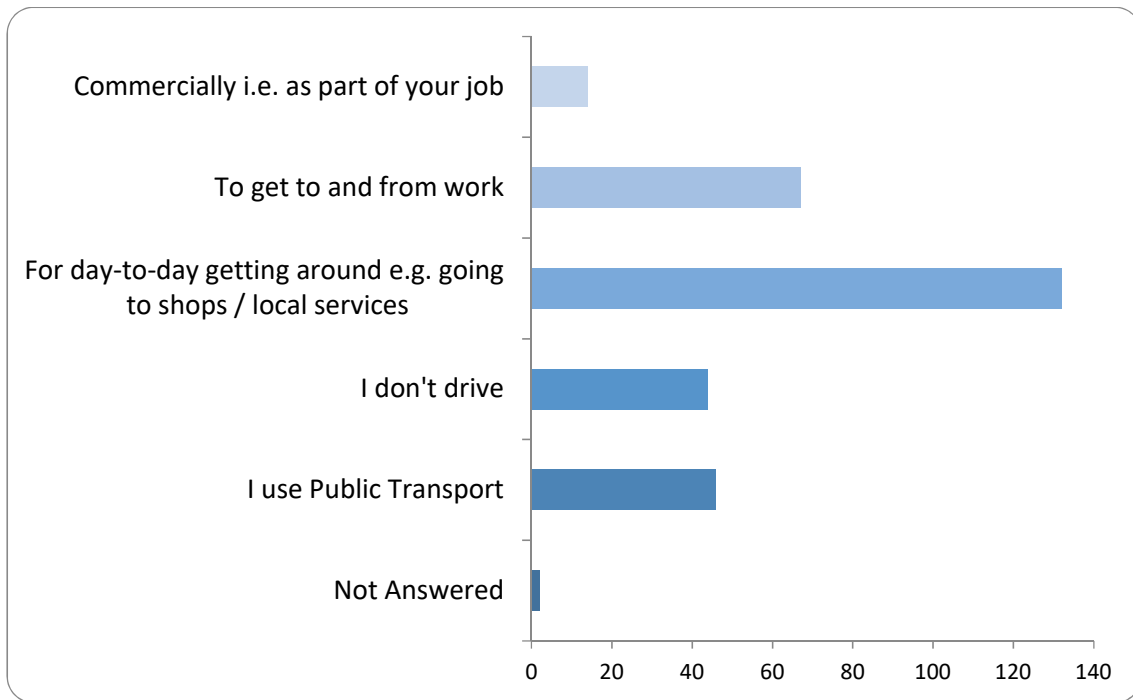
Other Local Authority

There were 8 responses to this part of the question.

5: What are the main reasons you drive a vehicle in your local area / in Dublin generally? Please select as many as apply to you.

Reasons for Driving

There were 206 responses to this part of the question.

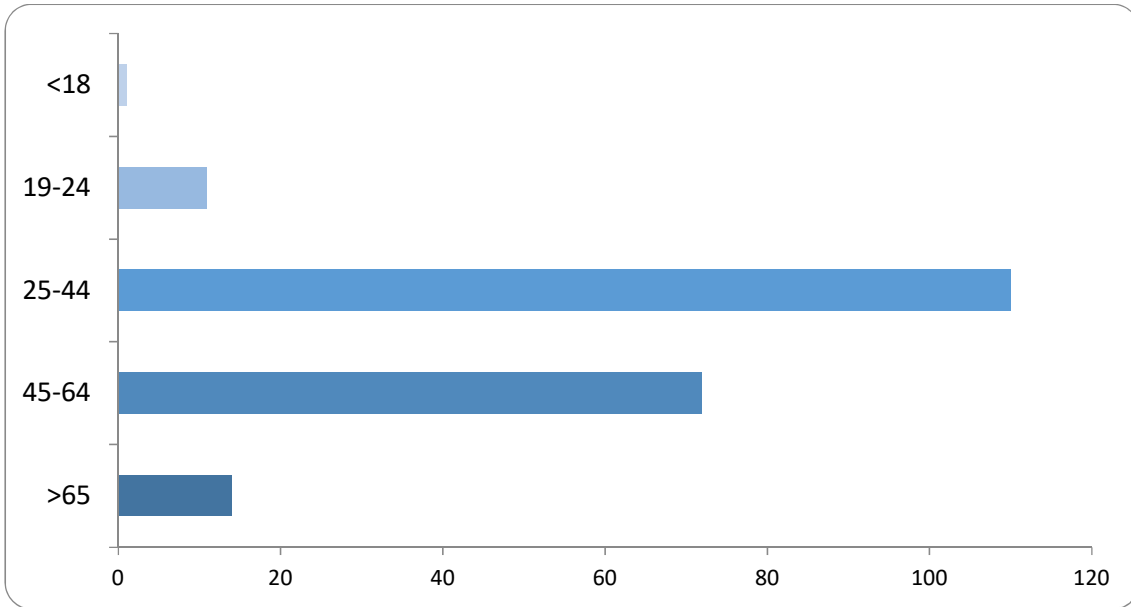


Option	Total	Percent
Commercially i.e. as part of your job	14	6.73%
To get to and from work	67	32.21%
For day-to-day getting around e.g. going to shops / local services	132	63.46%
I don't drive	44	21.15%
I use Public Transport	46	22.12%
Not Answered	2	0.96%

6: Which age bracket do you fall into?

Age Profile

There were 208 responses to this part of the question.

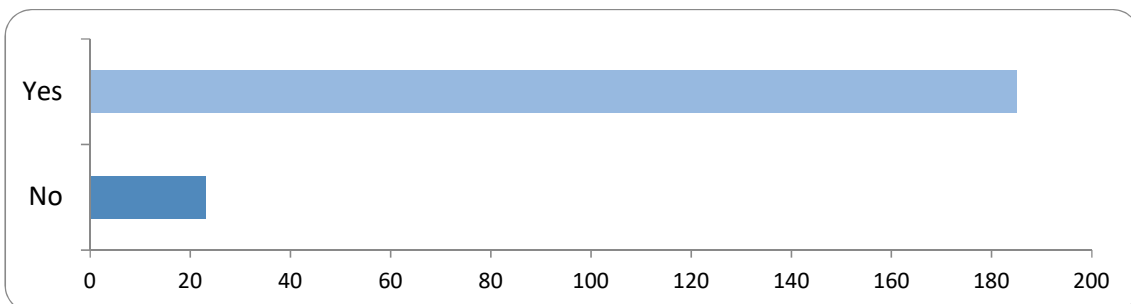


Option	Total	Percent
<18	1	0.48%
19-24	11	5.29%
25-44	110	52.88%
45-64	72	34.62%
>65	14	6.73%
Not Answered	0	0.00%

7: Do you have an understanding of the health impacts of elevated NO2 levels?

Understand health impacts of high NO2

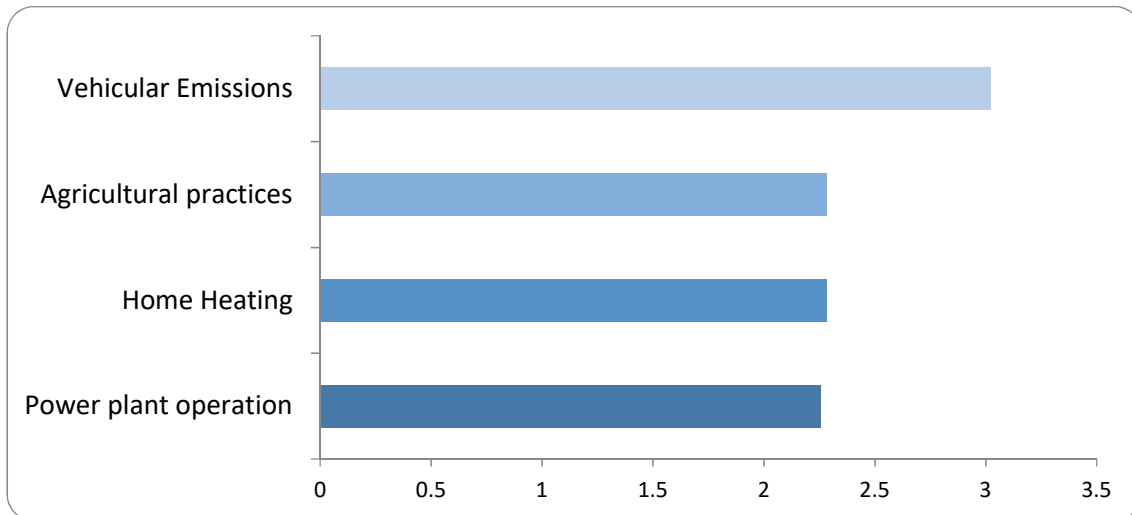
There were 208 responses to this part of the question.



Option	Total	Percent
Yes	185	88.94%
No	23	11.06%
Not Answered	0	0.00%

8: Rank each of the following contributors to elevated NO2 levels (with 1 being the highest contributor).

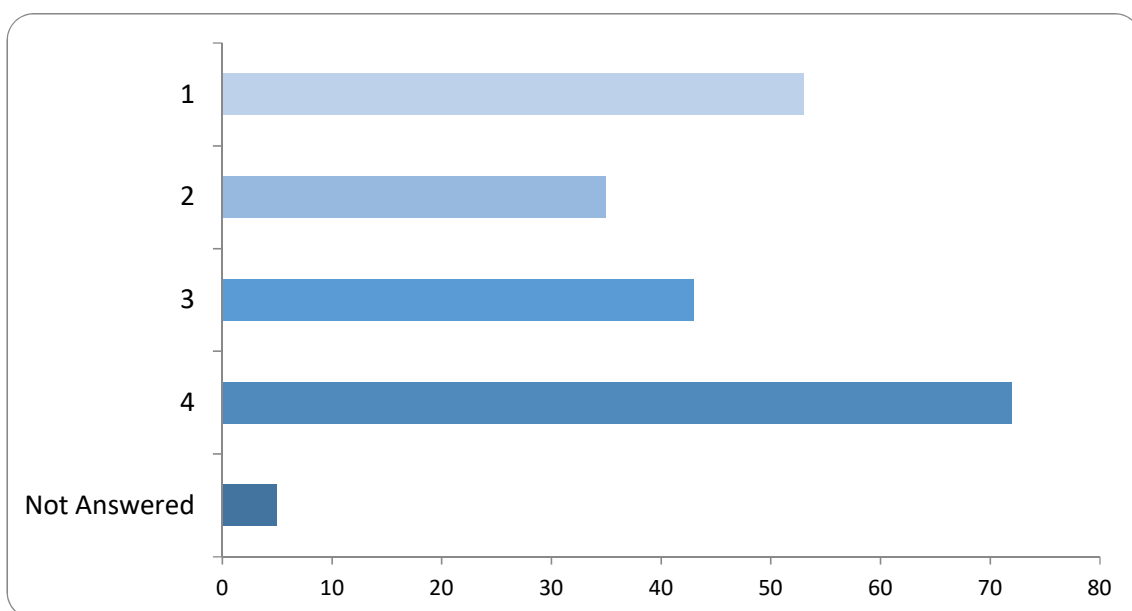
Ranking of 'Ranking of contributions to NO2 levels'



Item	Ranking
Vehicular Emissions	3.02
Agricultural practices	2.28
Home Heating	2.28
Power plant operation	2.25

Ranking of contributions to NO2 levels - Agricultural practices

There were 203 responses to this part of the question.

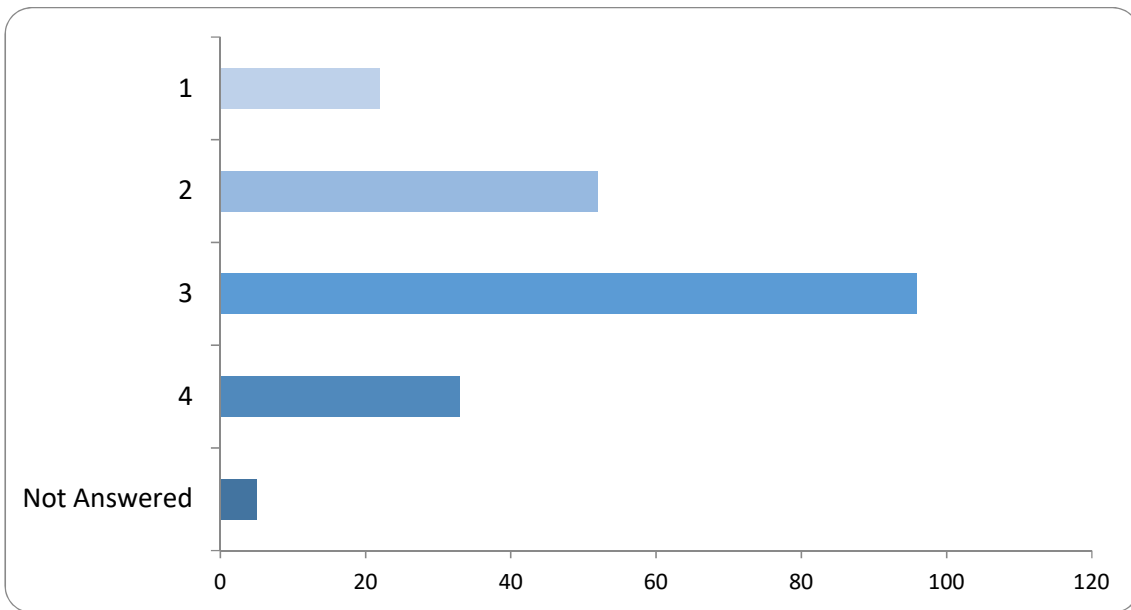


Option	Total	Percent
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1	53	25.48%
2	35	16.83%
3	43	20.67%
4	72	34.62%
Not Answered	5	2.40%

Ranking of contributions to NO2 levels - Power plant operation

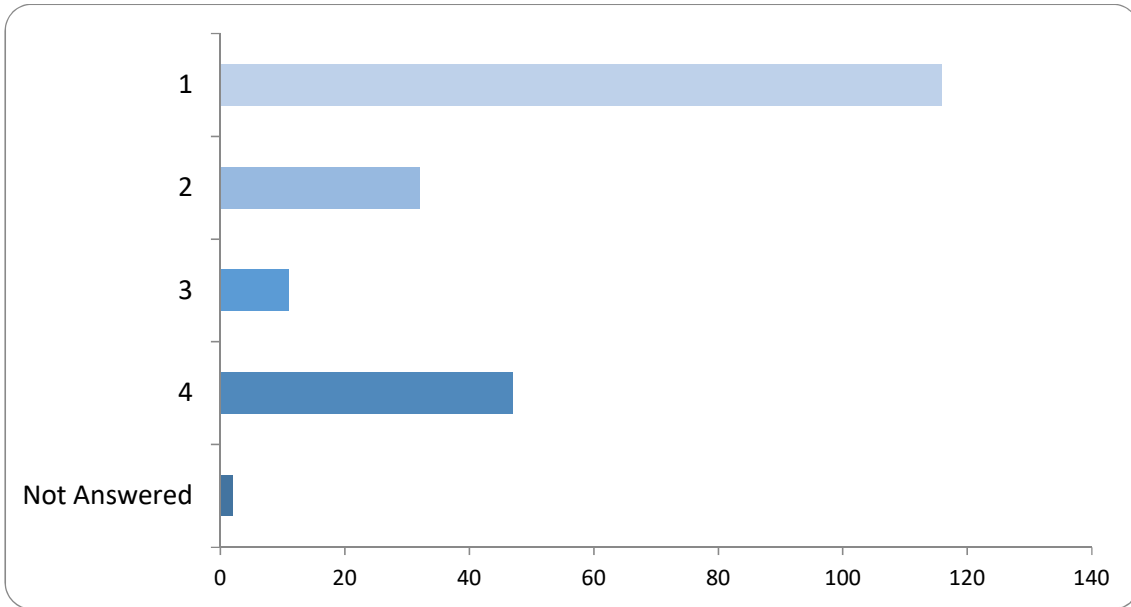
There were 203 responses to this part of the question.



Option	Total	Percent
1	22	10.58%
2	52	25.00%
3	96	46.15%
4	33	15.87%
Not Answered	5	2.40%

Ranking of contributions to NO2 levels - Vehicular Emissions

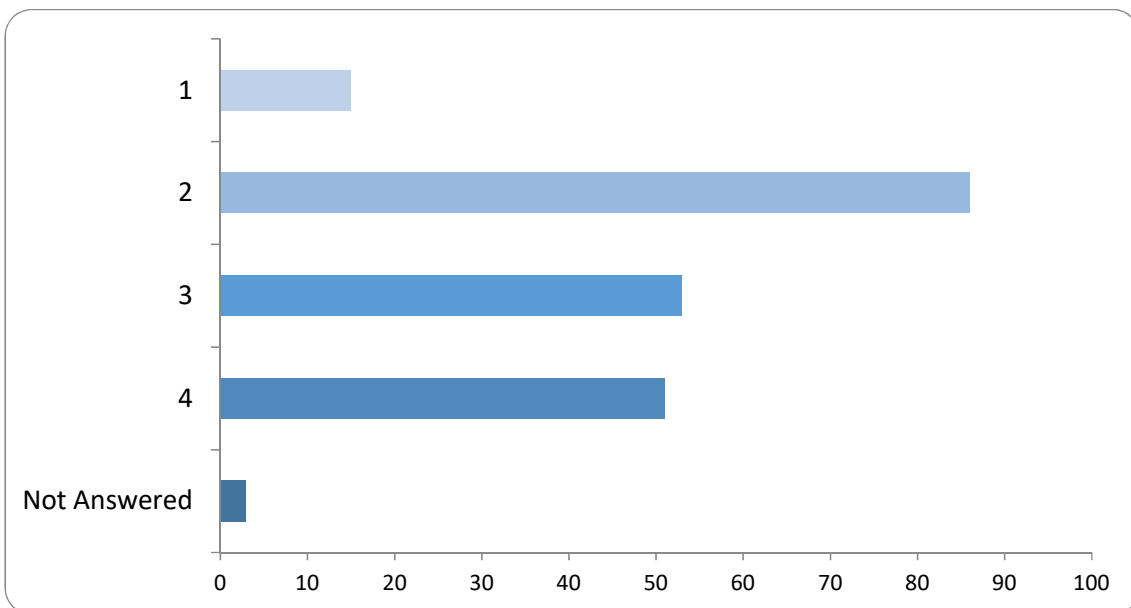
There were 206 responses to this part of the question.



Option	Total	Percent
1	116	55.77%
2	32	15.38%
3	11	5.29%
4	47	22.60%
Not Answered	2	0.96%

Ranking of contributions to NO2 levels - Home Heating

There were 205 responses to this part of the question.



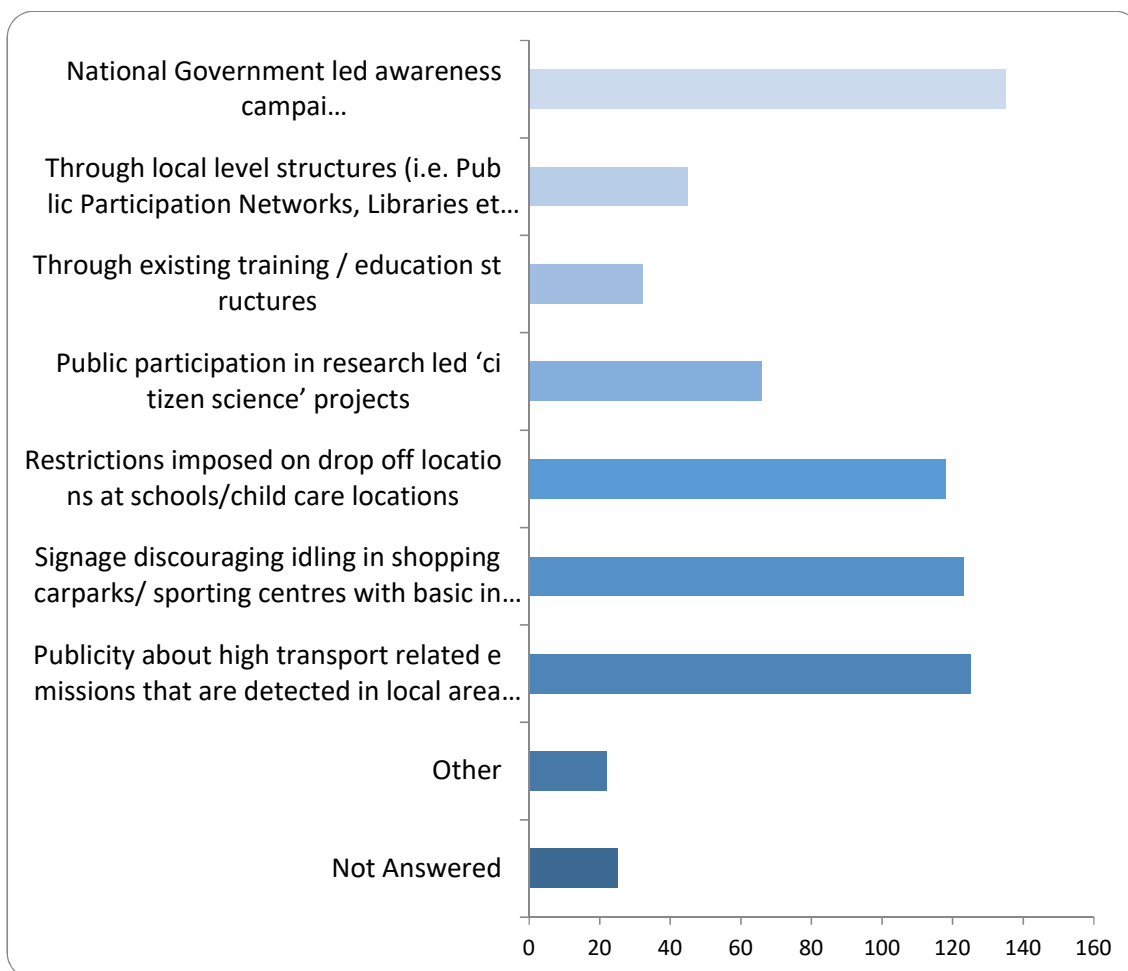
Option	Total	Percent
1	15	7.21%
2	86	41.35%

3	53	25.48%
4	51	24.52%
Not Answered	3	1.44%

9: How can the general public be best made more aware of the health impacts of air pollution (specifically NO2)?

How to make people aware of health impacts of NO2

There were 183 responses to this part of the question.



Option	Total	Percent
National Government led awareness campaigns	135	64.90%
Through local level structures (i.e. Public Participation Networks, Libraries etc)	45	21.63%
Through existing training / education structures	32	15.38%
Public participation in research led 'citizen science' projects	66	31.73%
Restrictions imposed on drop off locations at schools/child care locations	118	56.73%

Signage discouraging idling in shopping car parks/ sporting centres with basic info about harmful emissions from petrol/diesel vehicles	123	59.13%
Publicity about high transport related emissions that are detected in local areas	125	60.10%
Other	22	10.58%
Not Answered	25	12.02%

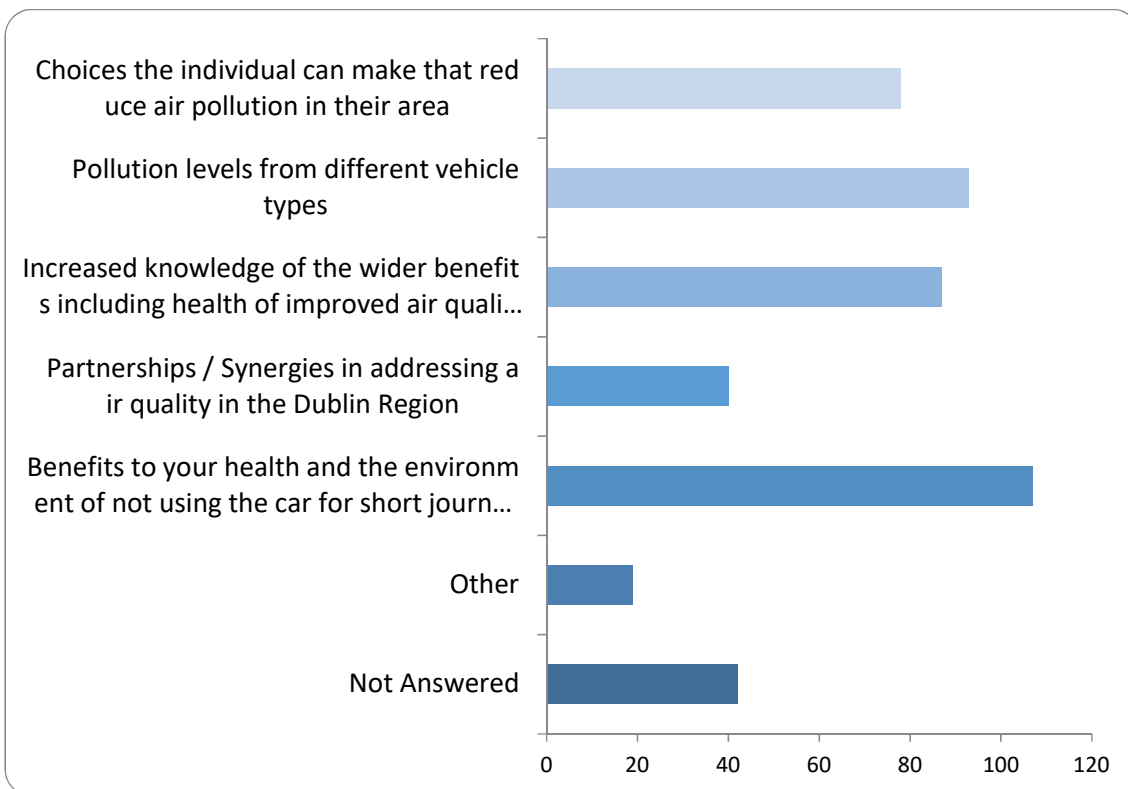
Other

There were 58 responses to this part of the question.

10: Are there particular transport related air pollution issues in your area that would benefit from an awareness raising campaign?

What awareness campaigns needed

There were 166 responses to this part of the question.



Option	Total	Percent
Choices the individual can make that reduce air pollution in their area	78	37.50%
Pollution levels from different vehicle types	93	44.71%

Increased knowledge of the wider benefits including health of improved air quality	87	41.83%
Partnerships / Synergies in addressing air quality in the Dublin Region	40	19.23%
Benefits to your health and the environment of not using the car for short journeys/ leaving the car at home for a number of days per week"	107	51.44%
Other	19	9.13%
Not Answered	42	20.19%

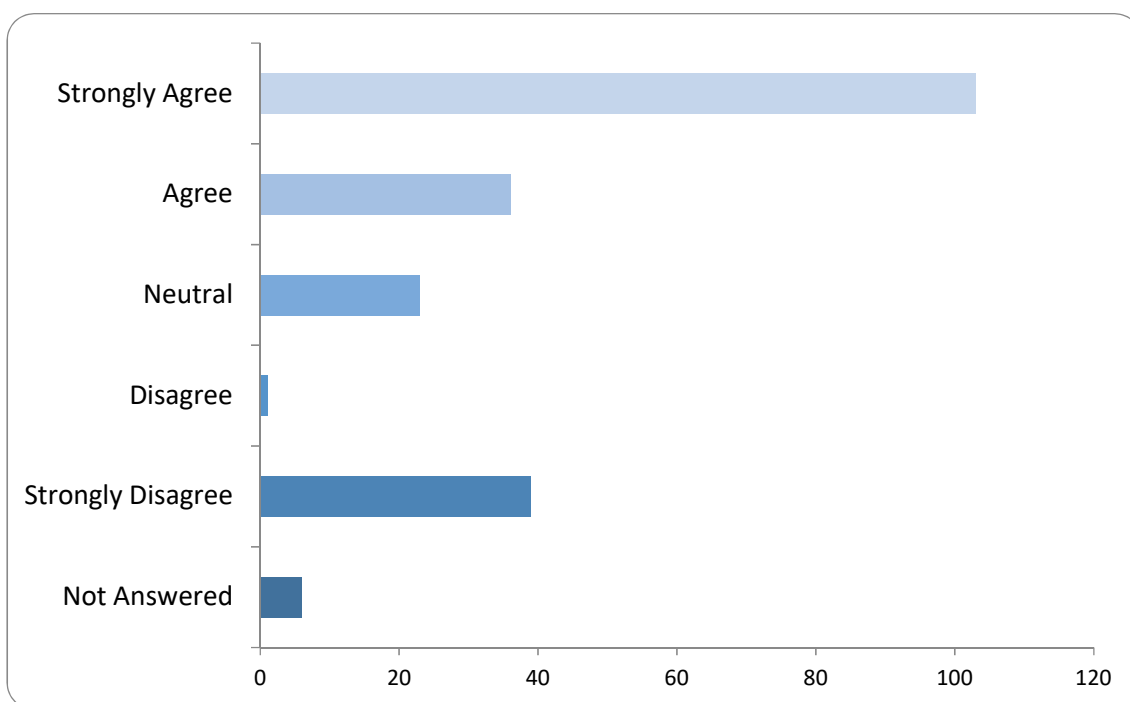
Other

There were 52 responses to this part of the question.

11: Do you agree with the recommendations of the Citizens' Assembly in relation to the climate actions that impact on air quality?

Recommendations of Citizen Assembly

There were 202 responses to this part of the question.



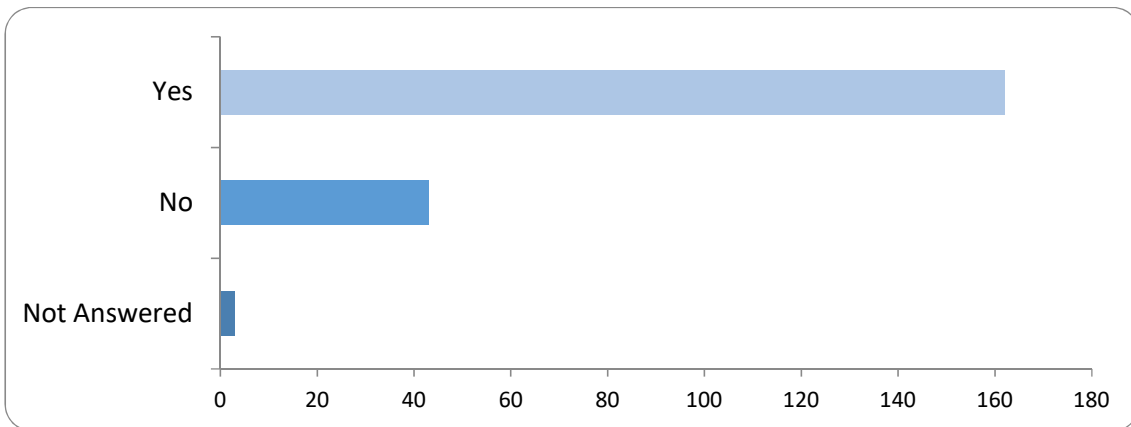
Option	Total	Percent
Strongly Agree	103	49.52%
Agree	36	17.31%
Neutral	23	11.06%
Disagree	1	0.48%

Strongly Disagree	39	18.75%
Not Answered	6	2.88%

12: Is there a need for review and strengthening Local Authority and Environmental Protection Agency EPA powers in relation to dealing with Air pollution, and in particular NO2 levels?

Need to review and strengthen powers to deal with Air Pollution

There were 205 responses to this part of the question.

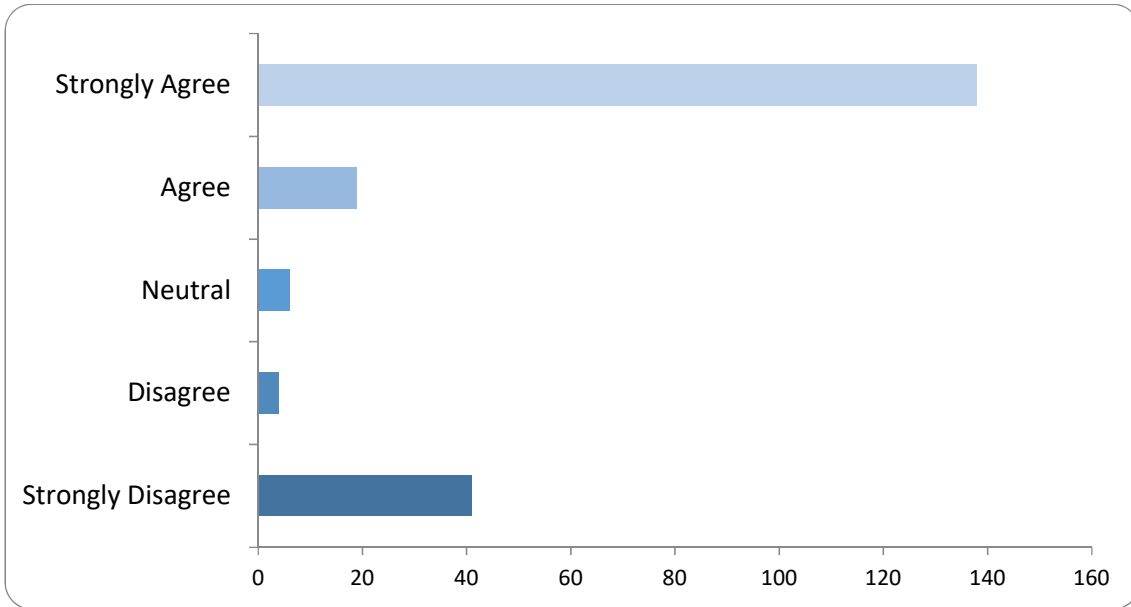


Option	Total	Percent
Yes	162	77.88%
No	43	20.67%
Not Answered	3	1.44%

13: Consideration should be given to the introduction of Low Emission Zones in urban areas.

Low Emission Zones

There were 208 responses to this part of the question.

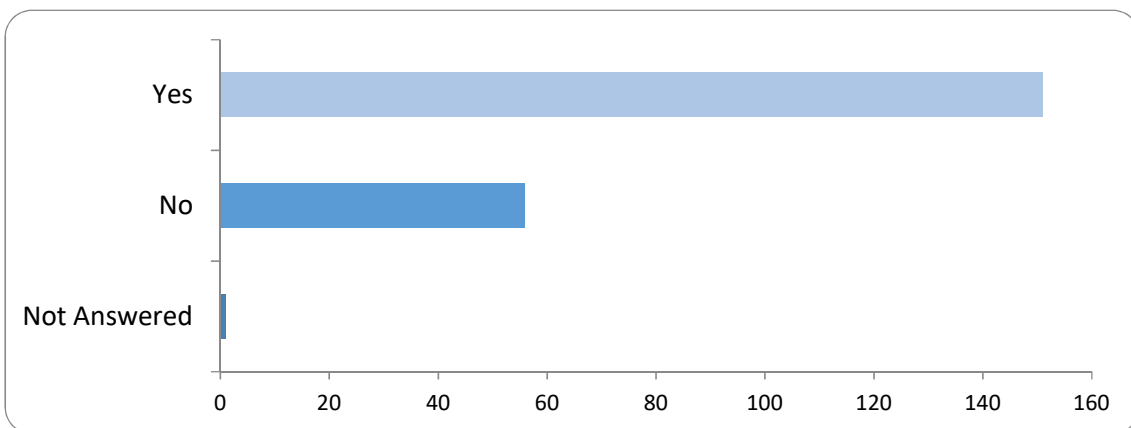


Option	Total	Percent
Strongly Agree	138	66.35%
Agree	19	9.13%
Neutral	6	2.88%
Disagree	4	1.92%
Strongly Disagree	41	19.71%
Not Answered	0	0.00%

14: A Low Emission Zone may involve a charge being levied on those with polluting vehicles. Is this a measure you would support?

Support Low Emission Zone Charge

There were 207 responses to this part of the question.



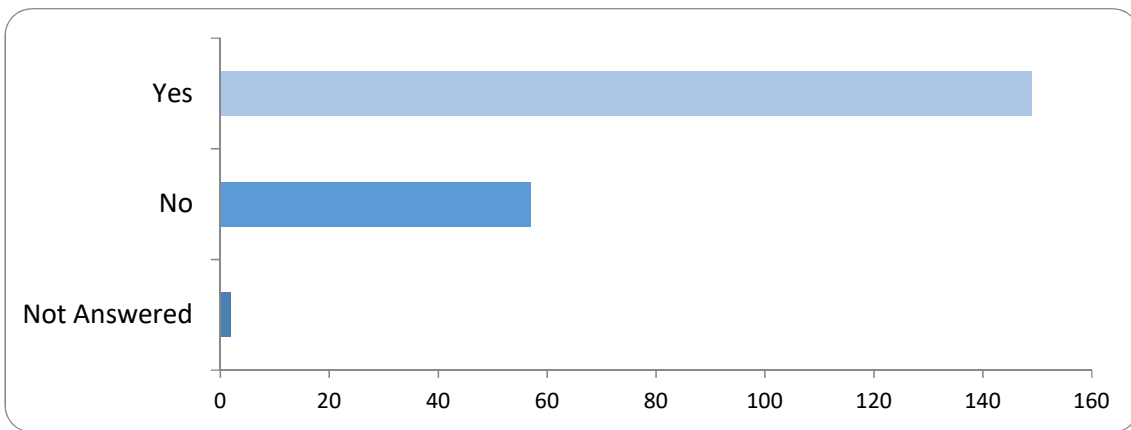
Option	Total	Percent
Yes	151	72.60%

No	56	26.92%
Not Answered	1	0.48%

15: Would you support the Government amending existing legislation to delegate powers to the Local Authorities to introduce Low Emission Zones?

Low Emission Zones

There were 206 responses to this part of the question.

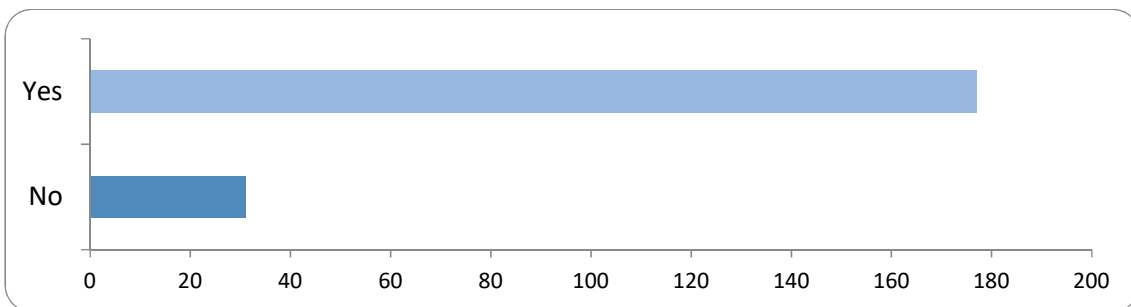


Option	Total	Percent
Yes	149	71.63%
No	57	27.40%
Not Answered	2	0.96%

16: Are you familiar with the concept of 10/15 minute neighbourhoods?

Familiar with 10-15 min neighbourhoods

There were 208 responses to this part of the question.



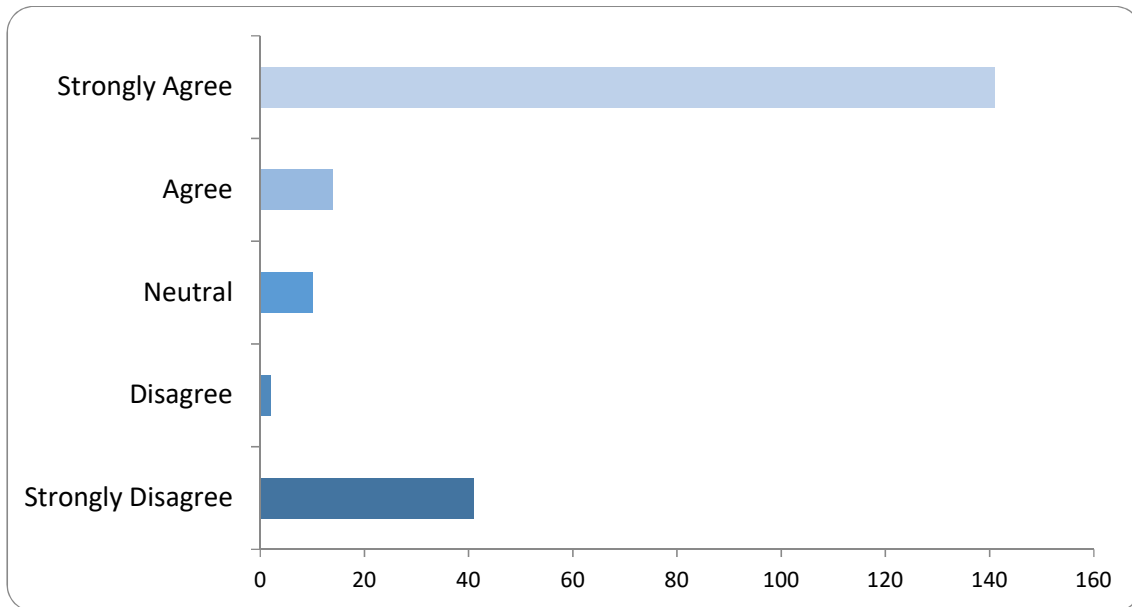
Option	Total	Percent
Yes	177	85.10%
No	31	14.90%

Not Answered	0	0.00%
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17: The concept of a 10/15 minute neighbourhood, or similar, should be examined by all local authorities.

10/15 minute neighbourhoods should be examined

There were 208 responses to this part of the question.

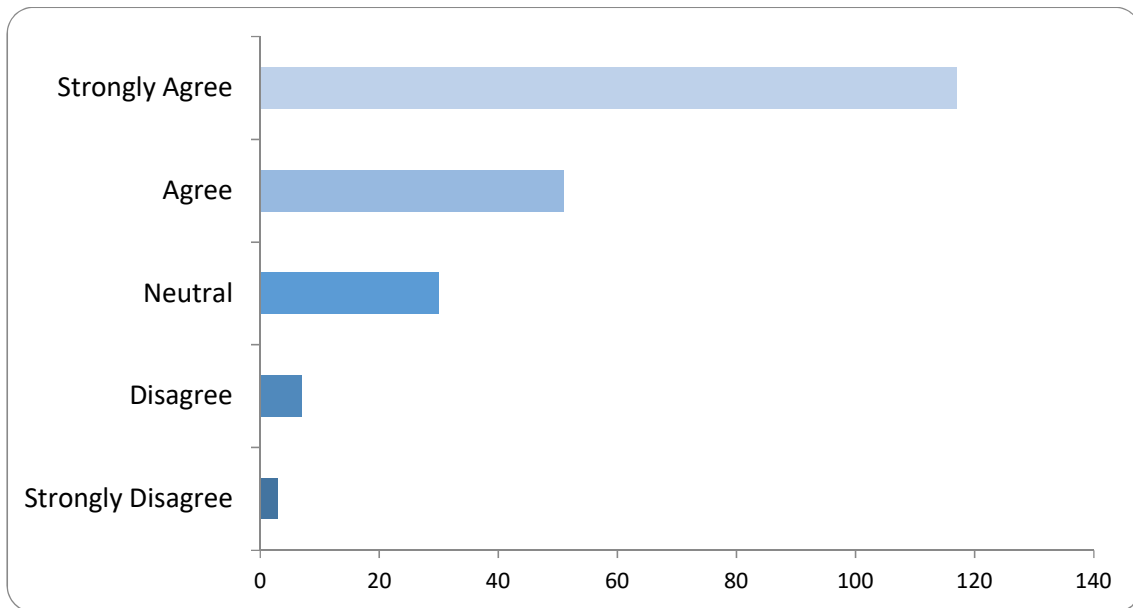


Option	Total	Percent
Strongly Agree	141	67.79%
Agree	14	6.73%
Neutral	10	4.81%
Disagree	2	0.96%
Strongly Disagree	41	19.71%
Not Answered	0	0.00%

18: An extensive electrical vehicle-charging network should be developed in Dublin.

Electrical Vehicle-charging

There were 208 responses to this part of the question.

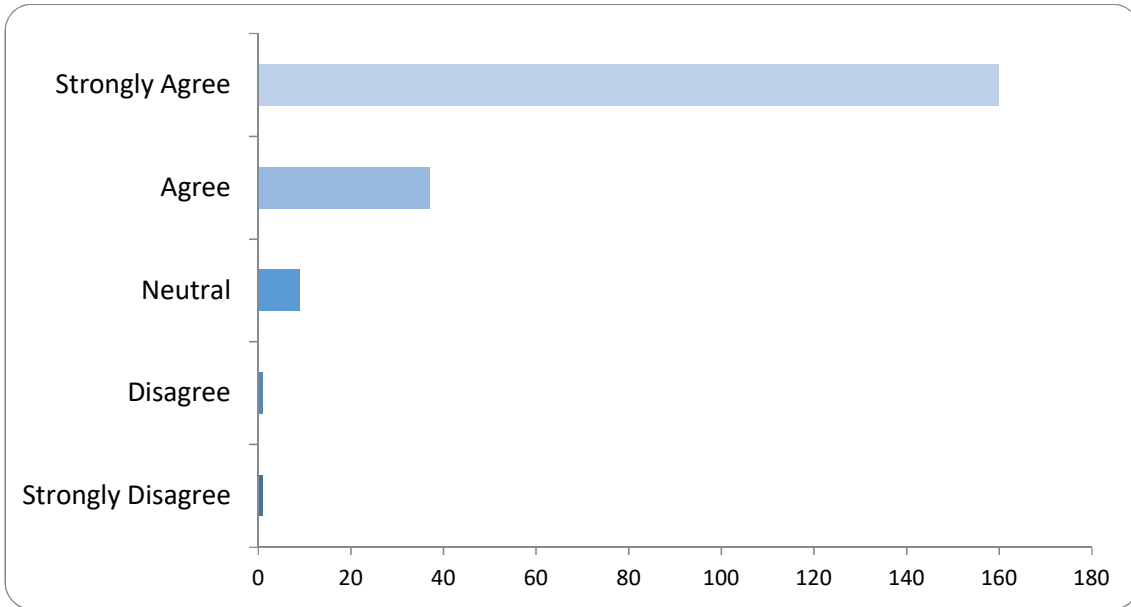


Option	Total	Percent
Strongly Agree	117	56.25%
Agree	51	24.52%
Neutral	30	14.42%
Disagree	7	3.37%
Strongly Disagree	3	1.44%
Not Answered	0	0.00%

19: The Irish workforce should be provided with the option of remote working, for a portion of the week, to reduce NO2 emissions.

Remote Working

There were 208 responses to this part of the question.

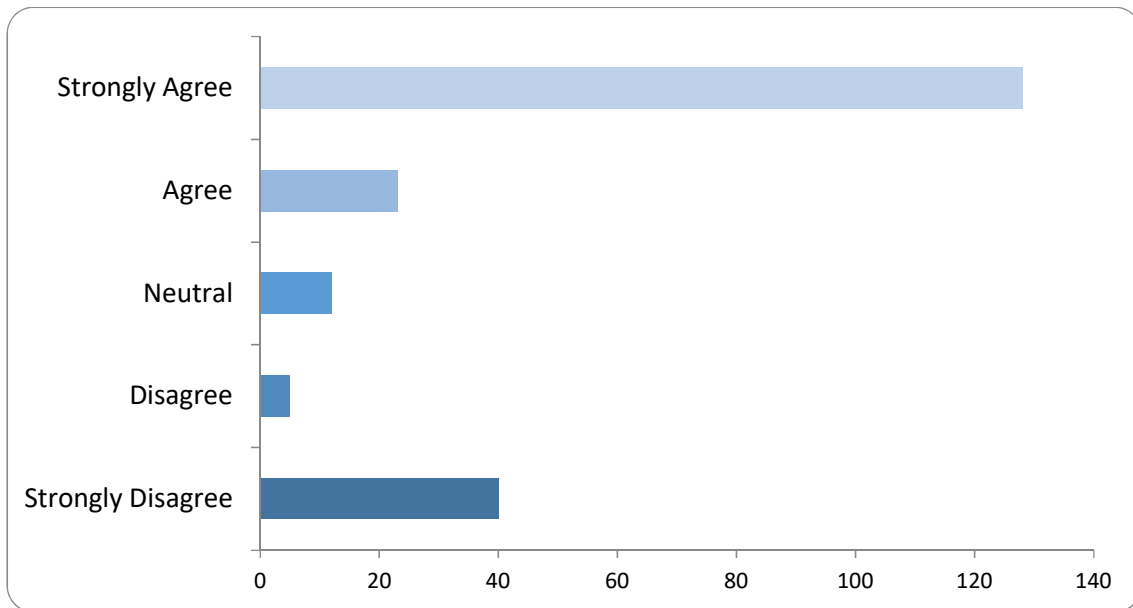


Option	Total	Percent
Strongly Agree	160	76.92%
Agree	37	17.79%
Neutral	9	4.33%
Disagree	1	0.48%
Strongly Disagree	1	0.48%
Not Answered	0	0.00%

20: Consideration should be given to incorporating air quality considerations into vehicle taxation.

Air Quality in vehicle tax

There were 208 responses to this part of the question.



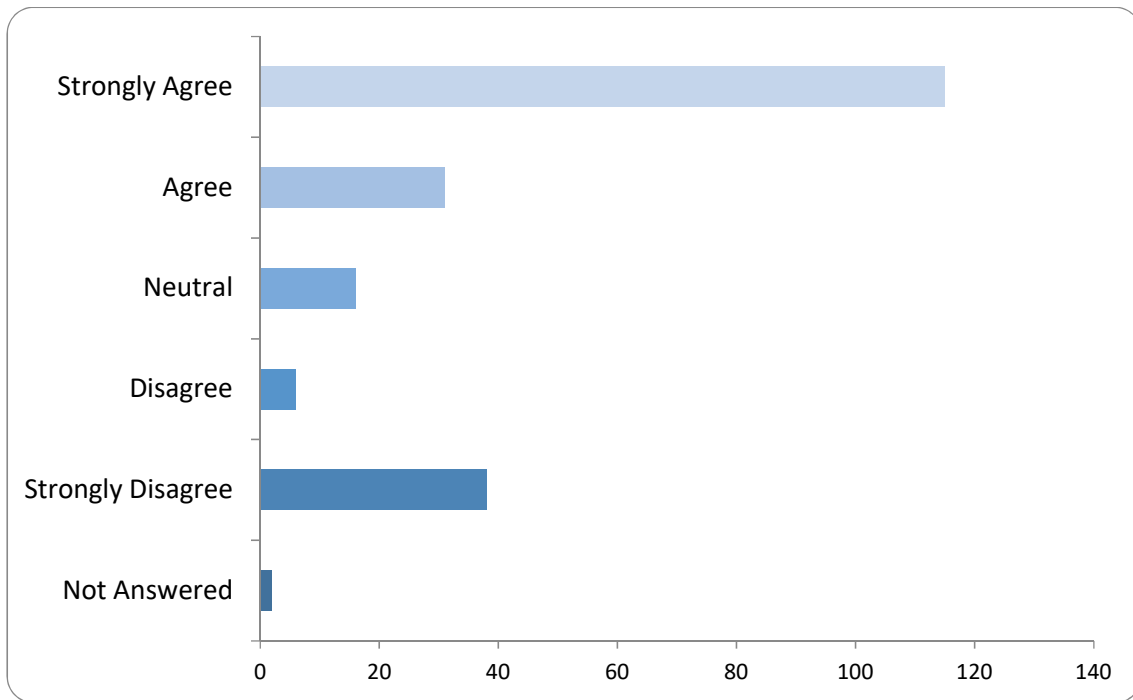
Option	Total	Percent
Strongly Agree	128	61.54%
Agree	23	11.06%
Neutral	12	5.77%
Disagree	5	2.40%
Strongly Disagree	40	19.23%
Not Answered	0	0.00%

21: The NCT emissions testing should have a role in periodic assessment of air pollution

emissions, to inform better regulation of 'in use' vehicle emissions.

NCT role in assessment of air pollution

There were 206 responses to this part of the question.

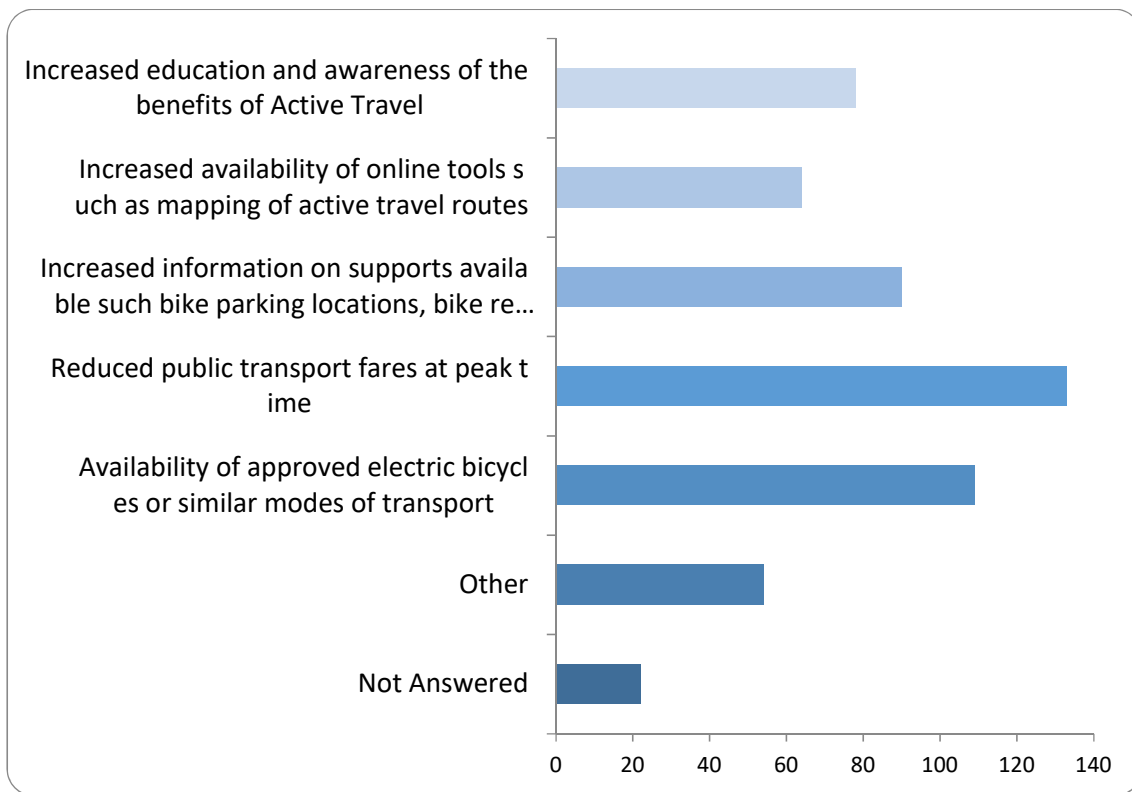


Option	Total	Percent
Strongly Agree	115	55.29%
Agree	31	14.90%
Neutral	16	7.69%
Disagree	6	2.88%
Strongly Disagree	38	18.27%
Not Answered	2	0.96%

22: What other measures would encourage and support the continued modal shift to Active Travel and Public Transport?

Measures to shift to Active Travel

There were 186 responses to this part of the question.



Option	Total	Percent
Increased education and awareness of the benefits of Active Travel	78	37.50%
Increased availability of online tools such as mapping of active travel routes	64	30.77%
Increased information on supports available such as bike parking locations, bike repair outlets etc	90	43.27%
Reduced public transport fares at peak time	133	63.94%
Availability of approved electric bicycles or similar modes of transport	109	52.40%
Other	54	25.96%
Not Answered	22	10.58%

Other

There were 93 responses to this part of the question.

23: What are the important current and emerging air quality transport related air pollution issues in Ireland that require research?

Emerging air quality issues

There were 94 responses to this part of the question.

24: How can the national research capacity that exists in Universities/educational institutions on air quality issues be best used to achieve the reduced NO₂?

Use of Research Capacity in Universities

There were 67 responses to this part of the question.

25: Do you have any additional comments / observations on the Draft Plan?

Milestone

There were 108 responses to this part of the question.

Appendix B – Organisations listed in responses

Organisations which were listed by respondents

Aeravai Autonomous Electric Road and Air Vehicle Association of Ireland

AHAA - All Hallows Area Association

Biodiverse Balbriggan

Fingal bikes

Naul Community Council

Nuaworks

Wood Fuel Quality Assurance Scheme

HES Ltd.

UCD

Emailed Response were received from

HSE Public Health

HSE Environmental Health

An Taisce

Ciaran Cuffe MEP (Green Party)

DAA

Dublin Friends of the Earth

Fingal Active Travel Group

Ger O'Halloran

Green Party West

Irish Doctors for the Environment

Met Eireann

Appendix C – Analysis of Public Consultation Submissions against Themes, Responses and Actions

Overview of the themes, responses and actions taken from the 219 submissions through the Public Consultation on the Draft Dublin Regional Air Quality Plan		
Theme	Response	Action
<p>Matters raised that do not come within the remit of this Plan</p> <p>A number of respondents queried why this plan dealt solely with nitrogen dioxide and did not address other issues including:</p> <ul style="list-style-type: none"> • Particulates (PM10 and PM2.5), • Emissions from vehicle brake and tyre wear. • Solid fuel burning • Emissions from the Dublin Waste to Energy Plant • Noise • Reorientation of public sector and civil service mileage expenses to discourage the use of vehicles and encourage active travel and public transport • Repurposing of public sector car park parking. 	<p>Particulates (PM10 and PM2.5) – including emissions from vehicle brake and tyre wear</p> <p>The legal obligation imposed by Section 22 of the Air Quality Standards Regulations 2011 is to produce a plan for nitrogen dioxide as there was a reported exceedance in 2019. There has not been a reported exceedance for any other air pollutants at any point.</p> <p>Solid fuel burning</p> <p>The Department of the Environment, Climate and Communications will introduce legislation in 2022 for a national ban on bituminous coal and setting standards for wood fuel.</p> <p>Emissions from the Dublin Waste to Energy Plant</p> <p>This facility is subject to EPA licensing – and the emissions data indicates nitrous oxide emissions are significantly below stipulated EPA limit values</p> <p>Noise</p> <p>The Dublin local authorities have commenced work on the preparation of noise maps and will be preparing a noise action plan in 2022 in accordance with the EU Environmental Noise Directive. The preparation of the noise action plan will involve a public consultation process</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>

	<p>Public sector and civil service mileage expenses and parking</p> <p>This is a matter for national government policy</p>	
<p>10/15/20 Minute Cities approach</p> <p>There was general (though not universal) support for the adaption of the 10/15/20 Minute Cities approach</p> <p>The points raised included the need to :</p> <p>Transform cities and towns to make it less likely to need cars.</p> <p>Increase efforts to populate the city between the canals.</p> <p>Reduce amount of derelict land and empty properties that could provide accommodation.</p> <p>One suggestion addressed the adoption of superblocks as a form of urban development, whereby residential blocks are larger than those traditionally built. These developments also give priority to pedestrians and cyclists. Such developments are taking place in other European cities, including Barcelona.</p>	<p>The 15 minute neighbourhood concept is addressed in Measure 1 of the Draft Plan. This concept has been addressed in both the Five Cities Demand Management Study and the Eastern and Midland Regional Assembly - Regional Spatial and Economic Strategy (RSES). This concept of mixed-use development envisages a range of community facilities and services being accessible in short walking/ cycling timeframes from homes or accessible by high quality public transport in larger settlements. This concept is also being considered in the preparation of new City / County Development Plans.</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>
<p>Parking Controls and Standards</p> <p>Enforcement of parking and traffic laws</p> <p>A number of respondents highlighted their dissatisfaction with the level of enforcement of current speeding and parking laws by enforcement bodies and their desire for further measures in this respect including the</p>	<p>Measures 2 to 4 in the Plan deal with Parking Controls and Standards.</p> <p>Enforcement of traffic and parking legislation violations including access to cycle lanes, bus lanes and footpaths is a matter for the Gardai and Traffic Wardens and is outside the scope of this report.</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>

<p>establishment of a new enforcement body. A smaller number of respondents indicated they did not wish to see any further speed limits imposed. Other submissions suggested that parking charges be used as a deterrent to car usage.</p>	<p>The Draft Greater Dublin Area Transport Strategy 2022-2042 provides for comprehensive enforcement of road traffic laws in order to protect investments in transport infrastructure. It also addresses car parking standards and a move to reduce the number of spaces available in Dublin city and elsewhere.</p>	
<p>Active Travel</p> <p>A number of submissions raised issues that included the need for increased active travel choices, access for all and addressing disability in active travel, improve public transport and the need to reduce / ban the use of the private car.</p>	<p>These issues are addressed under Measure 5 - Continued Delivery of the Active Travel Programme, of the Draft Plan.</p> <p>The Dublin local authorities, supported by Government, the National Transport Authority and other stakeholders, continue to develop and implement a range of active travel projects, in particular enhancing local walking and cycling networks. In particular, the Dublin local authorities were some of the first in Ireland, to introduce significant mobility and public realm measures, in order to respond to the COVID- 19 pandemic.</p> <p>In February 2021, the National Transport Authority announced a total of €240m to support sustainable transport projects across the country. The NTA will be tasked with overseeing and supporting the development of the high-quality mobility infrastructure across all projects. The state agency will also ensure that projects are accessible, age-friendly and maximise comfort to people of all ages and abilities.</p> <p>In November 2021, the NTA launched public consultation on the Draft Greater Dublin Area Transport Strategy 2022 - 2042, which sets out the framework for investment in transport</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>

	<p>infrastructure and services over the next two decades to 2042, including transport schemes and measures needed:</p> <ul style="list-style-type: none"> • to tackle climate change; • to reduce the impact of congestion; • to deliver a safe and attractive cycling environment; and • to develop sustainable communities across Dublin City and region. 	
<p>Active Travel – Continued</p> <p>Improved Cycling Infrastructure</p> <p>A consistent theme in the majority of responses was the desire to see significant improvement in cycling infrastructure including protected cycle ways, improved cycle facilities and overall promotion and prioritisation of active travel relative to car usage.</p> <p>Specific suggestions included: extending the Bike to Work Scheme to include cargo bikes to facilitate creche and school drop offs. Create more convenient exits routes from cul-de-sacs for cyclists Improve bike parking- safe and sheltered, bike lockers for example</p>	<p>These matters are substantively addressed in Measure 5 in the draft plan retain to active travel and are also addressed in Draft Transport Strategy for the Greater Dublin Area 2022-2042 which is currently undergoing public consultation</p> <p>At a local level the City and County Development Plans 2022 – 2028 set out the land use framework to guide future development within the city and county with a focus on the places we live and work and how we interact and move between these places while protecting our environment</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>
<p>Active Travel – Continued</p> <p>Public Transport/ Vehicles</p> <p>It was suggested that trialling free transport during off peak hours and free public transport for under 18 year olds on public transport be introduced.</p>	<p>These matters are substantively addressed in Measure 5 in the draft plan retain to active travel and are also addressed in Draft Transport Strategy for the Greater Dublin Area 2022-2042 which is currently undergoing public consultation</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>

<ul style="list-style-type: none"> • More park and ride facilities. • Reduce national Speed limits • Prohibit Diesel vehicles from entering city centre. <p>A number of respondents indicated they would wish to see an increase in the number and frequency of buses including more school buses with segregated routes for public transport</p>	<p>The issue of public transport charging does not come within the scope of this Plan.</p>	
<p>Electric Vehicles and EV charging Infrastructure</p> <p>Suggestions submitted included electrifying public and private buses; promoting taxi scrappage scheme to encourage greater uptake and more support for promoting EV for commercial vehicles.</p> <p>Other submissions were also received that suggest that EVs should be regarded as secondary and supplementary to active travel and public transport strategies</p> <p>There was broad support for expanding the EV charging infrastructure and a suggestion that new house builds should have charging points incorporated where possible.</p>	<p>The Draft Transport Strategy for the Greater Dublin Area 2022-2042 deals extensively with these issues.</p> <p>The ongoing development of the EV Charging Strategy is addressed in Measure 6 in the Plan.</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>
<p>Clean air zones/ low emission zones/congestion charging</p> <p>There were a wide range of diametrically opposed opinions received in respect of the potential introduction of clean air zones/ low emission zones/congestion charging. These ranged from the point of view that air quality was satisfactory, that no interventions were</p>	<p>The implications of measures in respect of the potential introduction of clean air zones/ low emission zones/congestion charging merit careful consideration in advance of any legislation by the relevant stakeholders.</p> <p>Measure 9 of the Plan to be amended to include an action as follows; The UTRAP Working Group, which includes the Dublin Local</p>	<p>Measure 9 of Dublin Regional Air Quality Plan amended</p>

<p>required and any move to introduce any charges was a stealth tax on motorists to those who held that immediate action was required to exclude all non EV private cars from the city centre entirely.</p> <p>In planning terms the following views were expressed; consider location of schools relative to main roads. Plant trees. Don't plan new schools within 10 metres</p>	<p>Authorities, should commit to further investigations into the feasibility of Low Emissions Zones in Dublin.</p>	
<p>Remote working</p> <p>Remote working as a choice for those who are in a position to avail of it was favoured by most respondents. Amongst the suggestions received were to stagger work start and finish times and promoting commuter belt workspaces/ hubs</p>	<p>The ongoing development of the National Remote Working Strategy is addressed in Measure 10 of the Plan</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>
<p>Increased air quality monitoring</p> <p>There was a number of calls for increasing the number air quality monitoring stations in the Dublin region and the deployment of low cost sensors.</p> <p>There were suggestions on the need for , roadside testing and improved real-time NO₂ monitoring across Dublin.</p> <p>One suggestion received addressed lining traffic data collected more closely with air quality monitoring data</p>	<p>These issues are addressed under Measure 11 - Enhanced Air Quality Monitoring and Modelling, of the Draft Plan.</p> <p>The Five Cities Demand Management Study suggests that increased air quality monitoring will lead to earlier action on air quality limit exceedances, which will contribute to driving a switch in the fleet away from older, more polluting vehicles. The Study further suggests this measure could contribute to a decrease of 48% in nitrogen dioxide levels as a result of driving this switch.</p> <p>It is planned to establish a further multipollutant (including nitrogen dioxide) monitoring station in the</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>

	<p>Dublin north inner city area, and ongoing indicative monitoring is being carried out to establish further suitable sites.</p> <p>As set out in the Draft Plan, the Dublin local authorities will work with the EPA to establish additional monitoring stations in the Dublin region as required. The Dublin local authorities will investigate in conjunction with the EPA, the feasibility of establishing regional air quality modelling capacity within the local authorities.</p> <p>In July 2021, the European Commission adopted a package of proposals to make the EU's climate, energy, land use, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. With these proposals, the Commission is presenting the legislative tools to deliver on the targets agreed in the European Climate Law and fundamentally transform the EU economy and society for a fair, green and prosperous future.</p> <p>The consideration of costs, taxation and regulation / enforcement related to air quality is a national issue and as such requires a cross Government and cross sectoral approach. The Department of the Environment, Climate and Communications is currently working to finalise Ireland's first National Clean Air Strategy. The Strategy will identify and promote the integrated measures and actions across Government, that are required to reduce air pollution and promote cleaner air, while delivering on wider national objectives. Accordingly, specific</p>	
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	<p>measures and actions on costs, taxation and regulation / enforcement are beyond the scope of this Plan.</p> <p>The need for the deployment of low cost sensors is acknowledged and as well as the projects such as the Clean Air Together described in Measure 12 listed in this Plan, a number of other university led projects are currently working in the area of citizen science and sensor deployment. This currently includes the UCD European funded, WeCount project. This project will carry out five different pilot projects across a number of European cities, Dublin, Cardiff, Leuven, Madrid, Barcelona and Ljubljana. The aim is to quantify local road transport, produce scientific knowledge in the field of mobility and environmental pollution, and devise informed solutions to tackle various road transport challenges.</p>	
<p>Citizen Engagement</p> <p>The submissions received encompassed a very comprehensive range of issues and suggestions including: Research the best ways to engage and inform the public; Empower community and citizen change and action; Economically nudge people and organisations to lower emissions; Get younger citizens and students involved;</p> <p>Enhancing political and public awareness;</p>	<p>Citizen engagement is crucial in strengthening climate action and lowering all greenhouse gas emissions, including nitrogen dioxide, in the Dublin Region. These issues are addressed under Measure 12 - Air Quality - Citizen Engagement and Measure 14 - Behavioural Change Campaigns to cleaner fleets, of the Draft Plan.</p> <p>In terms of building and strengthening public engagement in improving air quality in Dublin, it is vital to build on the high levels of support for continued roll out of air quality monitoring stations and citizen engagement programmes. The Five Cities</p>	<p>Measure 12 to be modified to reflect Smart Cities engagement</p>

<p>Consideration of Citizens Assembly findings; Provide air quality signage and real-time displays;</p> <p>Use easily understood data,</p> <p>Use robust and well-tested messaging,</p> <p>Communication of local active travel projects that displace car parking etc.</p> <p>On the other hand, The effectiveness of awareness campaigns in changing public behaviour was queried by a number of respondents</p> <p>Smart Cities link up There were a number of queries as to there were linkages between Smart Cities initiatives and air quality monitoring activities</p>	<p>Demand Management Study reported that stakeholders noted these measures could contribute to better quality of life, place making, improved air quality and the Smart City concept. There was also a suggestion that engagement programmes should emphasise and promote active travel as a solution to air quality issues.</p> <p>The Five Cities Demand Management Study also identifies the measure of targeted behavioural change campaigns to encourage low emission vehicle purchase, as being highly effective – estimating that a 57% reduction in nitrogen oxides emissions is achievable. Stakeholder feedback to the study highlighted COVID-19 as creating an opportunity for change in behaviour. The results from the modelling carried in the preparation of this plan also indicate that the graduated move towards cleaner vehicles, will have a significant influence on nitrogen dioxide levels in the Dublin region during the remainder of this decade.</p> <p>Citizen engagement is also a key action area of the Government’s Climate Action Plan 2021 – Securing Our Future, published in November 2021. A National Climate Stakeholder Forum (NCSF) will be established by the Department of the Environment, Climate and Communications, to function as a consultative forum on climate issues, with administrative support being provided by the Environmental Protection Agency.</p> <p>The participants will include a broad range of stakeholders from</p>	
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	<p>across society including elected politicians; government departments and local authorities; state agencies and national organisations; academics; representative bodies; community, local and voluntary groups; and representatives of stakeholders and communities most at risk from the impacts of climate change or the transition to a carbon neutral society. It will inform stakeholders of the latest scientific and policy developments and will act as a core mechanism to facilitate inputs into the Climate Action Plan and sectoral policies relating to climate change.</p> <p>The Airview project cited in measure 12 was established through the Dublin City Smarts Cities team, and other similar air quality projects are at commission stage</p>	
<p>Research</p> <p>Role of Universities in Air Quality and Transport Research</p> <p>Detailed submissions on these issues included: Highlighting the exemplar role of universities in air quality research and leading by example; Need for dedicated PhD funding;; data collection and analysis;; lessons learned from on-site / campus projects; Importance of STEM degrees (Science, Technology, Engineering, and Mathematics); the need for research grants, bursaries, placement programmes, linking with European ERASMUS programmes and international best practice,</p>	<p>The role of universities, third level institutions and other education institutions are recognised as key enablers of air quality research in Ireland. These issues are addressed under Measure 13 – Air Quality and Health Research, in the Draft Plan. As part of its range of functions the Environmental Protection Agency manages an environmental research programme to deliver essential scientific support for environmental policy development, implementation and broader decision-making. EPA Research focuses on achieving environmental objectives, informing policy and bringing together researchers and research users.</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>

<p>and graduate employment opportunities.</p> <p>With regard to transport research, the issues raised included :</p> <p>engaging expertise in the areas of sustainable transport/smart cities to devise action plans and transport modelling and emissions from heavy rail.</p> <p>With regard to Air Quality and Health Impact the issues raised included including the need for compelling research on the effect of air quality on health/quality of life; research on urban planting, research into NO₂ removal and the public dissemination of health research findings</p>	<p>The Draft plan outlines a number of EPA funded research projects ongoing of particular interest, the findings of which will be of particular interest in informing and shaping public discourse and policy in relation to nitrogen dioxide levels nationally, and in particularity in the Dublin region.</p> <p>Local authorities have a range of professional and technical staff working in the areas of transport, active travel and capital project delivery. It is acknowledged that local authorities engage a broad range of external expertise and advice, including consultants and third level institutions, as needed.</p> <p>The current round of calls for EPA funded research include funding for a study on the contribution of rail sources in urban areas to ambient air quality - See section 6.2 of Plan</p>	
Other issues raised		
<p>Staffing & Resources Submissions raised issues including maximising existing resources within local authorities, creation of graduate posts and the supporting role of third level institutions to local authorities in addressing air quality matters.</p>	<p>This matter is highlighted in the Plan in the context of commitment in the current Programme for Government. Local authorities have a range of professional and technical staff working in the areas of air quality, transport, active travel and capital project delivery. It is acknowledged that local authorities engage a broad range of external expertise and advice, including consultants and third level institutions, as needed.</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>
<p>Social inclusion A number of respondents urged that the needs of the elderly, those with disabilities and parents with young children be kept in mind, and raised the query to why a social inclusion</p>	<p>The Draft Transport Strategy for the Greater Dublin Area 2022-2042 places emphasis on inclusion and equality and it will be subject to a full Equality Impact Assessment prior to finalisation.</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>

<p>assessment was not part of this plan.</p>		
<p>Taxation and fiscal measures to address air quality</p> <p>There was a very diverse range of views on these matters and many respondents were not in favour of any introduction of taxes or other similar measures. The point was made by many respondents that a lack of alternative modes of transport to their private car usage was a major impediment in making other choices</p> <p>A number of submissions raised issues around researching the costs incurred by reduced air quality by sector and vehicle type, and related vehicle taxation</p>	<p>In July 2021, the European Commission adopted a package of proposals to make the EU's climate, energy, land use, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. With these proposals, the Commission is presenting the legislative tools to deliver on the targets agreed in the European Climate Law and fundamentally transform the EU economy and society for a fair, green and prosperous future.</p> <p>The consideration of costs, taxation and regulation / enforcement related to air quality is a national issue and as such requires a cross Government and cross sectoral approach. The Department of the Environment, Climate and Communications is currently working to finalise Ireland's first National Clean Air Strategy. The Strategy will identify and promote the integrated measures and actions across Government, that are required to reduce air pollution and promote cleaner air, while delivering on wider national objectives. Accordingly, specific measures and actions on costs, taxation and regulation / enforcement are beyond the scope of this Plan.</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>
<p>Driver Behaviour : Vehicle idling and using "rat runs"</p> <p>A number of respondents raised the contribution of idling vehicle engines as a particular concern to overall pollution levels and</p>	<p>The Clean Air Together project described in Measure 12 is specifically aimed at behaviour change and raising awareness of how individual actions contribute to improved air quality</p>	<p>No amendment to the Dublin Regional Air Quality Plan required</p>

<p>use of minor roads through housing estates as shortcuts by some drivers to the detriment of low traffic neighbourhoods</p>		
<p>Interaction with other Plans and Strategies A number of submissions raised concerns as to where this plan sits and interacts with other sectoral plans and strategies and the perception that this plan lacks clarity and/or urgency on a number of proposed measures and actions. Specifically the sectoral plans and strategies cited include:</p> <ul style="list-style-type: none"> • National Clean Air Strategy • UTRAP Working Group Final Report • City and County Development Plans • Transport Strategy for the Greater Dublin Area 	<p>The Dublin Regional Air Quality Plan has been prepared concurrently with a wide range of related plans and strategies. A number of these have in-built statutory public consultation which are ongoing at this point . It would be premature to include proposals from such plans and strategies currently undergoing public consultations as firm measures in this plan until those statutory processes have run their course.</p> <p>In respect of this plan, it should be noted that the EU Commission will require that it be subject to review and report to them ,and as related measures in other sectoral plans and strategies emerge , this would be reflected in the report issued to the EU Commission.</p> <p>As there is a mandatory legal deadline set for the submission of this Plan, it is inevitable that not all of the related sectoral plans and strategies will align in terms of completion and publication.</p>	<p>No amendment to the Dublin Regional Air Quality Plan</p>
<p>WHO Air Quality Guidelines 2021 In view of the recently published revised air quality guidelines by the World health Organisation, the concern was raised as to whether the revised standards for nitrogen dioxide could be met by 2030.</p>	<p>The revised WHO Air Quality Guidelines 2021 are under active consideration by the EU. It is envisaged a revised air quality directive will be prepared which will set out revised mandatory limit values and a timescale for compliance for all Member States. It should be noted that the forecasted reduction in the levels of nitrogen dioxide in the Dublin region – as per the</p>	<p>No amendment to the Dublin Regional Air Quality Plan</p>

	<p>Draft Transport Strategy for the Greater Dublin Area 2022-2042 and the modelling carried out for this plan indicate substantive reduction current legal limit values. Any changes to those limit values will be addressed in the ongoing review of this plan.</p>	
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