



Ireland's Long-Term Strategy on Greenhouse Gas Emissions Reduction

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Introduction

Dublin Chamber is the largest chamber of commerce in Ireland, representing 1,300 business from across the Greater Dublin Area (GDA), employing 300,000 nationally. Dublin Chamber has been at the forefront of driving the green agenda within the Dublin business community for the past decade and more. Dublin Chamber is pleased to make this submission to the Department of Communications, Climate Action & Environment as part of the consultation on the Long-Term Strategy on Greenhouse Gas Emissions Reduction.¹ The strategy should focus on sustainable cities, and a strategy for a sustainable capital city in particular. This is a recommendation that the Chamber similarly advocated for in its submission to the Department of Finance in relation to Carbon Tax revenue.²

Pathway to 2050 – Sustainable City

The Greater Dublin Area accounts for 44% of the country's urban population and 40% of the overall Irish population.³ The National Planning Framework projects that Dublin's population will increase by 25% by 2040, ten years before the 2050 deadline set by the Greenhouse Gas (GHG) Long-Term Strategy document.⁴ By virtue of their density, Dublin and Ireland's other four cities named in the National Planning Framework can become more sustainable and achieve significantly reduced GHG emissions more quickly than less urban parts of the country. This can be achieved through effective urban planning for compact growth and delivery of public transport infrastructure. Crucially, planning for Dublin 2050's emissions must rise to the challenge that will result from projected population growth. The National Development Plan reflects the Chamber's position on urban and regional development and the need to focus on the infrastructure of urban regions generally for the greatest economic impact.

¹ Government of Ireland, Long-Term Strategy on Greenhouse Gas Emissions Reduction, November 2019, <https://www.dccae.gov.ie/en-ie/climate-action/consultations/Documents/8/consultations/Public%20Consultation%20on%20the%20Long-Term%20Strategy%20on%20Greenhouse%20Gas%20Emissions%20Reduction.pdf>

² Dublin Chamber Principles for an Impactful Carbon Tax, <https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin-Chamber-Policy-on-Carbon-Tax-Increase-28-06-19.pdf>

³ CSO, <https://www.cso.ie/en/releasesandpublications/ep/p-cp2tc/cp2pdm/pd/http://www.cso.ie/en/media/csoie/census/census2016/pr/COPprelim2016.pdf>

⁴ National Planning Framework p61 https://www.housing.gov.ie/sites/default/files/publications/files/project_ireland_2040_npf_7mb.pdf

The benefits of GHG reduction should further encourage focus on infrastructure and planning for urban centres.

Dublin Chamber recommends that Ireland's long term strategy to reduce GHG emissions should focus on developing sustainable cities through investing in the public transport infrastructure and built environment to support it. As there are many unknowns in relation to technological development, renewables, and alternative fuels, this broad approach should produce the best results for GHG emission reduction long term. The UN Sustainable Development Goals (SDGs), to which Ireland is committed, reflect the Chamber's rationale for encouraging investment and focus on developing sustainable cities and infrastructure as a means of future proofing. SDG 9 (Industry, Innovation, and Infrastructure) and SDG 11 (Sustainable Cities and Communities) clearly reflect Dublin Chamber's position and are Goals to which the Chamber has committed.

Transport

Transport produces 23% of Ireland's emissions.⁵ If Dublin with its significant national population share achieved a large-scale modal shift toward active travel and public transport usage, a considerable reduction in emissions could be reached. The Government's Action Plan to Tackle Climate Breakdown sets out 28 Actions (Actions 72-100) for transport delivery specifically.⁶

For urban areas, transport offers the clearest opportunity to rapidly reduce GHG emissions by 2030 and beyond. Many of the large infrastructure investments required in the GDA to make the city work better as a place in which to live, work, and do business, will also reduce GHG emissions. The GHG strategy beyond 2030, however, is contingent on the delivery of key tranches of infrastructure on schedule. In order to plan 30 years into the future with the goal of reducing GHG emissions, capital investment must be committed and secured now to deliver on the major infrastructure that is necessary in the transport sector particularly.

MetroLink must be committed to and delivered by 2027, the deadline set by the NTA.⁷ As MetroLink will have a profound impact on the Greater Dublin Area's public transport usage, any strategy looking beyond this will depend upon its timely delivery. The strategy from 2030 onwards should also aim to improve low emission connectivity to the capital. The Dart Underground project would connect Dublin's busiest train stations and thereby unify Ireland's rail network, connecting Dundalk to Tralee and Sligo to Waterford. Dart Underground must be progressed now in order to reduce emissions to 2050. The development of intercity connections including a one hour train connecting Belfast to Dublin and a one hour train connecting Dublin to Cork should also be prioritised in the post-2030 timeframe to reduce emissions.

⁵ EPA 2017

⁶ Climate Action Plan to Tackle Climate Breakdown Annex of Actions, pp. 46-52, <https://www.dcaae.gov.ie/documents/Climate%20Action%20Plan%202019%20-%20Annex%20of%20Actions.pdf#page=46>

⁷ NTA <https://www.metrolink.ie/#/Timeline>

In the medium term, there is an urgent requirement to deliver cycling infrastructure. If this is prioritised in the next 5-10 years, it can become a core part of how the city functions beyond 2030. At the moment, cycling infrastructure is developing at a very slow pace. The modal change toward walking and cycling for urban dwellers must continue to be supported through continued investment.

Similarly, a better bus network will be necessary. Dublin Chamber has long advocated for the potential of BusConnects. This project must be delivered on schedule.⁸ Long term, Dublin's bus network will be in constant need of improvement in order to retain passenger loyalty. From 2030, the strategy should have the ambition of a Dublin Bus network functioning with low emission fuels, whether this be CNG, hydrogen, or hybrid. However, the main objective should be to serve the population of the city, encouraging long term modal change.

Enterprise

Businesses have the ability to reduce emissions and encourage emission reduction behaviours at a faster pace than Government as they are able to make operational and strategic decisions more quickly. With this in mind, long-term Government strategy to reduce Ireland's emissions should include further integration of the business community in the low carbon economy planning process. The business community also needs to be involved in any Just Transition strategy as this will be vital in the re-skilling process for industries set to undergo change on the course of lowering emissions. The announcement of a Just Transition Commissioner for the Midlands in Budget 2020 was welcome; however, a similar Just Transition committee should be introduced for the GDA or nationally. In the strategy to 2050, the business community should be included as a stakeholder in Just Transition committees to input on skills needs and regulatory requirements.

For post 2030 strategy, it is likely that there will be new innovations and technologies that will contribute to GHG reductions. However, Government should now put in place a regulatory environment conducive to allowing piloting and adoption of new technologies. This would include, for example, technologies that can improve the urban transport landscape. E-scooters offer a low emission urban transport solution, but the current regulatory environment is not conducive to their legal use, as legislation (Road Safety Act 1961) predates any foresight of such technology and therefore is ill fitted to supporting its development and application to the Irish context.⁹

Innovation in the renewable energy and energy efficiency spaces should be actively encouraged by Government. This could be achieved, for example, through a Prize Scheme with an open call to apply for funding for an innovative proposal to support the move to a low carbon economy on course to 2050. The focus of such research could be on innovating for a low carbon Smart City. An example of how

⁸ Dublin Chamber Submission to NTA on BusConnects, <https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/BusConnects-submission-Dec-19.pdf>

⁹ Dublin Chamber Submission to DTTAS on Personally Powered Transporters <https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin-Chamber-Submission-to-DTTS-PPT-November-1st-2019.pdf>

innovation and enterprise can aid in GHG reduction is ongoing in UCD. The UCD Alpha Innovation Campus has been working on the piloting of next generation e-scooter technology through a consortium of Irish SMEs, Instances of Irish indigenous business engaging in such innovation need to be encouraged through a supportive regulatory framework.¹⁰ If Government does not include in its long term strategy the provision of a regulatory environment that supports innovation and the adoption of new technologies, it is likely that Ireland will miss out on opportunities.

Built Environment

Urban planning for compact and dense growth must be at the core of all future planning to reduce GHG emissions. The best way to ensure that the built environment supports the goal of reducing GHG emissions is by ensuring that new development is planned with the sustainable transport infrastructure to support it.

Dublin Chamber advocates an 'infrastructure first' approach to Dublin's overall development. Through investment in the necessary public transport infrastructure to support subsequent housing, the urban population will gravitate toward low carbon transport and active mobility options. The built environment should support overall liveability, ensuring that people can live within a short commuting distance of their work. This in turn should dramatically reduce the need for cars in the city centre.

In relation to housing in particular, communities with mixed development and amenities need to be developed. Long term strategy needs to take account of changing demographics for cities to be sustainable.

A critical step in delivering national GHG reduction targets is ensuring that future buildings are designed to be highly energy efficient. Development of the skillsets needed to deliver such improvements will itself help to safeguard the economic future of the city. The labour force to deliver these new specifications in the timeframe beyond 2030 needs to be developed now.

Energy

The Government's strategy out to 2050 must remain open to alternative fuel sources. Currently, the information available does not provide a clear picture of how Ireland's fuel mix will look in 2050. For many areas of fuel technology, unknowns remain. The suitability of hybrid, hydrogen, CNG, bio-methane, and others, to the Irish landscape is still in its early stages of assessment.

With this in mind, it is essential that Government engage in ambitious and large-scale piloting of projects, including for public transport, which utilise alternative fuel sources. In order for Government to develop a fuel mix strategy past 2030, it needs to be ambitious now in its trialling, both in terms of

¹⁰ UCD Alpha <https://www.dcualpha.ie/2019/12/dcu-part-of-pilot-project-for-next-generation-technologies-for-e-scooters/>

fuels in transport as well as in other ways. It would be a mistake to wait for a silver bullet from the renewable sector to be proven before roll out. Government should look ahead with ambition in relation to its fuel mix and act as a leader in introducing new options.

Conclusion

Ireland's strategy for GHG emissions reduction beyond 2030 out to 2050 should focus on what can be achieved by creating a sustainable urban environment in Dublin, its most densely populated city.

In order for this strategy to be effective from 2030, major improvements in transport infrastructure, including MetroLink and the DART Expansion Programme, must be delivered by 2030. Planning past 2030 is also conditional on a highly functional bus network as well as cycling infrastructure to support active mobility. Government also needs to deliver on its commitments to improved urban planning. The Metropolitan Area Spatial Plan for Dublin must be implemented and requires a strong executive to drive this. Without the guarantee of vital infrastructure being in place at the 2030 juncture, the ability to plan strategically past 2030 will come into serious question. Similarly, the ability to deliver energy efficient buildings is contingent on building the required labour skillsets by 2030, and the requirement for innovation to fill gaps in the period beyond 2030 is contingent on the appropriate business and regulatory environment being provided over the next decade.

Dublin Chamber argues that the strategy to reduce GHG emissions beyond 2030 is largely contingent on Government ensuring that the required public transport infrastructure, regulatory framework, and private sector facilitation is delivered in the next ten years. If it is not delivered, strategies put in place today for the period to 2050 are moot.