



**Greater Dublin Area Transport Strategy** 

2022 2042



**Preliminary Equality Impact Assessment** 

**November 2021** 



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## **Executive Summary**

The National Transport Authority's (NTA) Draft Transport Strategy for the Greater Dublin Area 2022-2042 (Transport Strategy) replaces the previous framework, titled the Transport Strategy for the Greater Dublin Area 2016-2035. Under the Dublin Transport Authority Act 2008, the National Transport Authority must review its transport strategy every six years. As such, an updated strategy has been developed which sets out the framework for investment in transport infrastructure and services over the next two decades to 2042.

The aim of the Transport Strategy is to provide a sustainable, accessible and effective transport system for the Greater Dublin Area (GDA) that meets the region's climate change requirements, serves the needs of urban and rural communities, and supports economic and inclusive growth.

The Transport Strategy has been developed to be consistent with the spatial planning policies and objectives set out in the Regional Spatial and Economic Strategy, the National Planning Framework 2040 and the National Development Plan 2021-2030 as set out in Project Ireland 2040. The Transport Strategy is also based on national policies on sustainability as set out in low carbon legislation and in climate action plans. The potential long-term impacts of the Covid-19 pandemic, beyond the short-term, have also been considered.

This preliminary Equality Impact Assessment (EqIA) will inform the finalisation of the Transport Strategy and will assist the NTA in the fulfilment of its ongoing Public Sector Equality and Human Rights Duty, a legal obligation that originated in Section 42 of the Irish Human Rights and Equality Act 2014. It will also contribute to the NTA's fulfilment with obligations under the Irish Constitution, the EU Charter on Fundamental Rights, EU Equality Directives and Irish equality legislation, including the Equal Status Acts 2000–2018 and Employment Equality Acts 1998–2015. The nine protected grounds under the Equal Status Acts are gender, civil status, family status, sexual orientation, disability, age, race, religion and membership of the Traveller community.

As summarised in **Appendix A**, the nine protected characteristics groups have been assessed against the Transport Strategy's aim, public consultation, strategic objectives, strategy themes and associated strategy sections. Overall, the **Transport Strategy is expected to have a positive equality impact on individuals and communities living, working and visiting the Greater Dublin Area (GDA) through the implementation of its strategic ambitions.** 

The central recommendation of this preliminary EqIA is for the NTA to incorporate the needs of protected characteristic groups into a Strategy Implementation Plan, supported by:

- i) Detailed baseline data collection to inform the implementation approach;
- ii) A plan to engage with representatives of specific protected characteristic groups; and
- ii) A monitoring plan.

The completion of a preliminary EqIA is important for the NTA to demonstrate due regard through considering evidence and analysis to help identify the likely positive and negative equality impacts the Transport Strategy may have on certain protected characteristic groups and to estimate whether such effects disproportionately affect such groups.

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## 1. Introduction

## 1.1 Overview of the strategy

- 1.1.1 The Transport Strategy for the Greater Dublin Area 2022-2042 (Transport Strategy) seeks to provide a transport system which greatly enhances the quality of life for residents, workers and visitors to the GDA, as well as meeting our climate change obligations. Hence, the overall aim of the Transport Strategy is 'to provide a sustainable, accessible and effective transport system for the GDA which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports economic growth'.
- 1.1.2 The development of the Transport Strategy took account of various area-based studies and sectoral studies, in addition to feedback from the public consultation process. Use of the NTA's transport modelling system formed a quantitative evaluation of individual components of the strategy and assessment of the performance of the combined measures.
- 1.1.3 A key driver in the development of the Transport Strategy has been the legislatively based target to reduce overall greenhouse gas emission by 51% by the end of 2030, compared with 2018, with the achievement of such an ambitious target directing large elements of the strategy.
- 1.1.4 The Transport Strategy seeks to promote sustainable and inclusive growth by addressing the challenges of: climate change; recovery from the Covid-19 pandemic; servicing the legacy development patterns; revitalisation of the city centre and town centres; transformation of the urban environment; ensuring universal access, serving rural development; improving health and equality; fostering economic development and improved efficiencies in delivering transport schemes.
- 1.1.5 Based on these strategic challenges, as well as the plans, programmes and policies at the international, national and local level (including Regional Spatial and Economic Strategy, the National Planning Framework 2040 and National Development Plan 2021-2030 as determined by Project Ireland 2040) and on the statutory role of the NTA, the following objectives were established to support the Transport Strategy:
  - An Enhanced Natural and Built Environment: To create a better environment and meet our
    environmental obligations by transitioning to a clean, low emission transport system, reducing car
    dependency, and increasing walking, cycling and public transport use.
  - Connected Communities and Better Quality of Life: To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling.
  - A Strong Sustainable Economy: To support economic activity and growth by improving the
    opportunity for people to travel for work or business where and when they need to, and facilitating
    the efficient movement of goods.
  - An Inclusive Transport System: To deliver a high quality, equitable and accessible transport system, which caters for the needs of all members of society.



## 1.2 Overview of the EqIA context

## 1.2.1 Equality Legislation in Ireland

- 1.2.2 Equality rights in Ireland arise under the Irish Constitution and international law, and many of the State's equality and anti-discrimination protections are derived from EU law including the EU Charter on Fundamental Rights and the EU Equality Directives which underpin Ireland's equality legislation. The primary equality legislation is set out under Section 42 of the Irish Human Rights and Equality Commission Act 2014, the Employment Equality Acts 1998-2015 and The Equal Status Acts 2000-2018 (hereby referred to as 'the Acts').
- 1.2.3 The Acts prohibit discrimination in the provision of goods and services, including transport, accommodation, and education to the public under the nine protected characteristic grounds. In addition, the Acts, prohibit discrimination in the provision of accommodation services against people who are in receipt of rent supplement, housing assistance, or social welfare payments, and victimisation. Protected characteristic groups are shown in Table 1-1.

Table 1-1 Protected Characteristics covered within the Equality Impact Assessment as outlined in the Acts

Protected Characteristic	Description
Gender	Men, women, binary, non-binary gender, transgender, transitioning and other gender identities, married and single people; parenting, caring, flexible working and equal pay concerns.
Civil status	Discriminatory concerns based on less favourable treatment due to civil status of being single, married, separated or divorced, widowed, in a civil partnership or being a former civil partner in a civil partnership that has ended by death or been dissolved.
Family status	Including being pregnant or having responsibility as a parent or lone parent for a person under the age of 18 years or responsibility as a parent or resident primary carer of a person of 18 years or over with a disability requiring care or support
Age	Children (0-16), young people (17-25), working age people (15-64) and elderly people (65 and over).
Disability	People with physical, mental, sensory, visible or hidden medical condition or impairment (e.g. cancer, HIV, dyslexia).
Race	People from various ethnic groups, including colour, nationality, ethnic background and national origin.
Religion or belief	People who have a religious belief; people who are atheist or agnostic; people who have a philosophical belief which affects their view of the world or the way they live.
Sexual orientation	Impacts based on sexual orientation of heterosexual or lesbian, gay, bisexual, transgender, intersex, asexual and queer people, and persons with other sexual orientations and gender identities
Membership of the Traveller community	Member of the Traveller community' means a member of a community of people who are commonly called Travellers and who are identified (both by themselves and others) as people with a shared history, culture and traditions including, historically, a nomadic way of life on the island of Ireland.



### 1.2.4 Public Sector Equality and Human Rights Duty - Human Rights and Equality Commission Act

- 1.2.5 The Public Sector Equality and Human Rights Duty (the Duty) is part of the legislative framework governing human rights and equality in Ireland and has been a statutory obligation for public bodies since the enactment of the Irish Human Rights and Equality Commission Act 2014 on 1 November 2014. It assists public bodies in adhering to human rights and equality standards in a systematic way in their strategic and daily operations for both staff and service users.
- 1.2.6 The Duty, requires all public sector bodies, including statutory and local authorities, to have due regard to the need to:
  - Eliminate discrimination,
  - Promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and
  - Protect the human rights of its members, staff and the persons to whom it provides services.
- 1.2.7 The Duty is a permanent and ongoing statutory obligation. Section 42 of the 2014 Act requires public bodies to assess, address, and report on equality and human rights issues relevant to their function and purpose in a manner that is accessible to the public as outlined below:
  - Assess the public body must set out in its strategic plan an assessment of the human rights and
    equality issues it believes to be relevant to the functions and purpose of the body.
  - Address the public body must set out in its strategic plan the policies, plans and actions in place or proposed to be put in place to address those issues.
  - Report the public body must report on developments and achievements in its annual report.
- 1.2.8 Where the Commission considers that there is evidence of a failure by a public body to perform its functions in line with the Duty it has the power to invite a public body to carry out a review, or to prepare and implement an action plan related to the performance of its function.

### 1.2.9 The Equal Status Acts 2000-2015

1.2.10 The Equal Status Acts prohibit discrimination, harassment, and sexual harassment in access to and use of goods and services, accommodation and education. The nine protected grounds under the Equal Status Acts are gender, civil status, family status, sexual orientation, disability, age, race, religion and membership of the Traveller community. The Equal Status Act also protects people in receipt of rent supplement, housing assistance payments or other social welfare payments against discrimination when they are accessing accommodation or related services and amenities

## 1.2.11 Employment Equality Acts 1998-2015

- 1.2.12 The Employment Equality Acts 1998-2015 prohibit discrimination and harassment under the nine protected grounds (gender, civil status, family status, sexual orientation, disability, age, race, religion and membership of the Traveller community) in employment and stipulates that employers should make reasonable adjustments for employees with disability.
- 1.2.13 Other legislation relevant to the Irish context includes:
  - The Disability Act 2005 Part 5 a statutory obligation on public service providers to support access to services and facilities for people with disabilities.



## 1.2.14 Relevant Ireland national policy commitments:

- The Migrant Integration Strategy: A Blueprint for the Future
- The National Disability Strategy Inclusion Strategy 2017-2021
- The National Strategy for Women and Girls 2017-2020
- The National Traveller and Roma Inclusion Strategy 2017-2021
- The National Action Plan for Social Inclusion 2018-2021

#### 1.2.15 Equality and Covid-19 recovery

- 1.2.16 Covid-19 has had a disproportionate impact on certain groups in society, for example minority ethnic groups, older people, people with disabilities, women and those living in deprived communities. Covid-19 has created new inequalities as well as exacerbating existing disparities across society (Government of Ireland, 2020).
- 1.2.17 The pandemic has also magnified the inequalities experienced by many vulnerable and disadvantaged communities such as the Irish Traveller community, the Roma community, refugees, those who are homeless, those living in Direct Provision and those struggling with addiction (Government of Ireland, 2021). While less affected by the virus itself, the impact of measures to protect society have had an enormous impact on children and young people, especially those that are vulnerable. The pandemic has also negatively impacted the lives of both men and women albeit in different ways (ibid.).
- 1.2.18 As we move into the final phases of the Covid-19 pandemic and into recovery, addressing inequality through levelling up strategies that promote inclusive growth are paramount to actualise a sustainable future. Completion of an EqIA can be a useful process for organisations to assess, mitigate and monitor their equality practices and progress as part of their Covid-19 recovery initiatives. Hence, a Covid-19 recovery lens will be utilised throughout this EqIA.

## 1.3 EqIA Purpose

- 1.3.1 An EqIA considers the impact of a project or policy on persons or groups of persons who share characteristics that are protected under the Equal Status Acts 2000-2018 and under Section 42 of the Irish Human Rights and Equality Commission Act 2014. An EqIA might also include others considered to be vulnerable within society such as those on a low-income. In this way, an EqIA can act as an information gathering tool that enables decision makers within public bodies to implement their equality Duty.
- 1.3.2 The EqIA contributes towards both enabling and documenting the NTA's active compliance with its legal duties under the Duty during the design stage of the Transport Strategy. It is a predictive assessment, considering in advance of implementation the potential impacts arising from the Transport Strategy's implementation, and the likely or possible effects of these impacts for protected characteristic groups. The EqIA serves to inform design, mitigation and other relevant project-related decisions.
- 1.3.3 The objectives underpinning the EqIA are to:
  - Identify the presence of protected characteristic groups in the study area, in particular where such
    groups are disproportionately represented amongst those most likely to be impacted by the
    Transport Strategy;
  - Draw on engagement with stakeholders to inform understanding of the likely needs of protected characteristic groups relevant to identified potential impacts;



- Assess the likely effects of the Transport Strategy's implementation and operation for groups sharing protected characteristics, including how the Transport Strategy could impact relations between groups;
- Identify measures to avoid, minimise and/or mitigate possible negative equality impacts for protected characteristics groups; and
- Identify relevant measures, which, as part of the Transport Strategy's implementation or operation, that could further enhance equality, address existing disadvantage or support good relations between protected characteristic groups and other people.



## 2. Methodology

### 2.1 Overview

- 2.1.1 The EqIA consists of three stages, Screening, Assessment and Monitoring, which are outlined in more detail below. This EqIA does not quantitively assess the significance of effects. Instead, qualitative descriptive judgements have been made regarding the nature of potential equality effects.
- 2.1.2 Equality effects are defined as where an impact is identified as likely to have disproportionate and/or differential effect on groups of people on the grounds of their protected characteristic.
- 2.1.3 Disproportionate effects occur when an intervention has a proportionately greater effect on a protected characteristic group than on other members of the general population at a particular location. Disproportionate effects can arise in two main ways, either:
  - Where an impact is predicted on a residential area where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation in the wider district and/or county/region; or
  - Where an impact is predicted on a community resource predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for very elderly people).
- 2.1.4 Differential effects occur when members of a protected characteristic group are affected differently by an intervention because of specific needs, sensitivities or vulnerabilities related to their protected characteristic. Effects can be categorised as differential, regardless of the number of individuals affected.

## 2.2 Screening

- 2.2.1 The screening stage determines which protected characteristics are likely to experience differential and/or disproportionate effects as a result of the Transport Strategy, and therefore require further consideration within the EqIA. Table 2-1 outlines the screening questions that have been applied to this stage of the assessment. The questions were designed to focus on the interventions ability to address the needs of each protected characteristic group by providing an indication of the issues that are relevant to each group.
- 2.2.2 In addition, the following question has been applied to all groups during the screening stage: Have provisions been made to support Covid-19 recovery for this group?

Table 2-1 Typical Screening Questions

Protected Characteristic	Screening Question
Age	Is the Transport Strategy predicted to have adverse impacts on children's learning environment, access to school or places of recreation? Are the young or elderly disproportionately represented in the communities impacted by the Transport Strategy?
Disability	Will provision be made for fully inclusive design in terms of both transport users and employees?
Gender	Will the construction and/or operation of the Transport Strategy have a disproportionate impact on availability of or access to services used by women or men? Will the construction and/or operation of the Transport Strategy have a disproportionate impact on access to employment for women and/or men?
Civil Status	Is the Transport Strategy predicted to have adverse impacts on those who are married or in a civil partnership? Are there opportunities to better promote equality of opportunity for people within this protected characteristic?



Protected Characteristic	Screening Question
Family Status	Will provision be made for fully inclusive design for pregnant women and parents with young children to navigate public transport freely?
Race	Are particular racial or ethnic groups disproportionately represented in the communities impacted by the Transport Strategy? Will the construction of the Transport Strategy impact on the cohesion of these communities?
Religion belief	Considering the racial profile of surrounding communities, are any places of worship likely to be affected by the Transport Strategy?
Membership of the	Will the construction and/or operation of the Transport Strategy have a
Traveller Community	disproportionate impact on members of the Traveller Community?
Sexual Orientation	Are particular sexual orientation groups likely to experience a differential impact as a result of the Transport Strategy? Have provisions been made to support Covid-19 recovery for this group?



## 2.3 Assessment

- 2.3.1 The assessment stage aims to assess the likely differential and disproportionate effects on protected characteristic groups. The EqIA has assessed the consideration of the Transport Strategy to eliminating discrimination and promoting equality between protected characteristic groups. As set out in Section 2.1 significance of effects has not been assessed, rather qualitative descriptive judgments have been made regarding the nature of potential equality effects.
- 2.3.2 The assessment has also identified opportunities and relevant measures which can further enhance equality, address existing disadvantage, or support good relations between protected characteristic groups and other people.

## 2.4 Assessment of Disproportionate Effects

2.4.1 A baseline profile for the Greater Dublin Area has been compiled from publicly available data to provide context for the assessment. Census 2016 Small Area Population Statistics were analysed to identify areas with a high concentration of protected characteristic groups in comparison to the average for the Greater Dublin Area and the national average for Ireland. The maps in **Appendix B** highlight areas with the 10% highest concentration of protected characteristic groups and sub-groups.

## 2.5 Assessment of Differential Effects

- 2.5.1 A high-level, qualitative analysis of differential effects on protected groups has also been undertaken. The assessment draws on available literature to assess where potential impacts could result in differential equality effects on a protected characteristic group.
- 2.5.2 In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects. This EqIA has considered impacts on groups of people rather than on individuals. Individuals may experience equality effects, but these are not reported due to data protection considerations.

## 2.6 Monitoring

- 2.6.1 The Public Sector Equality and Human Rights Duty outlined in the Irish Human Rights and Equality Commission Act 2014 obliges a public body to monitor equality and human rights issues relevant to their organisation as an ongoing process and annually deliver a report outlining developments. The Duty stipulates that continuous monitoring could be reflected in public sector strategic plans and annual work plans (Irish Human Rights and Equality Commission, 2014).
- 2.6.2 Monitoring progress in relation to an EqIA allows the NTA to demonstrate how it has delivered on its Transport Strategy and lets the NTA build on its own success to identify gaps and to inform the focus of future strategic plans.
- 2.6.3 Monitoring information will be used to make any changes necessary to improve the Transport Strategy and possible evidence of impact may be used to direct change where appropriate and proportionate. If the monitoring and analysis of results over a two-year period show that the policy results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, the NTA must ensure that the Transport Strategy is revised to achieve better outcomes for the relevant equality groups.



## 2.7 Data Sources

2.7.1 Census 2016 small area population statistics were used to source data on age, disability, gender, civil status, family status, race, religious belief and traveller communities within the Greater Dublin Area (Census 2016). The census does not include data on sexual orientation and therefore qualitative data has been sourced from available peer reviewed literature. Government policy documents and available literature has also been used to inform the identification of potential effects on protected characteristic groups.

## 2.8 Assumptions and limitations

- 2.8.1 Changes in public policy, economic and other wider factors will shape, in both intended and unintended ways, the social, economic and environmental conditions that influence equality impacts and the way they are experienced amongst affected communities. This imposes limitations on identifying the impacts directly attributable to the Transport Strategy.
- 2.8.2 For assessment purposes it will be necessary to assume that the baseline characteristics established during the screening process will remain largely unchanged. Where information on forecast changes to population characteristics are available, these will be incorporated into the future baseline where relevant.



## 3. Screening

## 3.1 Differential effects

- 3.1.1 In recent years, researchers have developed new methods to measure how transport decisions affect different groups of society (Behbahani, Nazari, Kang, & Litman, 2019). Such decisions affect people's ability to access services and activities, and therefore their economic opportunities and development. As such, it is crucial to incorporate social equity measures in transportation network planning.
- 3.1.2 Although transportation is increasingly framed as a social issue by researchers and policymakers, the social dimension is still largely marginalised in planning processes. Women, ethnic minorities, the LGBTQ+ community and persons living with disability are all less likely to have their needs met by a standard transport system; potentially corresponding to worse health, economic and social outcomes for these groups (Boisjoly and Yengoh, 2017). One reason for this is the dominance of the conventional planning approach which has traditionally focused on the technical and physical dimension of transportation (ibid.).
- 3.1.3 Potential differential effects on protected characteristic groups are outlined in Table 3-1.

Table 3-1 Potential differential effects on protected characteristic groups

Protected Characteristic	Potential Differential Effect
Race	<ul> <li>Vulnerability to changes in transport costs: Evidence suggests that Black Asian Minority Ethnic community members are often over-represented within lower income groups and therefore have increased vulnerability to changes in transport fares (Martiskainen et al., 2020).</li> <li>Employment in transport roles: In Ireland, within the transport sector, ethnic minorities are more highly represented in bus driver roles of the 16% of bus drivers from a country of origin outside Ireland (Immigrant Council of Ireland, 2014). Dublin Bus, as of December 2012, employed 3,300 employees from 68 different countries of origin (ibid.). There has been an 85% increase in the reporting of racist incidents to the Immigrant Council of Ireland's Racist Incidents Support and Referral Service since its inception in 2013, with a total of 142 racist incidents reported to the Service (ibid.). In 2014, 24% of incidents reported to the Immigrant Council of Ireland occurred while travelling on public transport, with 42% of victims identifying as African (ibid.).</li> <li>Introduction of new transport corridors: The barrier presented by new transport corridors may result in spatial segregation which ethnic minority communities can be more susceptible to, especially those from low-income household who may face limitations in the set of residences, destinations, and transport modes they can choose. This has the potential to re-enforce or exacerbate societal divisions (Jones, Midell, &amp;</li> </ul>
Religion	<ul> <li>Safety using public transport: Perceptions of safety can differ between different cultures and faiths, particularly those with concerns related to hate crime. For religious people who have a marked religious identity through clothing there is an increased risk of harassment or discrimination (Irish Human Rights and Equality Commission, 2017). Compared to Catholics, members of minority religions report somewhat higher discrimination rates in the workplace and in public and private services (ibid.). Research interviews with Muslim men and women in Dublin outlined the discriminatory practices</li> </ul>



Protected Characteristic	Potential Differential Effect
	they felt they experienced from transport staff as a result of religious and racial profiling, which took the form of poor or no service provision (Immigrant Council of Ireland Independent Law Centre, 2016).
Disability	<ul> <li>Accessibility of public transport: Evidence suggests that some disabled people are more vulnerable to stress and anxiety in crowded places, as dense and fast-moving crowds can reduce accessibility and make vulnerable passengers feel unsafe (National Disability Authority, 2021). In addition, disabled people are particularly vulnerable to changes in journey times and accessibility resulting from transport network changes and/or diversions caused by new transport corridors (Jones, Midell, &amp; Anciaes, 2015).</li> </ul>
	• Environmental impacts of transport: People with certain pre-existing health problems are more sensitive to impacts from air pollution that may arise from construction and operation of transport infrastructure (European Environment Agency, 2020).
	Car dependency: Members of communities with disabilities are much more likely to be dependent upon public transport than car use. This dependency means that any changes to local transport infrastructure could have a direct impact on their lifestyle and wellbeing (International Transport Forum, 2017).
Age	Children and young people: New infrastructure can divide communities and change the normal journey routes of some individuals. For children, a change in route might take them across dangerous road or rail crossing points, placing them at increased risk of an accident. Children are limited by their physical, cognitive and social development, making them more vulnerable to transport accidents (World Health Organisation, 2015). For children and young people, access to reliable public transport can be critical for accessing education (O'Connor & Staunton, 2015).
	• Elderly populations: Elderly people are considered to have an increased dependency upon public transport and often place high importance on the availability of routes close to home. Changes to the accessibility of public transport is therefore likely to have differential impacts on elderly members of local communities (International Transport Forum, 2017). Evidence suggests that older people have a lesser likelihood to be able to walk for long distances. For this reason, the introduction of a physical barrier within the local community could increase their journey times and reduce their ability to access community facilities (Jones, Midell, & Anciaes, 2015). Older people are also more sensitive to impacts from air pollution that may arise from construction and operation of transport infrastructure (European Environment Agency, 2020).
Family status	Accessibility: Evidence suggests pregnant women and mothers with young children are more likely to use public transport to access community and healthcare facilities, which plays an important role in supporting social inclusion for this group (Lodovici and Torchio, 2015). The accessibility and design of physical spaces may also affect the ability of parents with young children to navigate public transport freely, especially if using pushchairs (ibid.). Further research suggests that lone parents, as a lower income group, experience higher levels of ill-health meaning that they are more constrained in their ability to cycle (Lucas, Stokes, Bastiaanssen, & Burkinshaw, 2019).



Protected Characteristic	Potential Differential Effect
	Environmental impacts of transport: Pregnant women are sensitive to impacts from air pollution, with exposure having negative effects including the potential to disrupt a baby's development (Medical News Today, 2020).
	Vulnerability to changes in transport costs: Lone parent families suffer from transport poverty; children and parents in lone-parent families are the least likely of any household type to have private transport, and the price of public transport excludes many young people, and mothers and children, from its use (Titherbridge, 2008). In addition, households with low incomes, ethnic minority community members, and those that have children or household members with mobility problems are also at risk of transport poverty (Simcock, et al., 2020). Rural and semi-rural communities are also more at risk because they lack access to alternatives to car-use. These groups without transport would be particularly vulnerable to both social and spatial isolation (ibid.).
Gender	• Safety: Research suggests that women are more likely to be subject to hate crimes and harassment and therefore feel unsafe within stations and on public transport (O'Connor & Staunton, 2015). In Dublin, 7% of women report having experienced sexual harassment on public transport and 55% of women stated that they would not use public transport at night (Transport Infrastructure Ireland, 2020). Evidence also suggests that women's susceptibility to sexual assault and frequent experiences of various forms of harassment can make them more vulnerable and perceive higher security risks (Nilay, 2010).
	• Travel Patterns: Whilst gender differences in car use are declining, women are still less likely to be the main driver in the household (Lucas, Stokes, Bastiaanssen, & Burkinshaw, 2019).
Sexual Orientation	• Safety: The LGBTQ Hate Crime Report by Johnny (Johnny, 2006), a non-governmental organisation for gay and bi-sexual men around Ireland and the UK indicated that in Dublin, members of the LGBT community are more likely to be subject to hate crimes and harassment and therefore feel unsafe within stations and on public transport (O'Connel, 2010). Further research reveals how the fear of anti-LGBTQ discrimination and violence have profound impacts on LGBTQ identity and visibility, and safety perceptions affect mobility opportunities and choices (Weintrob, Handell, Zebracki, Barnard, & K, 2021). This research identifies that LGBTQ participants are not necessarily physically excluded from mobility opportunities, rather, they pay hidden costs to travel safely which take the shape of identity and visibility comprises and heightened levels of fear while travelling (Weintrob, Handell, Zebracki, Barnard, & K, 2021).
Civil Status	Equality: In Ireland, the overall treatment of people across the system and institution of marriage, civil partnerships and cohabiting couples is not always consistent, or equitable, and this can have a direct bearing on economic equality (TASC, 2015). However, there is no evidence to suggest that this protected characteristic group experiences proportionately worse transport service today than other groups.
Membership of the Traveller Community	Disadvantage: Irish Travellers report very high rates of discrimination in seeking work, where they are ten times more likely than White Irish to experience discrimination, and experience high rates of discrimination in private services (Irish Human Rights and



Protected Characteristic	Potential Differential Effect
	Equality Commission, 2017). Further findings point to evidence of a widening gap in health over their life course. The increasing disadvantage in terms of health as their life course progresses is a characteristic of cumulative disadvantage, a process whereby early adverse experiences shape the long-term trajectory (Elder, 1985). Traveller children are particularly disadvantaged due to settlements being located in exposed areas at danger from passing traffic or poor air quality due to construction activity. Such sites are often remote from public provision of playgrounds and public transport can be almost non-existent (Cemlyn, Greenfields, Burnett, Matthews, & Whitwell, 2009).

## 3.1.4 Deprivation

- 3.1.5 For the purpose of this assessment, although not specified as one of the nine protected characteristic groups under the Act, people living in deprived areas are considered as a vulnerable group. People living in deprived areas are more likely to experience low life expectancy, poor general health, and high levels of unemployment than people in affluent areas and are therefore more vulnerable to the socioeconomic and environmental impacts of transport infrastructure.
- 3.1.6 Research suggests that lower income households experience more financial burden when using public transport and are therefore more vulnerable to changes in costs (Government Office of Science, 2019) Similarly, lower income households are less likely to have access to a car, therefore accessibility to public transport plays a significant role within the demand to reach key destinations for either work, education of healthcare (International Transport Forum, 2017).
- 3.1.7 Improved local transport infrastructure will directly benefit those living without a car as their accessibility to education, employment and essential service is dependent upon these public transport links (International Transport Forum, 2017). Research suggests that it is likely that a significant number of people on low incomes in rural areas (and some urban areas) are unable to meet their basic transport needs (O'Connor & Staunton, 2015).

## 3.2 Disproportionate effects

3.2.1 This section presents the total number of people within the study area belonging to a protected characteristic group in comparison to the Ireland average. The statistical data gathered in relation to the disproportionate effects on protected characteristic groups is presented in Table 3-2.



## 3.3 Disproportionate effects

3.3.1 This section presents the total number of people within the study area belonging to a protected characteristic group in comparison to the Ireland average. The statistical data gathered in relation to the disproportionate effects on protected characteristic groups is presented in Table 3-2.

Table 3-2 Statistical data gathered in relation to the disproportionate effects on protected characteristic groups

Protected Characteristic Group	Sub-Group	Total number of people in the Greater Dublin Area	Greater Dublin Area Average (%)	Ireland Average (%)	Comparison to Irish average (In Line = +/- 3%	Potential disproportionate effects
Age	0-19	511,000	26.8	27.5	In Line	Whilst most age groups are similarly represented in both the Greater Dublin Area and the rest of Ireland, there is a higher than average concentration of 20–39-year-olds within the Greater Dublin Area, particularly within Dublin city centre.
	20-39	594,000	31.2	27.8	Higher	
	40-64	576,000	30.2	31.3	In Line	the dreater bubblin Area, particularly within bubblin city tentre.
	65-84	202,000	10.6	11.0	In Line	
	85 and over	24,000	1.3	1.4	In Line	
Disability	Females	130,000	6.8	7.0	In Line	The proportion of the population with a disability in Dublin is in line with the rest of
	Males	117,000	6.1	6.5	In Line	Ireland, for both males and females. The distribution of people with this characteristic appears to be relatively even across the Greater Dublin Area. Compared to the rest of Ireland, the administrative country of Dublin City in the Greater Dublin Area contains the largest disabled population, representing 15% of its population (Disability Federation of Ireland, 2018).
Gender	Female	971,000	50.9	50.6	In Line	The representation of both males and females within the Greater Dublin Area is in line
	Male	936,000	49.1	49.4	In Line	with the rest of Ireland. However, geographically, there is a higher concentration of males located in central Dublin. The female population is more evenly represented than males across the Greater Dublin Area.
Civil Status	Single	1,060,000	55.4	53.6	In Line	For Civil Status, all categories are in line with the rest of Ireland, and Separated, Divorced
	Married	694,000	36.4	37.6	In Line	or Widowed persons are evenly distributed across the Greater Dublin Area. However, t
	Separated	46,100	2.4	2.5	In Line	single sub-group is concentrated in the Dublin City Centre, and married couples are more common in outer Dublin.
	Divorced	41,400	2.2	2.2	In Line	
	Widowed	70,100	3.7	4.1	In Line	



Family Status	Families Without Children	140,000	29.2	29.2	In Line	Whilst overall family status representation is in line with Ireland, those either without children or one parent families are heavily concentrated in the Dublin City Centre. On the other hand, those with children are more highly concentrated in outer Dublin.
	Couples With Children	250,000	52.1	52.8	In Line	
	One Parent Families	90,200	18.8	18.0	In Line	
Race	White Irish	1,460,000	78.1	82.2	Lower	Overall, racial representation in the Greater Dublin area is in line with Ireland, however
	White Irish Traveller	8,500	0.5	0.7	In Line	there is a significantly lower presence of White Irish compared to the Ireland average.  Geographically, this group is observed to have high representation in outer Dublin. On the other hand, Other White, Asian, Asian Irish, Other and Not Stated are overly represented in the centre. Black or Black Irish appear to cluster in communities around the edge of the city. White Irish Travellers are evenly distributed.
	Other White	204,000	10.9	9.5	In Line	
	Black or Black Irish	36,000	1.9	1.4	In Line	
	Asian or Asian Irish	59,500	3.2	2.1	In Line	
	Other	37,500	2.0	1.5	In Line	
	Not Stated	63,700	3.4	2.6	In Line	
Religion belief	Catholic	1,370,000	71.9	78.3	Lower	In comparison to Ireland, the Catholic sub-group is underrepresented in Greater Dublin  Area whilst those characterised as 'no religion' are overrepresented compared to the national average. There are a greater number persons belonging to Catholic sub-group ir the northern region of outer Dublin. Those with no religion or have not stated, are most represented in the Dublin centre. Other religions are evenly distributed across the Greater Dublin area.
	Other	220,000	11.5	9.2	In Line	
	No Religion	250,000	13.1	9.8	Higher	
	Not Stated	66,200	3.5	2.6	In Line	
Membership of the Traveller Community	White Irish Traveller	8,500	0.5	0.7	In Line	The number of White Irish travellers in the Greater Dublin Area is in line with the rest of Ireland. Geographically, the distribution of this group is even across the study area.



## 4. Assessment

## 4.1 Introduction

- 4.1.1 The Duty requires all public sector bodies, including statutory and local authorities, to have due regard to the need to eliminate discrimination, promote quality of opportunity and protect human rights of its members, staff and persons whom it provides services.
- 4.1.2 The EqIA has assessed the Transport Strategy's impact on promoting equality for protected characteristic groups. The assessment has also identified opportunities and relevant measures which can further enhance equality, address existing disadvantage, or support good relations between protected characteristic groups and other people.
- 4.1.3 Having considered the data and evidence gathered for the EqIA of the Transport Strategy; this section considers assessment findings of potential impacts that the strategy might have on groups from protected characteristics defined. It is important to remember the Duty is also a positive one it explores how the strategy offers the opportunity to promote equality, inclusion and foster good relations.

## 4.2 Assessment Findings

- 4.2.1 The EqIA assessment findings can be seen in the summary matrix in **Appendix A** of this document. Within the matrix, the nine protected characteristics groups defined by the Acts and Duty have been assessed against the Transport Strategy's aim, public consultation, strategic objectives, strategy themes and associated strategy sections. See **Table 4-1 for EqIA findings mitigations and recommendations** in Section 4.3.
- 4.2.2 Overall, the **Transport Strategy is expected to have a positive equality impact** on individuals and communities living, working and visiting the GDA through the implementation of its strategic ambitions.
- 4.2.3 It should be noted that the high-level nature of the strategy and associated policy measures precludes the identification of any specific impacts promoting good relations among some protected characteristic groups such as the traveller community, race, civil status and LGBTQIA+. Nevertheless, the strategy will establish a positive framework for a Strategy Implementation Plan that can allow specific interventions to be designed around promoting equality across the nine protected characteristic groups.
- 4.2.4 The Transport Strategy places great emphasis on inclusion and equality, with an overarching aim to create a sustainable, accessible and effective transport system that meets the region's climate change requirements, serves the needs of communities, and supports economic growth. The Transport Strategy also outlines the NTA's commitment to all key stakeholders and partners in transport to develop an inclusive transport system, building on the work done to date.
- 4.2.5 The Transport Strategy specifically outlines how strategy implementation will lead to more connected communities with better quality of life through faster commute times, better reliability and reduced rural isolation because of increased coverage and frequency of services, and wellbeing benefits of improved active transport options.



- 4.2.6 The Transport Strategy's 'Strategy Outcomes' section outlines how its implementation will lead to a better built environment through a people-centred street transformation through the creation of thoroughfares and places people wish to congregate; and where movement on foot and by bicycle is safer and more convenient. This focus on placemaking and greater access to public realm has societal benefits in improving people's physical and mental health, encouraging people to walk more, to play sport, and access to green space (Design Council UK). In addition, improved access to public realm can fosters greater community cohesion and promotes social inclusion across individuals and communities from diverse backgrounds and life circumstances (ibid.). Thus, the Transport Strategy's implementation provides an opportunity for the NTA to actualise an inclusive transport system for the GDA.
- 4.2.7 In addition, the Transport Strategy recognises the NTA's important role in promoting sustainability and accessibility, and improving health and equality beyond the nine protected characteristic groups to include those from lower income households or at risk of poverty with the following considerations (Section 3.9):
  - Affordable transport acting as a catalyst for reducing disadvantage in communities;
  - The affordability of public transport so that it remains available and useful for families with lower disposable incomes;
  - The role of public transport in further improving accessibility for persons with disabilities; and
  - Promoting active commuting for its benefits to people's health and to the environment.
- 4.2.8 Furthermore, when published, the Transport Strategy will establish an important statutory framework committing the NTA and all other agencies in the GDA to the implementation of inclusive measures to ensure the transport system meets the needs of all members of society, and to advertising and education campaigns which seek to inform people of specific needs of others.

## 4.3 EqIA findings mitigations and recommendations

- 4.3.1 Table 4-1 below outlines the mitigations and recommendations from the Equality Impact Assessment findings (see **Appendix A**).
- 4.3.2 The Table summarises key recommendations for each section of the Transport Strategy and outline suggestions that the NTA may seek to include as part of their Strategy Implementation Plan, making note of specific mitigations against certain protected characteristic groups where relevant. For the comprehensive suite of strategy implementation suggestions where please see Section 5 Recommendations: Strategy Implementation.
- 4.3.3 In addition, to mitigation and recommendations for each Transport Strategy section, the following recommendation has been applied to all Transport Strategy section for all groups as part of EqIA findings:

It is recommended that consideration be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.



Table 4-1 Key

Key – Protected Characteristic Groups					
CF	Civil Status and Family Status				
Α	Age				
D	Disability				
GSo	Gender and Sexual Orientation				
RT	Race and Traveller Community				
Re	Religion				

Table 4-1 Equality Impact Assessment Findings Mitigations/Recommendations (see **Appendix A** for EqIA matrix)

Transport Strategy Section	Mitigations and Recommendations
Strategic Objective: An enhanced natural and built environment	As the shift towards a low emission transport system and an enhanced natural environment is actualised it may be beneficial to understand and assess Strategy Implementation Plan impacts on protected characteristic groups through monitoring. Consideration could be given to affordability of scheme initiatives for lower income households, such as single income households or those with caring duties (CF1) as well as accessibility impacts on older persons (A1). It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
Strategic Objective: Connected communities and better quality of life	It is recommended that further consideration be given to seek opportunities that integrate the different modes of transport, including bus, highways, rail and light rail services with active travel moves such as pedestrian and cycling routes. Provisions at public transport stations could include bicycle storage, drop-off zones and disabled parking (D1). When designing new public transport facilities, it is important to consider the interplay between mobility and protected characteristics.  Specific considerations might include mobility limiting disabilities (D2), or the needs of the elderly and carers of young children (A2). Methods of combating the perceptions of public transport as unsafe may be sought in order to encourage modal shift, in particular for women (GSo1) and persons from ethnic minority backgrounds (RT1). The analysis of potential differential effects showed that some religious groups, particularly those from the Muslim community, have experienced racial and religious profiling and discrimination on public transport in Dublin (RT2, Re1). Thus, the Strategy Implementation Plan could engage with community liaison groups to explore how feelings of safety can be cultivated within local communities.  It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
Strategic Objective: A strong sustainable economy	It is recommended that the NTA considers protected groups in the assessment of the inclusivity impacts of economic objectives and productivity benefits as part of the Strategy Implementation Plan. This will allow proper utilisation of productive labour from protected characteristic groups, in particular persons living with disability (D3) and those who may currently not have access to public transport or a car. It may be useful to understand how the Strategy Implementation Plan increases labour market participation across the protected groups, for example, increased opportunities for women (GSo2), ethnic minorities (RT3) or



Transport Strategy Section	Mitigations and Recommendations
	younger/older people (A3) as a result of increased accessibility, reliability and safety measures of the new inclusive transport system.  It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
Strategic Objective: An inclusive transport system	Representatives of protected characteristics (whether individuals, established organisations or agencies, or specifically sought out target groups) could be engaged with during strategy implementation to ensure the needs of these groups are identified. For example, direct engagement with members of the LGBTQIA+ (GSo3) and minority ethnic communities (RT4) to address any inclusivity and safety perception concerns. Plans may consider the needs of people with limited mobility (D4, A4) and ensure public transport facilities and non-motorised travel forms are accessible for all users. The incorporation of lifts into existing tram and train stations will be beneficial for those with mobility needs such as pregnant women (CF2), those living with disability (D5) and younger/older persons (A5). Funding could be provided to support the maintenance and renovation of older lifts to ensure they are in good working order for their passengers. The provision of appropriate additional taxi rank space in towns and cities could be incorporated, which would improve accessibility for all transport users, especially those with mobility or accessibility issues (D6, A6, CF3).  It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
The Strategy: Planning for Sustainable Transport	Whilst the high-level strategy does not specifically mention the need to reduce discrimination or promote equality for all protected characteristic groups in this section, the NTA incorporates high quality urban design that encourages more people to choose to walk, cycle or use public transport by making the overall experience safer, more accessible and attractive.  Local Transport Plans could include a requirement for public engagement with representatives of protected characteristic groups during strategy implementation to ensure the needs of these groups are identified, such as mobility (D7,A7), accessibility and safety concerns (GSo4, RT5, Re2).  It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
The Strategy: Integration and Inclusion	At a high-level the strategy shows due regard to the need to promote equality of opportunity across all protected groups. Measure INT15 outlines NTA will ensure that public transport infrastructure and facilities in the GDA are made accessible for all users and measures INT15-INT18 ensure will that all travel information is universally accessible, travel assistance is provided for disabled travellers and that inclusivity campaigns will be implemented across the network (D8, RT6, Re3, A8, CF4, GSo5). This shows the NTA's commitment to integration and inclusion.  It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
The Strategy: Walking, Accessibility and Public Realm	The strategy shows due regard to the needs of those with mobility issues. Measure WALK8 states local authorities in the GDA and the NTA will take full account of pedestrians with visual and mobility impairments (D9) when delivering transport schemes which affect the pedestrian environment and will implement improvements to existing facilities where appropriate.



Transport Strategy Section	Mitigations and Recommendations
	It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
The Strategy: Cycling and Personal Mobility Devices	Further consideration of personal security along cycle greenways is recommended, which would help increase safety perceptions for protected characteristic groups, particularly women (GSo6).  The presence of bike carriages on public transport may provide benefits of increased transport options, however care must be taken that allowing bikes on public transport does not reduce the capacity on these services, disadvantaging those relying on them. It is recommended that road cycling education be provided for children (A9) to optimise the realisation of benefits for this group, with the added benefit of promoting a healthy lifestyle.  It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
The Strategy: Public Transport	Plans could consider the needs of people with limited mobility (D10, A10) and ensure public transport facilities and non-motorised travel forms are accessible for all users. It is beneficial to explore methods of encouraging behaviour change for modal shift from private vehicle to public transport/active travel.  Measures taken to implement the Core Bus Corridor Programme and Bus Service Network Monitoring and Review is expected to facilitate faster and more reliable bus journeys on the busiest bus corridors, making the overall bus system more convenient and useful for more people. This may benefit disabled persons (D11), families with young children and elderly populations (A11).  The implementation of improved security systems on Light Rail and new bus stops and shelters may improve the accessibility and safety for protected characteristic groups more likely to experience harassment and acts of violence on public transport (GSo7, RT7, Re4).  It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
The Strategy: Roads	The Transport Strategy's road measures outline implementation initiatives intended to increase provision of safe and appropriate arrangements to facilitate walking, cycling and public transport. This may have beneficial impacts on all protected groups vulnerable to safety concerns e.g., families with young children (A12, CF5), elderly (A13) and persons living with disability (D12).  Within urban areas, changes to road design to create compact, denser and more interconnected layouts may help to consolidate cities, towns and villages making them viable for reliable public transport and amenable to higher rates of walking and cycling. This focus on place-making may benefit groups who are more vulnerable to social isolation by improving sense of place and belonging (GS08, RT8, Re5, D13, A13).  It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.
The Strategy: Traffic Management and Travel Options	Monitoring of traffic patterns and air pollution in the GDA following any designations of traffic measures during strategy implementation could be undertaken to ensure that effects are not displaced to new areas and thus, exacerbate health inequalities of vulnerable or at-risk groups, including low income families, ethnic minorities, refugees, those living with disability, the elderly and persons with existing respiratory conditions (GS09, RT9, Re6, D14, A14).



Transport Strategy Section	Mitigations and Recommendations							
	Vehicle restriction and charging schemes could be subject to consultation. Should vehicle restriction schemes be implemented, adequate facilities including disabled parking could be implemented to ensure those with limited mobility are not adversely affected (D15).							
	It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.							
The Strategy: Freight, Delivery and Servicing	Some forms of employment may be adversely impact by Transport Strategy initiatives, for example, HGV drivers. Expansion of EV charging facilities could be provided throughout the GDA to support uptake across all protected characteristic groups, as well as those who are also low-income earners and/or live in socio-economically disadvantaged areas where this infrastructure is likely to be lacking. Consideration could be given to measures to ensure that the overall quality of freight, delivery and servicing is not adversely impacted by policies to reduce congestion and move operations to out-of-our/off-peak timeframes.							
	It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.							
The Strategy: Climate Action Management	The Transport Strategy's measures are likely to have positive health benefits on all protected groups due to increased air quality and active transport, and decreased emissions. It can be noted that there are participation limitations for those mobility issues or living with disability, however, these groups will be able to benefit from improved air quality and mitigated climate change effects (D16).							
	Consideration can be given to the impact of strategy initiatives that increase the cost of fossil fuels and discouragement of private vehicles on communities where alternative options are not available, as a result of affordability or reliance on these means for employment. These impacts may have a greater impact on low-income households, older persons, minority ethnic communities and those living in more rural environments (A15, RT10).							
	It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.							
Other: Environmental Assessment	It is recommended that consultation be undertaken with protected groups residing in the vicinity of transport projects with significant environmental impacts. This would ensure accurate quantification of local ecosystem services and the production of an accurate Strategic Environmental Assessment.							
	Furthermore, consideration could be made to ensure that expansions in active travel do not alienate those unable to use these options, such as those with mobility concerns (D17, A16), for example, through the simultaneous improvement in public transport provision.							
	It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Strategy Implementation Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Strategy Implementation Plan lifecycle and evaluation.							



## 5. Recommendations: Strategy Implementation Plan

#### 5.1 Overview

- 5.1.1 The central recommendation emerging from the EqIA findings (see **Appendix 1** EqIA assessment matrix, and Table 4-1 EqIA findings mitigations and recommendations) is that the needs of protected characteristic groups be incorporated into a Strategy Implementation Plan, supported by:
  - i) detailed baseline data collection to inform implementation approach (section 5.2);
  - ii) a plan to engage with representatives of specific protected characteristic groups (section 5.3); and
  - ii) a monitoring plan (section 5.4).
- 5.1.2 The Transport Strategy's Universal Design approach (whereby the design and composition of an environment so it can be accessed and used to the greatest extent possible by all people regardless of their age, size, ability or disability) will be a helpful guiding principal throughout the Strategy Implementation to achieve this ambition.

## 5.2 Baseline data collection to inform implementation approach

- 5.2.1 As stated in 4.2.3 the high-level nature of the Transport Strategy's precludes the identification of specific impacts on some protected characteristic groups, however, the extent of impacts on particular groups may only come to the fore during strategy implementation stage. It is suggested that the NTA could use the EqIA as a foundational analysis to consider ongoing assessment of impacts throughout the strategy's implementation lifecycle to evaluation.
- 5.2.2 As detailed schemes and interventions emerge as a result of the Transport Strategy, it is recommended that baseline data be collected and appraised in greater detail to understand the potential impacts on specific local populations and vulnerable groups.

## 5.3 Engagement with representatives of specific protected groups

- 5.3.1 It is recommended that the NTA seeks to engage with representatives of those with protected characteristics (whether individuals, representative bodies, established organisations or agencies, or specifically sought out target groups), to ensure that the needs of these groups are being captured and mitigated for where appropriate. When engaging with these groups it's important to employ participatory methods and/or use peer-support personnel to ensure the process is as inclusive as possible. For example, Measure PLAN15 Local Transport Plans as outlined in Transport Strategy Section 8.10, could include a requirement for public engagement with representatives of protected characteristic groups to ensure the needs of these groups are identified.
- 5.3.2 It is recommended that an equality toolkit could be developed covering the nine protected characteristic groups (of gender, marital status, family status, age, disability, sexual orientation, religion, race and membership of the Traveller community), as well as additional information on compounding factors of disadvantage such as deprivation. Such a toolkit would support inclusive strategy implementation at project and operational levels. This combined with strategic monitoring of the Transport Strategy's implementation process against specific inclusion targets would ensure that the needs of protected groups are adequately addressed to realise the NTA's ambitions of creating an inclusive transport network as well as assist in fulfilment of the Public Sector Equality and Human Rights Duty obligations.



## 5.4 Monitoring

- 5.4.1 It is recommended that a framework could be established as part of this Monitoring Report indicated in the Transport Strategy to monitor the impact of the implementation specifically on protected characteristic groups. If the monitoring results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, it is recommended that the strategy is revised to achieve better outcomes for the relevant equality groups. In line with the Public Sector and Human Rights Duty, it is recommended that the NTA report on developments and achievements in its annual report.
- 5.4.2 As stated in the Draft Transport Strategy, it would be beneficial for a robust monitoring programme to be put in place to ensure that the policies and proposals of the Strategy are being implemented in a coordinated, effective and timely manner. Monitoring can demonstrate the positive effects facilitated by the Transport Strategy for protected characteristic groups. Likewise, monitoring can enable, at an early stage, the identification of unforeseen adverse effects which will allow the NTA to undertake appropriate remedial action if required.
- 5.4.3 A Monitoring Report which assesses the implementation of the Strategy against the strategy objectives will be prepared by 2025 in advance of the review of the Strategy. Monitoring is based around the collation of available indicators which allow quantitative and qualitative measures of trends and progress over time relating to the achievement of the Strategy Objectives.
- As we move into the final phases of the Covid-19 pandemic into recovery, addressing inequality through levelling up strategies that promote inclusive growth are paramount to actualise a sustainable future. The following questions could be used to support future strategy implementation monitoring in alignment with the COVID-19 levelling up agenda and ensure alignment with the Public Sector and Human Rights Duty (Irish Human Rights and Equality Commission, 2021):
  - Are you gathering and reviewing disaggregated equality data and information on the impact of COVID-19, for example gender, age, disability, sexual orientation, ethnicity?
  - Have you put in place a mechanism to monitor the impact of decisions, policies and plans on different groups, through feedback or complaint mechanisms?
  - Have you in place a regular review process whereby your policies and plans are living documents that can be adapted based on emerging evidence from groups experiencing inequality and discrimination? (Irish Human Rights and Equality Commission, 2021).



## 6. Conclusion

This preliminary Equality Impact Assessment of the Draft Transport Strategy for Greater Dublin Area (GDA) 2022-2042 assessed the nine protected characteristics groups against the Transport Strategy's aim, public consultation, strategic objectives, strategy themes and associated strategy sections. EqIA assessment results show that the Transport Strategy is expected to have a positive equality impact on individuals and communities living, working and visiting the GDA through the implementation of its strategic objectives.

The completion of an EqIA at the draft stage of the NTA's Transport Strategy is emblematic of the NTA's due regard to its Public Sector Equality and Human Rights Duty on reducing discrimination and promoting equality for on protected characteristic groups, as well as its commitment to creating an inclusive transport system. It also outlines its alignment with its Public Authority obligations under the Equal Status Acts 2000-2018, Disability Act 2005 Part 5 and EU law, such as, the EU Charter on Fundamental Rights and EU Equality Directives.

The key recommendation for this preliminary EqIA is for the NTA to incorporate the needs of protected characteristic groups into an equality focussed Strategy Implementation Plan, supported by baseline data collection, a plan for engagement with representatives of protected characteristic groups, and for monitoring throughout the strategy implementation lifecycle.



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## Appendix A. Preliminary Equality Impact Assessment of the Transport Strategy of Greater Dublin Area 2022-2042

Symbol	Impact
+	Positive
0	Neutral
-	Negative

Transport Strategy Section	Summary	Impact: Gender and Sexual Orientat ion	Impact: Religion	Impact: Age	Impact: Disability	Impact: Race and Traveller community	Impact: Civil Status and Family Status	Rationale
Strategy Aim	To provide a sustainable, accessible and effective transport system for the Greater Dublin Area. This must meet the region's climate change requirements, serve the needs of both urban and rural communities, and support economic growth.	+	+	+	+	+	+	Through its inclusive growth high-level approach, the Transport Strategy is likely to provide beneficial impacts for all protected characteristic groups .
Public consultation	The NTA prepared a Pre-Draft Issues Paper in November 2020 which received public and stakeholder feedback into development from inception stage. A full Public Consultation then commenced from 23 <sup>rd</sup> November 2020 to 22 <sup>nd</sup> January 2021, and the public were asked to assist in the development of the strategy goals and objectives, and to help identify transport requirements and opportunities. Parallel to this a list of key stakeholders were contacted and asked for their views. 4,000 submissions were received.	0	0	0	0	0	0	To best achieve accessibility for all members of the public, the NTA developed accessible versions of the Issues Paper and made direct contact with various Disability Groups. The Transport Strategy places great emphasis on inclusion. In particular, Chapter 9 outlines a statutory framework committing the NTA and all other agencies in the GDA to the implementation of measures to ensure the transport system meets the needs of all members of society, and to advertising and education campaigns which seek to inform people with specific needs. Whilst responses to the consultation covered many different aspects of transport needs across the region, specific protected characteristic groups were not consulted with outside statutory consultation bodies, thus, NTA could consider this during the next stage of its strategy process.
An enhanced natural and built environment	To create a better environment and meet our environmental obligations by transitioning to a clean, low emission transport system, reducing car dependency, and increasing walking, cycling and public transport use.	0	0	+	+	+	0	Initiatives that contribute to net-zero carbon, and the encourage use of electric vehicles, public and active transport would result in the reduction in air pollution. This would benefit younger and older populations, those with underlying respiratory concerns and communities living near major roads. Supporting the shift from higher polluting and diesel private vehicles, to a greater reliance on cleaner private vehicles, private hire vehicles and public transport as part of the energy transition may require investment from households with lower socio-economic status. Vehicle restriction and scrappage schemes and other initiatives as part of the energy transition may disproportionately affect those in deprived areas who may be less able to adapt to changes outlined in the policy. To combat this disadvantage, compensatory schemes could be considered to provide for inclusive growth.
Connected communities and better quality of life	To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling.	+	0	+	+	0	+	The location and design of schools and the management of transport requirements for those travelling to schools, may have a positive impact on the health and quality of life of children and teenagers by helping to address childhood obesity.  With the integration of Mobility Hubs/major Interchange Facilities, the number of people living within 30 mins journey time to major destinations increases significantly. 45% more residents of the GDA will be within 30mins of a major hospital, specifically benefiting pregnant mothers, disabled persons, and those from elderly populations.  Improvements to junctions, footpaths, pedestrian crossings and additional crossing points may benefit those with disabilities and families with young children, particularly as shorter waiting times for pedestrians can reduce crowing in waiting areas by avoiding the build-up of people.  Initiatives that contribute to the perception of safety among vulnerable road users would benefit women and those from particular religious groups as they are more likely to experience harassment and hate crimes.

Transport Strategy Section	Summary	Impact: Gender and Sexual Orientat ion	Impact: Religion	Impact: Age	Impact: Disability	Impact: Race and Traveller community	Impact: Civil Status and Family Status	Rationale
A strong sustainable economy	To support economic activity and growth by improving the opportunity for people to travel for work or business where and when they need to, and facilitating the efficient movement of goods.	+	+	+	+	+	+	Policies that promote sustainable economic growth and increased access to opportunity through transport have universal benefits as long as the needs of protected characteristic groups and those from lower socio-economic circumstances are considered.  These benefits come in the form of increased employment and labour market opportunities. Low-income groups and young people are most likely to experience benefits as a more easily accessible transport network will allow these groups to realise their economic potential. The ambitions to use Universal Design approach to create an inclusive transport system could ensure that older people and those living with disability experience benefits provided accessibility adjustments are incorporated into the design implementation.
An inclusive transport system	To deliver a high quality, equitable and accessible transport system, which caters for the needs of all members of society.	+	0	+	+	+	0	Initiatives such as the Travel Assistance Scheme and improvements to the accessibility and reliability of public transport information may improve accessibility for people with mobility impairments, subsequently improving the inclusivity of the transport system. The integration of Small Public Service Vehicles through Mobility Hubs and Interchanges may benefit elderly populations by offering door-to-door trips. Late night transport initiatives may improve the safety of people walking and cycling at night, benefiting those more likely to be subject to harassment and hate crimes. Inclusivity campaigns on all modes of public transport remind people of politeness and etiquette for others. Anti-racism and LGBTQ+ campaigns will benefit those from different sexual orientation and ethnic minority groups.
Planning for Sustainable Transport	This section sets out the measures that the NTA believes are essential in meeting the objectives of the transport strategy to foster sustainable development and to fully integrate land use planning and transport planning, as a means of reducing travel demand both in terms of numbers of trips made and the length of trips.	+	+	+	+	+	+	Whilst the high-level strategy does not specifically mention the need to reduce discrimination or promote equality for all protected characteristic groups in this section, the NTA incorporates high quality urban design that encourages more people to choose to walk, cycle or use public transport by making the overall experience safer, more accessible and attractive. Sustainable transport measures are likely benefit all protected characteristic groups as long as the needs of protected characteristic groups and those from lower income households are considered.
Integration and Inclusion	This section sets out the features of a well-integrated transport network including the ability of people to change seamlessly from one mode to another e.g., walking to the bus; cycling to the train station; changing from one bus to another.  The strategy also considers the manner in which service providers and infrastructure respond to the wide variety of needs across all sectors of society.	+	+	+	+	+	+	Integration and inclusion are a central pillar of the Transport Strategy. The strategy considers inclusivity through a holistic lens and appreciates its interconnections with other systems and sectors as well as universal design needs. Measure INT15 states that during the strategy period the NTA will ensure that public transport infrastructure and facilities in the GDA are made accessible for all users, and similarly, measures INT15-INT18 ensure will that all travel information will be universally accessible, travel assistance will be provided for disabled travellers and that inclusivity campaigns will be implemented across the network. This is emblematic of the NTA's high-level strategic commitment to developing a universally inclusive transport system.
Walking, Accessibility and Public Realm	This section summarises how our road and street network could be designed in order to serve the needs of pedestrians. A high-quality walking network are expected to be safe, coherent, direct, attractive and comfortable.	0	0	+	+	0	+	The Transport Strategy shows due regard to the needs of those with mobility issues. Measure WALK8 states "local authorities in the GDA and the NTA will take full account of pedestrians with visual and mobility impairments when delivering transport schemes which affect the pedestrian environment and will implement improvements to existing facilities where appropriate."  Whilst the high-level strategy does not specifically reduce discrimination or promote equality for all protected characteristic groups, these measures are likely to benefit elderly and disabled people who are more vulnerable to severance effects introduced by transport infrastructure as well as families with young children who benefit from improved safety of traffic free streets and pedestrianisation.
Cycling and Personal Mobility Devices	This section summarises how they GDA cycle network and cycle infrastructure could be designed. This includes the use of cycle parking, bike sharing, bikes on public transport and the emergence of personal mobility modes.	+	0	+	+	0	+	Historically, woman have been observed to be less likely to cycle due to concerns over personal safety. Thus, policies which implement dedicated cycle lanes can encourage women to cycle, disproportionately benefiting them.  Similarly, cycle lanes can increase the number of children cycling to school, due to both increased safety and simplification. Thus, families with children could disproportionately benefit from increased transport options and healthier lifestyles.  Any scheme which encourages active travel such as cycling is least likely to benefit those groups which are more likely to contain physically impaired individuals, for example, the elderly or physically disabled. These groups could benefit proportionately less.  As cycling is most used for traveling short distances, it is most suited to the City Centre. Thus, individuals living outside of the city could benefit proportionately less from these policies.
Public Transport	The overall approach to public transport provision has been to put in place the appropriate public transport mode to address the transport demand on the relevant link. This section summarises the Public Transport Strategy for the GDA. Central to that overall provisions is the delivery of a comprehensive bus network, however in the short term there are also a number	+	+	+	+	+	+	Measures taken to implement the Core Bus Corridor Programme and Bus Service Network Monitoring and Review is expected to facilitate faster and more reliable bus journeys on the busiest bus corridors, making the overall bus system more convenient and useful for more people. This may benefit disabled persons, families with young children and elderly populations.  Updates to existing stations in terms of general upkeep relating to lifts, escalators, passenger information signs and literature may benefit those with young children, mobility challenges and those from different ethnic communities.

## Jacobs

Transport Strategy Section	Summary	Impact: Gender and Sexual Orientat ion	Impact: Religion	Impact: Age	Impact: Disability	Impact: Race and Traveller community	Impact: Civil Status and Family Status	Rationale
	of rail lines that will be pursued such as Metrolink and the DART+ programme.							The implementation of improved security systems on Light Rail and new bus stops and shelters may improve the accessibility and safety for protected characteristic groups more likely to experience harassment and acts of violence on public transport.
Roads	A key focus of the Transport Strategy is the provision of safe, resilient road transport routes and liveable streets within the context of the need to support sustainable development principles and legislative commitments to decarbonise the transport sector in Ireland.  This section summarises the Transport Strategies approach to national roads requirements and national road network resilience.	+	+	+	+	+	+	Measure ROAD1 – Principles of Road Development, the Regional Roads Policy and the Local Roads Policy ensures that appropriate measures are taken to provide safe and appropriate arrangements to facilitate walking, cycling and public transport provision. This may have a positive effect on all groups as accessibility and safety is generally improved.  National Road Network Resilience measures, including emergency diversion routes and improvements to road junctions further improves the safety for all protected groups vulnerable to safety concerns e.g., families with young children and elderly and disabled persons.  Within urban areas, changes to road design to create compact, denser and more interconnected layouts may help to consolidate cities, towns and villages making them viable for reliable public transport and amenable to higher rates of walking and cycling. This focus on place-making may benefit groups who are more vulnerable to social isolation, namely members of the Traveller Community, by improving sense of place and belonging.
Traffic Management and Travel Options	The main objective of traffic management in the Transport Strategy is to ensure that the regional transport system continues to operate in an efficient manner. This section sets out a broad range of measures that aim to manage the transport supply network in a way which places sustainable modes at the top of the road user hierarchy.	+	+	+	+	+	+	Traffic management measures, such as reduced speed limits, low-traffic neighbourhoods and safe routes to school, may have a positive effect on all groups by improving efficiency, accessibility and safety on the roads. However, the implementation of carfree zones and car-free residential developments has the potential to negatively impact those reliant on cars as a mode of transport, including families with young children, elderly people and members of the disabled community.
Freight, Delivery and Servicing	The strategy aims to mitigate the impact of freight activity and reconcile with demand/ demand patters and operational requirements associated with other modes and journey purposes. This is of great importance when considering the freight strains of the continued growth and opportunity development brough through related transport policy.	+	+	+	+	+	+	Strategic policies that increase the reliability and safety of freight travel can produce universal benefits as a result of increased productivity and consumer choice. Furthermore, policy to reduce the presence of Heavy Goods Vehicles in the city centre through 'lorry routes' and off-peak travel periods can reduce congestion and improve air quality, creating wider benefits for drivers, pedestrians, businesses and residents.
Climate Action Management	"The Strategy aims to provide an effective and sustainable transport system across the region and to accommodate future travel growth in a managed and balanced way"  This is to be primarily achieved through promoting active and public transport options, and shifting to electric/alternative fuel sources.	+	+	+	+	+	+	These policies are likely to have positive health benefits on all groups due to increased air quality from decreased emissions.  Active travel options can disproportionately benefit those physically able as they can fully utilise the options. However, those who are less likely to undertake active or public travel could also benefit due to reduced congestion on roads.  All groups are anticipated to universally benefit from the opportunities brought by increased public transport, however those who drive may experience a disproportionate negative impact as a consequence of charges from low-emission zones, increased fuel costs and the expense of alternative EV options, especially those from low income households.  Policies that disincentivise driving may potentially adversely impact those who live in the outer Dublin area who drive due to a lack of public transport provision, consideration could be given to these communities.
Environmental Assessment	Compliance with the mandates of the Strategic Environmental Assessment (SEA) will allow for environmental protection and contribution towards EU directives. These assessments recommend dedicated travel corridors, ecosystem protection and active or public transport.	+	+	-	-	+	+	Similarly, to Climate Action Management, the strategy is anticipated to provide environmental improvement and ecosystem benefits across all groups. Additionally, accessible public transport could disproportionately benefit low-income households. However, groups such as the elderly and the physically disabled are more likely to be mobility impaired, hence benefiting less from active travel.  A key benefit of SEA is its assurance that the most efficient, least environmentally impactful travel corridors will likely be selected. This therefore benefits groups already living in areas of low urbanisation and high ecological service. Thus, groups which live in the outer Dublin area such women, married couples, couples with children, white Irish and Catholics may disproportionately benefit.

# Appendix B. Distribution of Protected Characteristic Groups across the Greater Dublin Area















