



**Draft Transport Strategy for Waterford Metropolitan Area**  
**Equality Impact Assessment (EqIA)**

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National Transport Authority



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## Executive Summary

This Equality Impact Assessment (EqIA) works to ensure that the Waterford Metropolitan Area Transport Strategy (WMATS) does not unlawfully discriminate against protected characteristics outlined in The Equal Status Acts (2000-2018). An EqIA allows for the consideration of the likely impact of the WMATS on different population groups including likely disproportionate impacts on persons from protected characteristic groups (PCGs) and those living in communities experiencing deprivation.

The WMATS aims to create an attractive, liveable city which can support significant growth projections as Waterford Metropolitan Area (WMA) transitions into a key growth engine for the wider South-East Region of Ireland. The WMATS will be instrumental in the regeneration and transformation of Waterford and the development of a concentric city. The WMATS outlines a framework to enable the delivery of an *"accessible, high-quality and integrated transport network that provides for the travel demand, and supports the sustainable growth of, the Waterford Metropolitan Area"*. The proposed Vision for the WMATS is aligned with the Regional Spatial and Economic Strategy (RSES) for the Southern Region (Southern Regional Assembly, 2020) and the Waterford Metropolitan Area Strategic Plan (MASP) (Southern Regional Assembly, 2020).

This EqIA will inform the finalisation of the WMATS and will assist the National Transport Authority (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 NTA's fulfilment of its 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 characteristic groups (PCGs) under the Equal Status Acts are gender, civil status, family status, sexual orientation, disability, age, race, religion and membership of the Traveller community. A Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) have also been undertaken to inform the development of the WMATS.

The nine protected characteristics groups have been assessed against the WMATS's aim, public consultation, strategic objectives, strategy themes and associated strategy sections. Consideration has also been given to areas of deprivation, migrants and the intersectionality between PCGs. Overall, **WMATS is expected to have a positive equality impact on individuals and communities** living, working and visiting the WMA through the implementation of its strategic ambitions.

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

- Detailed baseline data collection to inform the implementation approach;
- A plan to engage with representatives of specific PCGs; and
- A monitoring plan.

The completion of an EqIA helps the NTA fulfil its ongoing Public Sector Equality and Human Rights Duty by considering evidence and analysis to help identify the likely positive and negative equality impacts the Transport Strategy may have on certain PCGs and to estimate whether such effects disproportionately affect such groups.

# 1. Introduction

## 1.1 Overview of the Strategy

The Waterford Metropolitan Area Transportation Strategy (WMATS) sets out a framework for investment in transport for the Waterford Metropolitan Area up to 2040. The Strategy aims to create an attractive, liveable city which can support significant growth projections as Waterford Metropolitan Area (WMA) transitions into a key growth engine for the wider South-East Region of Ireland.

The WMATS outlines a framework to enable the delivery of an *“accessible, high-quality and integrated transport network that provides for the travel demand, and supports the sustainable growth of, the Waterford Metropolitan Area”*. The proposed Vision for the WMATS is aligned with that outlined in both the Regional Spatial and Economic Strategy (RSES) for the Southern Region (Southern Regional Assembly, 2020) and the Waterford Metropolitan Area Strategic Plan (MASP) (Southern Regional Assembly, 2020). A Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) have been undertaken as well as the following EqlA to inform decision making in the WMATS development.

Focal aims of the WMATS include a reduction in car dependency, further promotion of active modes of travelling (i.e. walking and cycling), tackling climate change through reduction of greenhouse gas emissions, and an increase in accessibility, connectivity and social inclusion across the WMA. The WMA faces a significant projected growth trajectory which will, amongst other changes, cause significant increases in the demand for travel. A key aim of the WMATS is to effectively safeguard and enhance WMA's attractiveness as a place to live, work, visit, and invest in through improvements to public transport and walking and cycling infrastructure.

Several core challenges exist within the WMA which have been taken into careful consideration throughout the development of the WMATS. These challenges relate to land and physical constraints, behaviours around travel, current provision of public transport, congestion and the economy, and the issue of public health and deprivation. These core challenges form the focus of the overarching strategic objectives of the WMATS, as follows:

- To meet the demand generated by the future growth of the WMA through the provision of an efficient sustainable transport network;
- To prioritise sustainable transport and active travel to reduce car dependency;
- The provision of a high frequency and attractive, citywide public transport system connecting to key destinations within high demand corridors;
- To increase transport capacity where needed to achieve the WMATS outcomes;
- To deliver a fully accessible and inclusive transport system;
- To enhance the public realm of the WMA through demand management measures and transport interventions;
- To minimise the impact of motorised traffic in urban centres; and
- To identify and protect key strategic routes for the movement of freight traffic.

The draft WMATS sets out a framework to address these challenges through investment in transport for the WMA up to 2040.

## 1.2 Overview of the EqlA context

### 1.2.1 Equality Legislation in Ireland

Equality rights in Ireland are protected 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').

The Acts prohibit discrimination in the provision of goods and services, including transport, accommodation, and education to the public under the nine PCGs. 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. The nine PCGs are described in Table 1-1.

Table 1-1 PCGs covered within the EqlA 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 in Ireland.

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

The Public Sector Equality and Human Rights Duty (hereby referred to as ‘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.

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.

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 follows:

- 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.

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.

### 1.2.3 The Equal Status Acts 2000-2018

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 protect 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.

### 1.2.4 Employment Equality Acts 1998-2015

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.

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.

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.

### 1.2.5 Equality and COVID-19 recovery

The COVID-19 pandemic 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).

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). The impact of the measures implemented to protect society have had an enormous impact on children and young people, especially those that are vulnerable.

As communities 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 EqlA 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 EqlA.

### **1.3 EqlA Purpose**

An EqlA considers the impact of a project or policy on persons or groups of persons who share characteristics that are protected under the Acts, as described in Section 1.2. An EqlA might also include others considered to be vulnerable within society such as those on a low-income. In this way, an EqlA can act as an information gathering tool that enables decision makers within public bodies to implement their equality Duty.

The EqlA contributes towards both enabling and documenting the NTA's active compliance with its legal duties under the Duty during the design stage of the WMATS. It is a predictive assessment, considering in advance of implementation the potential impacts arising from WMATS implementation, and the likely or possible effects of these impacts for PCG. The EqlA serves to inform design, mitigation and other relevant project-related decisions.

The objectives underpinning the EqlA are to:

- Identify the presence of PCGs in the study area, in particular where such groups are disproportionately represented amongst those most likely to be impacted by the WMATS;
- Draw on engagement with stakeholders to inform understanding of the likely needs of PCGs relevant to identified potential impacts;
- Assess the likely effects of the WMATS implementation and operation for groups sharing protected characteristics, including how the WMATS 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 WMATS implementation or operation, could further enhance equality, address existing disadvantage or support good relations between PCGs and other people.



## 2. Methodology

### 2.1 Overview

The EqlA consists of three stages - Screening, Assessment and Monitoring - which are outlined in more detail below. This EqlA does not quantitatively assess the significance of effects. Instead, qualitative descriptive judgments have been made regarding the nature of potential equality effects.

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.

*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 PCGs 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 PCGs (e.g. primary schools attended by children; care homes catering for very elderly people).

*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 Differential Effects

The screening phase consists of a literature review of the most up to date academic and research literature on the impacts of transport on PCGs in order to inform the assessment of potential effects. Based on the literature, the screening stage determines which protected characteristics could experience differential effects as a result of the WMATS, and therefore require further consideration within the EqlA.

#### 2.2.2 Disproportionate Effects

A baseline profile for the Waterford Metropolitan 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 PCGs in comparison to the average for the WMA and the national average for Ireland. The maps in **Appendix A** highlight areas with the 10% highest concentration of PCGs and sub-groups. This stage identifies PCGs which could experience disproportionate effects and therefore require further consideration within the EqlA.

### 2.3 Assessment

Based on the outcomes of the screening exercise, the EqlA has assessed the consideration of the WMATS to eliminating discrimination and promoting equality between PCG. 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.

In some cases, PCGs could be subject to both disproportionate and differential equality effects. This EqlA 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.

The assessment has also identified opportunities and relevant measures which can further enhance equality, address existing disadvantage, or support good relations between PCGs and other people.

Table 2-1 outlines the assessment questions that have been applied to this stage. The questions were designed to focus on the interventions' ability to address the needs of each PCGs by providing an indication of the issues that are relevant to each group.

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 Assessment Questions

Protected Characteristic	Assessment Question
Age	Is the WMATS 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 WMATS?
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 WMATS have a disproportionate impact on availability of or access to services used by women or men? Will the construction and/or operation of the WMATS have a disproportionate impact on access to employment for women and/or men?
Civil Status	Is the WMATS 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?
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 WMATS? Will the construction of the WMATS impact on the cohesion of these communities?
Religious belief	Considering the profile of surrounding communities, are any places of worship likely to be affected by the WMATS?
Membership of the Traveller Community	Will the construction and/or operation of the WMATS have a 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 WMATS? Have provisions been made to support COVID-19 recovery for this group?

## 2.4 Monitoring

The 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).

Monitoring progress in relation to an EqIA allows the NTA to demonstrate how it has delivered on WMATS and lets the NTA build on its own success to identify gaps and to inform the focus of future strategic plans.

Monitoring information will be used to make any changes necessary to improve the WMATS 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 WMATS is revised to achieve better outcomes for the relevant equality groups.

## **2.5 Data Sources**

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 WMA (CSO) . 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 PCG.

## **2.6 Assumptions and limitations**

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 WMATS.

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

Potential differential effects on PCGs are outlined in Table 3-1. The table determines which protected characteristics could experience differential effects as a result of the WMATS and are therefore screened into the EqIA.

Table 3-1 Potential differential effects on PCG

Protected Characteristic	Potential Effect	Screened in / out
Race	<ul style="list-style-type: none"> <li>• <b>Vulnerability to changes in transport costs:</b> Evidence suggests that Black and 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>• <b>Employment in transport roles:</b> In Ireland 16% of bus drivers originate from a country outside of Ireland, suggesting ethnic minorities are more highly represented in bus driver roles (Immigrant Council of Ireland, 2014). For example, in Dublin, as of December 2012, bus drivers originated from 68 different counties (ibid.). Harassment and discrimination remains prevalent in Ireland. There was an 85% increase in the reporting of racist incidents to the Immigrant Council of Ireland’s Racist Incidents Support and Referral Service in 2013 when compared with the same period in 2012, (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 ethnicity (ibid.).</li> <li>• <b>Introduction of new transport corridors:</b> 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 can reinforce or exacerbate societal divisions (Jones, Midell, &amp; Ancaies, 2015).</li> </ul>	Screened in
Religion	<ul style="list-style-type: none"> <li>• <b>Safety using public transport:</b> 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 Catholic Christians, which is the dominant faith in Ireland, 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 they felt they experienced from transport staff because of religious and racial profiling, which took the form of poor or no service provision (Immigrant Council of Ireland Independent Law Centre, 2016).</li> </ul>	Screened in
Disability	<ul style="list-style-type: none"> <li>• <b>Accessibility of public transport:</b> 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</li> </ul>	Screened in

Protected Characteristic	Potential Effect	Screened in / out
	<p>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).</p> <ul style="list-style-type: none"> <li>• <b>Health and safety:</b> People with disabilities are also more at risk on the roads. The WHO World Report on Disability states that "people with disabilities are at a higher risk of non-fatal unintentional injury from road traffic crashes" (WHO, 2011)". A study conducted by University of Westminster found that Disabled people are five times more likely to be injured as a pedestrian than non-disabled people (Aldred, 2018).</li> <li>• <b>Feeling unsafe:</b> Disabled people can feel less safe when travelling alone in settings compared to non-disabled people (ONS, 2021).</li> <li>• <b>Environmental impacts of transport:</b> People with certain pre-existing health problems are more sensitive to impacts from air pollution that may arise from the construction and operation of transport infrastructure (European Environment Agency, 2020).</li> <li>• <b>Car dependency:</b> 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).</li> <li>• <b>Demographic context:</b> Almost 1 in 5 Irish Travellers are categorised as having a disability. The most common type of disability was 'difficulty with pain, breathing or any other chronic illness', followed by a 'difficulty with basic physical activities' (CSO, 2016) Changes to existing transportation links could improve accessibility for individuals with disabilities; however, changes to existing routeways could also create additional obstacles and/or increase journey distance and/or length for individuals with disabilities.</li> <li>• <b>Rural versus urban:</b> Research shows that individuals with disabilities who live in rural areas are significantly more likely to face social isolation and loneliness (Repke &amp; Ipsen, 2020). Research also shows that social enterprises are often used to fill the void between rural and urban transportation infrastructure (Kelly, Steiner, Mazzei, &amp; RachelBaker, 2019). Any changes to transport networks needs to take in to consideration the disproportional impact of changes to disabled people who are particularly vulnerable said changes (Jones, Midell, &amp; Anciaes, 2015).</li> </ul>	
Age	<ul style="list-style-type: none"> <li>• <b>Children and young people:</b> 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</li> </ul>	Screened in

Protected Characteristic	Potential Effect	Screened in / out
	<p>children and young people, access to reliable public transport can be critical for accessing education (O'Connor &amp; Staunton, 2015).</p> <ul style="list-style-type: none"> <li> <b>Young adults 16-25:</b> Cost, infrequency, inconvenience, and lack of services are contributing factors to young people not using to public transport frequently. The National Travel Survey (2019) reported that almost half (48.5%) of respondents aged 18 years and over never use bus services and a further 24.8% use public transport services less than monthly (CSO, 2019). The aversion to public transport likely results in a higher dependency of private vehicle use, contributing to congestion and air pollution as well as increased road accidents and fatalities. Drivers aged between 17 and 24 are statistically over-represented in reported road accidents in comparison with older car drivers aged 25 and above largely as a result of inexperience and the age of the young car driver (ONS, 2015).         </li> <li> <b>Elderly populations:</b> 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 are 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 journey times and reduce the ability to access community facilities (Jones, Midell, &amp; 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).         </li> <li> <b>Accessibility:</b> Elderly people are more likely to experience accessibility issues associated with non-private car ownership. This can lead to social isolation, loneliness, and an inability to access vital services. Impacts on accessibility are more prevalent in rural spaces than urban spaces as accessibility issues are exacerbated by a lack of public transportation system (DfT, 2019).         </li> <li> <b>Environmental impacts of transport:</b> Both elderly populations and children are particularly sensitive to the impacts of air pollution that may arise from construction and operation of transport infrastructure (European Environment Agency, 2020) (Brumberg, 2021).         </li> </ul>	
Family status	<ul style="list-style-type: none"> <li> <b>Accessibility:</b> Evidence suggests pregnant women and parents 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, &amp; Burkinshaw, 2019).         </li> </ul>	Screened in

Protected Characteristic	Potential Effect	Screened in / out
	<ul style="list-style-type: none"> <li>• <b>Environmental impacts of transport:</b> 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).</li> <li>• <b>Vulnerability to changes in transport costs:</b> Evidence suggests that lone parent families suffer from a higher incidence of transport poverty; children and parents in lone-parent families are the least likely of any household type to have access to private transport, and the price of public transport excludes many young people, parents 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 unaffordable travel (Simcock, et al., 2020). Rural and semi-rural communities are more at risk because of a further lack of access to alternatives to car-use such as a reliable public transportation system. These groups without transport would be particularly vulnerable to both social and spatial isolation as well as the risk of accessibility issues to vital services such as healthcare and/or economic support (ibid.).</li> </ul>	
Gender	<ul style="list-style-type: none"> <li>• <b>Safety:</b> 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 &amp; 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).</li> <li>• <b>Travel Patterns:</b> Whilst gender differences in car use are declining, women are still less likely to be the main driver in the household (Lucas, Stokes, Bastiaanssen, &amp; Burkinshaw, 2019). However, women do make more journeys via car in certain contexts such as driving children to school for educational purposes (Department for Transport, 2014).</li> </ul>	Screened in
Sexual Orientation	<ul style="list-style-type: none"> <li>• <b>Safety:</b> The LGBT 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'Connell, 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, &amp; 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, &amp; K, 2021). In a UK Stonewall LGBT survey, the most common places where cisgender LGBT respondents had avoided</li> </ul>	Screened in

Protected Characteristic	Potential Effect	Screened in / out
	<p>being open about their sexual orientation were on public transport (65%), through fear for safety (Stonewall, 2018).</p> <ul style="list-style-type: none"> <li>• <b>Discrimination:</b> Trans people experience high levels of discrimination and poor treatment when using public services because of their gender identity and often change their behaviour because of it (Stonewall, 2018).</li> <li>• <b>Same-sex couples:</b> Relating to utilizing public transport for commuting for employment, same-sex couples are more likely to walk or bike to work than individuals in different-sex couples. Men with a partner of the same sex were on average 69% more likely to commute by less popular forms of transport such as walking or cycling. Evidence suggests this sexual orientation gap could be due to gay, lesbian and bisexual individuals valuing the environment more (Sansone, 2022).</li> </ul>	
Civil Status	<ul style="list-style-type: none"> <li>• <b>Equality:</b> 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 limited evidence to suggest that this protected characteristic group experiences proportionately worse transport service today than other groups.</li> </ul>	Screened out
Membership of the Traveller Community	<ul style="list-style-type: none"> <li>• <b>Disadvantage:</b> 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 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).</li> <li>• <b>Geography:</b> Traveller children are particularly vulnerable to changes in the transport system as settlements are often located in exposed areas and therefore there are further dangers from passing traffic or poor air quality due to construction activity. In such sites public transport can be almost non-existent (Cemlyn, Greenfields, Burnett, Matthews, &amp; Whitwell, 2009).</li> </ul>	Screened in

### 3.1.1 Deprivation

For the purpose of this assessment, although not specified as one of the nine PCGs under the Acts, people living in deprived areas and/or experiencing deprivation are considered as a vulnerable equality group. People living in deprived areas or experiencing deprivation 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 socio-economic and environmental impacts of transport infrastructure.

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 or healthcare (International Transport Forum, 2017). A UK Department of Transport report (2019) on transport and inequality notes that:

*"Cost is a primary obstacle to the use of transport. Income was found to be one of the defining aspects of socio-economic inequality. Transport costs and affordability are central to the impact of transport on inequality. If transport is too expensive, then people are not able to make the journeys they need to get into work or move into education and training that could improve their prospects."* (NatCen, 2019).

Improved local transport infrastructure will directly benefit those living without a car as their accessibility to education, employment and essential services 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).

### 3.1.2 Migrant Populations

Although not specified as one of the nine protected characteristics of The Acts, it is important to note the potential impacts of the proposed WMATS on migrant populations within the WMA.

There has been a sustained inflow of migrant populations into Ireland since the mid-1990s, coinciding with the economic boom of the country across the late 20<sup>th</sup> century. Although there are high levels of economic productivity amongst migrant populations within Ireland, Irish natives continue to see lower levels of unemployment. In addition, it is highlighted that some migrant populations, predominantly migrant populations from Central and Eastern Europe are more likely to work unskilled, minimum wage jobs meaning they could be more likely to live within socio-economic deprivation and therefore have more limited access to public transport (Government Office of Science, 2019).

In addition, discrimination and harassment is notably more prevalent amongst migrant populations when compared to Irish nationals. A report into the social demographics of Ireland found that almost 25% of those of non-Irish nationality reported experiencing some form of discrimination in the previous two years, compared with 11.5% of those with Irish nationality, with this number raising to almost 31.5% of those from ethnic backgrounds other than 'White' (Nolan & Maitre, 2008).

Furthermore, evidence suggests that streets and/or public transport are 'hot spots' for harassment and discrimination for people of non-Irish nationality. A study into areas where non-Irish nationals report regular incidents of harassment and discrimination found that 35% of individuals sampled experiences discrimination and harassment on the street and on public transport at least once or twice (McGinnity, O'Connell, Quinn, & Williams, 2006).

In the UK, migrants' travel is strongly associated with the use of non-car-driving modes of travel (including public transport, walking, cycling and car sharing): 54% of non-EEA migrants use these forms of travel versus 26% of UK nationals (RAND, 2011).

### 3.1.3 Intersectionality

When assessing the potential equality effects for the nine PCGs and wider vulnerable groups outlined above, it is important to highlight likely cumulative effects experienced by individuals due to intersectionality and the acknowledgement that individuals' identities can fall into more than one group.

For example, when analysing the impact of the WMATS on individuals with disability, additional characteristics such as age, gender, race, region and so forth may cause equality impacts to be experienced differently by individuals within the same PCG.

### **3.2 Disproportionate effects**

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

Table 3-2 Statistical data gathered in relation to the disproportionate effects on PCGs

Protected Characteristic Group	Sub-Group	Total number of people in the WMA	WMA Average (%)	Ireland Average (%)	Comparison to Irish average (In Line = +/- 3%)	Potential disproportionate effects
Age	0-19	17,806	27.0	27.5	In Line	The 40-64 age group is the most prominent age group in the WMA, representing over 30% of the total population. All age groups are similarly represented in both the WMA and the rest of Ireland. The maps in Appendix A show a high concentration of residents aged 20-39 in the city centre, and a high concentration of those 85 and over on the outskirts of the WMA.
	20-39	18,091	27.4	27.8	In Line	
	40-64	20,545	31.2	31.3	In Line	
	65-84	8,519	12.9	11.0	In Line	
	85 and over	959	1.5	1.4	In Line	
Disability	Females	5,103	7.7	7.0	In Line	The proportion of the population with a disability in the WMA is in line with the rest of Ireland, for both males and females. The maps in Appendix A show areas with highest concentration of residents with a disability are concentrated in the city centre.
	Males	4,804	7.3	6.5	In Line	
Gender	Female	33,285	50.5	50.6	In Line	The representation of both males and females within the WMA is in line with the rest of Ireland. Geographically, the areas with the highest concentration of both men and women are concentrated in the city centre which has a high population density.
	Male	32,635	49.5	49.4	In Line	
Civil Status	Single	35,414	53.7	53.6	In Line	All civil status groups are reflective of the population structure across the rest of Ireland. Single people make up over 50% of the population, followed by married people at 36.3%. Geographically, there is a high concentration of married couples on the outskirts of the WMA particularly to the east in Belview, The Glen and towards Ballymaclode. In comparison, there is a much higher concentration of those who are single or separated in the city centre of Waterford.
	Married	23,923	36.3	37.6	In Line	
	Separated	1,948	3.0	2.5	In Line	
	Divorced	1,618	2.5	2.2	In Line	
	Widowed	3,017	4.6	4.1	In Line	
Family Status	Families Without Children	5,196	30.2	29.2	In Line	The data shows that the WMA has a lower-than-average number of couples with children and a higher-than-average number of one parent families when compared to the average for Ireland. Geographically, areas with the highest concentration of families without children can be found in the city centre in comparison to couples with children who tend to live further from the city centre.
	Couples With Children	8,329	48.4	52.8	Lower	
	One Parent Families	3,671	21.3	18.0	Higher	
Race	White Irish	52,604	80.8	82.2	In Line	Overall, racial representation in the WMA is in line with population of racial groups across Ireland. The majority of the population (over 80%) are White Irish, followed by 'other white' at 9.3%.
	White Irish Traveller	378	0.6	0.7	In Line	

	Other White	6,054	9.3	9.5	In Line	Where there are high levels of other ethnic groups, these are concentrated within the centre of the Metropolitan area.
	Black or Black Irish	1,461	2.2	1.4	In Line	
	Asian or Asian Irish	1,562	2.4	2.1	In Line	
	Other	995	1.5	1.5	In Line	
	Not Stated	2,017	3.1	2.6	In Line	
Religion/ belief	Catholic	51,019	77.4	78.3	In Line	The distribution of religion/ belief across the WMA is in line with the distribution across Ireland with over 75% of the population stating their religious belief as Catholic, followed by other (10%) and no religion (10%). The city centre of Waterford sees the greatest diversity in religious groups.
	Other	6,545	9.9	9.2	In Line	
	No Religion	6,300	9.6	9.8	In Line	
	Not Stated	2,056	3.1	2.6	In Line	
Membership of the Traveller Community	White Irish Traveller	378	0.6	0.7	In Line	The proportion of White Irish travellers in the WMA is in line with the proportion of this group across rest of Ireland. Geographically, areas with the highest concentration of White Irish Travellers are located just on the outskirts of the City Centre towards Waterford Retail Park, Sheeps Bridge and Carrigue.

## 4. Stakeholder Engagement

### 4.1 Introduction

The EqIA has drawn on the findings of wider stakeholder engagement undertaken during the development of the WMATS. Stakeholders from across representative business groups, educational institutions, transport operators, and relevant statutory bodies were invited to share their views to help shape the development of the draft WMATS to best serve the economic, environmental, social and cultural needs of the WMA. The sections below outline the findings of stakeholder engagement and public consultation.

### 4.2 Stakeholder Engagement

A total of ten submissions were received during the advance consultation period between the 15<sup>th</sup> November 2021 and 4<sup>th</sup> February 2022 from the following stakeholder groups:

- Industrial Development Agency Ireland (IDA Ireland) – Statutory Agency.
- Irish Wheelchair Association (IWA) – Charity.
- JJ Kavanagh and Sons – Private Company.
- National Council for the Blind of Ireland (NCBI) – Charity.
- Waterford Bicycle Users Group (W-BUG) – Charity.
- Waterford Older People’s Council – Charity.
- Waterford Public Participation Network (PPN) – Charity.
- Waterford Sport Partnership – Charity.
- Wexford Bus- Private Company.
- Waterford Institute of Technology (WIT) – Educational Institution.

Stakeholder feedback with specific reference to impacts on equality are outlined below:

- Several comments were made relating to the need to make the WMATS accessible for all, specifically individuals with disabilities;
- Design and procurement should be considered with respect to the needs of people who have visual impairment and/or require timely, reliable, audible and accurate audible announcements to be in operation on all public transport;
- Concerns were raised around the feasibility of shared spaces and the practicality of use. Shared spaces are not always conducive to a positive environment for individuals with disabilities, specifically individuals with visual impairments, as effective shared spaces require negotiation of space through eye contact for example;
- Concerns were raised around the creation of ‘bus stop islands’ due to certain pedestrians being more at risk of cyclists travelling at speed and the location of bus stop islands between cycle lanes and carriageways;
- Consideration should be made to transport accessibility to essential services such as hospitals, places of education and employment and amenity spaces to help reduce deprivation and social inequalities;
- Stakeholders identified the need to ensure that safety is prioritised throughout the WMATS for all users of transport;
- Comments were raised the supporting infrastructure of the WMATS and ensuring that this facilitates accessibility for all user groups through improved wayfinding signage, safe routes to and from school for young people, and creating safe and accessible infrastructure to support interchange between public transport;

- Stakeholders mentioned the need for frequent safe places of crossing which are audible and pulsating, and should allow adequate time for all pedestrians to cross safely; and
- Several supporting measures were suggested by stakeholders to improve accessibility of the WMA including:
  - Removal of street clutter and audio-tactile and visual signals;
  - Lower speed limits;
  - Community Hubs to educate communities on bike maintenance and bike skills training for children and adults; and
  - School Streets and Safe Routes to School.

Several stakeholders identified additional measures which could result in indirect effects on equality of opportunity for transport users. These included:

- Provision of interchange opportunities in tandem with revised fare structures and wayfinding. There is a need to ensure that interchange opportunities interchange facilities and interchange zones are accessible for all;
- A need to further connectivity between rural and urban spaces as well as service users and vital services;
- The need to develop a metropolitan public transport system connecting key villages and towns within the WMA to WIT and University Hospital Waterford;
- The possibility of making some street accessible only by bus, bike, or foot and the need to create low Traffic Neighbourhoods in inner-city areas of the WMA;
- The need to greatly reduce use of private cars across WMA through removal of on-street parking to facilitate bus lanes, increasing parking charges throughout the WMA, applying a congestion charge as well as the removal of 'all day parking' deals;
- The need to reduce public transport charges in line with an increase in car parking charges, and the encouragement of car-sharing schemes; and
- The creation of accessible parking bays adjacent to the shortest accessible route to the city centre.

### 4.3 Public Consultation

Two public consultation events were organised for members of the public during which the WMATS project team discussed the Draft WMATS and answered questions. Events were open to all and took place at the Tower Hotel, The Mall, at the following times:

- 2:00 pm to 8:00 pm, Wednesday 15th June 2022
- 10:00 am to 4:00 pm, Thursday 16th June 2022

Submissions or observations with respect to the Draft WMATS 2040 and/or associated SEA Environmental Report and/or associated AA Natura Impact Statement made up to Tuesday 12th July 2022 were taken into consideration in the finalisation of the WMATS. Submissions were encouraged to be made through the online platform; however, postal submissions were also accepted. Alternative formats of documentation were available if required to ensure accessibility and inclusivity within the consultation process.

Within the scope for development of the WMATS, allowance has been made to ensure that feedback during the consultation of the Draft WMATS will inform the subsequent finalisation of the WMATS. All comments made

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throughout the Advance Consultation and Strategy Steering Group process were considered and integrated into the Draft WMATS where appropriate.

## 5. Assessment

The EqlA has assessed the WMATS impact on promoting equality for PCGs. The assessment has also identified opportunities and relevant measures which can further enhance equality, address existing disadvantage, or support good relations between PCGs and other people.

Table 5-1 presents the findings of the EQIA assessment.

Table 5-1 EqlA Findings

Protected Characteristic	Potential Effect
Race	<p>➤ Positive:</p> <p>Provision of an enhanced public transport network across WMA, which includes increased capacity and reduced wait times for services, is a key priority area within the development of the WMATS. Both increases in capacity and reduced wait times for services should reduce perceived fear of attack, harassment, and/or discrimination associated with service waiting times for ethnic minority groups. This links to MEASURE BUS3 which aims to give buses priority; the NTA and WMA hopes this will reduce delays which could reduce wait times for PCGs and improve perceptions of safety. Similarly, MEASURE SM3 describes the high standard of urban design and placemaking that will be incorporated into the planning and design of all major public transport infrastructure schemes, including lighting, ground floor activity and passive surveillance which will further improve perceptions of safety for this group.</p> <p>Measure BUS7 describes the intention of the NTA to deliver a fully Zero Emission bus fleet by 2030. This should provide improvements to air quality and in turn have a positive impact on those more exposed to pollution who are often people of non-white ethnicities (Logica, 2021).</p> <p>The WMATS’s BusConnects scheme, which intends to increase the frequency and capacity of buses across the WMA, will work to improve connectivity between city and suburbs as well as provide interchange between Cross City, Radial and Orbital bus services. If the BusConnects scheme is implemented this should improve accessibility across WMA which could link marginalised individuals with better access to services, provisions, and opportunities.</p> <p>➤ Negative:</p> <p>No negative equality impacts have been identified for this group.</p>
Religion	<p>➤ Positive:</p> <p>Provision of an enhanced public transport network across WMA, which includes increased capacity and reduced wait times for services, is a key priority area within the development of the WMATS. 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). Both increases in capacity and reduced wait times for services should reduce perceived fear of attack, harassment, and/or discrimination associated with service waiting times for individuals of different cultures and faiths. Similarly, MEASURE SM3 describes the high standard of urban design and placemaking that will be incorporated into the planning and design of all major public</p>



Protected Characteristic	Potential Effect
	<p>transport infrastructure schemes, including lighting, ground floor activity and passive surveillance which will further improve perceptions of safety for this group.</p> <ul style="list-style-type: none"> <li>➤ Negative:</li> </ul> <p>No negative equality impacts have been identified for this group.</p>
Disability	<ul style="list-style-type: none"> <li>➤ Positive:</li> </ul> <p>WMATS aligns with several key national and local policies including the Climate Action Plan, as well as NSO's such as NSO 4 - Sustainable Mobility and NSO 8- Transition to a Low Carbon and Climate-Resilient Society. These policies seek to promote sustainable growth whilst improving air pollution through increasing active travel and low-emission vehicles. The WMATS provides an opportunity to reduce congestion and air pollution, which should lead to positive effects for those with disabilities who are disproportionately and differentially impacted by poorer air quality. Measure BUS7 describes the intention of the NTA to deliver a fully Zero Emission bus fleet by 2030. This should further provide improvements to air quality and in turn have a positive impact on those more sensitive to pollution individuals with disabilities.</p> <p>Evidence suggests disabled people can feel less safe when travelling alone in settings compared to non-disabled people (ONS, 2021). MEASURE SM3 describes the high standard of urban design and placemaking that will be incorporated into the planning and design of all major public transport infrastructure schemes, including lighting, ground floor activity and passive surveillance which will further improve perceptions of safety for this group.</p> <p>The approach to delivery of an enhanced public transport network is underpinned by six guiding principles which includes increased speed of buses and increased directness to minimise journey times. This should increase the accessibility of vital services which could have positive impacts on individuals with disabilities who may require additional support and better access to services.</p> <p>MEASURES WALK1-5 describe the intentions of the NTA to maintain and improve footpaths, whilst improving junctions (safety and enhanced movement), and identifying and improving crossing points and crossing times across the WMA. These proposed measures (WALK1-5) for walking routes could positively impact people with disabilities by improving the walking route infrastructure through measures such as ensuring adequate width for wheelchair users, removing unnecessary street clutter to improve mobility, and installing additional crossing points which should aid disabled users by decreasing distance travelled.</p> <p>MEASURE WALK6 describes how the NTA will take full account of people with disabilities and mobility impairments when delivering a transport strategy which affects the pedestrian environment and will implement improvements to existing facilities where appropriate. Through utilising Universal Design, the WMATS should positively impact disabled users, creating a pedestrianised environment which can be used by all people regardless of disability; including physical, cognitive and sensory. Supporting Measure 4 (SM4) also describes how the NTA will ensure the universal design of all public transport projects and active travel strategies which would similarly positively impact this group.</p> <p>MEASURE CYCLING6 describes how the NTA plan to support the delivery of cycle parking for non-standard cycles. This may positively impact disabled people through the</p>

Protected Characteristic	Potential Effect
	<p>inclusion of cycle parking which allows the parking of adapted cycles for the disabled e.g. hand cycles.</p> <p>MEASURE BUS8 describes the intention of the NTA to ensure that all new buses serving the WMA will be fully accessible, with a view to fully transition to an accessible fleet over the WMATS lifetime. This should have positive effects for disabled users through the creation of a fleet which is more accessible to all.</p> <p>MEASURE ROAD4 describes the WMATS's Regional and Local Roads Policy which aims to facilitate and enhance public transport, cycling and pedestrian facilities; active travel facilities; as well as, the safety enhancement of road junctions, pedestrian crossings, appropriate cycle measures including signalised crossings; and, to improve the safety of the local road network for all road users. This should positively benefit disabled people through enhanced safety within the WMA road network, as this group tend to be more sensitive to the safety and accessibility of spaces.</p> <p>The WMATS's BusConnects scheme, which intends to increase the frequency and capacity of buses across the WMA, will work to improve connectivity between city and suburbs as well as provide interchange between Cross City, Radial and Orbital bus services. If the BusConnects scheme is implemented this should improve accessibility across WMA which would link marginalised individuals with better access to services, provisions, and opportunities.</p> <p>➤ Negative:</p> <p>As part of the WMATS's approach to Climate Action Management, and the target to achieve a 51% reduction on greenhouse gas emissions, the WMATS looks to align to several mechanisms of the Climate Action Plan and Low Carbon Development (Amendment) Act 2021. Mechanisms include fuel price increases, further electrification of vehicles, congestion charge zones and low emission zones. For some individuals with disability, private vehicles are the only feasible mode of transport, placing restrictions on use of private vehicles through fuel price increases and introduction of congestion charges could restrict the movement for some people with disabilities who have no alternative means of travel and therefore limit access to vital services.</p>
Age	<p>➤ Positive:</p> <p>WMATS aligns with several key national and local policies including the Climate Action Plan, as well as NSO's such as NSO 4 - Sustainable Mobility and NSO 8- Transition to a Low Carbon and Climate-Resilient Society. These policies seek to promote sustainable growth whilst improving air pollution through increasing active travel and low-emission vehicles. The WMATS provides an opportunity to reduce congestion and air pollution, which should lead to positive effects to both elderly people and children who are disproportionately impacted by poorer air quality.</p> <p>Measure BUS7 describes the intention of the NTA to deliver a fully Zero Emission bus fleet by 2030. This should further provide increases to air quality and in turn have a positive impact on the age groups more sensitive to pollution.</p> <p>Provision of an enhanced public transport network across WMA is a key priority area within the development of the WMATS. Both increases in capacity and service frequency should reduce wait times for services and therefore reduce the perceived fear of attack, harassment, and/or discrimination associated with service waiting times for vulnerable</p>

Protected Characteristic	Potential Effect
	<p>demographics such as elderly people. MEASURE SM4 also describes the principles of Universal Design and Age-Friendly design which will be adhered to in all public transport projects and active travel schemes, demonstrating due regard to the need of all age groups.</p> <p>The approach to an enhanced public transport network is underpinned by six guiding principles which includes increased speed of buses and increased directness to minimise journey times. This should increase the accessibility to vital services for protected age groups, which will have positive impacts on e.g. children travelling to school and the elderly travelling to vital services such as hospitals.</p> <p>MEASURE WALK1-5 describe the intentions of the NTA to maintain and improve footpaths, whilst improving junctions (safety and enhanced movement), as well as identifying and improving crossing points and crossing times across the WMA. These proposed measures (WALK1-5) for walking routes should positively impact children and the elderly by improving the walking route infrastructure through measures such as ensuring adequate width for users, removing unnecessary street clutter to improve mobility, and installing additional crossing points which will aid children and the elderly users through decreasing distance travelled and increasing safety. By increasing the quality and area of walking infrastructure, the WMATS should positively impact children and the elderly people through reduced crowding.</p> <p>MEASURE WALK8 describes how the NTA intends to support the delivery of expanded and new wayfinding systems in Waterford City Centre and settlements in the WMA. This may positively benefit elderly populations through the delivery of increased wayfinding infrastructure which can be helpful if they do not have access to e.g. GPS technology. SM4 describes how the NTA plans to implement Universal Design/an Age-Friendly Public Realm in all public transport projects and active travel schemes which would benefit the elderly through designing-in accessibility.</p> <p>MEASURE BUS9 describes the intention of the NTA to continue implementing a programme of bus stop and shelter provision to serve the WMA network, and to monitor and potentially expand and upgrade this programme. This may positively benefit the elderly population who use the network as bus shelters provide shelter from the elements and provide a sense of safety, which are noted as important factors for the elderly who tend to be the most frequent users of buses (B. P. Shrestha et al., 2016).</p> <p>The WMATS's BusConnects scheme, which intends to increase the frequency and capacity of buses across the WMA, will work to improve connectivity between city and suburbs as well as provide interchange between Cross City, Radial and Orbital bus services. If the BusConnects scheme is implemented this should improve accessibility across WMA which could link elderly people and young adults with better access to services, provisions, and opportunities.</p> <p>Drivers aged 17 and 24 are statistically over-represented in reported road accidents in comparison with older car drivers aged 25 and above largely as a result of inexperience and the age of the young car driver (ONS, 2015). The introduction of a more efficient and effective transport system could result in increased use of public transport by young adults which should reduce the quantity of traffic accidents and reduce air pollution in the WMA.</p> <p>Finally, MEASURE SM7-SM11 outline the NTA's plans for safe routes to school, green schools, school planning and design, cycle training and school travel strategies. All these</p>

Protected Characteristic	Potential Effect
	<p>measures are focused on increasing the safety and accessibility of routes to school which will result in positive impacts on school aged children.</p> <ul style="list-style-type: none"> <li>➤ Negative:</li> </ul> <p>As part of the WMATS’s approach to Climate Action Management, and the target to achieve a 51% reduction of greenhouse gas emissions, the WMATS looks to align to several mechanisms of the Climate Action Plan and Low Carbon Development (Amendment) Act 2021. Mechanisms include fuel price increases, further electrification of vehicles, congestion charge zones and low emission zones. For some elderly people, private vehicles are the only feasible mode of transport, placing restrictions on use of private vehicles through fuel price increases and introduction of congestion charges could restrict the movement for some elderly people and therefore limit access to vital services.</p>
Family Status	<ul style="list-style-type: none"> <li>➤ Positive:</li> </ul> <p>The approach to an enhanced public transport network is underpinned by six guiding principles which includes increased speed of buses and increased directness to minimise journey times. This should increase the accessibility of vital services which could have positive impacts on families with children for example.</p> <p>MEASURE WALK1-5 describe the intentions of the NTA to maintain and improve footpaths, whilst improving junctions (safety and enhanced movement), as well as identifying and improving crossing points and crossing times across the WMA. These proposed measures (WALK1-5) for walking routes should positively impact families with children by improving the walking route infrastructure through measures such as ensuring adequate width for users with buggies/prams, removing unnecessary street clutter to improve mobility, and installing additional crossing points which could aid families with children through decreasing distance travelled and increasing safety. By increasing the quality and area of walking infrastructure the WMATS could positively impact families with children through reduced crowding.</p> <p>MEASURE SM4 describes the principles of Universal Design and Age-Friendly design which will be adhered to in all public transport projects and active travel schemes. This will positively impact families through enhanced accessibility, safety and inclusivity.</p> <p>MEASURE BUS12 of the WMATS describes the intentions of the NTA to monitor demand for late night and 24-hour services on the bus network. If implemented, this should result in positive effects on young adults, particularly single women, who have greater safety concerns when walking alone at night.</p> <p>MEASURE CYCLING6 describes how the NTA plan to support the delivery of cycle parking for non-standard cycles. This may positively impact families with children through the inclusion of cycle parking which allows the parking of e.g. adapted cycles for the families such as family/tandem cycles, or purpose built cargo cycles designed to carry passengers.</p> <p>MEASURE ROAD4 describes the WMATS’s Regional and Local Roads Policy which aims to facilitate and enhance public transport, cycling and pedestrian facilities; active travel facilities; as well as, the safety enhancement of road junctions, pedestrian crossings, appropriate cycle measures including signalised crossings; and, to improve the safety of the local road network for all road users. This may positively benefit families travelling</p>

Protected Characteristic	Potential Effect
	<p>with children through enhanced safety within the WMA as this group could be more sensitive to the safety and accessibility of public spaces.</p> <ul style="list-style-type: none"> <li>➤ Negative:</li> </ul> <p>No negative equality impacts have been identified for this group.</p>
Gender	<ul style="list-style-type: none"> <li>➤ Positive:</li> </ul> <p>Provision of an enhanced public transport network across WMA is a key priority area within the development of the WMATS. Both increases in capacity and service frequency should reduce wait times for services and therefore reduce the perceived fear of attack, harassment, and/or discrimination associated with service waiting times for women. This ties in to MEASURE BUS3 which aims to give buses priority with the aim to reduce delays and wait times. More frequent services and increased capacity of buses should also increase the accessibility of vital services through improved connectivity and reduced risk to vulnerable groups such as women. This should have positive impacts for women who continue to be the primary caregiver across Ireland and/or women who are pregnant.</p> <p>MEASURE BUS12 of the WMATS describes the intentions of the NTA to monitor demand for late night and 24-hour services on the bus network. If implemented, this should result in positive effects on women who have greater safety concerns when walking alone at night.</p> <p>Through the delivery of a safe cycle network with improved cycling infrastructure, there may be an increased uptake of cycling among women, who tend to cycle less than men (Heesch, Sahlqvist, &amp; Garrard, 2012).</p> <ul style="list-style-type: none"> <li>➤ Negative:</li> </ul> <p>Whilst gender differences in car use are declining, evidence suggests that women make more complex trips (Department for Transport, 2014). Increases in driving restrictions may therefore disproportionately affect women in the WMA when, for example, driving to and from schools or managing caring duties, as often these journeys are not cost effective to undertake via public transport.</p>
Sexual Orientation	<ul style="list-style-type: none"> <li>➤ Positive:</li> </ul> <p>Provision of an enhanced public transport network across WMA is a key priority area within the development of the WMATS. Both increases in capacity and service frequency should reduce wait times for services and therefore reduce the perceived fear of attack, harassment, and/or discrimination associated with service waiting times for LGBTQA+ individuals.</p> <p>Evidence suggests that 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'Connell, 2010). MEASURE BUS3 aims to give buses priority, which should reduce delays to services and could improve perceived safety of services for LGBTQA+ individuals. Increased patronage of buses should also improve passive surveillance on the bus network, at both stops and on board buses. Similarly, MEASURE SM3 describes the high standard of urban design and placemaking that will be incorporated into the planning and design of all major public transport infrastructure schemes, including</p>

Protected Characteristic	Potential Effect
	<p>lighting, ground floor activity and passive surveillance which will further improve perceptions of safety for this group.</p> <p>The WMATS's BusConnects scheme, which intends to increase the frequency and capacity of buses across the WMA, will work to improve connectivity between city and suburbs as well as provide interchange between Cross City, Radial and Orbital bus services. If the BusConnects scheme is implemented this should improve accessibility across WMA which could link marginalised individuals with better access to services, provisions, and opportunities.</p> <ul style="list-style-type: none"> <li>➤ Negative:</li> </ul> <p>No negative equality impacts have been identified for this group.</p>
Civil Status	N/A: Screened out.
Membership of the Traveller Community	<ul style="list-style-type: none"> <li>➤ Positive:</li> </ul> <p>The WMATS looks to align to several mechanisms of the Climate Action Plan and Low Carbon Development (Amendment) Act 2021. Mechanisms include fuel price increases, further electrification of vehicles, congestion charge zones and low emission zones. These mechanisms, designed to reduce air pollution, should bring about an improvement in air quality and/or congestion therefore benefiting the health and wellbeing of all however especially those more susceptible to high volumes of traffic and poor air quality such as Members of the Traveller Community who are more likely to be geographically exposed to areas of high traffic volume and air pollution (Cemlyn, Greenfields, Burnett, Matthews, &amp; Whitwell, 2009).</p> <ul style="list-style-type: none"> <li>➤ Negative:</li> </ul> <p>As part of the WMATS's approach to Climate Action Management, and the target to achieve a 51% reduction on greenhouse gas emissions, the WMATS looks to align to several mechanisms of the Climate Action Plan and Low Carbon Development (Amendment) Act 2021. Mechanisms include fuel price increases, further electrification of vehicles, congestion charge zones and low emission zones. Increasing the price of fuel and/or introducing areas of congestion charge could have a significant economic consequence for Members of the Traveller Community who are statistically more likely to be economically deprived. This could cause a travel restriction and may lead to difficulties accessing vital services.</p>

## 5.1 Additional considerations for vulnerable groups

### Deprivation

The overarching vision for the WMATS is to set the framework for a transportation network enables the sustainable growth of the WMA as a key regional driver of growth in the South-East Region. WMATS aligns with several National Strategic Outcomes (NSOs), including NSO 6 High-Quality International Connectivity as well as regional and local level policy such as the Regional Spatial and Economic Strategy for the Southern Region and Waterford City and County Development Plan. These policies aim to actively facilitate, amongst other outcomes, an increase in international, national, and local productivity through strengthened connectivity and investment

opportunities. If successful, the WMATS should facilitate substantial growth in economic productivity through increased investment and subsequent job creation which could positively benefit areas of high deprivation.

The approach to an enhanced public transport network is underpinned by six guiding principles which includes increased speed of buses and increased directness to minimise journey times. This could increase the accessibility of vital services which should have positive impacts for individuals who may require additional support such as access to financial support services, food banks, as well as employment and skills support. By increasing the efficiency of the network, WMATS may reduce travel time for those who are deprived and may have more reliance on public transport over private mobility methods. The expanded extent of the network should also bring more people who suffer from deprivation within the catchment of public transport.

MEASURE SM20 and SM21 describe the intention of the NTA to review the fare structure for transport in the WMA to support the increased use of public transport and to support effective taxi service throughout the WMA. This includes reviewing the national maximum fare for taxis every two years and monitoring fares throughout the period of the strategy. This should have positive impacts on those in areas of high deprivation by ensuring ongoing affordability of public transport.

MEASURE CYCLING 3-4 describes the intention of the NTA to support the provision of bike and electric bike share scheme expansions serving key origins and destinations. This may positively impact those in areas of high deprivation through allowing access to cycling to those who otherwise would not necessarily have the financial resources to purchase their own bike and/or equipment and/or adequately store a bike. Those from a deprived background may not have the capital to invest in a bike and protective equipment and therefore this measure should provide greater access to cycling for this group by providing the option to pay as you go.

MEASURE BUS4-5 describes the intention of the NTA to complete and implement the Connecting Ireland programme in the short term as a means of ensuring that the towns and villages of the WMA are well served by public transport; these measures aim to connect bus networks. This may positively affect those from a deprived background through the provision of affordable routes of travel to move around the city and country. Those from deprived backgrounds have less access to cars and rely more on public transport, particularly buses (NatCen, 2019), and therefore this group should benefit from this measure being implemented.

Measure BUS7 describes the intention of the NTA to deliver a fully Zero Emission bus fleet by 2030. This should provide improvements to air quality and in turn have a positive impact on those more exposed to higher pollution levels which is often those from a deprived background.

The WMATS's BusConnects scheme, which intends to increase the frequency and capacity of buses across the WMA, will work to improve connectivity between city and suburbs as well as provide interchange between Cross City, Radial and Orbital bus services. If the BusConnects scheme is implemented this should improve accessibility across WMA which would link marginalised individuals with better access to services, provisions, and opportunities.

The WMATS looks to align to several mechanisms of the Climate Action Plan and Low Carbon Development (Amendment) Act 2021. Mechanisms include fuel price increases, further electrification of vehicles, congestion charge zones and low emission zones. Increasing the price of fuel and/or introducing areas of congestion charge should have a significant economic consequence on individuals living in deprivation, reducing access to employment, education and vital services.

### Migrant Populations

As discussed in section 3.1.2, migrants can often face higher levels of deprivation and inequalities compared to the general population, as well as higher levels of abuse when in the streets/using public transport. Similarly, migrants tend to use public transport at a higher rate than the general population (RAND, 2011), and so should benefit from improvements to the public transport system in the WMA through WMATS implementation.

One of overall objectives of the WMATS is to deliver a fully accessible and inclusive transport system. Through the principles of accessibility and universal design, the WMATS will ensure the design of an environment so that it can

be accessed, understood and used to the greatest extent possible by people regardless of their age, size, ability or disability, including physical, cognitive and sensory. This will likely benefit migrant populations who have limited experience of local customs, culture and language. It could also be assumed that the various efficiency, safety and air quality improvements planned by the WMATS would also benefit the migrant population of the WMA.

Through the intersectionality of migrant populations often more likely to be from a deprived background, then similar positive and negative impacts of the WMATS would be expected for migrants as for those from a deprived background, as listed above.

### COVID-19

The COVID-19 pandemic highlighted the importance of low-carbon transport for providing access to critical healthcare roles and economic opportunities. Women in particular are more prone to the risk of COVID-19 infection due to the fact that women make up the majority of essential or front-line workers.

Data from The Department for Transport also suggests that disabled passengers are less confident about returning to public transport than non-disabled passengers. Similarly, more disabled people are at risk of experiencing financial hardship because of COVID-19.

Through investment in low-carbon and sustainable transport, the WMATS is likely to result in improvements to air quality within the city space, which can have respiratory health benefits for the whole population, and particularly for those more sensitive to air pollution such as the disabled or young/elderly.

Additional attention should be given to sustainable, resilient and inclusive transport measures which do not exacerbate existing inequalities highlighted by the COVID-19 pandemic. Further recommendations are provided in Section 6.

## **5.2 Assessment Conclusion**

The WMATS places emphasis on creating a transport system which travels away from a private car dependant legacy and focuses on creating an accessible, high quality and integrated transport network which supports the sustainable growth of the area whilst also supporting wider government planning and climate commitments. The strategy includes proposals for the significant enhancement of bus services and infrastructure, the development of a cycle network, and a range of other measures related to walking, roads and streets, parking and the enhancement of the public realm.

Overall, the WMATS is likely to have positive impacts on equality due to:

- Increased capacity and reduced wait times for bus services which should reduce fear or attack, harassment and/or discrimination on public transport services, and increase patronage which could lead to increased passive surveillance;
- High standards of urban design and placemaking that will be incorporated into the planning and design of all major public transport infrastructure schemes, including lighting, ground floor activity and passive surveillance;
- The WMATS's approach to Climate Action Management, through plans for a Zero Emission Fleet and associated impacts on air quality which could positively impact PCGs disproportionately impacted by poorer air quality;
- Increased speed of buses and increased directness to minimise journey times and increase accessibility to vital services;
- Enhanced walking measures such as improved footpaths, junctions, and crossing points;
- Universal design measures and designing-in accessibility for all public transport projects; and
- The availability of cycle parking for non-standard cycles.

Potential negative equality impacts have been identified as a result of fuel price increases, further electrification of vehicles, congestion charge zones and low emission zones and which could place restrictions on private vehicles, introduce economic barriers and reduce access to services for some PCG.



Whilst the WMATS explicitly mentions and identifies specific measures which can have a positive impact on some PCG, such as 'Age-Friendly Design' for 'Age' and 'Accessibility' for 'Disability' and 'Age', the WMATS does not identify specific measures to promote equality among certain protected groups such as gender, race and sexuality. To identify measures which explicitly mention or focus on closing the equality gap for other protected groups could equate to an enhanced response to reducing inequality for these specific groups in WMA. The intersectionality of users who fit into multiple PCGs could mean that individuals benefit from cumulative positive and/or negative impacts of the WMATS. For example, the potential benefits of the WMATS on a woman who is a single parent living in socio-economic deprivation could be an increased sense of security as a result of a greater selection of routes and more frequent and reliable services, and therefore further use of, and accessibility to, services, provisions, and opportunities. Parents may also benefit from increased safety at junctions whilst travelling with children. This provides several socio-economic benefits including autonomy, a sense of wellbeing and reduction in deprivation.

Overall, the WMATS is expected to have a positive equality impact on all of the PCGs considered within the EqIA, with the exception of 'Civil Status'. However, there is no evidence to suggest that this PCG experiences a proportionately worse transport service today than other groups. The positive impacts of the WMATS can be expected if the needs of all of the PCGs are fully considered during implementation.

## 6. Mitigation and Recommendations

### 6.1 Overview

The following section identifies measures to avoid, minimise and/or mitigate possible negative equality impacts for PCGs and provide recommendations to further enhance equality of opportunity for PCGs.

The central recommendation emerging from the EqIA findings (see Table 4-1) is that the needs of PCGs should be incorporated into a Strategy Implementation Plan, supported by detailed baseline data collection to inform implementation approach, a plan to engage with representatives of specific PCGs and a monitoring plan. These measures are outlined in more detail below.

#### 6.1.1 Updates to Strategy

Overall, the WMATS is expected to have a positive equality impact on individuals and communities living, working and visiting the Waterford Metropolitan Area through the implementation of the WMATS and planned measures. Further consideration could be given to:

- Impacts on affordability of measures e.g. potential congestion charges, city centre parking charges, fuel price increases, cost of bike share or private cycling schemes. Further consideration should be given to the need to mitigate the impacts of price increases on PCGs.
- Policy context should give mention to the Irish Equal Status Acts 200-2018 and the influence of the Acts on the Strategy development. The strategy could give explicit mention to the need to close the equality gap for PCGs.
- Reducing the impacts of the COVID-19 pandemic and the long-term recovery towards sustainable, resilient and inclusive transport through for example, expanded eligibility criteria for access to assisted travel services (such as Dial-a-Ride), and taxi card schemes, to provide safer alternatives to public transport, accurate and accessible information on requirements for face coverings and the provision of priority or discounted access to public transport for health and essential workers.
- It is recommended that consideration is also given to inclusivity and accessibility of low carbon transport e.g. electric vehicles charging points accessible for disabled people and plug in grants for wheelchair accessible taxis.

#### 6.1.2 Baseline Data Collection

As stated in 4.2.3 the high-level nature of the WMATS precludes the identification of specific impacts on some PCGs. 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 WMATS's implementation lifecycle to evaluation, as required by the Duty.

The NTA could use hot-spot mapping to identify areas which have high concentrations of PCG, building in population and amenities data to analyse the potential impact of measures outlined in the WMATS. This could aid the WMATS in identifying priority areas for interventions and help to promote equality of opportunity between PCG.

#### 6.1.3 Engagement with representatives of specific protected groups

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 is 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 WMATS Section 8.10, could include a requirement for public engagement with representatives of PCGs to ensure the needs of these groups are identified.

Table 6-1 provides a list of community groups and programmes that operate in WMA that the NTA could engage with in order to ensure full representation of PCG.

Table 6-1 Engagement groups within the WMA

Protected Characteristic	Potential Engagement Group
Gender	Women's Collective Ireland / Representative groups
Civil status	Social Inclusion and Community Activation Programme (SICAP) / Waterford Local Community Development Committee (WLCDC) / Representative groups
Family status	Waterford Area Partnership (WAP) / The Waterford Inner City Lone Parents Project / Representative groups
Age	Waterford Children and Young People's Services Committee / Schools / Elderly Representative groups
Disability	Waterford Disability Network / Waterford Intellectual Disability Association / Representative groups
Race	Irish Network Against Racism / WAP / Representative groups
Religion or belief	Local religious groups
Sexual orientation	South East LGBT Group / belongTO / Representative groups
Membership of the Traveller community	Traveller Interagency Group / SICAP / WLCDC / Representative groups

#### 6.1.4 Development of an Equality Toolkit

It is recommended that an equality toolkit is developed covering the nine PCGs as well as additional information on compounding factors of disadvantage such as deprivation. This could include guidelines for practitioners on how to understand and assess impacts of specific interventions on PCGs e.g., accessibility of passenger rail services and transport connections for disabled people, affordability of scheme initiatives for lower income households, safety considerations for groups who express greater levels of concern regarding personal safety when using active or passenger transport modes. Such a toolkit would support inclusive strategy implementation at project and operational levels. This combined with strategic monitoring of the WMATS'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.

#### 6.1.5 Scoping additional work

Where specific equality concerns are raised either through stakeholder engagement or the EqIA, consideration should be given to additional studies which take an in-depth look at equality issues. For example, the NTA could consider undertaking a more in-depth study of inclusivity and equality issues surrounding rural and coastal communities in comparison to urban areas. This could include further engagement with community groups to explore how feelings of safety and accessibility can be cultivated within rural communities.

## 7. Monitoring

The 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 WMATS outlines how the NTA, in association with relevant stakeholders, plans to successfully deliver a transport network which will result in positive outcomes for the WMA, providing long-term economic, social and environmental benefits to the region whilst combatting existing challenges which exist with the network. WMATS success will be measured against key indicators such as: Reduction in CO2 emissions from transport in the WMA; Air quality; Mode share; Walking & cycling targets; as well as against the 8 Objectives listed below:

- Objective 01: To meet the demand generated by future growth of the WMA through the provision of an efficient transport network.
- Objective 02: To prioritise sustainable transport and active travel to reduce car dependency.
- Objective 03: The provision of a high-level, citywide public transport system connecting to key destinations within high demand corridors.
- Objective 04: To increase transport capacity where needed to achieve the strategy outcomes.
- Objective 05: To deliver a fully accessible and inclusive transport system.
- Objective 06: To enhance the public realm of the WMA through demand management measures and transport interventions.
- Objective 07: To minimise the impact of motorised traffic in urban centres.
- Objective 08: To identify and protect key strategic routes for the movement of freight traffic.

The Draft WMATS describes how the NTA will support the local authorities in undertaking periodic monitoring of transport trends and patterns. The NTA will also continue to monitor public transport passenger data on an ongoing basis. However, the WMATS does not describe where the results will be reported or published. Neither does the planned monitoring plan mention any specific monitoring indicators relating to equality.

It is recommended that, where possible, all indicators are disaggregated by equalities, socioeconomic, and geographic characteristics. This will provide the ability to look at sections of the population, and conduct intersectional analysis, as opposed to having only one or two isolated indicators which pick up equality, socioeconomic or geographical issues.

It is recommended that a framework could be established as part of a Monitoring Report as part of the WMATS, to monitor the impact of the implementation, specifically on PCG. If the monitoring outputs result in greater adverse impacts than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, it is recommended that the WMATS is revised to achieve better outcomes for the relevant equality groups. In line with the Duty, it is recommended that the NTA report on developments and achievements in its annual report.

## 8. Conclusion

The EqlA of the Draft Waterford Metropolitan Area Transport Strategy assessed impacts on equality of opportunity for the nine PCGs covered under Section 42 of the Irish Human Rights and Equality Commission Act 2014. The assessment also considered impacts on areas of high deprivation, migrant populations, the impact of the COVID-19 pandemic, and gave consideration to the intersectionality of identities.

The EqlA assessment results demonstrate that the WMATS is expected to have a positive equality impact on individuals and communities across the PCGs living, working and visiting WMA through the implementation of proposed measures and objectives. Some PCGs are set to positively benefit more than other groups through the implementation of the WMATS. However, if the needs of all groups are fully considered through strategy implementation, it could be expected that all PCGs will positively benefit.

The completion of an EqlA at the draft stage of the NTA's WMATS 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 PCG, 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 recommendations for this EqlA are for the NTA to incorporate the needs of PCGs into an equality focused Strategy Implementation Plan, supported by: baseline data collection, a plan for engagement with representatives from each PCG, strategy fine-tuning based on stakeholder feedback and for monitoring throughout the strategy implementation lifecycle.

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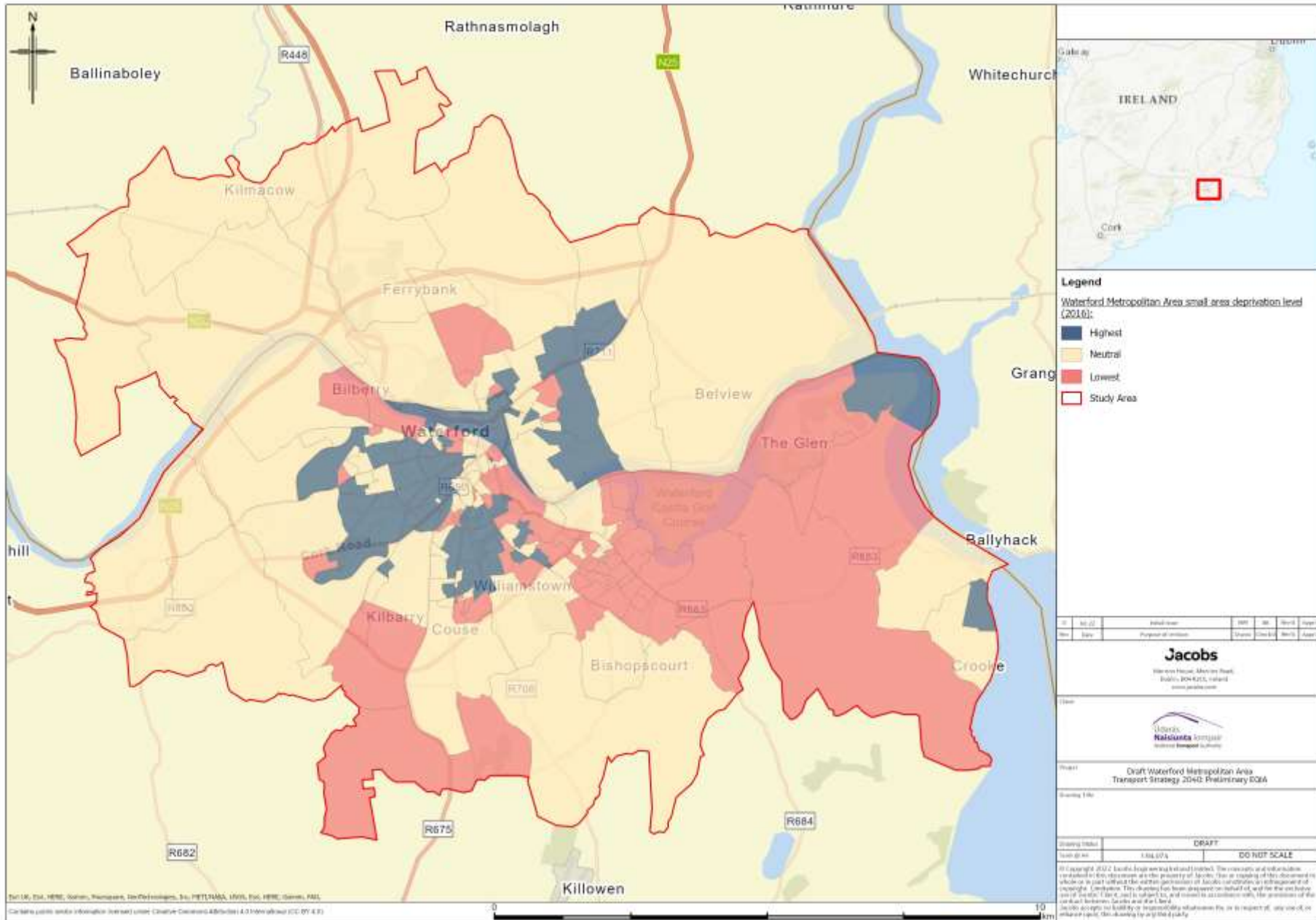
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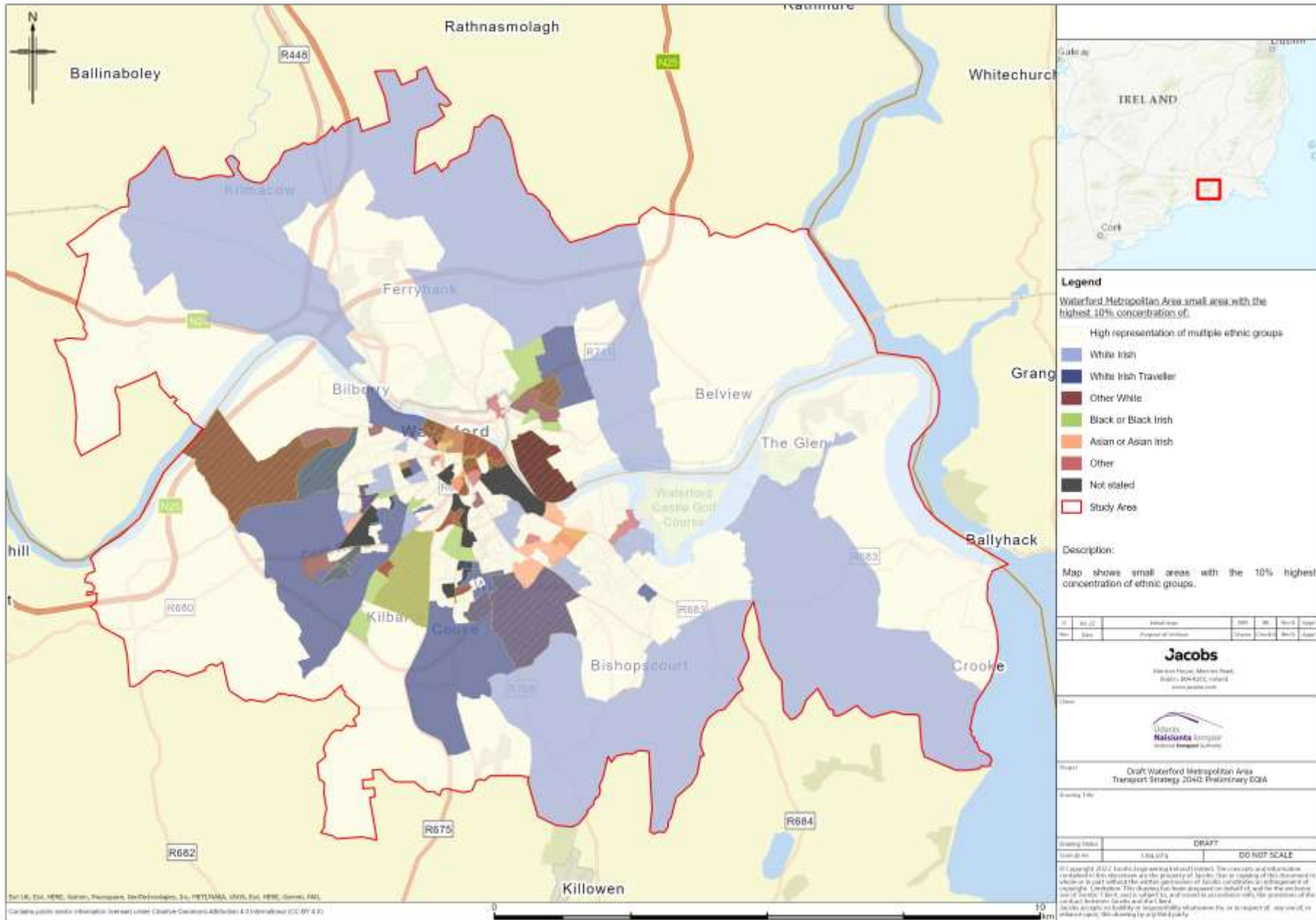
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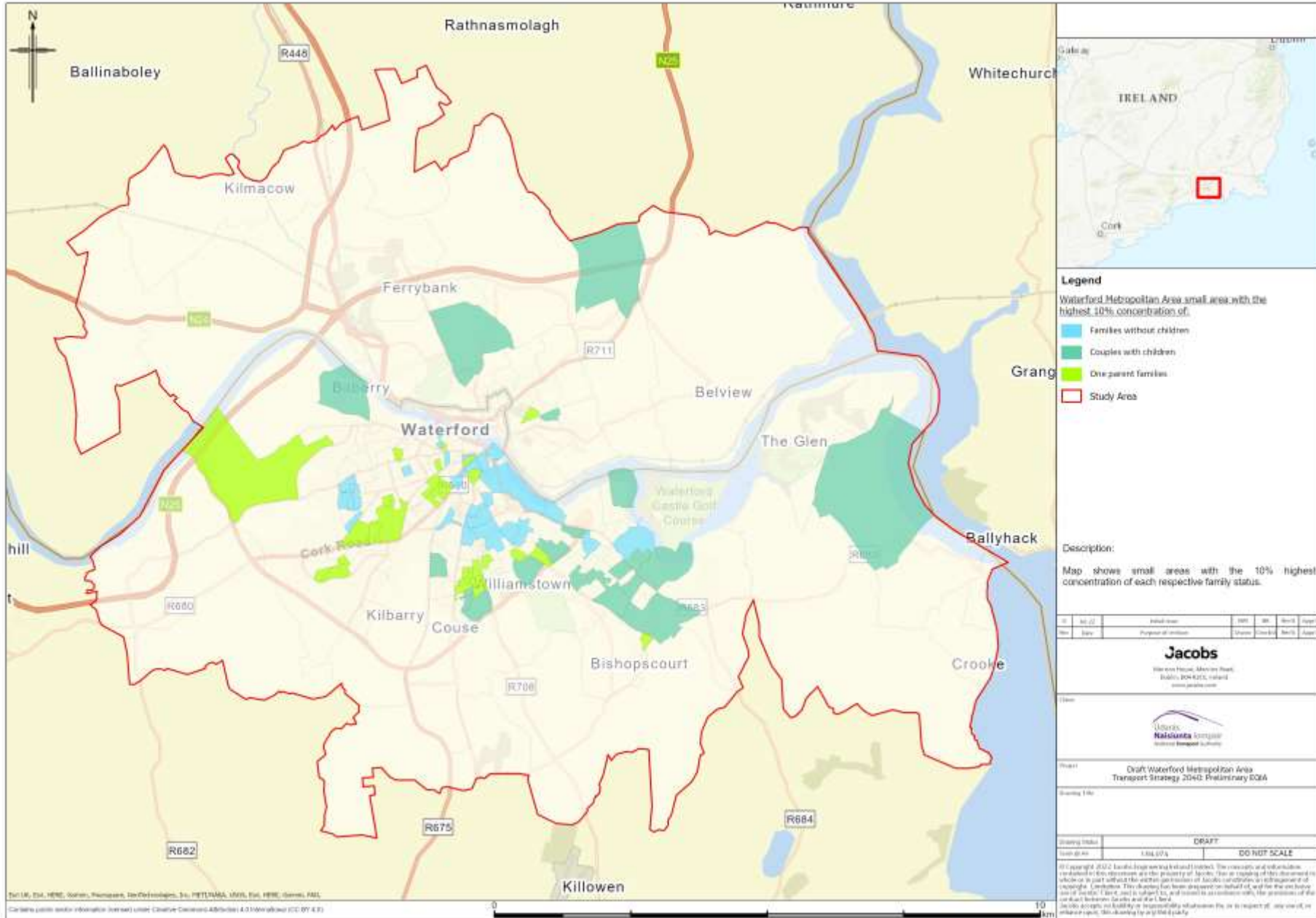


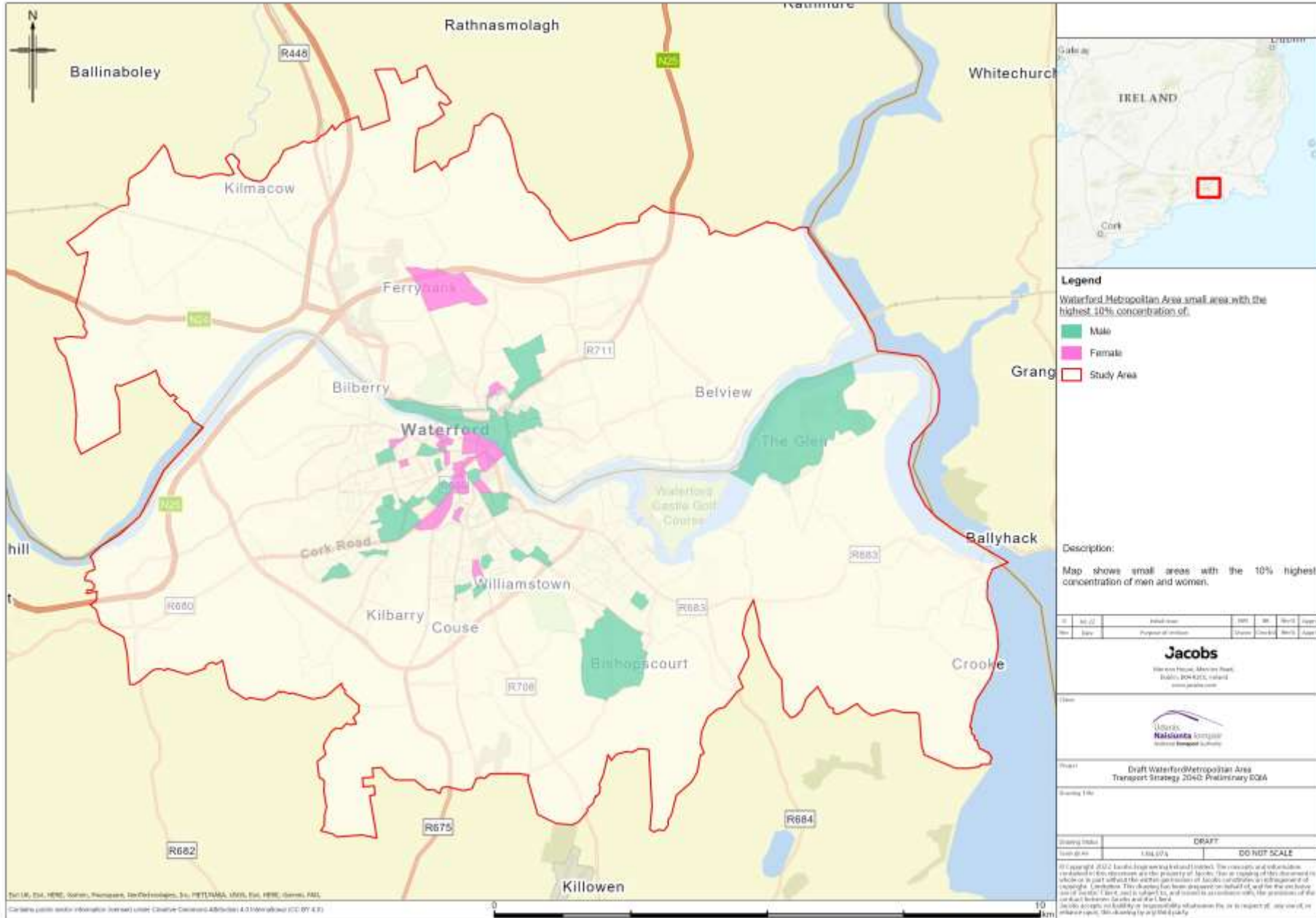
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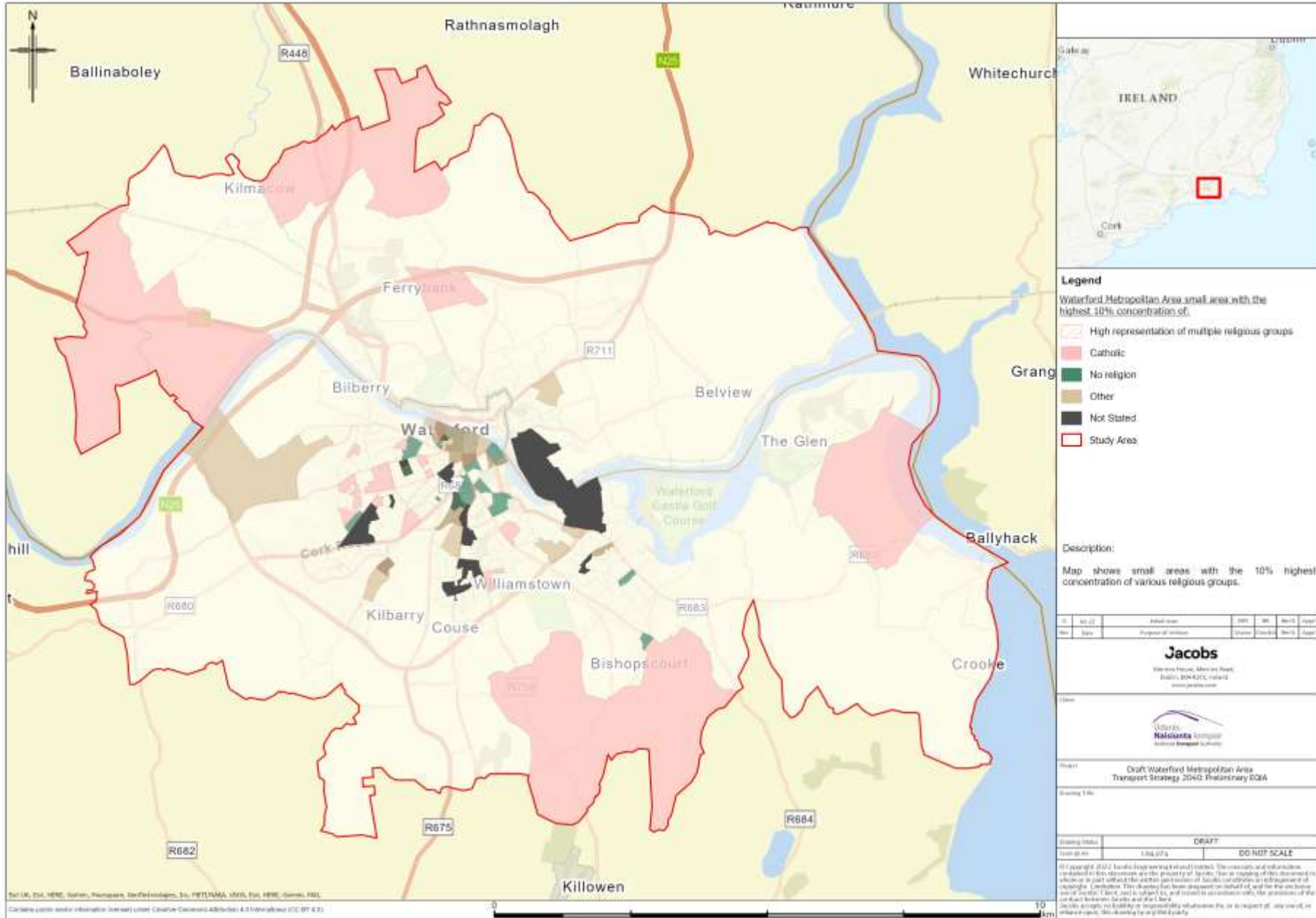
## **Appendix A. Distribution of PCGs across the Waterford Metropolitan Area**

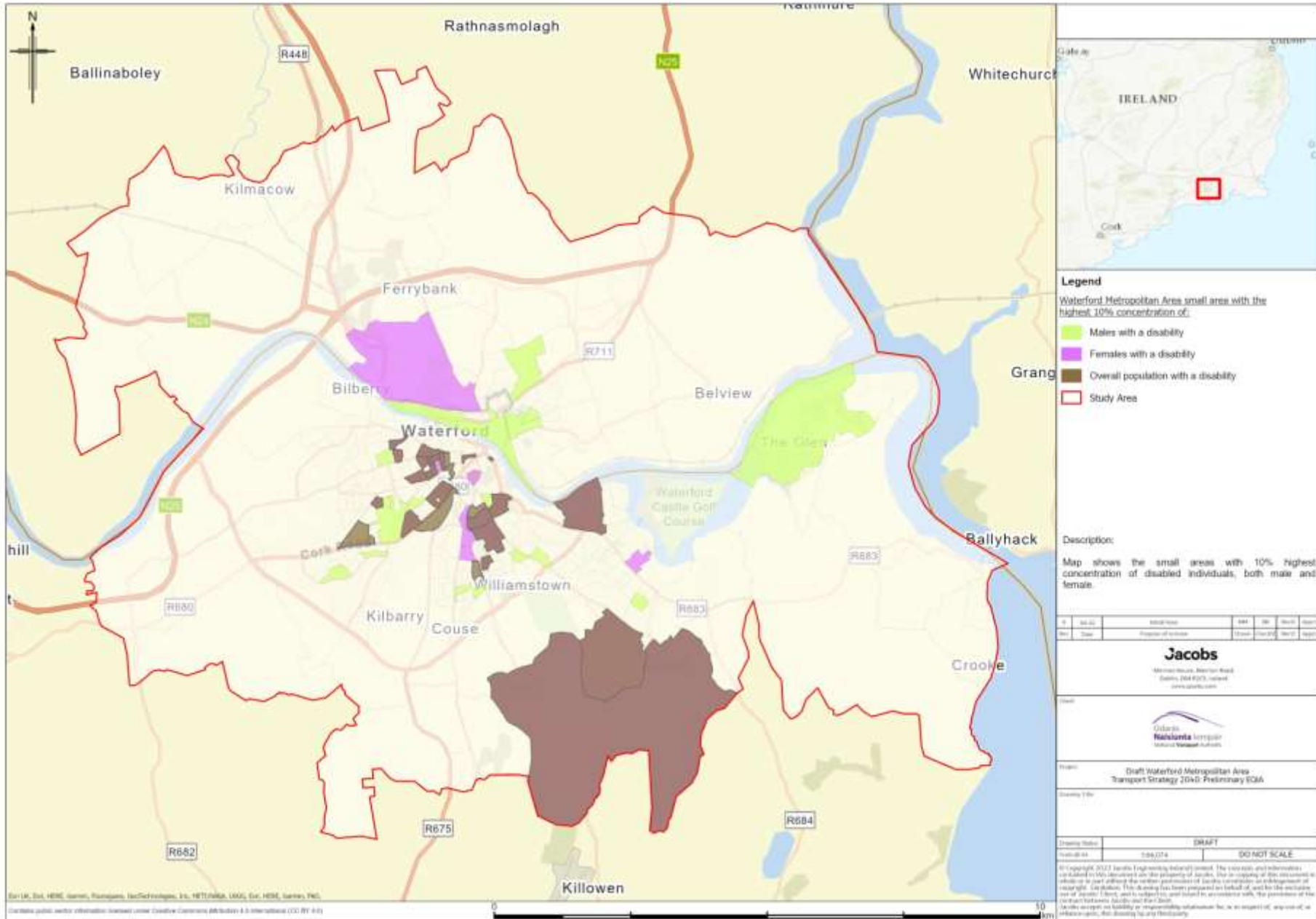














## Equality Impact Assessment for the Draft Waterford Metropolitan Area Transport Strategy

