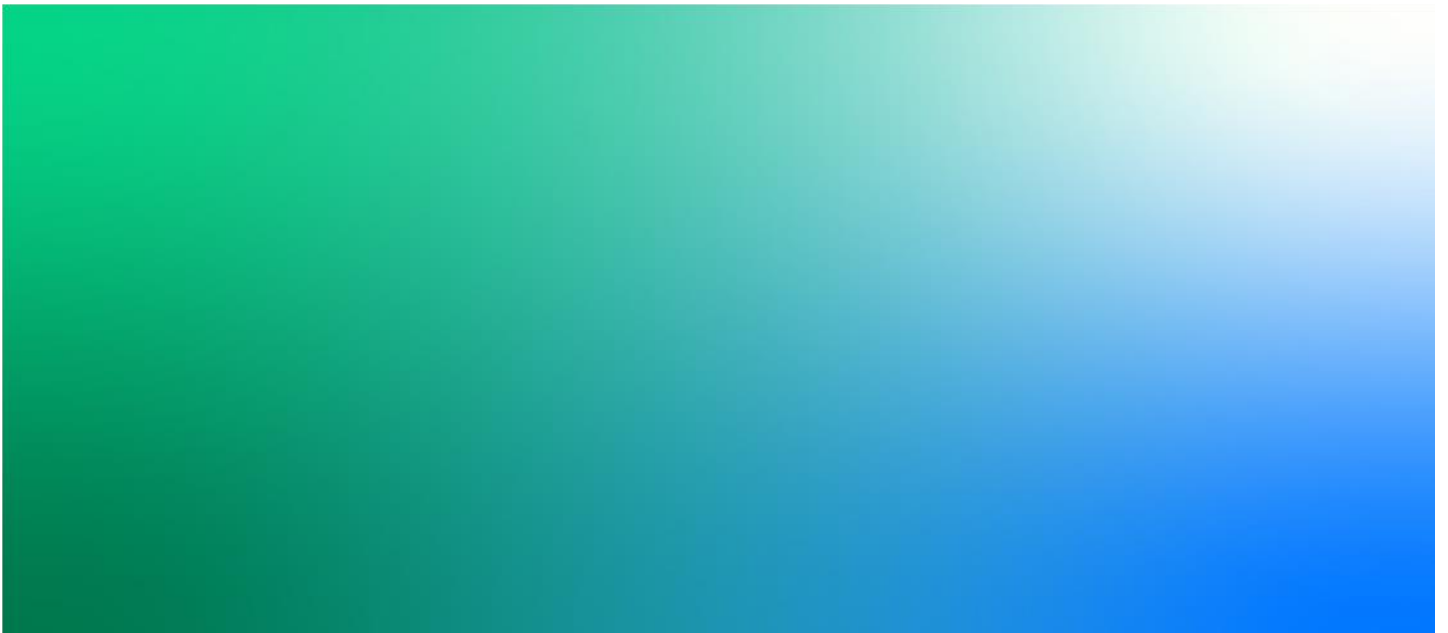


Preliminary Equality Impact Assessment
Revised Draft Limerick | Shannon Metropolitan Area Transport Strategy 2040

March 2022

National Transport Authority



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Executive Summary

This document sets out the preliminary Equality Impact Assessment (EqIA) for the revised draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) 2040. The LSMATS sets out the framework for the delivery of the transport system required to further the development of the Limerick Shannon Metropolitan Area (LSMA). The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the LSMA.

This preliminary EqIA will inform the finalisation of the LSMATS and will assist the National Transport Authority 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 fulfilment of the National Transport Authority's obligations under the Irish Constitution, the EU Charter on Fundamental Rights, and 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 under the Equal Status Acts are gender, civil status, family status, sexual orientation, disability, age, race, religion, and membership of the Traveller community.

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

The National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Southern Assembly (RSES), incorporating the Metropolitan Area Strategic Plan (MASP) for Limerick Shannon, are the key policy instruments which have guided the development of the LSMATS. In addition to the NPF, the LSMATS is consistent with the investment priorities outlined in the National Development Plan 2021-2030, both of which combine to form Project Ireland 2040. The LSMATS supports key national, regional, and local policy objectives, as well as European, and global policies relating to the environment, sustainability, and climate action. Tackling emissions from the transport sector (accounting for almost 20% of Ireland's greenhouse gases in 2017) is a significant part of the recently published Climate Action Plan 2021, which follows the Climate Action and Low Carbon Development (Amendment) Act 2021 (signed July 2021). The potential long-term impacts on the transport network as a result of the Covid-19 pandemic have also been considered in the Strategy.

As summarised in **Appendix A**, the nine protected characteristic groups have been assessed against the strategic objectives of the LSMATS. Key themes and comments raised during public consultation with potential implications for equality impacts have also been considered. Overall, the **LSMATS is expected to have a positive equality impact on individuals and communities** residing and working in the LSMA through the implementation of its strategic ambitions.

The central recommendation of this preliminary EqIA is for the National Transport Authority to incorporate the needs of protected characteristic groups into an Implementation and Monitoring Plan, which would include:

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

This recommendation has been incorporated into the revised draft of the LSMATS, published in April 2022. With cognisance of the above, monitoring and analysis of results should be undertaken at appropriate milestones in the rollout of the Strategy to identify whether potential impacts on protected characteristic groups have changed, and to explore further opportunities for enhancement and fostering good relations. It is recommended that Monitoring Reports to present the results be prepared periodically during each phase of Strategy rollout, up to its intended completion in 2040.

1. Introduction

1.1 Purpose of Report

- 1.1.1 This document sets out the preliminary Equality Impact Assessment (EqIA) for the draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) 2040. The LSMATS sets out the framework for the delivery of the transport system required to further the development of the Limerick Shannon Metropolitan Area (LSMA). The function of the LSMATS is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services for the LSMA.
- 1.1.2 The aim of this assessment is to identify potential differential impacts on protected characteristic groups as a result of the LSMATS, and to contribute towards enabling and documenting the National Transport Authority's active compliance with equalities legislation during the development and implementation of the Strategy.

1.2 Overview of the EqIA context

Equality Legislation in Ireland

- 1.2.1 Equality rights in Ireland are enshrined under the Irish Constitution and international law, and many of the State's equality and anti-discrimination protections are derived from EU law including the EU Charter on Fundamental Rights and the EU Equality Directives which underpin Ireland's equality legislation. The primary equality legislation is set out under Section 42 of the Irish Human Rights and Equality Commission Act 2014, the Employment Equality Acts 1998-2015 and The Equal Status Acts 2000-2018 (hereby referred to as 'the Acts').
- 1.2.2 The Acts prohibit discrimination in the provision of goods and services, including transport, accommodation, and education to the public under the nine protected characteristic groups. In addition, the Acts prohibit discrimination in the provision of accommodation services against people who are in receipt of rent supplement, housing assistance, or social welfare payments, and victimisation. Protected characteristic groups are shown in Table 1.1.

Table 1.1: Nine Protected Characteristic groups 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.

Protected Characteristic	Description
Religion or belief	People who have a religious belief; people who are atheist or agnostic; people who have a philosophical belief which affects their view of the world or the way they live.
Sexual orientation	Impacts based on sexual orientation of heterosexual or lesbian, gay, bisexual, transgender, intersex, asexual and queer people, and persons with other sexual orientations and gender identities
Membership of the Traveller community	Member of the Traveller community' means a member of a community of people who are commonly called Travellers and who are identified (both by themselves and others) as people with a shared history, culture and traditions including, historically, a nomadic way of life on the island of Ireland.

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

1.2.3 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 1st November 2014. It assists public bodies in adhering to human rights and equality standards in a systematic way in their strategic and daily operations for both staff and service users.

1.2.4 The Duty, requires all public sector bodies, including statutory and local authorities, to have due regard to the need to:

- Eliminate discrimination,
- Promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and
- Protect the human rights of its members, staff and the persons to whom it provides services.

1.2.5 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; and
- Report – the public body must report on developments and achievements in its annual report.

1.2.6 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.

The Equal Status Acts 2000-2015

1.2.7 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 groups 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.

Employment Equality Acts 1998-2015

- 1.2.8 The Employment Equality Acts 1998-2015 prohibit discrimination and harassment under the nine protected groups (gender, civil status, family status, sexual orientation, disability, age, race, religion and membership of the Traveller community) in employment and stipulates that employers should make reasonable adjustments for employees with disability.
- 1.2.9 Other legislation relevant to the Irish context includes:
- The Disability Act 2005 Part 5 - a statutory obligation on public service providers to support access to services and facilities for people with disabilities.
- 1.2.10 Relevant Irish 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; and
 - The National Action Plan for Social Inclusion 2018-2021.

Equality and Covid-19 pandemic recovery

- 1.2.11 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 areas. 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).
- 1.2.12 The impact of measures to protect society have had an enormous impact on children and young people, especially those that are vulnerable. The pandemic has also negatively impacted the lives of both men and women albeit in different ways (ibid.).
- 1.2.13 Addressing inequality through levelling up strategies that promote inclusive growth are paramount to the realisation of a sustainable future as part of the economic and social recovery from Covid-19. Undertaking 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 and as a requirement of The Duty. Hence, a Covid-19 recovery 'lens' will be utilised throughout this EqlA.

1.3 EqlA Purpose

- 1.3.1 An EqlA considers the impact of a project or policy on persons or groups of persons who share characteristics that are protected under the Equal Status Acts 2000-2018 and under Section 42 of the Irish Human Rights and Equality Commission Act 2014. An 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.

1.3.2 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 Transport Strategy. It is a predictive assessment, considering in advance of implementation the potential impacts arising from the Transport Strategy's implementation, and the likely or possible effects of these impacts for protected characteristic groups. The EqlA serves to inform design, mitigation and other relevant project-related decisions.

1.3.3 The objectives underpinning the EqlA are to:

- Identify the presence of protected characteristic groups in the study area, in particular where such groups are disproportionately represented amongst those most likely to be impacted by the Transport Strategy;
- Draw on engagement with stakeholders to inform understanding of the likely needs of protected characteristic groups relevant to identified potential impacts;
- Assess the likely effects of the Transport Strategy's implementation and operation for groups sharing protected characteristics, including how the Transport Strategy could impact relations between groups;
- Identify measures to avoid, minimise and/or mitigate possible negative equality impacts for protected characteristics groups; and
- Identify relevant measures, which, as part of the Transport Strategy's implementation or operation, that could further enhance equality, address existing disadvantage or support good relations between protected characteristic groups and other people.

2. The Strategy

2.1 Overview of the Strategy

- 2.1.1 The LSMATS sets out the framework for the delivery of the transport system required to further the development of the LSMA, shown on Figure 1. LSMATS has been developed by the National Transport Authority in collaboration with Limerick City and County Council, Clare County Council and Transport Infrastructure Ireland.
- 2.1.2 The LSMATS aims to transform the LSMA city-region into a hub of cultural and social development and regeneration; as the economic core for the Mid-West; as an environmentally sustainable and unified metropolitan unit; as a place where people of all ages can travel conveniently and safely; and a place that attracts people, jobs and activity from all over Ireland and beyond.

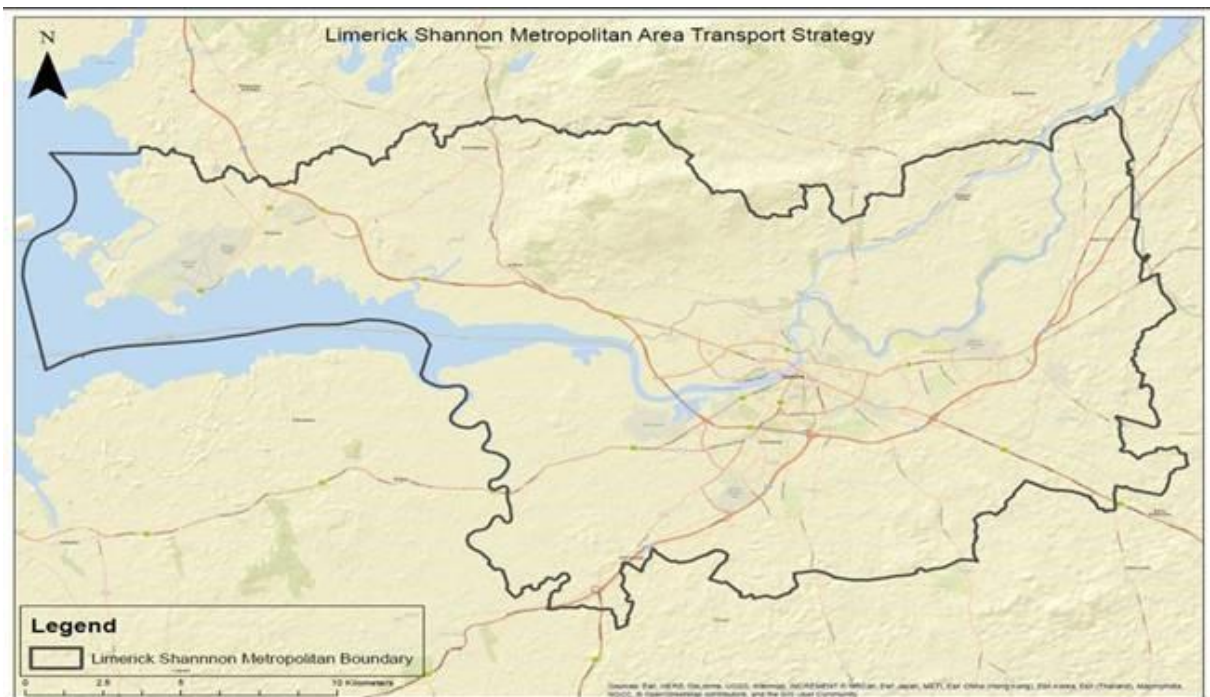


Figure 1: Limerick-Shannon Metropolitan Area Boundary

- 2.1.3 The LSMATS is a cross-county Metropolitan scale document which sets out the policies and objectives at a level appropriate to that scale. Many of the details of transport infrastructure or services are most appropriately dealt with at a more localised level and as such, the LSMATS, where applicable, refers to more detailed programmes and projects which will be brought forward by the National Transport Authority and other agencies at a future date.
- 2.1.4 With this strategic function in mind, the LSMATS comprises the transport planning response to a range of challenges across several areas of national, regional, and local government. These are presented in the LSMATS as eight pillars, which were then translated into Strategic Transport Objectives against which the Strategy will be measured and appraised. The eight pillars established to support the LSMATS are, as follows:
- **Pillar 1:** Climate change and reducing emissions – commitment to zero-emissions public transport and investment in active travel;
 - **Pillar 2:** A Unified Limerick – Shannon Metropolitan Area – city unification through improved public transport connectivity to economic centres and housing;

- **Pillar 3:** Revitalisation of Limerick City Centre – redevelopment and regeneration to improve attractiveness and sense of place;
- **Pillar 4:** Transit-Oriented Development – comprehensive public transport and cycle network to maximise accessibility;
- **Pillar 5:** Reducing social disadvantage – by improving transport connectivity to employment, services, regeneration areas, urban realm and active transport options;
- **Pillar 6:** Transformation of the urban environment – through improving public realm and reducing car dominance to transform the equitable enjoyment of public spaces and environment; and
- **Pillar 7:** Universal access – commitment to a Universal Design approach; and
- **Pillar 8:** Economic, social and cultural development – responding to the economic, social and cultural requirements of the LSMA.

2.1.5 LSMATS was developed in an iterative manner in order to deliver a transport network which supports the population and employment growth planned for Limerick, Shannon and Environs under the NPF to 2040.

2.1.6 The development of the LSMATS took account of relevant policy and guidance; baseline transport conditions; key challenges to be addressed, following stakeholder consultation; guiding principles in the development of network options; and potential future land use scenarios set by local authorities that may impact on the transport network. Use of the National Transport Authority’s transport modelling system allowed quantitative evaluation of individual components during the options development stage of the Strategy, and subsequently the assessment of the performance of the combined measures.

2.1.7 The LSMATS seeks to promote sustainable and inclusive growth by addressing the challenges of climate change; recovery from the Covid-19 pandemic; servicing the legacy development patterns; revitalisation of the city centre and town centres; transformation of the urban environment; ensuring universal access, serving rural development; improving health and equality; fostering economic development and improved efficiencies in delivering transport schemes.

2.1.8 The LSMATS intends to promote and facilitate change through providing infrastructure and necessary ambitions to increase the use of public transport, walking and cycling, and to support the conversation of transport fleet to zero emission vehicles. The LSMATS supports the National Transport Authority’s commitment for all urban public transport vehicles to be zero-emissions by 2035.

2.2 Policy Context

2.2.1 The LSMATS supports key national, regional, and local policy objectives, as well as European, and global policies relating to the environment, sustainability, and climate action, including the UN Sustainable Development Goals and the Climate Action Plan 2021.

2.2.2 A key driver in the development of LSMATS has been the legislatively based target outlined by the Climate Action and Low Carbon Development (Amendment) Act 2021 (‘the Climate Act 2021’) to reduce overall greenhouse gas emission by 50% by the end of 2030. Tackling emissions from the transport sector (accounting for almost 20% of Ireland’s greenhouse gases in 2017) is a significant part of the recently published Climate Action Plan, which follows the Climate Act 2021. The Climate Action Plan is a road map to delivering Ireland’s climate ambition and has 475 actions identified that extend to all sectors of the economy aiming to transform Ireland to a low carbon nation over the next three decades. The focus of the Plan for reducing carbon emitted by the transport sector relates primarily to facilitating a modal shift towards public transport and active travel, electrification of road transport, and the use of biofuels.

- 2.2.3 The National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Southern Assembly (RSES), incorporating the Metropolitan Area Strategic Plan (MASP) for Limerick Shannon, are the key policy instruments which have guided the development of the LSMATS.
- 2.2.4 The NPF is a strategic development framework that sets out the long-term context for Ireland's physical development and associated progress in economic, social and environmental terms until 2040. In addition to the NPF, the LSMATS are consistent with the investment priorities outlined in the National Development Plan (NDP) 2021-2030. The focus of the NDP is on strengthening housing, climate ambitions, transport, healthcare, jobs growth and economic renewal (Department of Public Expenditure and Reform, 2021).
- 2.2.5 The NPF and LSMATS combine to form Project Ireland 2040, with the NPF setting vision and strategy for development and the NDP providing the enabling investment for implementation. Project Ireland 2040 is described by the government as '*a long-term overarching strategy to make Ireland a better country for all and to build a more resilient and sustainable future. The strategy ensures the alignment of investment plans with the stated National Strategic Objectives for 2040 in a considered, cohesive and defined manner.*' (Government of Ireland, 2022).
- 2.2.6 The RSES, published in January 2020, addresses the matters targeted as in the NDP through a regional-level framework to ensure improved coordination in planning and development policy across local authority boundaries, underpinned by Project Ireland 2040. The Limerick-Shannon Metropolitan Area Strategic Plan (L-SMASP) also provides a framework through which transport priorities are set out, of which the development of the LSMATS is a key component.
- 2.2.7 The LSMATS supports the aims of the Limerick County Development Plan 2010-2016, to '*develop and improve, in a sustainable manner the social, economic, cultural and environmental assets of the County*' and of the Limerick City Development Plan 2010 – 2016, to '*embrace the principle of sustainability and deliver on the growing demand for travel by sustainable forms of transport*'.
- 2.2.8 The Draft Limerick Development 2022-2028 Plan, due to be adopted this year, also supports the LSMATS, setting out that '*the Council will strengthen the links between land use and transportation planning and will seek to promote sustainable transport, through the management of the road network in Limerick, by providing attractive, inclusive and connected walking and cycling networks, improving permeability within settlements, supporting car-share facilities and the use of electric vehicles and securing investment in public transport.*' (Limerick City and County Council, 2021)
- 2.2.9 Other relevant local development plans are the Clare County Development Plan 2017 – 2023, the Shannon Municipal District Plan, and the Southern Environs Local Area Plan 2011 – 2017 (extended to 2023). Integration of land use and transportation planning is a focus of these city and council development plans, which has been considered in the development of the LSMATS.

2.3 Strategic Transport Objectives

- 2.3.1 Based on these strategic challenges, as well as the plans, programmes and policies at the international, national and local level (including NPF, the NDP and the RSES as determined by Project Ireland 2040) and on the statutory role of the National Transport Authority, the eight pillars listed in Section 2.1 were developed.
- 2.3.2 The eight pillars were then translated in Strategic Transport Objectives for the LSMA by which the Strategy will be measured and appraised, and against which this EqlA has been assessed. The Objectives are set out below.

Limerick – Shannon Metropolitan Area Strategic Transport Objectives	
Strategic Transport Objective 1	To prioritise investment in sustainable transport in order to reduce the reliance on the private car.
Strategic Transport Objective 2	To provide a high level of public transport connectivity to key destinations.
Strategic Transport Objective 3	To facilitate higher density housing a part of Transit-Oriented Developments at key points of high public transport accessibility.
Strategic Transport Objective 4	To deliver a fully accessible and inclusive transport system.
Strategic Transport Objective 5	To identify and protect key strategic routes for the movement of freight traffic and to improve access to Shannon-Foynes Port and Shannon Airport.
Strategic Transport Objective 6	To improve road safety, public health and personal security.
Strategic Transport Objective 7	To minimise the impact of motorised traffic in urban centres.

2.4 Study Area Context

- 2.4.1 The LSMA covers 387km², and has a population of over 132,400 (CSO, 2016). This is made up of approximately 96,800 residents within the Limerick City and Suburbs boundary as defined by the CSO. The LSMA includes: Limerick City and Suburbs; Shannon; Annacotty; Castleconnell; Patrickswell; Clarina; Mungret; Sixmilebridge; Ardnascrusha; Clonlara; Cratloe; Meelick / Ballycannan; Bunratty; and Parteen.
- 2.4.2 Limerick City is the largest urban centre in Ireland’s Mid-West Region and the third largest city in the State. Shannon is a significant employment centre with assets such as Shannon International Airport and Shannon Free-Zone. Limerick City and Shannon are interdependent, with their complementary functions contributing to a combined strength which is a key economic driver for the Mid-West Region.
- 2.4.3 The LSMA is served by:
- InterCity rail services;
 - City, regional and Expressway bus/coach and Local Link services; and
 - Shannon International Airport (located approximately 20km to the north-west of the City Centre).
- 2.4.4 Transport modelling data shows a low mode share for sustainable travel modes within the LSMA, reflecting the current limitations of public transport and cycling provision.
- 2.4.5 The LSMATS study area and existing transport network coverage is illustrated on Figure 2.



Figure 2: Study Area and Existing Transport Network

3. Methodology

3.1 Overview

- 3.1.1 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 judgements have been made regarding the nature of potential equality effects.
- 3.1.2 Equality effects are defined as where an impact is identified as likely to have disproportionate and/or differential effect on groups of people on the groups of their protected characteristic.
- 3.1.3 Disproportionate effects occur when an intervention has a proportionately greater effect on a protected characteristic group than on other members of the general population at a particular location. Disproportionate effects can arise in two ways, either:
 - Where an impact is predicted on a residential area where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation in the wider district and/or county/region; or
 - Where an impact is predicted on a community resource predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for very elderly people).
- 3.1.4 Differential effects occur when members of a protected characteristic group are affected differently by an intervention because of specific needs, sensitivities or vulnerabilities related to their protected characteristic. Effects can be categorised as differential, regardless of the number of individuals affected.

3.2 Screening

- 3.2.1 The screening stage determines which protected characteristics are likely to experience differential and/or disproportionate effects as a result of the LSMATS, and therefore require further consideration within the EqlA. Table 3.1 outlines the screening questions that have been applied to this stage of the assessment. The questions were designed to focus on the interventions ability to address the needs of each protected characteristic group by providing an indication of the issues that are relevant to each group.
- 3.2.2 In addition, the following question has been applied to all groups during the screening stage: *Have provisions been made to support Covid-19 recovery for this group?*

Table 3.1: Typical Screening Questions

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

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

3.3 Assessment

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

3.4 Assessment of Disproportionate Effects

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

3.5 Assessment of Differential Effects

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

3.6 Monitoring

- 3.6.1 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).

- 3.6.2 Monitoring progress in relation to an EqIA allows the National Transport Authority to demonstrate how it has delivered on its LSMATS and provides a framework to identify gaps and to inform the focus of future strategic plans.
- 3.6.3 Monitoring information will be used to make any changes necessary to improve the LSMATS and evidence of potential 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 impacts than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, the National Transport Authority must ensure that the LSMATS is revised to achieve better outcomes for the relevant equality groups.

3.7 Data Sources

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

3.8 Assumptions and limitations

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

4. Screening

4.1 Introduction

4.1.1 This section sets out the initial screening exercise undertaken to identify which protected characteristic groups are likely to experience differential and/or disproportionate effects as a result of the LSMATS, and therefore require further consideration within the EqIA.

4.2 Differential effects

4.2.1 In recent years, researchers have developed new methods to measure how transport decisions affect different groups of society (Behbahani, Nazari, Kang, & Litman, 2019). Such decisions affect people's ability to access services and activities, and therefore their socio-economic opportunities and development. As such, it is crucial to incorporate social equity measures in transportation network planning.

4.2.2 Although transportation is increasingly framed as a social issue by researchers and policymakers, the social dimension is still largely marginalised in planning processes. Women, ethnic minorities, the LGBTQ+ community and persons living with disability are all less likely to have their needs met by a standard transport system; potentially corresponding to worse health, economic and social outcomes for these groups (Boisjoly and Yengoh, 2017). One reason for this is the dominance of the conventional planning approach which has traditionally focused on the technical and physical dimension of transportation (ibid.).

4.2.3 For the purpose of this assessment, although not specified as one of the nine protected characteristic groups under the 2014 Act, people living in deprived areas are considered as a vulnerable group. Those in material or enforced deprivation in Ireland are those who cannot afford at least two of the eleven goods or services considered essential for a basic standard of living (EAPN Ireland, 2019). People living in areas considered as deprived 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.

4.3 Outcome of screening exercise

4.3.1 Potential differential effects on protected characteristic groups and the outcome of the screening exercise following the literature review are outlined in Table 4.1.

Table 4.1 Potential differential effects on protected characteristic groups

Protected Characteristic	Potential Differential Effect	Screened In
Race	<ul style="list-style-type: none"> Vulnerability to changes in transport costs: Evidence suggests that Black Asian Minority Ethnic community members are often over-represented within lower income groups and therefore have increased vulnerability to changes in transport fares (Martiskainen et al. , 2020). Employment in transport roles: In Ireland, within the transport sector, ethnic minorities are more highly represented in bus driver roles of the 16% of bus drivers from a country of origin outside Ireland (Immigrant Council of Ireland, 2014). There has been an 85% increase in the reporting of racist incidents to the Immigrant Council of Ireland's Racist Incidents Support and Referral Service since its inception in 2013, with a total of 142 racist incidents reported to the Service (ibid.). In 2014, 24% of incidents reported to the Immigrant 	Yes

Protected Characteristic	Potential Differential Effect	Screened In
	<p>Council of Ireland occurred while travelling on public transport, with 42% of victims identifying as African (ibid.).</p> <ul style="list-style-type: none"> • Introduction of new transport corridors: The barrier presented by new transport corridors may result in spatial segregation which ethnic minority communities can be more susceptible to, especially those from low-income household who may face limitations in the set of residences, destinations, and transport modes they can choose. This has the potential to re-enforce or exacerbate societal divisions (Jones, Midell, & Anciaes, 2015). • Safety: A recent study by Living Streets found that people from an ethnic minority (excluding non-white minorities) are 25% more likely to be a casualty than white pedestrians (Living Streets, 2021). This is likely to be as a result of the amount of time spent as a pedestrian due to lack of access to a vehicle or public transport. 	
Religion	<ul style="list-style-type: none"> • Safety using public transport: Perceptions of safety can differ between different cultures and faiths, particularly those with concerns related to hate crime. For religious people who have a marked religious identity through clothing there is an increased risk of harassment or discrimination (Irish Human Rights and Equality Commission, 2017). Compared to Catholics, members of minority religions report somewhat higher discrimination rates in the workplace and in public and private services (ibid.). Research interviews with Muslim men and women in Dublin outlined the discriminatory practices they felt they experienced from transport staff as a result of religious and racial profiling, which took the form of poor or no service provision (Immigrant Council of Ireland Independent Law Centre, 2016). There is no similar data available for Limerick, however it is expected that similar issues may be experienced by minority religious groups. 	Yes
Disability	<ul style="list-style-type: none"> • Accessibility of public transport: Evidence suggests that some disabled people are more vulnerable to stress and anxiety in crowded places, as dense and fast-moving crowds can reduce accessibility and make vulnerable passengers feel unsafe (National Disability Authority, 2021). In addition, disabled people are particularly vulnerable to changes in journey times and accessibility resulting from transport network changes and/or diversions caused by new transport corridors (Jones, Midell, & Anciaes, 2015). • Environmental impacts of transport: People with certain pre-existing health problems are more sensitive to impacts from air pollution that may arise from construction and operation of transport infrastructure (European Environment Agency, 2020). • Car dependency: Members of communities with disabilities are much more likely to be dependent upon public transport than car use. This dependency means that any changes to local transport infrastructure could have a direct impact on their lifestyle and wellbeing (International Transport Forum, 2017). 	Yes
Age	<ul style="list-style-type: none"> • Children and young people: New infrastructure can divide communities and change the normal journey routes of some individuals. For children, a change in route might take them across dangerous road or rail crossing points, placing them at increased risk of an accident. Children are limited by their physical, cognitive and social development, making them more vulnerable to transport accidents (World Health Organisation, 2015). For children and 	Yes

Protected Characteristic	Potential Differential Effect	Screened In
	<p>young people, access to reliable public transport can be critical for accessing education (O'Connor & Staunton, 2015).</p> <ul style="list-style-type: none"> Elderly populations: Elderly people are considered to have an increased dependency upon public transport and often place high importance on the availability of routes close to home. Changes to the accessibility of public transport is therefore likely to have differential impacts on elderly members of local communities (International Transport Forum, 2017). Evidence suggests that older people have a lesser likelihood to be able to walk for long distances. For this reason, the introduction of a physical barrier within the local community could increase their journey times and reduce their ability to access community facilities (Jones, Midell, & Anciaes, 2015). Older people are also more sensitive to impacts from air pollution that may arise from construction and operation of transport infrastructure (European Environment Agency, 2020). 	
Family status	<ul style="list-style-type: none"> Accessibility: Evidence suggests pregnant women and mothers with young children are more likely to use public transport to access community and healthcare facilities, which plays an important role in supporting social inclusion for this group (Lodovici and Torchio, 2015). The accessibility and design of physical spaces may also affect the ability of parents with young children to navigate public transport freely, especially if using pushchairs (ibid.). Further research suggests that lone parents, as a lower income group, experience higher levels of ill-health meaning that they are more constrained in their ability to cycle (Lucas, Stokes, Bastiaanssen, & Burkinshaw, 2019). Environmental impacts of transport: Pregnant women are sensitive to impacts from air pollution, with exposure having negative effects including the potential to disrupt a baby's development (Medical News Today, 2020). Vulnerability to changes in transport costs: Lone parent families suffer from transport poverty; children and parents in lone-parent families are the least likely of any household type to have private transport, and the price of public transport excludes many young people, and mothers and children, from its use (Titherbridge, 2008). In addition, households with low incomes, ethnic minority community members, and those that have children or household members with mobility problems are also at risk of transport poverty (Simcock, et al., 2020). Rural and semi-rural communities are also more at risk because they lack access to alternatives to car-use. These groups without transport would be particularly vulnerable to both social and spatial isolation (ibid.). 	Yes
Gender	<ul style="list-style-type: none"> Safety: Research suggests that women are more likely to be subject to hate crimes and harassment and therefore feel unsafe within stations and on public transport (O'Connor & Staunton, 2015). Evidence 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). Women are more likely to feel unsafe when travelling in the evenings, with over half (55%) stating they would not use public transport after dark or late at night, and one in three having seen or experienced some form of harassment or violence while using public transport (Transport Infrastructure Ireland, 2020). 	Yes

Protected Characteristic	Potential Differential Effect	Screened In
	<ul style="list-style-type: none"> • Travel Patterns: Outside of Dublin, 81% of women own or have access to a car, and 95% of women consider the car to be a necessity (Transport Infrastructure Ireland, 2020). Cars offer more convenience for responsibilities commonly shouldered by women, such as caring for children and other adults. Women’s primary reason for travelling is to drop off and collect children or family members, while men’s primary reason is travelling for work (Transport Infrastructure Ireland, 2020). 	
Sexual Orientation	<ul style="list-style-type: none"> • Safety: The LGBTQ Hate Crime Report by Johnny (Johnny, 2006), a non-governmental organisation for gay and bi-sexual men around Ireland and the UK indicated that in Dublin, members of the LGBTQ 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, & K, 2021). This research identifies that LGBTQ participants are not necessarily physically excluded from mobility opportunities, rather, they pay hidden costs to travel safely which take the shape of identity and visibility comprises and heightened levels of fear while travelling (Weintrob, Handell, Zebracki, Barnard, & K, 2021). 	Yes
Civil Status	<ul style="list-style-type: none"> • Equality: In Ireland, the overall treatment of people across the system and institution of marriage, civil partnerships and cohabiting couples is not always consistent, or equitable, and this can have a direct bearing on economic equality (TASC, 2015). However, there is no evidence to suggest that this protected characteristic group experiences proportionately worse transport service today than other groups. Therefore, this group is not considered further in this EqIA. 	No
Membership of the Traveller Community	<ul style="list-style-type: none"> • Disadvantage: Irish Travellers report very high rates of discrimination in seeking work, where they are ten times more likely than White Irish to experience discrimination, and experience high rates of discrimination in private services (Irish Human Rights and Equality Commission, 2017). Further findings point to evidence of a widening gap in health over their life course. The increasing disadvantage in terms of health as their life course progresses is a characteristic of cumulative disadvantage, a process whereby early adverse experiences shape the long-term trajectory (Elder, 1985). Traveller children are particularly disadvantaged due to settlements being located in exposed areas at danger from passing traffic or poor air quality due to construction activity. Such sites are often remote from public provision of playgrounds and public transport can be almost non-existent (Cemlyn, Greenfields, Burnett, Matthews, & Whitwell, 2009). 	Yes
Deprivation	<ul style="list-style-type: none"> • Disadvantage: 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). 	Yes

Protected Characteristic	Potential Differential Effect	Screened In
	<ul style="list-style-type: none"> Accessibility to transport: Improved local transport infrastructure will directly benefit those living without a car as their accessibility to education, employment and essential service is dependent upon these public transport links (International Transport Forum, 2017). Research suggests that it is likely that a significant number of people on low incomes in rural areas (and some urban areas) are unable to meet their basic transport needs (O'Connor & Staunton, 2015). A study on transport inequality undertaken by NatCen found that People who depend more on the bus network for work tend to be lower paid, live in more deprived areas, and are more likely to turn down jobs due to transport issues, than those on higher incomes, who tend to use cars and trains more often (Gates, Gogescu, Grollman, Cooper, & Khambhaita, 2019). Improvements to bus networks tend to be of greatest service to the most vulnerable groups in society, be it those on low incomes, those trying to find work, young, older or disabled people (Gates, Gogescu, Grollman, Cooper, & Khambhaita, 2019). Safety: According to a recent study by Living Streets, deprivation doubles the risk of becoming a pedestrian casualty (Living Streets, 2021), which is likely as a result of the amount of time spent as a pedestrian due to lack of access to a vehicle or public transport. 	

4.4 Disproportionate effects

4.4.1 This section presents the total number of people within the study area belonging to a protected characteristic group in comparison to the Ireland national average. The statistical data gathered in relation to the disproportionate effects on protected characteristic groups is presented in Table 4.2, with reference to the geographical distribution shown in **Appendix A** (Figures A1 – A7). The assessment of deprivation has considered the bottom 25% most disadvantaged areas as shown on the Pobal HP Deprivation Index¹.

Table 4.2 Statistical data gathered in relation to the disproportionate effects on protected characteristic groups

Protected Characteristic Groups	Sub-Group	Total number of people in the LSMA	Limerick Area Average (%)	Ireland Average (%)	Comparison to Irish average (In Line = +/- 3%)	Potential disproportionate effects
Age	0-19	35,700	26.8	27	In Line	Whilst most age groups are similarly represented in both the LSMA and the rest of Ireland, there is a higher than average concentration of 20–39 year olds within the LSMA. Geographically, as shown on Figure A.1 this age group is particularly prevalent within Limerick city centre.
	20-39	40,700	30.8	27.8	Higher	
	40-64	39,300	29.7	31.3	In Line	
	65-84	15,200	11.5	11	In Line	
	85 and over	1,430	1.1	1.4	In Line	
Disability	Females	10,400	7.9	7	In Line	The proportion of the population with a disability in the LSMA is in line with the rest of Ireland, for both males and females. Geographically, Figure A.2 shows that the highest concentration of people with a disability in the LSMA, both males and females and in the population overall are located within the Limerick city centre and in the east of the study area. Data gathered shows that 15% of the population of Limerick, or 20,100 people have at least one disability, slightly higher than the average for Ireland overall at 13.5% but still in line with the average (Disability Federation of Ireland, 2019).
	Males	9,700	7.4	6.5	In Line	
	Overall	20,100	15.3%	13.5%	In Line	
Gender	Female	66,800	50.5	50.6	In Line	The data shows that the representation of both males and females within the LSMA is in line with the rest of Ireland. Geographically, Figure A.3 shows that higher concentrations of the males and females within specific small areas are seen more in Limerick city centre than in the outer areas of the LSMA.
	Male	65,600	49.5	49.4	In Line	
Family Status	Families Without Children	9,740	29.7	29.2	In Line	The data shows that the representation of different types of family status within the LSMA is in line with the rest of Ireland. Geographically, as shown on Figure A.4, those either without children or one parent families

¹ The Pobal HP Deprivation Index is a series of maps measuring the relative affluence or disadvantage of a particular geographical area in the Republic of Ireland, using data compiled from various censuses.

Protected Characteristic Groups	Sub-Group	Total number of people in the LSMA	Limerick Area Average (%)	Ireland Average (%)	Comparison to Irish average (In Line = +/- 3%)	Potential disproportionate effects
	Couples With Children	16,400	50.1	52.8	In Line	are more heavily concentrated in Limerick city centre, and families with children are more highly concentrated in the suburbs of the LSMA.
	One Parent Families	6,640	20.2	18	In Line	
Race	White Irish	104,000	80	82.2	In Line	Overall, representation of different ethnic groups in the LSMA is in line with Ireland. The data shows that there is a higher presence of Asian or Asian Irish people within the LSMA compared to the Ireland average, and a lower presence of White Irish compared to the Ireland average. Geographically, Figure A.5 illustrates that within the city centre, there is a high representation of multiple ethnic groups.
	White Irish Traveller	678	0.5	0.7	In Line	
	Other White	10,800	8.3	9.5	In Line	
	Black or Black Irish	2,060	1.6	1.4	In Line	
	Asian or Asian Irish	4,580	3.5	2.1	In Line	
	Other	2,110	1.6	1.5	In Line	
	Not Stated	4,570	3.5	2.6	In Line	
Religion	Catholic	102,000	77.4	78.3	In Line	The data shows that the proportion of different religious groups in the LSMA are in line with the average in Ireland. Geographically, Figure A.6 there are a greater number of persons belonging to Catholic sub-group in the south-west of the LSMA. Those with no religion or have not stated, are most represented in Limerick city centre.
	Other	12,300	9.3	9.2	In Line	
	No Religion	13,000	9.8	9.8	In Line	
	Not Stated	4,530	3.4	2.6	In Line	
Membership of the Traveller Community	White Irish Traveller	678	0.5	0.7	In Line	Overall, representation of White Irish Travellers in the LSMA is in line with Ireland. Geographically, Figure A.5 illustrates that within the city centre, there is a high representation of White Irish Travellers in the west of the LSMA.

Protected Characteristic Groups	Sub-Group	Total number of people in the LSMA	Limerick Area Average (%)	Ireland Average (%)	Comparison to Irish average (In Line = +/- 3%)	Potential disproportionate effects
Deprivation	Bottom 25% POBAL Score	30563	20.1	22.6	In Line	Overall, levels of deprivation are in line with the average for Ireland. Geographically, Figure A.7 illustrates that there are pockets of deprivation concentrated in the city centre of Limerick, with several extremely disadvantaged and very disadvantaged areas. There are fewer disadvantaged areas in the outer areas and suburbs of the LSMA, and the most affluent areas are on the outskirts of Limerick city and the LSMA.

5. Assessment

5.1 Introduction

- 5.1.1 The Duty requires all public sector bodies, including statutory and local authorities, to have due regard to the need to eliminate discrimination, promote quality of opportunity and protect human rights of its members, staff and persons whom it provides services.
- 5.1.2 The EqlA has assessed the LSMATS impact on promoting equality for protected characteristic groups. The assessment has also identified opportunities and relevant measures which can further enhance equality, address existing disadvantage, or support good relations between protected characteristic groups and the general population.
- 5.1.3 Having considered the data and evidence gathered for the EqlA of the LSMATS, this section considers how the Strategy may disproportionately and/or differentially impact on protected characteristic groups. It is important to remember the Duty also has a positive function, as it explores how the Strategy offers the opportunity to promote equality, inclusion and foster good relations.

5.2 Assessment Findings

- 5.2.1 The EqlA assessment findings are detailed in the summary matrix in **Appendix A** of this document, and mitigation and recommendations are presented in Table 5.1 in Section 5.3. Within the matrix, the nine protected characteristic groups defined by the Acts and Duty have been assessed against the LSMATS aim, public consultation, strategic objectives, strategy themes and associated strategy sections. People living in deprived areas have also been considered in the assessment due to the potential for them to experience disproportionate and/or differential effects as a result of transport interventions.
- 5.2.2 Overall, the **LSMATS is expected to have a positive equality impact** on individuals and communities living in, working in, and visiting the LSMA through the implementation of its strategic ambitions.
- 5.2.3 It should be noted that the high-level nature of the Strategy and associated policy measures precludes the identification of any specific impacts promoting good relations among protected characteristic groups. Nevertheless, the Strategy will establish a positive framework for the development of an **Implementation and Monitoring Plan** that can allow specific interventions to be designed around promoting equality across the nine protected characteristic groups as well as people living in deprived areas.
- 5.2.4 One of the key objectives in the LSMATS is to *'deliver a fully accessible and inclusive transport system'* that serves the needs of people of all ages and with differing mobility needs and circumstances. LSMATS is intended to be scalable, flexible and future-proofed enough to meet changes in population and employment growth. It is a live document, subject to periodic review every six years, which provides an opportunity for the EqlA to be continually reviewed and updated alongside this.
- 5.2.5 The successful implementation of the LSMATS will provide long-term economic, social, and environmental benefits to the region and assist in the realisation of the Climate Action Plan targets, as well as walking and cycling mode split targets as set out in the NTA. Integration with sustainable land use planning, involving facilitating housing development to cater for future population growth, is crucial in contributing to the effectiveness of the LSMATS.

- 5.2.6 LSMATS outlines how its implementation will lead to a better urban environment through a people-centred street transformation, placing the needs of those walking, wheeling and cycling above those of people travelling by private vehicle. This will be done through design and placemaking policies, creating thoroughfares and places people wish to congregate, where movement on foot and by bicycle is safer and more convenient. Positive impacts for the LSMA population for the envisaged public realm improvements include better health and wellbeing through reduced emissions and increased uptake of active travel, improved accessibility to socio-economic opportunities, and enhancements in road safety and journey amenity.
- 5.2.7 Placemaking and public realm improvements can also have the effect of enhancing community cohesion and promoting social inclusion across individuals and communities from different background. The principle of Universal Design is a key focus of the Strategy; The National Disability Authority's Centre for Excellence in Universal Design, Age-Friendly Ireland and DMURS all provide best practice guidance on designing an accessible public realm. All LSMATS transport schemes will be fully inclusive and adhere to these standards. Thus, the LSMATS implementation provides an opportunity through which the National Transport Authority can promote equality and inclusion across an updated, sustainable transport system within the LSMA.
- 5.2.8 The LSMATS has considered the wider socio-economic and environmental objectives set out for Ireland in Project 2040 and the Climate Change Plan and sets out how these may be realised in the LSMA through the delivery of transport infrastructure. The LSMATS will establish an important statutory framework committing the National Transport Authority, Transport Infrastructure Ireland, the Southern Regional Assembly, Limerick City and County Council and Clare County Council to the implementation of inclusive measures. These measures will ensure the transport system meets the needs of all members of society, and to advertising and education campaigns which seek to inform people of specific needs of others.

5.3 EqlA Mitigations and Recommendations

- 5.3.1 The mitigations and recommendations arising from the Equality Impact Assessment findings (see **Appendix A**) are outlined in Table 5.1.
- 5.3.2 Table 5.1 summarises key recommendations for each strategic objective and section of the Strategy and outline suggestions that the National Transport Authority may seek to include as part of their Implementation and Monitoring Plan, making note of specific mitigations against certain protected characteristic groups where relevant. For the comprehensive suite of strategy implementation suggestions refer to **Section 6 - Recommendations: Implementation and Monitoring Plan**.
- 5.3.3 In addition to the mitigation and recommendations for each of the LSMATS objectives/sections, the following recommendation has been applied to all LSMATS objectives/sections for all groups as part of EqlA findings:

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

Key – Protected Characteristic groups ²	
ALL	All PCGs
A	Age
D	Disability
DA	Deprived Areas
F	Family Status
GSo	Gender and Sexual Orientation
RT	Race and Traveller Community
Re	Religion

Table 5.1: Equality Impact Assessment Findings, Mitigations and Recommendations

Objective/Section of LSMATS	Mitigation and Recommendations
<p>Strategic Transport Objective 1: To prioritise investment in sustainable transport in order to reduce the reliance on the private car.</p>	<p>Sustainable transport measures are likely to benefit all protected characteristic groups as long as the specific needs of protected characteristic groups and people with lower incomes are considered. As set out in the LSMATS, the requirement for public consultation in relation to the processes used to implement the LSMATS is set out in legislation. In cases where consultation is not a statutory requirement, such as in changes to bus routeings, the NTA will seek engagement with local communities as part of the decision-making process. It is recommended that targeted stakeholder consultation be undertaken with all protected characteristic groups at the next stage in the implementation of the Strategy, in particular to determine how the needs of rural communities, people with mobility issues (older people (A), disabled people (D), pregnant women and families with young children (F)) and people living in deprived areas (DA) in relation to the public transport network are taken into account.</p> <p>Additionally, it is recommended that a review of the affordability of the ticketing and fares for the public transport system be undertaken to ensure the proposed changes are financially accessible to all, particularly people living in deprived areas (DA). Subsidised or reduced fares for people on lower incomes should be considered, where appropriate.</p>
<p>Strategic Transport Objective 2: To provide a high level of public transport connectivity to key destinations.</p>	<p>Enhancement of public transport connectivity is likely to benefit all protected characteristic groups as long as the specific needs of protected characteristic groups and people with lower incomes are considered.</p> <p>As set out in the LSMATS, the requirement for public consultation in relation to the processes used to implement the LSMATS is set out in legislation. In cases where consultation is not a statutory requirement, such as in changes to bus routeings, the National Transport Authority will seek engagement with local communities as part of the decision-making process. It is recommended that targeted stakeholder consultation be undertaken with all protected characteristic groups at the next stage in the implementation of the Strategy, in particular to determine how the needs of rural communities, older people (A), disabled people (D), and people living in deprived areas (DA) in relation to the public transport network are taken into account.</p>

² For the purposes of the impact assessment, certain protected characteristic grounds have been grouped together due to the similarities in potential differential effects on these groups identified through the literature review.

Objective/Section of LSMATS	Mitigation and Recommendations
	<p>It is recommended that further consideration be given to seek opportunities that integrate the different modes of transport, including bus, highways, rail and light rail services with active travel moves such as pedestrian and cycling routes. Provisions at public transport stations could include bicycle storage, drop-off zones and disabled parking (D). When designing new public transport facilities, it is important to consider the interplay between mobility and protected characteristics. Specific considerations might include mobility limiting disabilities (D), or the needs of older people and families with young children (F). Methods of combating the perceptions of public transport as unsafe may be sought in order to encourage modal shift, in particular for women (GSo), LGBTQ+ people (GSo) and people from ethnic minority background (RT). Thus, the Implementation and Monitoring Plan could engage with community liaison groups to explore how feelings of safety can be cultivated within local communities.</p>
<p>Strategic Transport Objective 3: To facilitate higher density housing a part of Transit-Oriented Developments at key points of high public transport accessibility.</p>	<p>It is recommended that careful consideration be given to the impact on people living in deprived areas (DA) and on lower incomes in relation to housing development that is intended to be facilitated by the LSMATS. The need for high density housing to accommodate with future population growth should be balanced against the requirement for affordable housing for people on low incomes and better quality housing for people currently residing in deprived areas.</p>
<p>Strategic Transport Objective 4: To deliver a fully accessible and inclusive transport system.</p>	<p>Representatives of protected characteristics (whether individuals, established organisations or agencies, or specifically sought out target groups) should be engaged with during strategy implementation to ensure the needs of these groups are identified. For example, direct engagement with members of the LGBTQ+ (GSo) and minority ethnic communities (RT) to address any inclusivity and safety perception concerns.</p> <p>Plans may consider the needs of people with limited mobility (D) older people (A) and ensure public transport facilities and non-motorised travel forms are accessible for all users. The incorporation of lifts into existing bus and train stations would be beneficial for those with mobility needs such as pregnant women (F), those living with disability (D) and younger/older persons (A). Funding could be provided to support the maintenance and renovation of older lifts to ensure they are in good working order for their passengers. The provision of appropriate additional taxi ranks and disabled parking spaces could be incorporated, which would improve accessibility for all transport users, especially those with mobility or accessibility issues (D, A, F).</p> <p>It is recommended that the National Transport Authority considers protected groups in the assessment of the inclusivity impacts of economic objectives and productivity benefits as part of the Implementation and Monitoring Plan. This will allow proper utilisation of productive labour from protected characteristic groups, in particular persons living with disability (D) and those who may currently not have access to public transport or a car. It may be useful to understand how the Implementation and Monitoring Plan increases labour market participation across the protected groups, for example, increased opportunities for women (GSo), ethnic minorities (RT) or younger/older people (A) as a result of increased accessibility, reliability and safety measures of the new inclusive transport system.</p> <p>At a high-level the Strategy shows due regard to the need to promote equality of opportunity across all protected groups. This objective, in particular the adoption of the principle of Universal Design, will ensure that public transport infrastructure and facilities in the LSMA are made accessible for all users.</p> <p>It is recommended that the LSMATS also ensures that all travel information is universally accessible, travel assistance is provided for people with disabilities and that inclusivity campaigns will be implemented across the network (D, RT, Re, A, F, GSo). The National Transport Authority and associated body should pay due consideration to employing people from protected characteristic groups within their public transport services to ensure a more diverse workforce (ALL). Training should also be provided for staff working at public transport facilities on dealing with customers in</p>

Objective/Section of LSMATS	Mitigation and Recommendations
	<p>an inclusive and fair manner should be provided (ALL). These measures will show the National Transport Authority's commitment to integration and inclusion.</p>
<p>Strategic Transport Objective 5: To identify and protect key strategic routes for the movement of freight traffic and to improve access to Shannon-Foynes Port and Shannon Airport.</p>	<p>There are no specific recommendations relating to this objective for the promotion of equality and inclusivity. However, consideration could be given to measures to ensure that the overall quality of freight, delivery and servicing is not adversely impacted by policies to reduce congestion and move operations to out-of-our/off-peak timeframes.</p>
<p>Strategic Transport Objective 6: To improve road safety, public health and personal security.</p>	<p>Non-intrusive security measures including appropriate pedestrian-level lighting, clear sight lines, active ground floor frontage, and passive surveillance are therefore important place considerations in both land use and transport planning throughout the LSMA. Measures taken to improve personal security when using public transport and active travel is likely to contribute to the perception of safety among vulnerable road users would benefit women, LGBTQ+ (GSo) and particular religious groups (Re) as they are more likely to experience harassment and hate crimes. It is recommended that the National Transport Authority and Limerick City and County Council and Clare County Council launch campaigns relating to safety on public transport for certain protected characteristic groups (benefit women, LGBTQ+ (GSo) and particular religious groups (Re)) to promote the changes related to personal security and foster improved perceptions of safety for this mode.</p> <p>Additionally, further consideration of personal security at park and ride facilities and along cycle greenways is recommended, which would help increase safety perceptions for protected characteristic groups, particularly women (GSo).</p> <p>It is recommended that a Health Impact Assessment be undertaken alongside the Strategy and EQIA, to identify the areas in the LSMA where there may be existing health inequalities or concerns affecting any of the protected characteristic groups (D, RT, Re, A, F, GSo, DA) that the LSMATS may be able to address through the suite of interventions.</p>
<p>Strategic Transport Objective 7: To minimise the impact of motorised traffic in urban centres.</p>	<p>As set out in the LSMATS, the requirement for public consultation in relation to the processes used to implement the LSMATS is set out in legislation. In cases where consultation is not a statutory requirement, such as in changes to bus routeings, the NTA will seek engagement with local communities as part of the decision-making process. It is recommended that targeted stakeholder consultation be undertaken with all protected characteristic groups at the next stage in the implementation of the Strategy, in particular to determine how the needs of older people (A), disabled people (D), and people living in deprived areas (DA) in relation to public realm improvements are taken into account.</p> <p>Monitoring of traffic patterns and air pollution in Limerick following any designations of traffic measures during strategy implementation could be undertaken to ensure that effects are not displaced to new areas and thus, exacerbate health inequalities of vulnerable or at-risk groups, including low income families, ethnic minorities, refugees, those living with disability, the elderly and persons with existing respiratory conditions (GSo, RT, Re, D, A).</p> <p>Vehicle restriction and charging schemes could be subject to consultation. Should vehicle restriction schemes be implemented, it is recommended that adequate facilities including mobility hubs, taxi ranks, disabled parking could be implemented to ensure those with limited mobility are not adversely affected (D).</p>
<p>The Strategy: Walking</p>	<p>The Strategy shows due regard to the needs of those with mobility issues through the adoption of the principles of Universal Design. The LSMATS sets out measures for improving accessibility that will benefit disabled people (D) and older people (A), such as the removal of unnecessary signage, advertising and other obstacles; improving the city-wide wayfinding network; undertaking regular Walkability Audits with relevant stakeholder groups, and adequate provision of publicly accessible</p>

Objective/Section of LSMATS	Mitigation and Recommendations
	<p>toilets, lighting and seating. It is recommended that representatives from these protected characteristic groups that may experience mobility issues are consulted throughout the design development process (D, A, F) to ensure that measures to improve accessibility suit their specific needs.</p>
<p>The Strategy: Cycling</p>	<p>It is recommended that road cycling education and safety campaigns be promoted for children (A) by the National Transport Authority to optimise the realisation of benefits for this group, with the added benefit of promoting a healthy lifestyle.</p> <p>As already outlined above, further consideration of personal security at cycling parking facilities and along cycle greenways is recommended, which would help increase safety perceptions for protected characteristic groups, particularly women (GSo).</p> <p>Access to a bike may not be affordable for people on low incomes and it is recommended this should be considered further in the development of specific cycle infrastructure programmes and improvements, to ensure this group is also able to benefit from the enhancements (De). The measures set out in the LSMATS relating to Bicycle Sharing Schemes could be a conduit through which this could be addressed (De).</p>
<p>The Strategy: Bus</p>	<p>Plans for specific interventions should consider the needs of people with limited mobility (D, A, FS) to ensure public transport facilities and non-motorised travel forms are accessible for all users. Accessibility could be improved through providing real time passenger information at bus stops, through audio as well as on screens, to assist passengers who may be visually impaired (D).</p> <p>It is recommended that consideration be given to providing improved security systems at new bus stops and shelters may improve the accessibility and safety for protected characteristic groups more likely to experience harassment and acts of violence on public transport (GSo, RT, Re). As mentioned above, it is recommended that the National Transport Authority and Limerick City and County Council and Clare County Council launch campaigns relating to safety on public transport for certain protected characteristic groups (benefit women, LGBTQ+ (GSo) and particular religious groups (Re)) to promote the changes related to personal security and foster improve perceptions of safety on this mode.</p> <p>The Strategy sets out that is the intention of the National Transport Authority, Bus Éireann to continually monitor the demand for bus services in the LSMA throughout the lifetime of the LSMATS and enhance or amend the service network as appropriate. It is recommended that particular cognisance be given to the travel patterns and demands of bus services serving deprived areas of the LSMA (DA).</p>
<p>The Strategy: Rail</p>	<p>Plans for specific interventions should consider the needs of people with limited mobility (D, A, FS) to ensure public transport facilities and non-motorised travel forms are accessible for all users. Accessibility could be improved through providing real time passenger information at stations, through audio as well as on screens, to assist passengers who may be visually impaired (D).</p> <p>New rail stations at Moyross and Ballysimon, as well as a park and ride at the latter, are proposed as part of the Strategy, and it is recommended that the design of such improvements take into account the specific needs of groups who feel concerned for their personal security when waiting at rail stations, specifically women, LGBTQ+ people, people of different religions, and people from minority ethnic groups. As mentioned above, it is recommended that the National Transport Authority and Limerick City and County Council and Clare County Council launch campaigns relating to safety on public transport for certain protected characteristic groups (benefit women, LGBTQ+ (GSo)), people from ethnic minority groups and particular religious groups (Re)) to promote the changes related to personal security and foster improve perceptions of safety on this mode.</p> <p>Rail services tend to be used most frequently by more affluent groups, therefore it is expected that rail improvement policies may have the least overall benefit for people on low incomes. To address this disparity, it is recommended that the affordability of tickets is reviewed and the potential for offering reduced rates for people with limited financial means is considered (De).</p>

Objective/Section of LSMATS	Mitigation and Recommendations
<p>The Strategy: Land Use, Regeneration and Schools</p>	<p>As outlined above, it is recommended that careful consideration be given to the impact on people living in deprived areas (DA) and on lower incomes in relation to housing development that is intended to be facilitated by the LSMATS. The need for high density housing to deal with future population growth should be balanced against the requirement for affordable housing for people on low incomes and better quality housing for people currently residing in deprived areas.</p> <p>Lack of connectivity between regeneration areas and surrounding neighbourhoods is a key issue, and it is recommended that people living in these areas such as Moyross and Southill should be consulted on the permeability of the urban realm and on planned interventions to reduce community severance (DA).</p> <p>Opportunities for the Strategy to link in with regeneration programmes, including expansion of the Green Schools Travel Module and the NTA’s Safe to School Programme, should be targeted in deprived areas to facilitate improved access to employment and education, and enhance overall community wellbeing (DA).</p>
<p>The Strategy: Urban Design and Placemaking</p>	<p>Measures to improve urban design and placemaking are likely to benefit all protected characteristic groups as long as the specific needs of protected characteristic groups and people with lower incomes are considered. It is noted that The National Disability Authority’s Centre for Excellence in Universal Design, Age-Friendly Ireland and DMURS all provide best practice guidance on designing an accessible public realm. All LSMATS transport schemes will be fully inclusive and adhere to these standards (ALL).</p> <p>As set out in the LSMATS, the requirement for public consultation in relation to the processes used to implement the LSMATS is set out in legislation. In cases where consultation is not a statutory requirement, such as in changes to bus routeings, the NTA will seek engagement with local communities as part of the decision-making process. It is recommended that targeted stakeholder consultation be undertaken with all protected characteristic groups at the next stage in the implementation of the Strategy, in particular to determine how the needs of older people (A), disabled people (D), and people living in deprived areas (DA) in relation to development of the public realm are taken into account.</p> <p>Opportunities to link in with other existing programmes for public realm and placemaking should be explored with Limerick City and County Council and Clare County Council, particularly those related to improving biodiversity, accessibility to greenspace, and wellbeing (ALL). Areas of deprivation in particular should be looked at for regeneration opportunities in relation to providing solutions around permeability and connectivity, and reducing severance (DA).</p> <p>Vehicle restriction and charging schemes could be subject to consultation. Should vehicle restriction schemes be implemented, adequate facilities including disabled parking could be implemented to ensure those with limited mobility are not adversely affected (D).</p>
<p>The Strategy: Roads and Parking</p>	<p>Consideration can be given to the impact of strategy initiatives that increase the cost of fossil fuels and discouragement of private vehicles on communities where alternative options are not available, as a result of affordability or reliance on these means for employment. These impacts may have a greater impact on low-income households, older persons, minority ethnic communities and those living in more rural environments (A, RT).</p> <p>Monitoring of traffic patterns and air pollution in the LSMA following any designations of traffic measures during strategy implementation could be undertaken to ensure that effects are not displaced to new areas and thus, exacerbate health inequalities of vulnerable or at-risk groups, including low income families, ethnic minorities, refugees, those living with disability, the elderly and persons with existing respiratory conditions (ALL).</p>
<p>The Strategy: Freight, delivery and servicing</p>	<p>As set out above, consideration could be given to measures to ensure that the overall quality of freight, delivery and servicing is not adversely impacted by policies to reduce congestion and move operations to out-of-our/off-peak timeframes.</p>

Objective/Section of LSMATS	Mitigation and Recommendations
<p>Other: Environmental Assessment</p>	<p>It is recommended that consideration be given to the findings of the SEA in relation to potentially significant environmental impacts on protected groups as the individual projects to be delivered as part of the strategy are progressed (ALL).</p> <p>Consultation will be undertaken as part of the SEA process for the draft Strategy and it is recommended that additional consultation is undertaken to inform the strategy implementation and project level environmental impact assessments. Furthermore, consideration could be made to ensure that expansions in active travel do not alienate those unable to use these options, such as those with mobility concerns (D, A), for example, through the simultaneous improvement in public transport provision and measures to improve accessibility of walking and wheeling.</p>
<p>Other: Climate Action</p>	<p>The strategy refers to the assessment work required to develop an optimal framework for Climate Action Management. This will be undertaken at an early point in the lifetime of the LSMATS in cooperation with Government and the local authorities. It is recommended that the needs of protected characteristic groups and people in deprived communities are taken into account when discussing and developing this framework with stakeholders, particularly regarding issues of affordability in mode shift (ALL).</p> <p>It is recommended that climate adaptation and mitigation be considered throughout the further development and implementation of the Strategy; for example, in order to avoid displacement of flooding to deprived communities as a result of new infrastructure. It is expected that this would be sufficiently captured and mitigated through environmental assessments that would be undertaken as appropriate for the planned interventions (ALL).</p> <p>Issues around affordability and access to electric vehicles means that this mode of travel may not be practical for people on lower incomes, meaning this group is less able to adapt to change. To combat this disadvantage, compensatory schemes could be considered to provide for inclusive growth (DA).</p>
<p>Other: Covid-19</p>	<p>The NTA intends to monitor and analyse the medium and long-term impacts of the Covid-19 pandemic as they become clearer over the coming years, responding as appropriate. Monitoring the impacts of Covid-19 on the travel patterns of protected characteristic groups will be important in ensuring that policy and planning decisions are made with these groups in mind, with a view to reducing inequalities wherever possible (ALL).</p>
<p>General</p>	<p>It is recommended that consideration could be given to eliminating discrimination and promote equality of opportunity for all protected characteristic groups when assessing the accessibility of specific projects or interventions that occur as part of the Implementation and Monitoring Plan. This could be achieved through targeted engagement with protected groups and monitoring throughout the Implementation and Monitoring Plan lifecycle and evaluation (ALL).</p>

6. Recommendations: Implementation and Monitoring Plan

6.1 Overview

6.1.1 The central recommendation emerging from the EqlA findings (refer to **Appendix A** – EqlA assessment matrix, and Table 5.1 - EqlA findings mitigations and recommendations) is that the needs of protected characteristic groups be incorporated into the LSMATS through an Implementation and Monitoring Plan, which would include:

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

6.1.2 This EqlA has been undertaken as part of an iterative process in the further development of the LSMATS and as a result, the findings of this assessment have informed the revised draft of the strategy, published in 2022. The revised draft of the LSMATS includes the above key recommendation to prepare an Implementation and Monitoring Plan, for both EqlA and SEA.

6.1.3 Each component of the Implementation and Monitoring Plan are outlined in further detail in this section.

6.2 Baseline data collection to inform implementation approach

6.2.1 At this stage, the high-level nature of the LSMATS precludes the identification of specific impacts on some protected characteristic groups. It is expected that the extent of impacts on particular groups may only come to the fore during strategy implementation stage, once specific interventions and their geographical scope are identified. It is suggested that the National Transport Authority uses this preliminary EqlA as a benchmark analysis to consider ongoing assessment of impacts throughout the Strategy's implementation lifecycle to evaluation.

6.2.2 As detailed schemes and interventions emerge to drive the enactment of the LSMATS, it is recommended that baseline data be collected and appraised in greater detail to understand the potential impacts on specific local populations and vulnerable groups.

6.3 Engagement with representatives of specific protected groups

6.3.1 It is recommended that the National Transport Authority 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. Potential methods of engagement to be employed include virtual workshops, online surveys and exhibition events in local community centres.

6.3.2 It is recommended that an equality toolkit be developed covering the nine protected characteristic groups, as well as additional information on compounding factors of disadvantage such as deprivation. Such a toolkit would support inclusive strategy implementation at project and operational levels. This combined with strategic monitoring of the LSMATS implementation process against specific inclusion targets would ensure that the needs of protected groups are adequately addressed to realise the National Transport Authority's ambitions of creating an inclusive transport network as well as assist in fulfilment of The Duty's obligations.

6.4 Monitoring

- 6.4.1 The LSMATS sets out that periodic monitoring of transport trends and patterns will be undertaken to form an input into transport investment decisions made under the LSMATS to check whether these may be subject to change. Similarly, monitoring is a crucial mechanism through which the potential effects on protected characteristic groups identified in this assessment can be tracked, following changes to the baseline conditions or indeed, changes to the Strategy itself. Monitoring can demonstrate the positive effects facilitated by the LSMATS for protected characteristic groups and can also enable the identification of unforeseen adverse effects at an early stage, to allow the National Transport Authority to undertake appropriate remedial action if required. In line with The Duty, it is recommended that the National Transport Authority report on developments and achievements in its annual report.
- 6.4.2 Monitoring and analysis of potential impacts should be undertaken at appropriate milestones during the rollout of the Strategy. In terms of programme, the implementation of the major public transport and roads infrastructure projects of the LSMATS will be determined by the outcome of the current review of the NDP. However, an indicative implementation plan in the LSMATS divides delivery into three suggested phases –short (up to 2026), medium (up to 2031), and longer term (up to 2040). It is recommended that monitoring and analysis of impacts on protected characteristic groups be undertaken periodically during these phases – for example, every two years - with results presented in a Monitoring Report including additional mitigation and recommendations where required.
- 6.4.3 As Ireland moves towards a recovery from the Covid-19 pandemic, addressing inequality through levelling up strategies that promote inclusive growth are paramount to actualise a sustainable future. The following questions could be used to support future strategy implementation monitoring in alignment with the Covid-19 levelling up agenda and ensure alignment with the Public Sector and Human Rights Duty (Irish Human Rights and Equality Commission, 2021):
- Are you gathering and reviewing disaggregated equality data and information on the impact of Covid-19, for example gender, age, disability, sexual orientation, ethnicity?
 - Have you put in place a mechanism to monitor the impact of decisions, policies and plans on different groups, through feedback or complaint mechanisms?
 - Have you in place a regular review process whereby your policies and plans are living documents that can be adapted based on emerging evidence from groups experiencing inequality and discrimination? (Irish Human Rights and Equality Commission, 2021).

7. Conclusion

This preliminary EqIA of the Draft LSMATS 2040 assessed the nine protected characteristics groups, as well as people living in deprived areas, against the Strategy's aims, public consultation, strategic objectives, strategy themes and associated strategy sections.

The preliminary EqIA assessment results show that the Strategy is expected to fulfil its overarching aims of developing the LSMA as a hub of cultural and social development and regeneration; as the economic core for the Mid-West; as an environmentally sustainable and unified metropolitan unit; as a place where people of all ages can travel conveniently and safely; and a place that attracts people, jobs and activity from all over Ireland and beyond. The realisation of these aims, with a focus on creation of an inclusive, accessible transport system for all, will have a positive equality impact on individuals and communities residing and working within the LSMA. The alignment of the Strategy with the facilitation of regeneration in deprived areas and contribution to the achievement of the Climate Change Plan targets will be crucial to the success of the LSMATS and are key components in reducing inequality as part of the Covid-19 recovery levelling-up agenda.

The LSMATS Universal Design approach (whereby the design and composition of an environment so it can be accessed and used to the greatest extent possible by all people regardless of their age, size, ability, or disability) will be a helpful guiding principle throughout the strategy implementation to achieve the ambition of reducing potential adverse impacts and enhancing positive outcomes for protected groups.

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

The key recommendation for this preliminary EqIA is for the NTA to incorporate the needs of protected characteristic groups into an equality focussed Implementation and Monitoring Plan. This recommendation has been incorporated into the revised draft of the LSMATS, published in April 2022. The Implementation and Monitoring Plan will be supported by baseline data collection and a plan for engagement with representatives of protected characteristic groups. As part of the Plan, monitoring throughout the strategy implementation lifecycle will be captured in Monitoring Reports, to be prepared periodically during each phase of strategy rollout. High-level mitigation measures and recommendations relating to the specific needs of protected characteristic groups and people living in deprived areas have also been set out, and it is envisaged that these will be refined and supplemented as the detailed interventions to support the Strategy are developed.

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Appendix A. Preliminary Equality Impact Assessment of the LSMATS

Symbol	Impact
+	Positive
0	Neutral
-	Negative

Transport Strategy Section	Summary	Gender and Sexual Orientation	Religion	Age	Disability	Race and Traveller community	Civil Status and Family Status	Deprivation	Rationale
Sustainable transport	To prioritise investment in sustainable transport in order to reduce the reliance on the private car.	+	+	+	+	+	+	+	<p>The realisation of this objective is likely to have positive health benefits on all groups due to increased air quality from decreased emissions and a reduction in traffic-induced severance.</p> <p>Active travel options could disproportionately benefit those physically able as they can fully utilise the options. However, those who are less likely to undertake active or public travel could also benefit due to reduced congestion on roads.</p> <p>Adoption of demand management measures and other supporting measures such as car clubs and Mobility as a Service (MaaS) may disproportionately benefit people on low incomes and people living in deprived areas who are less likely to have access to a car.</p> <p>All groups are anticipated to universally benefit from the opportunities brought by increased public transport. Policies that disincentivise driving may potentially adversely impact those who need to drive into the LSMA for work or other purposes due to a lack of public transport provision or for affordability reasons; however, it is envisaged that over time these people will shift to sustainable modes as the LSMATS policies are fully realised. It is recommended that a review of the affordability of the public transport system be undertaken to ensure the proposed changes are financially accessible to all.</p> <p>The measures are expected to have a positive impact on the health and wellbeing of young people, particularly of school age. Providing schoolchildren with feasible and safe alternatives to the private car is essential: the funding of school streets, school zones and other measures will be expanded under the LSMATS and the Safe Routes to School Programme, building on the work done to date nationally; this could be supplemented by educational campaigns in schools, teaching children about road safety and cycling proficiency.</p> <p>Consideration has been given to the needs of rural communities through the National Transport Authority's Connecting Ireland programme which addresses the gaps in connections to local and regional centres in rural Ireland, to allow access to services without the need for a car. Further service improvements will be undertaken after the initial rollout of Connecting Ireland to ensure that an effective alternative to car can be offered in rural parts of the LSMA for all trip purposes. Following implementation of the programme, no adverse impacts on people living in rural areas is expected as a result of the LSMATS.</p> <p>Sustainable transport measures are likely benefit all protected characteristic groups as long as the specific needs of protected characteristic groups and those from lower income households are considered.</p>
Public transport connectivity	To provide a high level of public transport connectivity to key destinations.	+	+	+	+	+	+	+	<p>BusConnects Limerick is the key focus of this objective, which will provide end-to-end connectivity between Limerick City Centre and suburbs, to key education and employment hubs and healthcare facilities. This objective is likely to have a disproportionate benefit for people on low incomes and women, who are more likely to travel by bus. Young people and other age groups attending further education are also likely to disproportionately benefit from the improved links to University of Limerick, Mary Immaculate College, and Technological University of the Shannon. Additionally, disabled people may disproportionately benefit from improved connectivity to the University Hospital Limerick and Raheen.</p> <p>The LSMATS aims to improve the effective service of the night-time economy, through the expansion of late-night public transport services and improvements to the taxi system. Providing improvements to public transport services and infrastructure will enhance opportunities for accessing employment. Low-income groups and young people are most likely to experience disproportionate benefits as a more easily accessible transport network will allow these groups to realise their economic potential.</p>
Facilitation of housing	To facilitate higher density housing a part of Transit-Oriented	0	0	0	0	0	0	+ -	<p>The objective aims to facilitate the local authorities in meeting their housing targets in a consolidated urban form, reducing the proportion of urban generated housing being accommodated in peri-urban and rural locations. The redevelopment of under-utilised land is likely to bring socio-economic benefits, improving the public realm for existing residents and providing additional housing to address future growth needs. Under the objective, housing will be</p>

Transport Strategy Section	Summary	Gender and Sexual Orientation	Religion	Age	Disability	Race and Traveller community	Civil Status and Family Status	Deprivation	Rationale
	Developments at key points of high public transport accessibility.								delivered at locations in the city where public transport can be used to the maximum extent. With the planned connectivity between transport infrastructure and new housing developments, there may be a disproportionate benefit for people on lower incomes who may be able to relocate to a new development and in doing so have better quality housing that is located closer to public transport, and thus makes it easier to access opportunities. This would, in turn, support the Covid-19 economic recovery levelling-up agenda. However, there is also potential for new development to drive up prices in an area and make it unaffordable for people on lower incomes, forcing them to move elsewhere and resulting in a disproportionate negative impact on this group. More generally, LSMATS will contribute to Limerick Regeneration – a multi-agency, cross-sectoral programme to address social disadvantage in four areas of the city. Policies that promote urban regeneration, sustainable economic growth, and increased access to opportunity through transport have universal benefits as long as the needs of protected characteristic groups and those from lower socio-economic circumstances are considered.
An inclusive transport system	To deliver a fully accessible and inclusive transport system.	+	+	+	+	+	+	+	The objective aims to ensure inclusivity of the public transport system for people across different geographical areas of the LSMA, for people with different travel needs, and for those belonging to different population groups. Planned bus service improvements will enhance connectivity between the key locations and the city's deprived areas and suburbs. Additionally, all rail infrastructure investments will ensure accessibility for all users and will service areas of social disadvantage, such as Moyross. The enhanced cycling and pedestrian infrastructure to be delivered under the LSMATS will also have a significant positive impact on areas of social disadvantage by addressing many of the issues around geographic isolation. Integration and inclusion are a central pillar of the LSMATS. The Strategy considers inclusivity through a holistic lens and appreciates its interconnections with other systems and sectors as well as universal design needs. It is noted that The National Disability Authority's Centre for Excellence in Universal Design, Age-Friendly Ireland and DMURS all provide best practice guidance on designing an accessible public realm. All LSMATS transport schemes will be fully inclusive and adhere to these standards. This will ensure that accessibility adjustments benefitting older people and people with disabilities are incorporated into the transport infrastructure design. Additionally, safety is a key focus of this objective, particularly in relation to personal security around public transport stops and stations and along active travel routes. Providing improved security measures and lighting enhancements is likely to disproportionately benefit women, LGBTQ+ and particular religious groups as they are more likely to experience harassment and hate crimes.
Strategic routes for freight traffic	To identify and protect key strategic routes for the movement of freight traffic and to improve access to Shannon-Foynes Port and Shannon Airport.	+	+	+	+	+	+	+	This objective sets out the importance of ensuring the feasibility of rail freight between the Port of Foynes and Limerick and the potential identification of a rail line between Shannon Airport, Shannon Free Zone and Shannon town. Strategic policies that increase the reliability and safety of freight travel can produce universal benefits as a result of increased productivity and consumer choice. Furthermore, policy to reduce the presence of Heavy Goods Vehicles in the city centre through 'lorry routes' and off-peak travel periods can reduce congestion and improve air quality, creating wider benefits for drivers, pedestrians, businesses and residents.
Road safety, public health, and personal security	To improve road safety, public health, and personal security.	+	+	+	+	+	+	+	This objective aims to improve public health through transport improvements designed to reduce noise and air pollution and the risk of conflict between people and vehicles. The realisation of this objective is likely to have positive health benefits on all groups, but there may be a disproportionate benefit for disabled people, pregnant women, and older people, who are more likely to experience worse health effects from air pollution than other groups. Additionally, a reduction in noise and improvements in air quality may disproportionately benefit people on low incomes and minority ethnic communities, as these groups are more likely to live next to busy roads with higher existing background levels of noise and air pollution. People living in deprived areas and ethnic minorities are more likely to be involved in road traffic accidents and therefore would disproportionately benefit from measures taken to reduce the risk of conflict between people and vehicles. Additionally, measures taken to improve personal security when using public transport and active travel is likely to contribute to the perception of safety among vulnerable road users would benefit women, LGBTQ+ and particular religious groups as they are more likely to experience harassment and hate crimes.
Minimising impact of motorised traffic	To minimise the impact of motorised traffic in urban centres.	+	+	+	+	+	+	+	The objective aims to improve the public realm of the city through reallocation of roadspace from private vehicles for use by people walking, cycling and wheeling. Enhancements will follow best practice design guidance and will be accessible, attractive, safe and interesting for all ages and abilities. All groups would experience positive impacts from urban realm enhancements, which would minimise vehicular traffic on the streets and bring associated wellbeing benefits from reduced air and noise pollution and severance. Realisation of the objective may disproportionately benefit groups who do not have access to a vehicle, such as people on low incomes and young people. Additionally, making streets more accessible through following Universal Design principles would have a differential positive impact on older people and people with certain disabilities. Improving the public realm may have the additional benefit of promoting social inclusion and reducing discrimination through providing safer, more accessible, and attractive outdoor spaces for people to congregate.

Transport Strategy Section	Summary	Gender and Sexual Orientation	Religion	Age	Disability	Race and Traveller community	Civil Status and Family Status	Deprivation	Rationale
Walking	<p>Policy context: <i>Encouraging walking and cycling, linked to easier access for a broad range of ages and abilities, will ensure liveliness and interaction on streets, thereby increasing vibrancy and improving commercial and retail activity.</i> (Design Manual for Urban Roads and Streets 2019, p.4.)</p> <p>This section is focused on the need for a safe, accessible, interesting and attractive pedestrian environment for people of all ages and abilities.</p>	+	+	+	+	+	+	+	<p>Reallocation of roadspace to pedestrians, lower traffic speeds, and improvements to junctions, footpaths, pedestrian crossings and additional crossing points are some of the key walkability improvements envisaged for the City Centre over the lifetime of the Strategy. These measures are expected to benefit all protected characteristic groups through improved amenity, safety and wellbeing from reduced air and noise pollution and increased uptake of walking.</p> <p>The LSMATS sets out measures for improving accessibility that will benefit disabled people and older people, such as the removal of unnecessary signage, advertising and other obstacles; improving the city-wide wayfinding network; undertaking regular Walkability Audits with relevant stakeholder groups, and adequate provision of publicly accessible toilets, lighting and seating.</p> <p>People living in deprived areas, young people, and families with young children who may experience a disproportionate safety benefit from lower traffic speeds. Additionally, moving obstacles to movement such as street clutter and parked vehicles on footpaths may disproportionately benefit people living in deprived areas, where on-pavement parking may be more common.</p>
Cycling	<p>Policy context: <i>The vision of a Cycle Network Study for the Limerick Metropolitan Area is to develop a consistent, clear and continuous network of urban and suburban cycle networks throughout the Limerick Metropolitan Area to ensure cycling becomes a realistic choice as a mode of transport.</i> (Limerick Metropolitan Cycle Network Study 2016, p. 6.)</p> <p><i>The vision for Shannon town is that it will become a bicycle-friendly town. Cycling will become a normal way to get about, especially for short trips. Cycling will be promoted to cater for commuting, recreational, tourist and competitive cyclists.</i> (Shannon and Environs Local Area Plan 2012-2018, p.98.)</p> <p>This section is focused on the need to develop a consistent, clear and continuous network of urban and suburban cycle networks throughout the Limerick Metropolitan Area to ensure cycling becomes a realistic choice as a mode of transport.</p>	+	0	+ -	-	0	0	0	<p>The LSMATS sets out the key findings from the Limerick Metropolitan Cycle Network Study, which forms the basis of the delivery of the cycle network and is an important component of developing a cycling culture within the LMA. Measures to be adopted under the Strategy include the development of a comprehensive cycle network; supporting bicycling sharing schemes; providing long-stay cycle parking and end-of-trip facilities; and facilitating behavioural change and promotion.</p> <p>Additional cycle routes are proposed to be installed throughout the LSMA, including across the Shannon River and within the three 'economic corridors' of Transverse; North Western; and the South Eastern. The LSMATS supports segregated cycle lanes as the most desirable infrastructure for Primary Routes in terms of safety and comfort. Historically, women have been observed to be less likely to cycle due to concerns over personal safety. Thus, policies which implement dedicated cycle lanes can encourage women to cycle, disproportionately benefiting them.</p> <p>Similarly, cycle lanes can increase the number of children cycling to school, due to both increased safety and simplification. Thus, young people and families with children could disproportionately benefit from increased transport options and healthier lifestyles as a result of increased physical activity.</p> <p>Improvements to the cycle network would least benefit groups who may be unable to travel by this mode, such as some older people or people with certain disabilities.</p> <p>Access to a bike may not be affordable for people on low incomes and this should be considered further in the development of specific cycle infrastructure programmes and improvements, to ensure this group is also able to benefit from the enhancements. The measures relating to Bicycle Sharing Schemes could be a conduit through which this could be addressed.</p>
Bus	<p>Policy context: <i>Delivery of the full BusConnects programme for all of Ireland's cities (inclusive of ticketing systems, bus corridors, additional capacity, new bus stops and bus shelters etc.) is proposed for delivery during the period to 2027.</i> (National Development Plan 2018-2027, p.54.)</p>	+	+	+	+	+	+	+	<p>Measures taken to implement the BusConnects Limerick programme, such as increased frequency of services, bus priority, bus gates, one way traffic systems and Advanced Bus Signalisation, are expected to facilitate faster and more reliable bus journeys on the busiest bus corridors. These measures will make the overall bus system more convenient and useful for more people travelling to key destinations, including between the suburbs and the city. This is likely to benefit groups that are more likely to travel by bus, such as women, disabled persons, families with young children, older people, and minority ethnic communities.</p> <p>Updates to existing bus stations in terms of general upkeep relating to lifts, escalators, passenger information signs and literature may benefit people with disabilities, older people, and people with young children. Improvements to fares and ticketing are likely to disproportionately benefit people on low incomes.</p> <p>Measures such as the reallocation of roadspace to make room for buses as opposed to private vehicles and the conversion of the public transport fleet to zero carbon vehicles will assist in the realisation of Ireland's climate change targets, as well as improving air quality and reducing levels of noise in the city. This will</p>

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	This section is focused on the key role of buses in achieving climate change targets, implementation of bus priority measures, and the intended delivery of the BusConnects programme for all of Ireland's cities.								<p>have wellbeing benefits for everyone, but may have a disproportionately positive impact on people with certain disabilities, pregnant women, older people and younger people, who may be more vulnerable to the effects of poor air quality and noise levels.</p> <p>Connectivity to Shannon is expected to be enhanced over the lifetime of the LSMATS through provision of more bus services, which may disproportionately benefit people on low incomes and/or living in deprived areas; for example, there are several Small Areas within Shannon shown on the Pobal Index as disadvantaged. Greater public transport provision will increase accessibility to jobs and opportunities for people living in these areas.</p> <p>Bus shelter improvements are proposed as part of the Strategy, with the potential to incorporate urban design and environmentally beneficial features being explored. It is recommended that the design of such improvements take into account the needs of groups who feel concerned for their personal security when waiting at bus stops / stations, specifically women, LGBTQ+ people, people of different religions, and minority ethnic communities.</p> <p>As discussed above under 'sustainable transport', consideration has been given to the travel demand needs of rural communities through the National Transport Authority's Connecting Ireland programme which addresses the gaps in connections to local and regional centres in rural Ireland, to allow access to services without the need for a car.</p>
Rail	<p>Policy context: <i>The Dublin to Limerick Junction/Cork rail lines are subject to an examination to move to higher speeds and/or electrification leading to improved connectivity and journey times to regional cities.</i> (Regional Spatial and Economic Strategy for the Southern Region, p.179)</p> <p>This section is focused on maximising potential of the rail corridors to support better integration of land use planning and public transport.</p>	+	+	+	+	+	+	0	<p>Electrification of the rail network would assist in the realisation of Ireland's climate change targets, as well as improving air quality and reducing levels of noise in the city. This will have wellbeing benefits for all communities, but may have a disproportionately positive impact on people with certain disabilities, pregnant women, older people and younger people, who may be more vulnerable to the effects of poor air quality and noise levels.</p> <p>Providing improvements to rail services and infrastructure will enhance opportunities for accessing employment. Young people are most likely to experience disproportionate benefits as a more easily accessible transport network will allow these groups to realise their economic potential.</p> <p>Station enhancements and upgrades will benefit all groups, but improved accessibility is likely to have a disproportionate positive impacts for people with reduced mobility, older people, pregnant women and people with young children. Rail shelter improvements are proposed as part of the Strategy, and it is recommended that the design of such improvements take into account the specific needs of groups who feel concerned for their personal security when waiting at bus stops / stations, specifically women, LGBTQ+ people, people of different religions, and minority ethnic communities.</p> <p>Rail services tend to be used most frequently by more affluent groups, therefore it is expected that rail improvement policies may have the least overall benefit for people on low incomes. To address this disparity, it is recommended that the affordability of tickets is reviewed and the potential for offering reduced rates for people with limited financial means is considered.</p>
Land Use, Regeneration and Schools	<p>Policy context: <i>The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites.</i> (National Planning Framework 2040, p.11.)</p> <p>This section is focused on the need for alignment of land use and transport planning. This will be crucial in order to ensure the projected population and employment growth happens in a sustainable way.</p>	0	0	+	+	0	0	+	<p>Urban regeneration of underused land can bring numerous socio-economic and environmental benefits. Integrated transport and land use planning can reduce the need to travel by car and support the functioning of a connected, sustainable transport system. The LSMATS has identified opportunities for development at brownfield locations, where new housing and public realm improvements will be delivered.</p> <p>Young people and other people attending further education may disproportionately benefit from the regeneration measures, with LSMATS supporting development along high-capacity public transport corridors serving Limerick's universities and colleges, as well as key employment centres. Children will also disproportionately benefit through the planned expansion of the Green Schools Travel Module and the NTS Safe to School Programme which the LSMATS aims to facilitate; these programmes aim to promote active travel and provide a safe walking and cycling environment to schools within the LSMA.</p> <p>The policy sets out the principles that will be used in the integration of land use and transport planning to promote transport, walking and cycling across the LSMA. Adopting the concept of the 15-minute neighbourhood, discouraging the use of private vehicle and ensuring permeability for pedestrians and cyclists through prioritising these modes of travel is likely to have a positive effect particularly on young people, older people, people with disabilities by improving efficiency, accessibility and safety on the streets.</p> <p>The measures specifically aim to target areas requiring regeneration, i.e.. the deprived areas of the LSMA, and include service improvements, measures to enhance personal security, improvements to walking and cycling infrastructure, and closer engagement with local communities. There is likely to be a disproportionate benefit for people living in deprived areas from these improvements and community consultation.</p> <p>Measures are also proposed to tackle severance which may have a disproportionate positive impact on people living in deprived areas. These areas are more likely to experience heavy traffic flows or have transport infrastructure which has created barriers between communities and services. Tackling severance through reducing traffic flows and creating permeability through these barriers will allow people to travel more freely and safety throughout the city to access amenities and opportunities, and may also promote social inclusion. Regeneration and investment in deprived areas would also contribute to the levelling-up agenda as part of the economic recovery from Covid-19.</p>
Urban Design and Placemaking	Policy context: <i>Street networks should be designed to maximise connectivity between destinations to promote higher levels of permeability and legibility for all users, in particular more sustainable forms of transport.</i>	+	+	+	+	+	+	+	<p>The urban design and placemaking policies within the LSMATS support the land-use and regeneration priorities of ensuring effective integration between transport and land-use, particularly in seeking an alternative approach to urban design around car based travel. The aim is to provide a long-term sustainable economic, environmental, and social case for reliable public transport, permeable, high-quality walking and cycling routes and an inclusive, people-centred public realm. Within urban areas, changes to road design to create compact, denser and more interconnected layouts may help to consolidate cities, towns and villages making them viable for reliable public transport and amenable to higher rates of walking and cycling. This focus on place-making may benefit</p>

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	<p>(Design Manual for Urban Roads and Streets 2019, p.4.)</p> <p>This section is focused on the proactive management of urban spaces, moving away from the domination by car, and reimagining streets as vibrant and attractive places for people to enjoy.</p>								<p>groups who are more vulnerable to social isolation by improving sense of place and belonging. The realisation of these policies is envisaged to have a positive impact for all population groups in the LSMA.</p> <p>Within urban areas, changes to road design to create compact, denser and more interconnected layouts may help to consolidate cities, towns and villages making them viable for reliable public transport and amenable to higher rates of walking and cycling. This focus on place-making may particularly benefit groups who are more vulnerable to social isolation, such as members of the Traveller Community and people living in deprived areas, by improving sense of place and belonging.</p> <p>The LSMATS is underpinned by the ongoing work of the NTA in improving the interface between the transport network and persons with physical and intellectual disabilities, with accessibility of the public realm for all an essential component of this priority. The principles of Universal Design will be adopted throughout the delivery of the public realm and streetscape improvements, such as implementation of high-quality footpaths, tactile paving, dropped kerbs, sufficient provision of places to rest, public toilets, removal of street clutter, legible and permeable street networks, and wayfinding infrastructure. People with disabilities and older people are therefore likely to experience a disproportionate benefit following adoption of this policy. Best practice guidance for the design of the public realm for accessibility will be followed, and it is also recommended that representatives from these protected characteristic groups are consulted throughout the design development process to ensure that measures to improve accessibility suit their specific needs.</p>
Roads and Parking	<p>Policy context: <i>Street networks should be designed to maximise connectivity between destinations to promote higher levels of permeability and legibility for all users, in particular more sustainable forms of transport.</i> (Design Manual for Urban Roads and Streets 2019, p.31.)</p> <p><i>The planning system must ensure that the strategic traffic function of National Roads is maintained by limiting the extent of development that would give rise to the generation of short trip traffic on National Roads.</i> (Spatial Planning and National Roads, p.3.)</p> <p>This section is focused on controlling road capacity and ensuring that the areas with predicted significant future growth are serviced primarily by public transport, walking and cycling.</p>	+ -	+ -	+ -	+ -	+ -	+ -	+ -	<p>The LSMATS sets out that while the Strategy favours a shift away from investment in new road schemes, a number of projects are required to facilitate the sustainable movements of people, good, and services to complement sustainable travel and traffic management objectives. Investment in road schemes is likely to benefit affluent people who own private vehicles and have the least benefit for people more likely to travel by public transport and active travel (for example people on low incomes, women, older people and younger people).</p> <p>There are also a number of measures set out which aim to limit the use of private vehicle within the LSMA, such as implementation of mobility hubs and on and off-street parking restrictions. and It is envisaged that over the lifetime of the Strategy, improvements to the road network within the Metropolitan towns will largely consist of streetscape and public realm enhancements, as discussed above, which will have a positive impact on all population groups.</p> <p>Strategic park and ride schemes at designated public transport interchanges are proposed. These measures are unlikely to benefit people on low incomes who are less likely to own private vehicles, however they may benefit people with mobility issues and people with young children.</p> <p>Parking management measures including the repurposing of car parks to support bus priority and active travel, and redevelopment of off-street parking, and workplace parking levy charges are likely to have amenity and wellbeing benefits for all population groups.</p>
Freight, delivery and servicing	<p>Policy context: <i>We will set a target aimed at reducing the environmental impact of freight while at the same time improving efficiency in the movement of goods and promoting economic competitiveness.</i> (Smarter Travel: A New Transport Policy for Ireland 2009-2020, p.37.)</p> <p>This section is focused on how to manage the increased movement of freight associated with planned development, as well as the role of the freight in the decarbonisation of the transport sector.</p>	+	+	+	+	+	+	+	<p>The LSMATS sets out how reducing the volume of freight vehicles in the LSMA would contribute to the creation of a safe and friendly environment for cyclists and pedestrians through the recovery of street space and the reduction of conflicts between modes. Instead, dedicated 'lorry routes' would be implemented on national roads at designated times of the day.</p> <p>Restrictions on the movement of HGVs would reduce pollutant emissions and noise levels within the city, bringing positive amenity and wellbeing benefits for all population groups. Certain groups may experience disproportionate benefits, such as people with certain disabilities, pregnant women, older people and younger people, who may be more vulnerable to the effects of poor air quality and noise levels.</p> <p>Similarly, the decarbonisation of the freight sector as outlined in the Climate Action Plan will help to achieve Ireland's climate targets and will benefit all population groups.</p>

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Environmental Assessment	As part of the LSMATS, an assessment of potential significant environmental impacts against twelve Strategic Environmental Objectives (SEOs) defined at the scoping stage of the SEA has been undertaken for each of the proposals outlined in each of the eight chapters of the Strategy (walking, cycling, BusConnects, rail, land use, regeneration and schools, roads and parking, freight delivery and servicing and supporting measures and integration).	+	+	+	+	+	+	+	<p>An Environmental Report presenting the findings of the SEA for the LSMATS was produced in July 2020. The SEA identified positive impacts on health, quality of life, accessibility of economic, employment and community facilities and air and noise pollution associated with walking, cycling, BusConnects, rail and other objectives that promote modal shift away from the use of private vehicles and towards public transport, walking and cycling. This is expected to have benefits for all population groups.</p> <p>Positive wellbeing impacts for all population groups are expected through improvements to the pedestrian realm in Limerick, to the public realm on Old Bunratty Road and improved access to key tourist attractions from greenways.</p> <p>In addition to the positive impacts on landscapes and townscapes from public realm improvements, the SEA identified potential negative impacts associated with new pedestrian crossings on the River Shannon; however, these impacts will be minimised as far as practicable through appropriate mitigation measures. There are also potential negative impacts on built heritage assets which again will be mitigated as far as practicable. It is not envisaged that these potential negative impacts would disproportionately impact on any protected characteristic ground; indeed, it is considered that the accessibility benefits of the new pedestrian crossings are likely to outweigh any adverse visual effects.</p> <p>The SEA process is undertaken in tandem with the Strategy, allowing environmental considerations to be factored into the development of specific objectives and policies. This ensures that environmental factors such as air quality, noise, biodiversity and water which are key to human health and wellbeing are given due consideration from the outset of the LSMATS. Mitigation measures are developed to minimise negative impacts and enhancement of positive impacts is proposed where appropriate.</p>
Climate Action	<p><i>'Transitioning to a low-carbon and climate-resilient society and achieving sustainable mobility are vital strategic outcomes identified in the NPF.'</i> (National Development Plan 2018-2027, p.9.)</p> <p>The Strategy aims to be consistent with the 2021 Climate Action Plan. In terms of the requirement to reduce emissions from transport by 50% by 2030, there are two main actions required, namely:</p> <ul style="list-style-type: none"> Increased use of public transport, walking and cycling; and Conversion of the transport fleet to zero emissions vehicles. <p>The core function of the LSMATS is to meet the first objective and this LSMATS sets out the scale and the strategic-level detail of the investment required to facilitate a reduction in the use of the private car in the LSMA over the period to 2040.</p>	+	+	+	+	+	+	+	<p>A key focus of the Strategy is to facilitate increased use of other modes in order to meet environmental, economic and social objectives related to emissions, congestion and car-dependency. The proposals in the LSMATS also facilitate and support the recently established Decarbonisation Zone in Limerick City by providing alternatives to the private car, through measures such as BusConnects Limerick, the cycle network, traffic signal prioritisation for sustainable modes, reduced parking and vehicle electrification are front-loaded into the first phase. In assessing the LSMATS, a full modelling exercise of a 2030 scenario was undertaken to reflect this suite of measures, which has been shown to reduce CO2 emissions from transport in the LSMA by the required amount of up to 50%. As such, the implementation of the LSMATS, in combination with the implementation of measures by Government and the local authorities, will meet emissions targets in accordance with the 2021 Climate Action Plan. Initiatives that contribute to net-zero carbon, and the encourage use of electric vehicles, public and active transport would result in a reduction in air pollution, benefitting all communities. This would benefit younger and older populations, people with certain disabilities, pregnant women and communities living near major roads (including deprived communities).</p> <p>Supporting the shift from higher polluting and diesel private vehicles, to a greater reliance on cleaner private vehicles, private hire vehicles and public transport as part of the energy transition may require investment from households with lower socio-economic status. Issues around affordability and access to electric vehicles means that these modes of travel may not be practical for people on lower incomes, meaning this group is less able to adapt to change. To combat this disadvantage, compensatory schemes could be considered to provide for inclusive growth.</p>
Covid-19	The impacts of Covid-19 have been taken into account within the LSMATS through incorporation of an alternative future demand scenario in the transport modelling.	+	+	+	+	+	+	+	<p>Research undertaken throughout the Covid-19 pandemic's exacerbation of pre-existing inequalities amongst groups in society that were already disadvantaged. A report on health inequalities published by the Northern Ireland Department of Health found that the infection rate in the 10% most deprived areas (3,052 cases per 100,000 population) was almost two-thirds higher than the rate in the 10% least deprived areas (1,859 cases per 100,000 population) and more than one and a half times the NI average (1,972 cases per 100,000 population) (Department of Health for Northern Ireland, 2020). Factors contributing to this higher rate of infection are likely to be higher levels of exposure due to working in low paid jobs with no option to work from home, and the need for people in deprived areas to travel by public transport due to not having access to a private vehicle.</p> <p>The NTA responded to the challenges of the pandemic across the country by maintaining a high frequency of public transport services when the permitted capacity was reduced, and continuing to facilitate the safe on-going management of travel demand in line with Government guidelines and advice. At all stages, the health of staff and passengers was of paramount importance in the decision-making process. Within Limerick, the NTA distributed significant</p>

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									<p>funding to develop temporary schemes to facilitate travel during the period of social distancing, via extended footpaths; enhanced cycling facilities; increased space at bus stops etc. These measures have helped people to travel safely.</p> <p>An alternative future demand scenario was modelled by the NTA which concluded that even in a scenario where there is a reduced demand for travel, there is still a requirement for sustainable transport infrastructure, in particular bus priority, cycling facilities and an improved walking environment. Generally, interventions which favour bus improvements and active travel will disproportionately benefit protected characteristic groups, who are more likely to travel by these modes.</p> <p>The NTA intends to monitor and analyse the medium and long-term impacts of the pandemic as they become clearer over the coming years, responding as appropriate. Monitoring the impacts of Covid-19 on the travel patterns of protected characteristic groups will be important in ensuring that policy and planning decisions are made with these groups in mind, with a view to reducing inequalities wherever possible.</p>
Public consultation	<p>A public consultation period on the draft LSMATS ran between 2nd September 2020 to 30th October 2020. Throughout this period members of the public, relevant respondents and interested parties were invited to share their views and opinions on the draft Strategy, its associated supporting documents, and the Strategic Environmental Assessment (SEA) Environmental Report and Appropriate Assessment (AA) Natura Impact Statement. Following the consultation, the NTA prepared a Public Consultation Report in December 2020, setting out the key feedback received from the public.</p> <p>A Strategy Steering Group (SSG) was set up at the outset of the project and included senior personnel involved in land use planning and transport planning from the NTA, Transport Infrastructure Ireland, Limerick City and County Council, and Clare County Council.</p> <ul style="list-style-type: none"> Additionally, 34 stakeholders including education bodies, transport and charity organisations, local businesses, and representatives for people with disabilities were identified by the Steering Group members and invited to be involved in the consultation process for the draft Strategy. 	0	0	0	+	0	0	0	<p>The National Transport Authority published the draft Limerick Shannon Metropolitan Transport Strategy for public consultation on the 2nd September 2020. The public consultation initially ran from the 2nd September to the 16th October, the consultation was extended until 30th October to allow for greater participation from respondents to help compensate for restrictions on public gatherings and to avoid conflict with the consultation period on the Limerick City and County Development Plan. To best achieve accessibility for all members of the public, a range of communications tools were used to generate awareness and interest throughout the consultation period, including advertisements in the press; information stands in public places; traditional and social media; and direct engagement with stakeholders. This helped to facilitate involvement from a diverse range of population groups, particularly those who may not have access to or the ability to use the internet.</p> <p>In-person consultation events could not take place due to Covid-19 restrictions however the project team were available to answer questions from the public by phone. Virtual events were undertaken throughout September and October and feedback was received by email, post and phone.</p> <p>The National Disability Authority provided feedback on the LSMATS and other stakeholders raised issues in relation to how the Strategy would address the needs of disabled people. The LSMATS sets out Universal Access as one of its key Strategic Transport Objectives, which is aimed at providing transport that serves all sectors of society and people's access to opportunities. The LSMATS is underpinned by the on-going work of the National Transport Authority in improving the interface between the transport system and persons with physical and intellectual disabilities.</p> <p>Key issues raised during the consultation process in relation to equality were as follows:</p> <ul style="list-style-type: none"> Limerick Chamber outlined that the draft LSMATS must 'explicitly identify how the transport strategy will support vital social concepts such as inclusion, accessibility, and wellbeing.' One respondent noted 'a high-level vision for the future of Limerick must be a guiding principle of the transport strategy, where public health, transport inclusion, place-making, heritage protection and liveability form key areas for discussion and consultation.' A submission also stated 'it is very disappointing that such a critical strategy makes little reference to how it intends to respond to needs for sustainability, social equity and environmental quality and health needs, balanced with economic viability. How will this strategy make it a better place to live for its citizens – especially those currently experiencing transport poverty, those with disabilities and mobility issues.' A submission noted 'for us, this transport document had the potential to influence in a pivotal way the emerging development plan for Limerick. In our view, as currently drafted, it is failing in that. For that and other reasons set in this letter, it is critical that it is amended so that the outcome of all of the converging draft policies at play is a new ambitious, sustainable, affordable, inclusive, community focused and prosperous Limerick.' <p>The matters raised were responded to within the LSMATS Public Consultation Report and a revised draft of the LSMATS was since produced, incorporating some of the changes suggested by stakeholders. This included the addition of an additional 'pillar' related to Transit Oriented Development - comprehensive public transport and cycle network to maximise accessibility (Pillar 4). An analysis of the challenges posed by Covid-19 to the transport sector was also undertaken in the revised draft, including consideration of how the Strategy could respond to potential changes in demand patterns, and whether the Strategy was still fit for purpose. The analysis showed that in a scenario where there is a reduced demand for travel, there is still a requirement for investment in sustainable transport infrastructure, in particular bus priority, cycling facilities and an improved walking environment.</p> <p>In terms of future consultation as the LSMATS progresses, is recommended that continued engagement be undertaken with disability groups as the Strategy moves towards implementation in order to ensure that their needs are adequately addressed. The other relevant protected characteristic groups should also be consulted in regards to their specific needs as the Strategy progresses.</p>

Appendix B. Distribution of Protected Characteristic Groups across the LSMA (Figures A.1 – A.7)

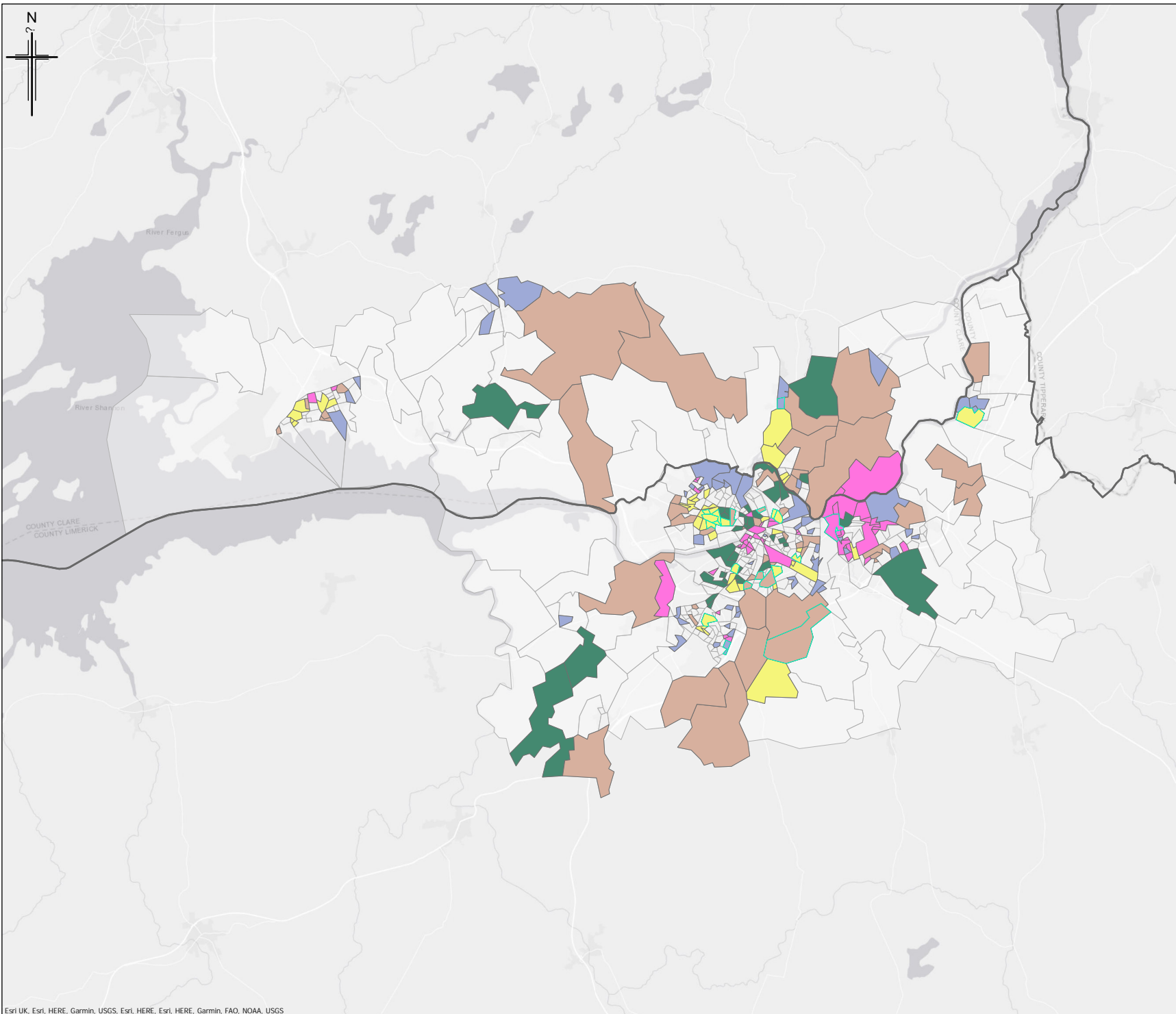


FIGURE A.1



Legend

Limerick-Shannon Metropolitan Area small area with the 10% highest concentration of:

- High representation of multiple age groups
- Age 0 - 19
- Age 20 - 39
- Age 40 - 64
- Age 65 - 85
- Age 85 and over

Description:
Map shows the small areas with the 10% highest concentration of various age groups.

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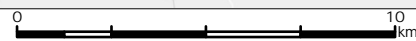
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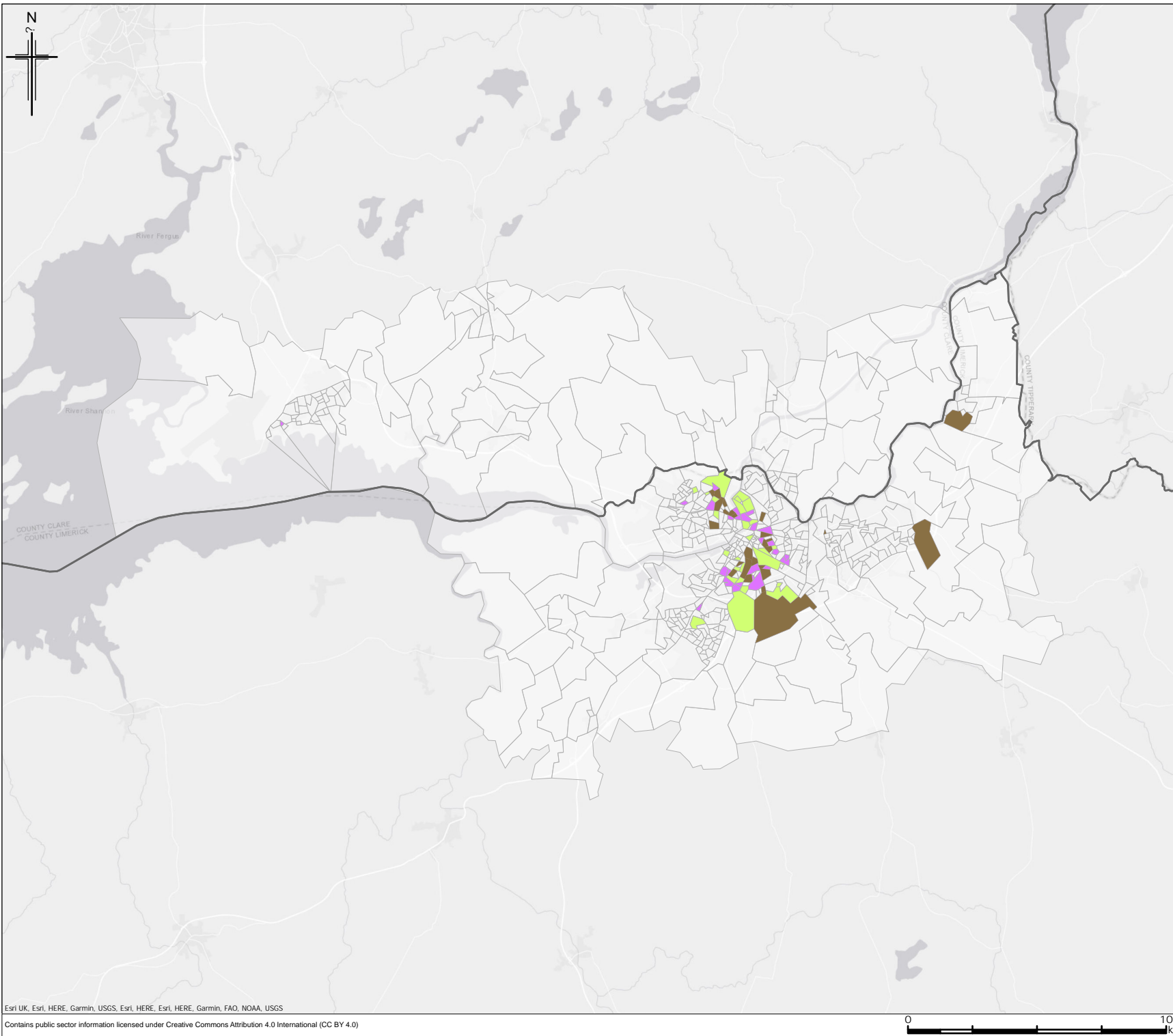


FIGURE A.2



Legend

Limerick-Shannon Metropolitan Area small area with the 10% highest concentration of:

- Males with a disability
- Females with a disability
- Overall population with a disability

Description:

Map shows the small areas with 10% highest concentration of disabled individuals, both male and female.

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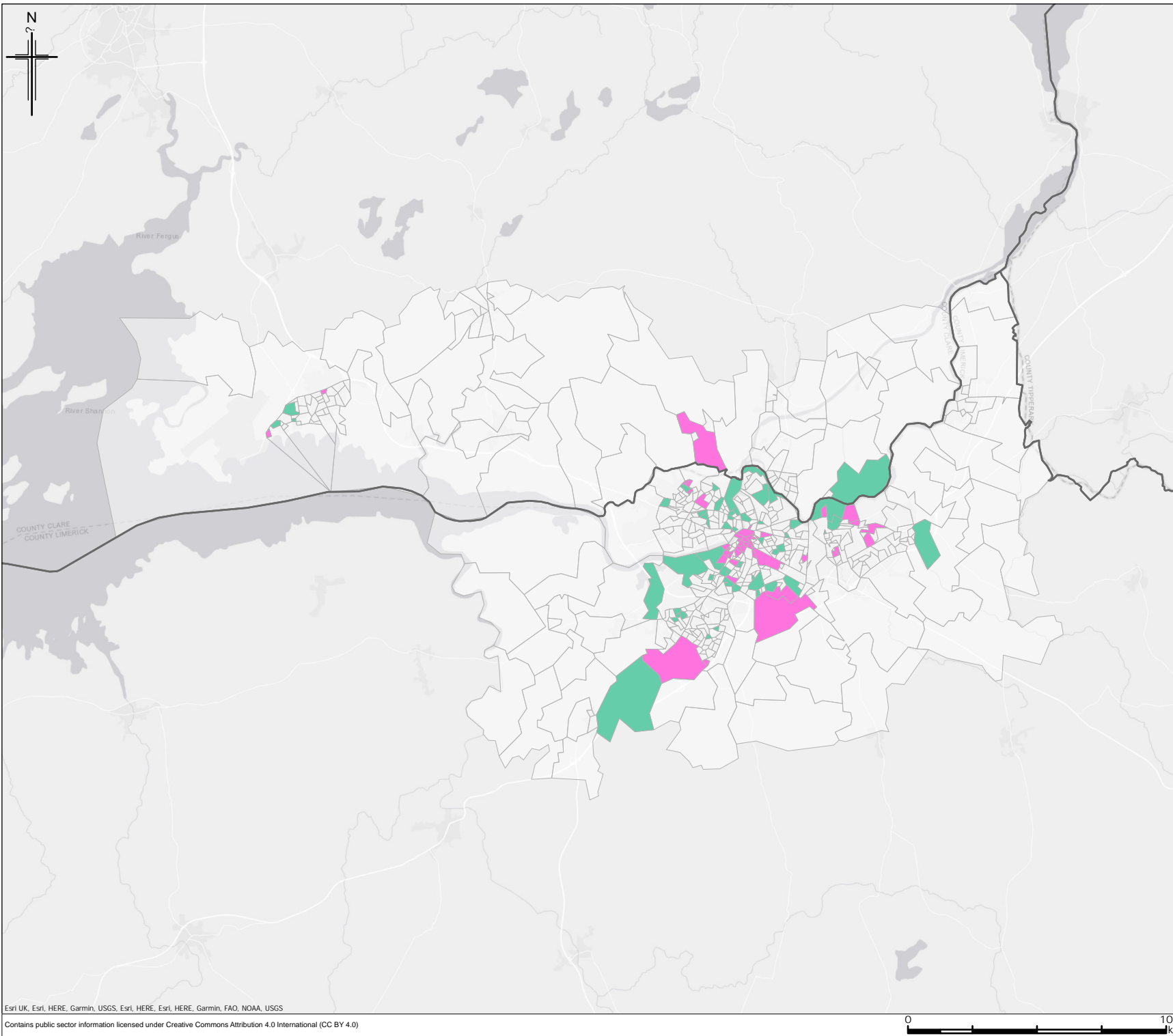


FIGURE A.3



Legend

Limerick-Shannon Metropolitan Area small area with the 10% highest concentration of:

- Male
- Female

Description:

Map shows small areas with the 10% highest concentration of men and women.

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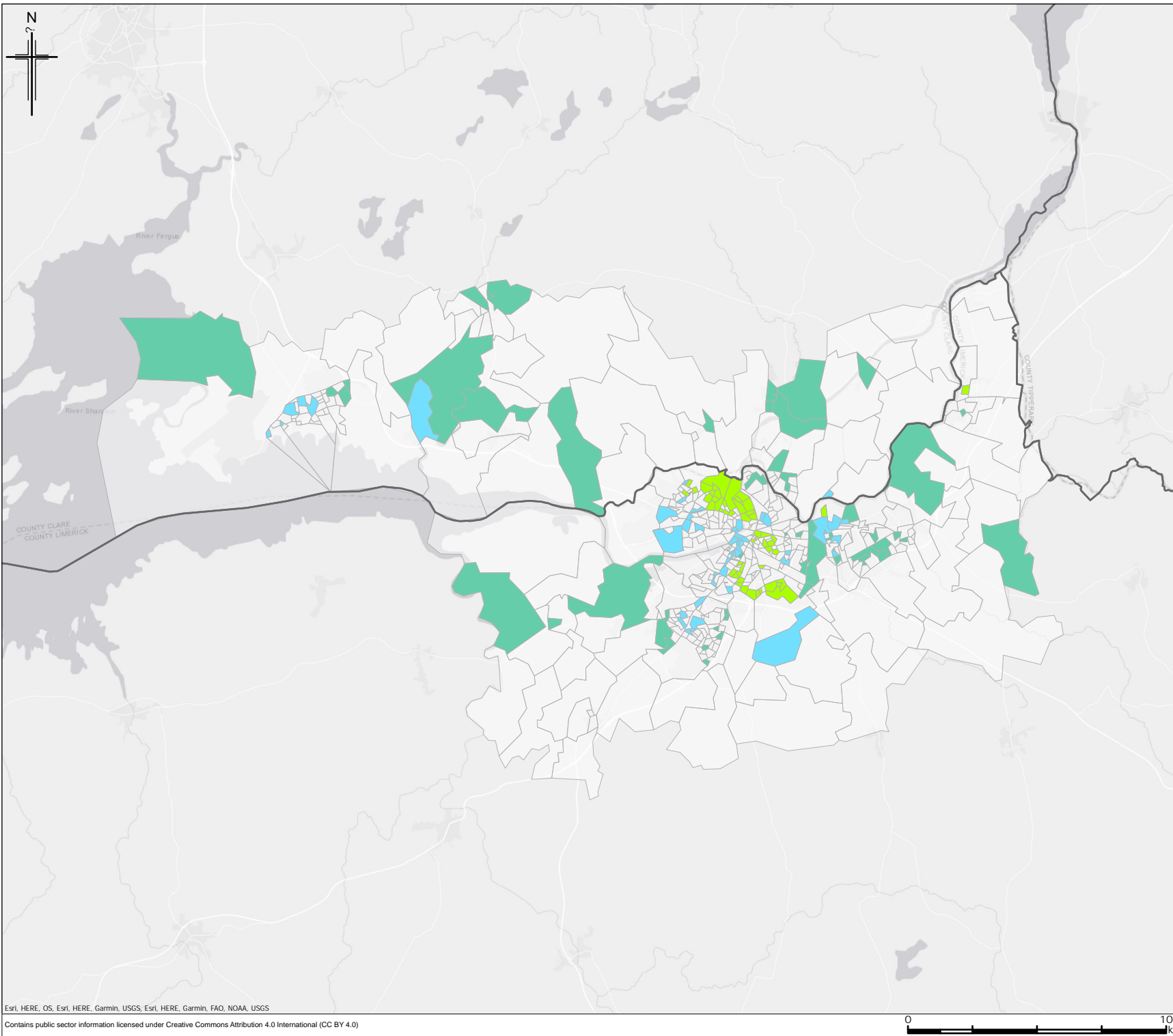


FIGURE A.4



- Legend**
- Limerick-Shannon Metropolitan Area small area with the 10% highest concentration of:
- Families without children
 - Couples with children
 - One parent families

Description:

Map shows small areas with the 10% highest concentration of each respective family status.

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FAMILY STATUS DISTRIBUTION
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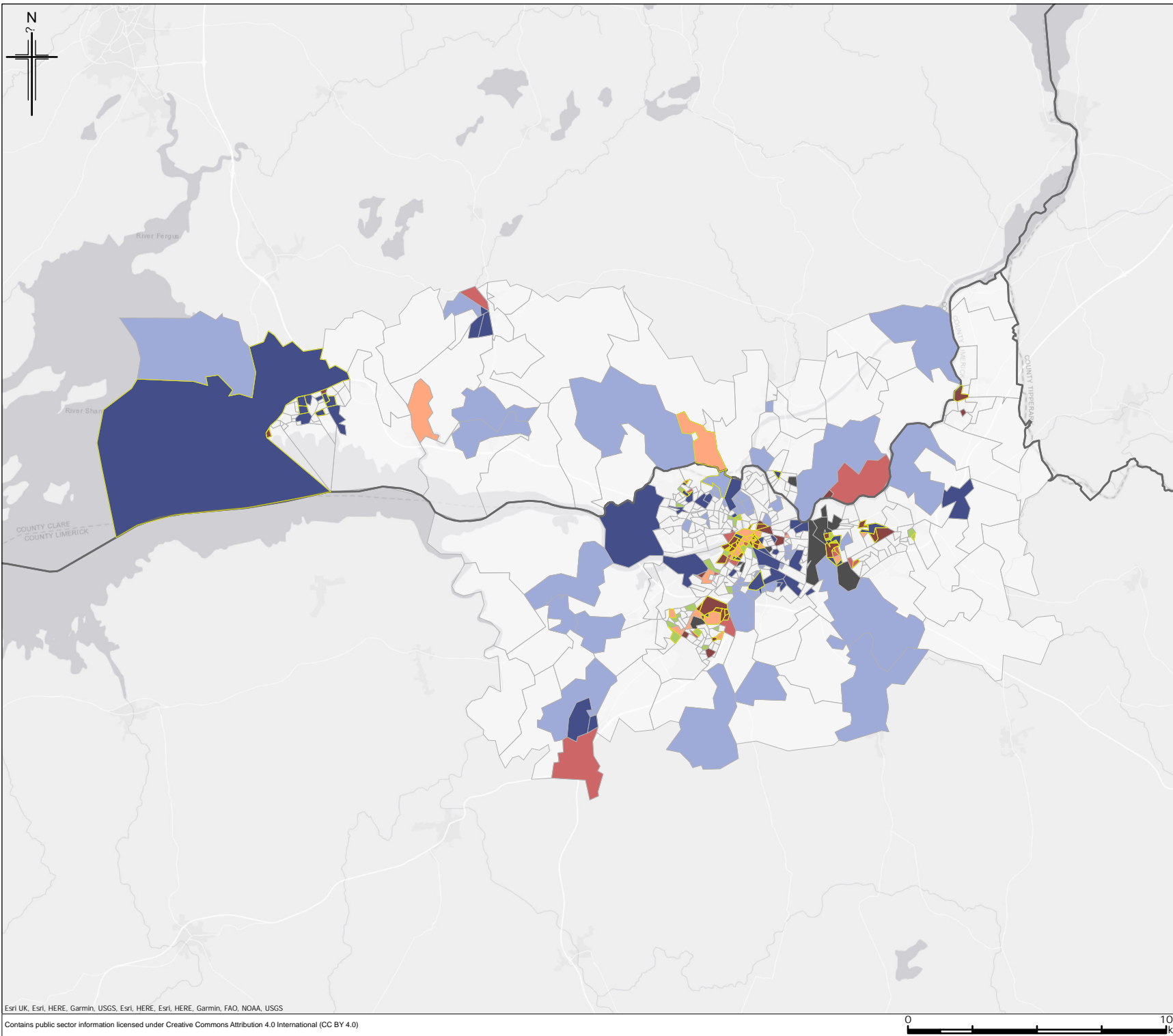


FIGURE A.5



- Legend**
- Limerick-Shannon Metropolitan Area small area with the 10% highest concentration of:
- High representation of multiple ethnic groups
 - White Irish
 - White Irish Traveller
 - Other White
 - Black or Black Irish
 - Asian or Asian Irish
 - Other
 - Not stated

Description:

Map shows small areas with the 10% highest concentration of ethnic groups.

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Drawing Title

DISTRIBUTION OF ETHNIC GROUPS
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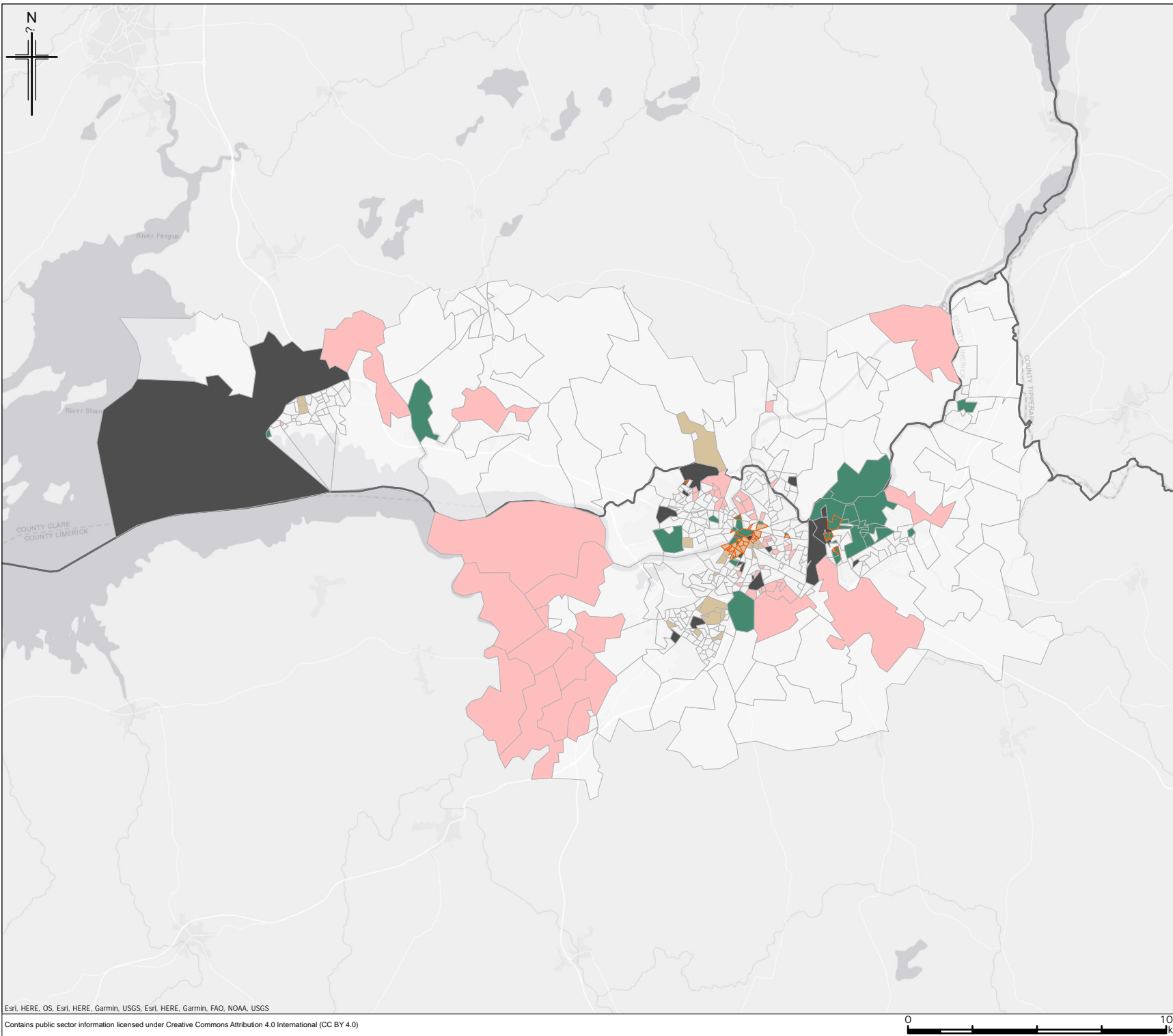


FIGURE A.6



Legend

Limerick-Shannon Metropolitan Area small area with the 10% highest concentration of:

- High representation of multiple religious groups
- Catholic
- No religion
- Other
- Not Stated

Description:

Map shows small areas with the 10% highest concentration of various religious groups.

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Drawing Title: DISTRIBUTION OF RELIGION ACROSS THE LIMERICK-SHANNON METROPOLITAN AREA

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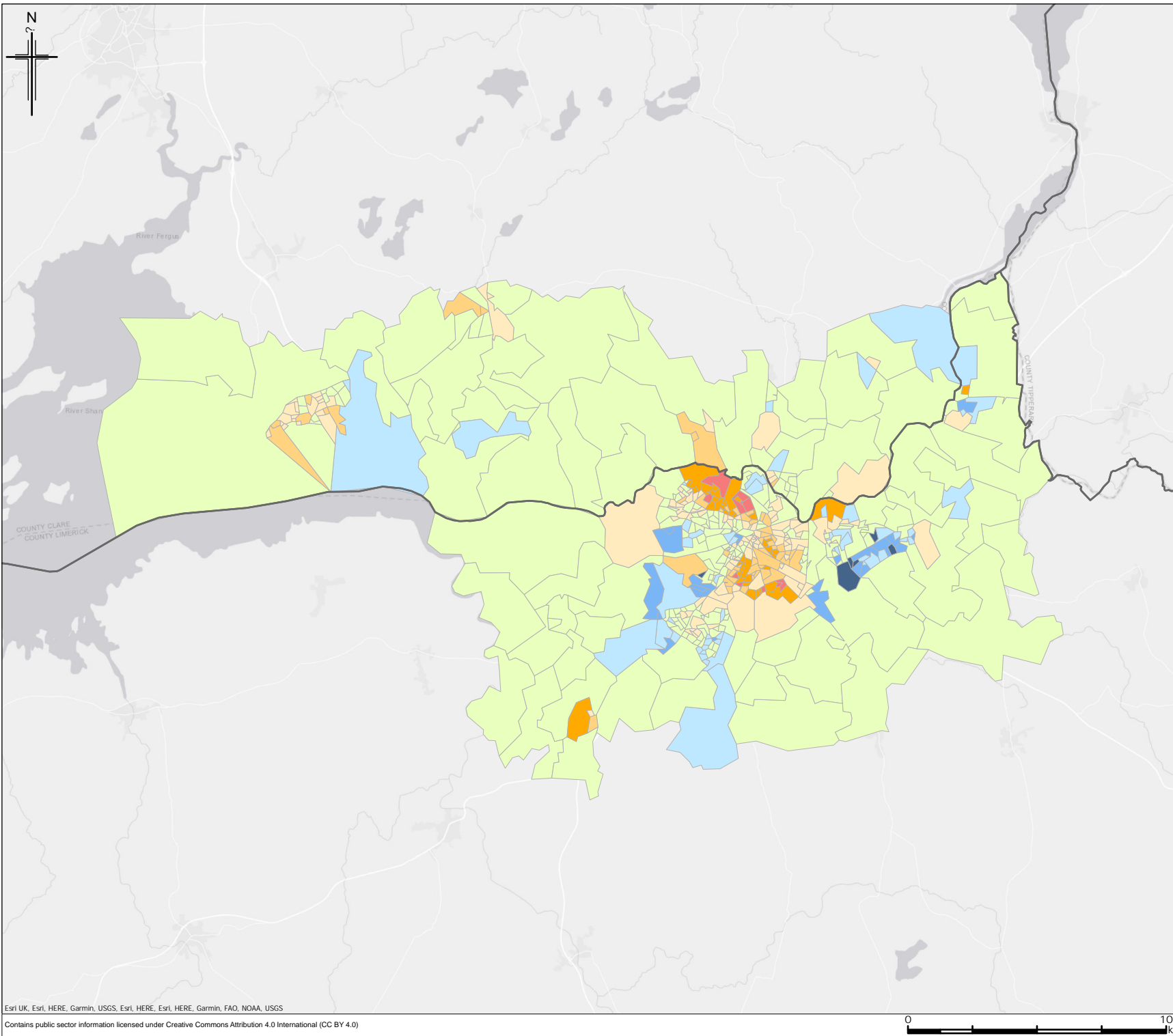


FIGURE A.7



Legend
Limerick-Shannon Metropolitan Area small area deprivation level (2016):

- Extremely affluent
- Very affluent
- Affluent
- Marginally above average
- Marginally below average
- Disadvantaged
- Very Disadvantaged
- Extremely Disadvantaged

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