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EQUALITY IMPACT ASSESSMENT (EQIA)

MAKING BETTER AND FAIRER DECISIONS

Getting started

1. **Lead Official**

   Tom Wharf

2. **Have you read the Guidance for completing this assessment?**

   Yes

3. **Have you completed the essential e-learning (available from September) on equality impact assessment?**

   No

4. **Deputy Director / Senior Responsible Officer (SRO)**

   Alex Walters

A. Proposal

1. **Title of proposal**

   Active Travel Act Guidance (ATAG)

2. **What is your proposal aiming to achieve?**

This EqIA assessed the impact of ATAG 2026's updated technical guidance on walking, wheeling and cycling to improve accessibility and inclusion of active travel investments, supporting long-term population scale benefits across all protected characteristics.

3. **When did work start on the proposal?**

   January 2025

4. **Which organisations, groups or communities are likely to be affected?**

   Most people in Wales will be affected by this guidance

5. **Have you registered your EqIA on iShare?**

   You must register your EqIA when you start developing your proposal. **Yes**

Author's note, *this EqIA was prepared in Autumn 2025 to support the Draft ATAG Consultation, as part of the ATAG Integrated Impact Assessment. Some updates to the EqIA/IIA were made post consultation, to reflect the changes to ATAG made post consultation. This EqIA has then been copied into a new document format template to be published published separately, without additional rework, to comply with Welsh Governments legally binding obligation to publish EqIAs.*

B. Impact on, and engagement with, people in protected groups

SUMMARY

This EqIA assessed the impact of Active Travel Act Guidance 2026's (ATAG) updated technical guidance on walking, wheeling and cycling to improve accessibility and inclusion of active travel investments, supporting long-term population scale benefits across all protected characteristics.

This EqIA assesses the impact of the updates between proposed ATAG 2026 and the current ATAG 2021. However, this EqIA does not reassess the impact of Llybwr Newydd's (Wales Transport Strategy 2021) strategic intent to increase the prevalence of active travel, as that decision has already been made. It does however offer occasion to reflect how improved street design guidance can mitigate any harms, and maximise opportunities for benefits, to people with protected characteristics.

ATAG 2026 offers reduced impact and improved accessibility and inclusion for disabled people compared to maintaining ATAG 2021 as the current guidance.

Some difficult decisions are required, balancing negative impacts of changing and novel street environments on some groups against the potential for long-term population scale benefits. For example, visually impaired users report increased anxiety from increased prevalence of cycle tracks at bus stops. On balancing this evidence, and in consideration of longer-term health, mobility, place and sustainability outcomes, the population scale benefits of changes proposed in ATAG 2026 outweigh the harms. Ongoing research and collaboration, as well as actions to mitigate any residual negative impacts after ATAG 2026 are proposed in this EqIA, alongside an ongoing monitoring and evaluation plan.

Recognising the technical audience of this document, the updated version provides improved information accessibility and design by improving internal links and providing improved advice on Design Elements applicability. A new Design Decision Log in Appendix L ensures transparency in project design choices, while refinements to monitoring duties track equality outcomes. These amendments will help make sure designers are better informed and accountable regarding the equalities impacts of their decisions.

KEY POSITIVE IMPACTS ON EQUALITIES

Responding to feedback from users, especially from groups representing disabled people, this update emphasises the need for segregation of people walking from people cycling, and to reduce the proliferation of shared use paths as a first resort by designers. It includes a new flow-chart (Figure 11.1: ATNM Link Design Selector) with links to Design Elements to help guide designers away from using shared use paths in inappropriate locations.

ATAG 2026 strengthens gender-inclusive design outcomes. Key design updates include emphasising the importance of subjective safety on active travel facilities. Protected cycle tracks, wider footways, and continuous physical separation from busy traffic to address road safety concerns. Lighting, clear sightlines, and natural surveillance are prioritised to improve real and perceived personal security. It proposes inclusive engagement, requiring targeted consultation with women and girls, supported by Equality Impact Assessment (EqIA) at all stages.

Updated placemaking principles now set out requirements for regular seating, accessible toilets, and age-friendly/ family-friendly features to support multi-stop journeys. Junctions and crossings must provide priority for people walking, wheeling, and cycling, with safer layouts and continuous routes. Integration with public transport, secure cycle parking, and e-cycle charging are reinforced. These measures aim to make active travel networks safer, more inclusive, and attractive for women and girls, encouraging greater uptake and reducing barriers.

CYCLE TRACK CONTINUATION AT BUS STOPS

This additional section of the EqIA has been set out to record in extra detail the consideration of cycle track continuation at bus stops. These features were included in ATAG 2021, and remain included in ATAG 2026, with modifications and mitigations to reduce the risk or exclusion and harm they may cause.

Introduction

People using cycles who are passing a bus stop while on a cycle facility may either encounter people walking or wheeling, or be required to mix with motor traffic. When ATAG's core principles of continuity, directness, coherence, attractiveness and safety are applied to integrating bus stops into segregated cycle tracks and shared use paths in real-world scenarios, variations on the six arrangements given in Design Elements 501-506 arise.

Some disabled people have raised concerns regarding some of these features. Organisations representing disabled people, especially Guide Dogs Cymru and RNIB Cymru, have engaged with the ATAG 2026 team by providing research and evidence, as well as ideating and evaluating potential mitigations to these concerns.

In response to concerns raised regarding these features by Guide Dogs Cymru and RNIB Cymru, this section reports on the evidence and explains the rationale for decision making in updating the ATAG 2026 guidance for these features.

Impacts on disabled people

Bus stop bypasses, boarders and similar arrangements are reported as essential elements of an inclusive active travel network that enable a wide range of people, including disabled people, to make journeys by cycling [25]. They are also required to create the conditions for increased age- and gender-inclusivity of cycling (including by age- and gender-diverse disabled people), by offering the prerequisite safe, continuous networks [1][2][15][38].

Evidence from recent research [2][3][4] indicates that some cycle track designs at bus stops increase anxiety for blind and visually-impaired people. Visually impaired users already experience higher levels of anxiety than the general population [24] and increasing this anxiety burden creates a negative impact on people with visual impairments.

It is recognised that adding cycle tracks and shared use paths at bus stops at adds complexity to movements in their vicinity. [2] [3] It is recognised that cycles are often quieter than cars and can be difficult to detect for people with visual and hearing impairments.

However, it is also noted that the policy goal targeted here is to replace one hazardous vehicle (person driving a private car) with another less hazardous vehicle (person on

cycle) [29] [30] [42] that has both immediate and longer-term benefits to population scale economic, social, health and wellbeing outcomes. [1] [5] [7] [14] [38] [44].

Options considered for cycle track continuation at bus stops

Three options for updating ATAGs Design Elements for cycle track continuation at bus stops have been considered, and only one taken forward. These options were;

1. **Do nothing; no change to ATAG guidance on DEs 501-504**. This option was not progressed, as this would miss the opportunity to improve and refine the guidance based on new research and input from early stakeholder engagement that is expected to materially improve design outcomes.

2. **Update, improve and expand upon DEs 501-504 and section 11.31 (preferred option taken forward).** This option looks to refine and improve guidance for cycle track continuation bus stop. Taking a safe-systems approach, ATAG 2026 first advises elimination of cycle track/bus stop interactions by network planning. Where this isn't possible, for example at local shopping streets where both motor traffic speeds and volumes require cycle tracks, and bus-transit demand requires bus stops, the Design Elements 501-504 should be used, with careful consideration site specific factors. They should always be used in combination with engagement and involvement of local people, in particular disabled people, and alongside behaviour change interventions. A full record of decisions in the new Appendix L Design Decisions Log is required.
3. **Bans, pauses and moratoria on one or more of the DEs 501-504.** This option was not progressed as this would stop LAs from being able to deliver continuous, safe, segregated cycling facilities in Wales, making it likely impossible to achieve active travel targets set out in Wales Transport Strategy [23]. This would also require an alternative government mechanism, as ATAG is only one of several relevant technical guidance documents for street design in Wales. This would also be a departure from norms in street operations, maintenance and design, as it would result in centralising decision making accountability to Welsh Government, and away from away from Local Authority officers and members [15].

As stated in Draft ATAG 2026, the preferred option carried forward in the Draft ATAG 2026 guidance on these features represents current accepted approaches and best practice. However, the document will be reviewed and updated periodically to account for emerging best practice following engagement between Welsh Government, Transport for Wales and relevant partners across the UK.

Preferred option for cycle tracks at bus stops taken forward in this update

The updated guidance on these features is contained in section 11.31 of Draft ATAG 2026, and design examples 501-504 within Appendix G.

The key general changes in ATAG 2026 affecting all cycle facilities at bus stops are;

- New guidance on aligning cycle facilities away from bus-routes wherever possible (11.31.3).
- New guidance on engagement and enforcement where new features are introduced or existing ones are causing concerns (11.31.9).
- The reinforcement of requirements for separated walking and cycling facilities to avoid shared use paths facilities in busier urban areas, specifically in relation to bus stops at cycle facilities (11.31.12).
- Reinforcement of road-space reallocation in favour of additional width for bus stops, pedestrian facilities and cycle tracks (listed in each DE under 'Other considerations')
- New text in 11.31 and DEs setting out Welsh Governments' intention to monitor UK practice for emerging improvements in this space, such as the work-in-progress by Brian Deegan and Active Travel England in developing a bus stop cycle track quality assessment tool. If appropriate, ATAG 2026 will be updated to align with UK best practice.

As a result of the engagement undertaken during the consultation period the Design Elements have been refined with input from the TfW Accessibility and Inclusion Panel, RNIB Cymru and Guide Dogs Cymru, as well as other stakeholders, two additional Design Elements have been developed, as well as a new Figure 11.28: Bus stop design selector.

There were no specific improvements made to Design Example 501 (Bus stop: cycle lane continuation), but there were improvements made to the DEs 502, 503 and 504. These are summarised below.

The updates to DE 502 & 503 Bus stop by-passes are;

- Separated into one-way cycle track (DE 502) and 2-way cycle track (DE 503) variants
- Re-named as 'Bus stop by-pass' to avoid ambiguity.
- Increased desirable minimum width from 2.0m to 2.5m in ATAG 2026.
- Included different crossing design solutions, including signalised crossings.
- Alignment of DE details with recent DfT Guidance for Floating bus stops provision and design [57] to improve cycle user compliance, reduce speed of people cycling at these features and reduce the number of interactions at the bus stop access crossing. These include;
    - introducing an optional merge point for people cycling who wish to rejoin carriageway traffic;
    - blunt-faced SuDS planter towards oncoming cycle traffic, and;
    - reduced absolute minimum lane and pedestrian crossing widths.

The updates to DE504 & 505 Bus stop boarders are;

- Separated into two variants; with and without a boarder-island, in accordance and alignment with new DfT Guidance [57]
- Trapezoidal delineator separating the footway from the cycle track and bus boarding location.
- Tramline tactile paving on the cycle track entry to and exit from the bus boarder.

- Give way markings on cycle track entry to the bus boarder.
- Inclusion of guidance paving on DE 505
- Alignment of DE details with recent DfT Guidance for Floating bus stops provision and design [57] to improve cycle user compliance, reduce speed of people cycling at these features and reduce the number of interactions at the bus stop access crossing. These include;
    - introducing an optional merge point for people cycling who wish to rejoin carriageway traffic, and;
    - reduced absolute minimum lane and pedestrian crossing widths.

The updates to DE506 Bus stop: shared use are;

- Increased absolute minimum width behind bus shelter to 2.7m.
- Added flow-chart decision (Figure G3) making for shared-use path facilities to clarify the limited applicability of shared use facilities.

Conclusions and recommendations

The overall impact of the ATAG 2026 revisions relating to cycle track continuation at bus stops is expected to be positive for disabled people. This includes improved, consistent and compliant tactile legibility on bus boarders and reduced prevalence of shared use paths at bus stops for new infrastructure. It provides guidance to designers on other modest, incremental, but user-responsive refinements to the standard layout dimensions and details they should apply in real-world retrofit scenarios.

It is recognised that there are likely to be some continued negative effects arising from cycle tracks at bus stops, primarily impacting blind and visually impaired people through increased anxiety [3], but also impacting any users that find them new or confusing [2].

ATAG 2026 is not a code of conduct for road users. Fears of collision with a person riding a cycle are reported as a causal factor in harms caused to blind people by increased social prevalence of cycling [3].

Regarding the behaviour of those cycle users who do not comply with Highway Code rules, COM-B method behavioural analysis by TfW has identified ‘Motivation’ as the target for behavioural intervention. People cycling in well-designed environments generally have both Capability (brakes, skill) and Opportunity (training, legible priority indicators such as road markings) to manage interactions with people walking in compliance with the Highway Code. Those who don’t comply may not appreciate the significant impact their behaviour has on disabled people. This is addressed in ATAG section 7.1, recommending LAs deliver new infrastructure alongside targeted engagement, including disabled people, cycle users and others, alongside reinforcement of existing Highway Code principles and enforcement of traffic offences.

The negative impacts noted are not new, and they have sought to be reduced by the changes made in ATAG 2026. It is nevertheless reasonable to consider how these negative effects might be yet further mitigated in other Welsh Government activities and workstreams.

It is recommended that TfW, Local Authorities and Welsh Government consider the following recommendations;

- Research and development of new technologies and techniques to mitigate risks to users at busy or complex scenarios of cycle track continuation at bus stops. This should include in-situ trials in real-world scenarios with high quality evidence collection through well-resourced monitoring and evaluation programmes.
- Audible announcements and other improvements to bus operations and technology, alerting passengers alighting at bus stops with cycle tracks.
- Police enforcement campaign using existing moving traffic offences for people riding cycles in ways that impact disabled people.
- Micro-targeted advertising and social campaign targeting people who are currently cycling, telling a compelling story of the impact on disabled people that inconsiderate cycling causes.

EQIA SUMMARY BY PROTECTED CHARACTERISTIC

(Please note: this EqIA has been provided in an open text format, i.e. not tabulated, to improve accessibility and legibility when used by screen-reader software. Though ATAG 2026 is primarily a technical reference document to engineers, designers and planners, extra care has been taken to improve its legibility to screen readers. This is intended to improve inclusion of visually impaired and blind stakeholders and practitioners in the scrutiny and continuous improvement of the ATAG 2026 document.)

This section summarises information considered by the Active Travel Act Guidance (ATAG) 2026 project team in relation to groups of people with protected characteristics under the Equality Act 2010. Improving equity of outcomes is a core objective of ATAG 2026.

This EqIA identifies the amendments, the potential impacts arising, evidence of those impacts and mitigations taken where such impacts are negative arising from the changes between the current ATAG 2021 and the draft ATAG 2026 for each characteristic.

The EqIA process began in January 2025, with initial scoping of potential equalities impacts. This identified small to negligible potential for impact on Marriage & Civil Partnership, Race and Religion. It identified significant potential for impact on Disability, Sex, Age, Pregnancy and Maternity. Some positive impact to public safety is expected in relation to Gender Reassignment and Sexual Orientation.

This project's execution and management plan prioritised early engagement with stakeholders, maximising the opportunity for their concerns and insight inform the contextual analysis and technical approaches used to update this street design guidance document.

Significant historic and structural exclusion factors in street design for selected protected characteristics

For some protected characteristics – but not all - there is strong evidence of significant historic and structural exclusion from both access to streets and inclusion in the street design process.

For example; since the dawn of civilisation streets and highways provided a continual public space available for informal play by children. In the last 120 years this space has been yielded to the movement and storage of private cars, without consultation with, or inclusion of, children in that decision, or in development of mitigations.

Such historic exclusions frames where we are now, and the scale of the challenge people with some characteristics face as a result. These are provided under additional sub-headings as part of this EqIA for the following protected characteristics.

- Age (children)
- Disability – people with visual impairments
- Disability – people with mobility impairments
- Sex
- Pregnancy and maternity

AGE

Age – Children & young people

Population estimates in Wales

Source [18] dated 2023
Age 0-4 = 150k
Age 5-15 = 398k
Age 16-24 = 339k
Total = 887k

Note: Every future person will be a child.

Significant historic and structural exclusion factors in street design

- children are not allowed to vote in elections, and they have no direct agency in holding government to account for the services they receive.
- children (especially boys) are more likely to be killed or seriously injured as pedestrians than the UK average. [29]
- children's independent mobility and opportunity for play have been negatively impacted by the increase in automobility through the 20th and 21st centuries. [28]

Relevant amendments in ATAG 2026

- integrated with Play Sufficiency Assessment (Wales) Regulations 2012 (Ch. 3.8, 8.7) – promotes "play on the way".
- reaffirmed and expanded with Active Travel School Plans (Ch. 4.2.9) mesh density and direct access to all schools (Ch. 4.7.6–4.7.7).
- design standards with enhanced separation and priority for people walking, wheeling or cycling (Chapters 11 & 12, and Appendix G) prioritise continuity of safe segregated walking, wheeling and cycle facilities, responding to concerns for the safety of children [1] and their increased vulnerability when walking, wheeling or cycling [29] [30].

Impact of ATAG update (positive/negative)

(positive) improved opportunity for independent mobility by providing direct and continuous walking, wheeling and cycling routes.

(positive) improved continuity of safe, segregated cycle facilities.

(positive) long-term: higher active travel prevalence linked to improved classroom concentration.

(positive) long term: increased educational attainment and childhood wellbeing. Health, wellbeing and attainment benefits are long-lasting and long-term.

Reasoning and supporting evidence

- public demand and safety concerns [1] [38]
- improving independent mobility for children requires LAs to be able to build safe, continuous cycle facilities [15]
- bus/cycle user accidents have higher fatality rates than most other two-vehicle collision involving a cycle user [12]
- childhood mobility correlates with educational attainment and wellbeing [16] and concentration [17] [19]

Age – Older people

Population estimates in Wales

Age 65-74 = 351k
Age 75-85 = 245k
Age >85 = 86k
total = 682k
2023 data [18]

Note 1: The number of people in Wales aged 65 years or older is projected to increase by 19.6% to 806,000 between 2022 and 2032 and reach over one million by 2060. [18]

Note 2: Age positively correlates with disability prevalence, including various age-related diseases, sensory impairments and mobility impairments. For example; o ne in five people aged 75 and over are living with sight loss, and one in two people aged 90. [46]

Relevant amendments in ATAG 2026

- project consultation formats updated in Chapter 5 to include easy read and screen readable formats.
- chapter 9 expanded to include seating, rest areas, mobility aids, and dementia-friendly surfaces.
- design standards with enhanced separation and priority for people walking, wheeling or cycling (Chapters 11 & 12, and Appendix G) prioritise continuity of safe segregated walking, wheeling and cycle facilities, responding to concerns for the older people [1] and their increased vulnerability when walking or cycling [29] [30] [38].
- chapter 14 reinforces requirements for access to toilets and changing facilities.
- presumption against new access controls, and refined guidance on bollard placement.

Impact of ATAG update (positive/negative)

(positive) increased seating and rest opportunities

(positive) improved mobility using walking and cycling facilities

(positive) Smoother surfaces

(negative) anxiety caused by changes to street environment and the introduction of unfamiliar features and behaviours (e.g. bus stops at cycle tracks; more children walking, wheeling, sitting and cycling, including using seating for social gatherings and cycling in the carriageway)

Reasoning and supporting evidence

- better alignment with inclusive mobility guidance [22]
- guidance on dementia friendly surfaces [20] [21]

- on balance, the long-term population scale benefits of ATAG 2026 (climate change, economy, health, etc) outweigh negative impacts on this group.

Mitigations to negative impacts within ATAG 2026

- clarified guidance on engagement, including providing documentation on how older people are consulted at project level. This includes consideration of digital exclusion for older people who may not find online engagement accessible or inclusive.
- new requirements to consider public health demographics in network planning and project prioritisation.
- updated requirements regarding maintenance and winter-gritting for walking/wheeling routes.

DISABILITY

Disability – Vision impairment

Population estimates in Wales

People with sight loss in Wales:
Partial sight = 97k
Blindness = 15k
Total = 112k

[46] 2023 data

Total people with sight loss in Wales estimated to double by 2050.

Significant historic and structural exclusion factors in street design

People with visual impairments (including people who are blind) face some of the most significant challenges of a disabling street environment, significantly reducing their independent mobility and access to services. [3] [32]

People with visual impairments are often not allowed to drive a car and rely solely on walking, wheeling and cycling to provide for their independent local mobility, and connections with public transport modes.

People with visual impairments have a history of systematic segregation in the UK. [31]

Historic models of disability, such as the medical and deficit models of disability, have informed street design practices that have excluded by design. These approaches were prevalent during the development of 20th century car infrastructure, leaving much legacy street infrastructure inaccessible to blind and visually impaired people (for example T-junctions without tactiles). [32] [49]

The Social Model of Disability makes an important distinction between ‘impairment’ and ‘disability’. It recognises that people with impairments are disabled by barriers that commonly exist in society. These barriers include negative attitudes, and physical and organisational barriers, which can prevent disabled people’s inclusion and participation in all walks of life. This approach to disability was developed by disabled people and was formally adopted by the Welsh Government in 2002.

Relevant amendments in ATAG 2026

- shared use paths (SUP) flow-charts and additional guidance to reduce SUP applicability in busy urban areas.
- increased legibility of blended side road entry treatments, now including colour contrast tactiles.
- refinements to guidance on bus stops at cycle tracks, reducing prevalence and highlighting the need for stakeholder engagement, responding to disabled people’s user concerns, especially visually impaired people.
- no change to pavement parking enforcement made as part of this update.

Impact of ATAG update (positive/negative)

(negative) continued anxiety to disabled people, especially visually impaired people, caused by increased prevalence of cycle tracks, including cycle track continuation at bus stops.
(positive) reduced proliferation of SUP facilities which cause discomfort and exclusion for many users with visual impairments
(positive) consistent, legible tactile layouts at side roads

Reasoning and supporting evidence

- increased anxiety of some visually impaired walkers/wheelchair users at bus boarders/ bypasses. [3] [49]
- the risk of pedestrians being injured at locations of cycle track continuation at bus stops is very low. [4]
- fatality and serious injury rate of accidents involving a person cycling and a bus coach are higher than most other collisions involving cyclist [4] [12]
- long term population scale benefits to increasing active travel [23] judged to outweigh the evidenced disbenefits [3] to this group.
- shared use paths can be installed less frequently as part of ATNM delivery with improved accessibility outcomes, but to enable this, LA officers will need to be empowered to reallocate space for car storage and movement, in accordance with transport hierarchy. [23]
- alignment with UK wide approaches through home-nations bus boarder working group and reference to DfT Guidance [57]

Mitigations to negative impacts within 2026 ATAG update

- provided additional guidance and improvements to relating to bus stops at cycle tracks in section 11.31, and DE's 501-504
- design decisions log provides additional accountability on designers
- maintain consistent tactiles at side road crossings and avoid ambiguous shared surfaces. [6][2][3]
- TfW successfully applied for the Health and Care Research Wales' Evidence Centre to undertake an independent Rapid Evidence Review (scheduled to publish in October 2025) looking systematically and holistically at evidence of "Barriers and Facilitators Experienced by Disabled People in Response to Changes in Active Travel Infrastructure, and the Impact on Their Accessibility"
- multiple iterations of Series 500 Design Elements in collaboration with RNIB Cymru, Guide Dogs Cymru and TfW's Accessibility and Inclusion Panel, though facilitated sessions supported by tactile models.

Disability – Mobility impairment & wheelers (including adapted cycles)

Population estimates in Wales

Total = 268,000 (low certainty)

Population estimates vary and are not well defined in available statistics, but by combining census 2021 data with mobility impairment prevalence estimates in [26] (2024 data) yields an estimate of 268,000.

Significant historic and structural exclusion factors in street design

People with mobility impairments (including people who are visually impaired) face significant challenges of disabling street environments, significantly reducing their independent mobility and access to services. [3] [32]

Disabled people have a history of systematic segregation in the UK. [31]

Historic models of disability, such as the medical and deficit models of disability, have informed street design practices that have excluded by design. These approaches were prevalent during the development of 20th century car infrastructure, leaving much legacy street infrastructure inaccessible to disabled people (for example T-junctions without dropped kerbs). [32] [49]

The Social Model of Disability makes an important distinction between 'impairment' and 'disability'. It recognises that people with impairments are disabled by barriers that commonly exist in society. These barriers include negative attitudes, and physical and organisational barriers, which can prevent disabled people's inclusion and participation in all walks of life. This approach to disability was developed by disabled people and was formally adopted by the Welsh Government in 2002.

Relevant amendments in ATAG 2026

- chapter 9 expanded to include seating, rest areas, mobility aids, and smooth surfaces.
- design standards with enhanced separation and priority for people walking, wheeling or cycling (Chapters 11 & 12, and Appendix G) prioritise continuity of safe segregated walking and cycle facilities, responding to concerns for mobility impaired disabled people [1] and their increased vulnerability when walking or cycling [29] [30].
- chapter 14 reinforces requirements for access to accessible toilets and changing facilities.
- presumption against new access control barriers, and refined guidance on bollard placement.

Impact of ATAG update (positive/negative)

(positive) improved quality and continuity of inclusive walking, wheeling and cycling facilities

(positive) adequate effective width and turning space

(positive) reduced exclusion by chicanes/A-frames

Reasoning and supporting evidence

- refined principles on geometry and widths; [5][7]

- wheels for Wellbeing guidance on inclusive cycle parking and access [33]
- support for cycling growth when conditions are safe and inclusive. [1] [38]
- improved crossing facilities [49]

Disability – Neurodivergence

Population estimates in Wales

There is currently no comprehensive data source on the number of people diagnosed with neurodevelopmental conditions in Wales. However;

- the National Autistic Society estimates that approximately 1% of the population in the UK are on the autism spectrum. [40]
- according to ADHD UK, the prevalence of ADHD is estimated to be around 5% for children and between 3 – 4% for adults in the UK. [40]
- the British Dyslexia Association (BDA) states that approximately 10% of the UK population is dyslexic.

Relevant amendments in ATAG 2026

- updated section 9.8.2 references difficulties for neurodivergent people with complex pattern work on surfaces.
- section 8.2 includes new reference to neurodivergence when scoping play facilities.

Impacts on ATAG update (positive/negative)

(positive) benefit from predictable, legible environments

(positive) reduced prevalence of complex pattern work on street spaces.

(positive) improved access and inclusion in play facilities

Reasoning and supporting evidence

Reports on perceived safety/comfort [1] [38] [49]

Inclusive design literature highlighting the value of predictable layouts. [2]

Disability – hearing impairments

Population estimates in Wales

575,500 have hearing loss in Wales

2020 data [41]

Relevant amendments in ATAG 2026

- updated flow charts in Appendix G to reduce prevalence of shared use paths
- design standards with enhanced separation and priority for people walking, wheeling or cycling (Chapters 11 & 12, and Appendix G) prioritise continuity of safe segregated walking and cycle facilities, responding to concerns for mobility impaired disabled people [1] and their increased vulnerability when walking or cycling [29] [30] [49]

Impact of ATAG update (positive/negative)

(positive) benefit from predictable, legible environments

(positive) improved access and inclusion in play facilities

Reasoning and supporting evidence

Reports on perceived safety/comfort [1] [38] [49]

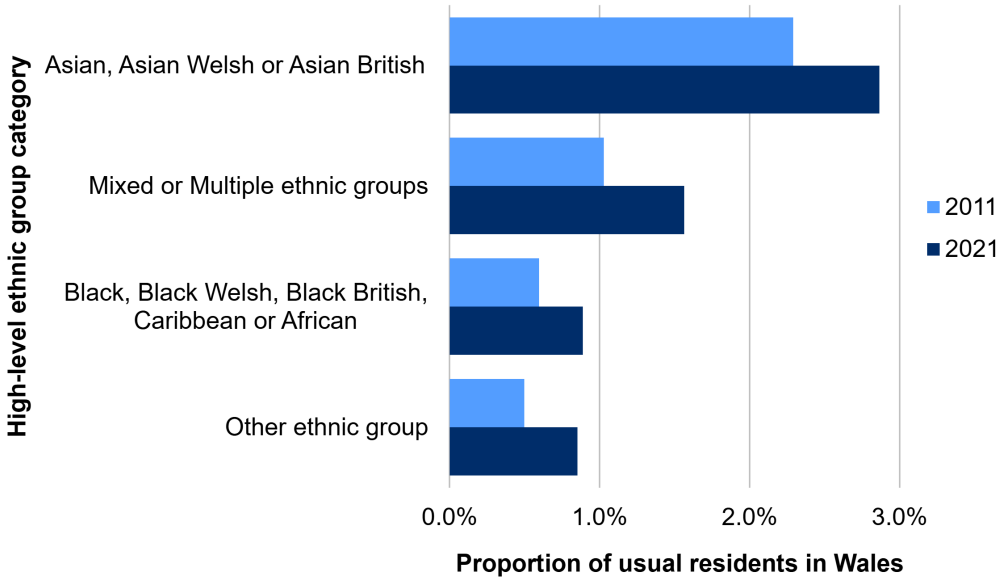
Inclusive design literature highlighting the value of predictable layouts. [2] [49]

RACE

Population estimates in Wales

Everybody in Wales has a race, and this is a shared protected characteristic.

In the 2021 census a 90.6% majority of Welsh people identified as “White: Welsh, English, Scottish, Northern Irish or British”. [52] Of the remaining percentage, a breakdown of this across the population is included below.



Relevant amendments in ATAG 2026

- prioritise safety, lighting and passive surveillance on active travel routes [1] [38]
- better integrate walking, wheeling and cycling facilities with bus stops
- involve community groups in route selection and design. [1]

Impact of ATAG update (positive/negative)

(positive) Better access to services, including bus stops, by walking, wheeling and cycling.

Reasoning and supporting evidence

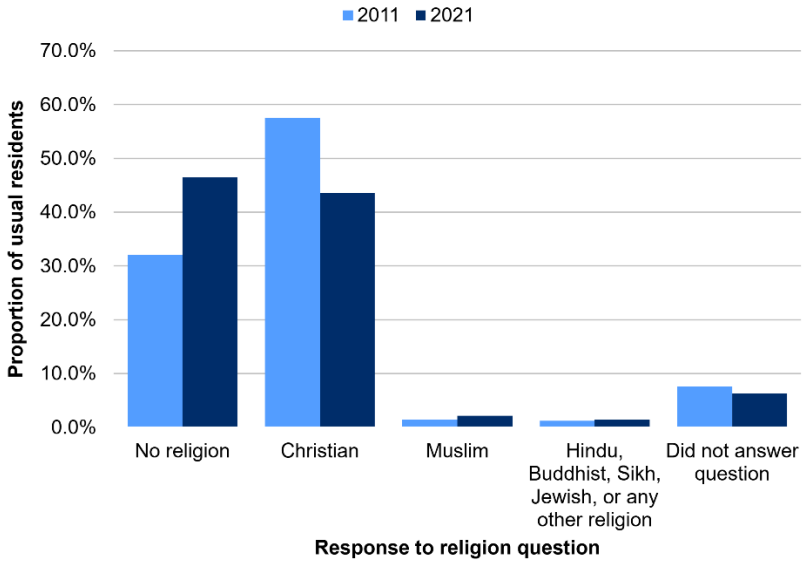
- perceptions on feeling welcome/safe [1] [38]
- 23% of people of a Black, Asian or Minority Ethnic background using the bus at least once a week, compared with 12% of people with a White background. [51]
- Health Foundation analysis of car access gaps by income (often correlated with ethnicity). [1][11]

RELIGION, BELIEF OR NON-BELIEF

Population estimates in Wales

In 2021, the number of people in Wales reporting “No religion” was larger than those reporting any individual religious affiliation, with 47% of the population (1.4 million) reporting “No religion”.

The graph below shows the breakdown by percentage of religions in Wales [52]



Relevant amendments in ATAG 2026

≈ Neutral overall (no specific barriers beyond general public-realm needs)

Impact of ATAG update (positive/negative)

≈ Neutral overall (no specific barriers beyond general public-realm needs)

Reasoning and supporting evidence

No specific barriers beyond general public-realm needs.

SEX & PREGNANCY AND MATERNITY

Population estimates in Wales

Based on 2021 Census data, there were 1,586,600 women in Wales, representing 51.1% of the country's population.

Approximately four fifths of women will bear children [36] and there is an annual conception rate per 1,000 women of 71.4 in 2022 [36].

In Wales, the number of live births has shown a declining trend in recent years, reaching 27,374 live births in 2023, and then falling further to 26,832 in 2024, which is a decrease of 2.0% compared to the previous year.

Significant historic and structural exclusion factors in street design

Women's access to public space is framed within their life experiences, with a significant majority (92%) reported experiencing public sexual harassment at some point in their lives. [33]

Women in Wales have only had the ability to vote for 97 years, and in "both politics and public life in the UK, women have historically been underrepresented." [35] Women are also underrepresented in professional bodies associated with street design, such as transport planning and highway engineering. [37] [27]

Sexual harassment and violence also have considerable costs which undermines economic growth, with estimated economic costs of between 2% and 4% of GDP. [39]

Relevant amendments in ATAG 2026

- new references to gender-sensitive design principles and resources such as TfL's Women's safety audits, Make Space for Girls and the Creating Places that Work for Women and Girls handbook.
- placemaking approaches that consider safety, comfort, and visibility for women and girls in public spaces, including lighting, toilets & baby changing, seating including push-chair seating, and surveillance.
- design standards with enhanced separation and priority for people walking, wheeling or cycling (Chapters 11 & 12, and Appendix G) prioritise continuity of safe segregated walking and cycle facilities, responding to concerns for mothers with infants [1] and their increased vulnerability when walking or cycling [38][27]
- monitoring frameworks now require reporting on how schemes address barriers for women and girls, including those linked to pregnancy and maternity.
- aligns with Placemaking Wales Charter and emerging Green Infrastructure strategies, which support safe, inclusive spaces for women and families

Impact of ATAG (positive/negative)

(negative) continued avoidance of some public spaces and active travel routes, especially at night

(positive) improved walking, wheeling and cycling experiences for women and girls

(positive) improved health and wellbeing outcomes for women and girls who are able to participate in active travel

(positive) modest incremental improvements to personal safety and reductions in gender-based street harassment outcomes for women and girls

Reasoning and supporting evidence

- gendered mobility/timing patterns and safety concerns [50]
- support for safer, better-lit, continuous networks. [1][27][38]

Mitigations to negative impacts within ATAG 2026

- provide lighting and passive surveillance [1] [38]
- ensure continuous, direct routes to key services with secure cycle parking to allow trip chaining mobilities [50]
- design interchanges that minimise isolation [1] [50]
- consider buggy/cargo cycle manoeuvring. [1][8]

GENDER REASSIGNMENT

Population estimates in Wales

Approximately 10,000 based on the 2021 census [47]

Relevant amendments in ATAG 2026

- placemaking approaches that consider safety, comfort, and visibility in public spaces, including lighting, and surveillance.
- design standards with enhanced separation and priority for people walking, wheeling or cycling (Chapters 11 & 12, and Appendix G) prioritise continuity of safe segregated walking and cycle facilities, responding to concerns for mothers with infants [1] and their increased vulnerability when walking or cycling [27][39]
- aligns with Placemaking Wales Charter and emerging Green Infrastructure strategies, which support safe, inclusive spaces for women and families

Impact of ATAG update (positive/negative)

(positive) Inclusive consultation

(positive) Safer, well-overlooked public spaces reduce exclusion

Reasoning and supporting evidence

Safety perceptions and support for more welcoming streets. [1] [38]

SEXUAL ORIENTATION

Population estimates in Wales

Key figures for Wales (Census 2021):

- Total responders (16+): 2.4 million (92.4% of the population 16+)
- Straight/Heterosexual: 89.4%
- Gay or Lesbian: 1.5%
- Bisexual: 1.2%
- Other sexual orientations: 0.3%
- Did not answer: 7.6%
- LGBQ+ Total: 3.0%

Relevant amendments in ATAG 2026

- introduces the LGBTQ+ Action Plan Wales as a supporting strategy, which emphasises the need for safe, welcoming, and inclusive spaces.
- sexual orientation and LGBTQ+ is recognised as a factor that can influence the way an individual experiences a space, especially in terms of safety and states factors that can have impact (such as lighting, isolation, passive surveillance). [1]
- the guidance reinforces the duty under the Equality Act to consider the needs of LGBTQ+ people in planning, design, engagement and promotion of schemes and ATNM. Encourages local authorities to engage actively and meaningfully with LGBTQ+ communities and representative organisations.
- requires that EQIAs explicitly assess impacts on LGBTQ+ with the objective that design and policy decisions consider harassment risk and inclusivity.
- provide lighting, clear sightlines and activity along routes; remove blind corners and create predictable layouts. [1]

Impact of ATAG update (positive/negative)

(positive) Safer, more welcoming public realm

(positive) Encourages inclusive planning, design, engagement and promotion

Reasoning and supporting evidence

perceptions about feeling welcome and safe on streets. [1][34][38][45]

MARRIAGE AND CIVIL PARTNERSHIP

Population estimates in Wales

Married or civil partnered is the most common legal partnership status among the population aged 16 years and over in England and Wales, at 49.7% in 2021.

Relevant amendments in ATAG 2026

(none)

Impact if ATAG update (positive/negative)

≈ Neutral overall (no specific barriers beyond general public-realm needs)

Reasoning and supporting evidence

(no specific barriers beyond general public-realm needs)

LOW-INCOME HOUSEHOLDS (SOCIO-ECONOMIC DUTY)

Population estimates in Wales

Approximated Social Grade in Wales is provided by the Office for National Statistics based on 2021 census, below [53]

- AB Higher and intermediate managerial, administrative, professional occupations (19.6%)
- C1 Supervisory, clerical and junior managerial, administrative, professional occupations (32.9%),
- C2 Skilled manual occupation (23.0%)
- DE Semi-skilled and unskilled manual occupations; unemployed and lowest grade occupations (24.6%)

Relevant amendments in ATAG 2026

- the guidance now explicitly references the Socio-Economic Duty (Equality Act 2010, Section 1), which requires local authorities to consider how active travel decisions can reduce inequalities caused by socio-economic disadvantage. This includes prioritizing investment in deprived areas and ensuring equitable access to active travel infrastructure.
- requires that local authorities use deprivation indices and transport poverty data when prioritizing routes in the Active Travel Network Maps (ATNMs, previously Existing Route Maps – ERMs and Integrated Network Maps - INMs) and recommends the use of Transport for Wales prioritisation tool to assess socio-economic impact.
- requires that local authorities demonstrate how the engagement for scheme design and the development of the ATNM was inclusive, specifically targeting low-income households and underrepresented groups.
- monitoring reports should now include metrics on how the active travel improvements benefit low-income households (such as access to work, education and services).

Impact of ATAG update (positive/negative)

(positive) Greater equity in the investment

(positive) Prioritise investment in high-need areas

(positive) offering affordable access to jobs/education by walking/wheeling/cycling

(positive) deliver safe first/last-mile links to public transport;

(positive) Engagement more inclusive (stronger requirement to engage with low-income households and underrepresented groups)

(positive) Increase in physical activity levels, reducing health inequalities and exposure to air pollution

Reasoning and supporting evidence

- people experiencing poverty are less likely to own a car, as shown in the National Survey for Wales: car access by group; [10] and Health Foundation trends in car access by income [11]
- demand for alternatives exists [1] [38]
- road traffic KSI data correlates negatively with income [54]

GENERAL EQIA CONCLUSION

On balance, the guidance advances equality by clarifying inclusive design standards and mitigations. Where risk remains (notably at bus stops and continuous footways), ATAG 2026 specifies controls and encourages local site audits and collaborative design approaches with disabled people to help prevent exclusion [2][3][8]. Further mitigations are proposed outside of ATAG 2026.

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C. Publication and Monitoring

1. **Is this EqIA ready for publication on the Welsh Government website?**

   Yes

2. **If you cannot publish the EqIA please explain why.**

   Will be published – N/A

3. **Is this EqIA an update on a version previously published?**

   Yes

4. **How will you monitor and evaluate progress on the equality issues identified in this EqIA?**

   Monitoring, evaluation and continual improvement of ATAG will be undertaken proportionately through existing Welsh Government and Transport for Wales governance arrangements. Evidence will be drawn from routine engagement with local authorities, delivery partners and representative stakeholder groups, alongside relevant scheme monitoring, complaints, emerging research and feedback on the application of the guidance.

   Equality issues identified in this EqIA, particularly any recurring or material impacts on protected groups, will be reviewed as part of periodic guidance reviews; where the evidence indicates an unintended impact or an opportunity to improve inclusion, proportionate clarifications, supplementary advice or future amendments to ATAG will be considered.

D. Authorisation

Declaration by the Deputy Director / Senior Responsible Officer (SRO):

I am satisfied that the impact of the proposal has been properly assessed and recorded in accordance with guidance, and that the requirement for publication has been duly considered.

Signature: Alex Walters

Department: Integrated Local Transport

Date: 13/10/2026