
TECHNICAL NOTE

Project Title: Land to the East of Ffordd Amazon, Crymlyn Burrows, Neath Port Talbot (Planning Application Reference: P2025/0124)

Report Reference: 794-PLN-TRP-00294-04c V2

Date: 20th May 2025

Post Application Response NPTCBC's Active Travel Team

Introduction

- 1.1 A planning application for development of a hydrogen refuelling facility was submitted to Neath Port Talbot County Borough Council (NPTCBC) in February 2025. The planning application description is as follows:
- “Development of a Hydrogen Refuelling Facility with hydrogen buffer storage, tube trailer loading, HGV, bus and car refuelling dispensers, DNO substation, hardstanding and demountable/containerised storage and demountable welfare area (container) together with boundary fences, gates and ancillary infrastructure”**
- 1.2 NPTCBC's Active Travel Team have provided their formal response to the application on 4th April 2025. In their response they have raised concerns which need to be addressed by the applicant. A copy of their full response is provided in **Annex 1**.
- 1.3 This brief Technical Note provides a response to all comments raised by the Active Travel Team. For ease of reference, their comments have been replicated in *italics* with the RPS response detailed immediately below.

NPTCBC Active Travel Team Comments

- 1.4 *All walking and cycling infrastructure should be designed to comply with the Welsh Governments [Active Travel Act Guidance](#) (ATAG).*

RPS Response

- 1.5 All walking and cycling infrastructure has been provided in accordance with the Welsh Governments Active Travel Act Guidance (ATAG).

NPTCBC Active Travel Team Comments

- 1.6 The Councils Active Travel Network (ATNM) shows both existing (solid lines) and future routes (dotted lines) in the vicinity of the proposed development.
- 1.7 The future routes show where routes need improvement and/or a new link is required, and existing routes represent a route that has passed an audit and therefore meets active travel requirements.
- 1.8 To allow staff to travel actively to the site, shared-use paths meeting ATAG standards are required in the following location.
- Active travel links to Jersey Marine are currently via stairs, an active travel link that is accessible for all would be beneficial for potential staff living in Jersey Marine

RPS Response

- 1.9 The Active Travel Team have suggested that links to Jersey Marine could be further strengthened through the removal of the existing stairs linking from the site access road to Ashleigh Terrace.
- 1.10 These stairs would then be replaced by a shared cycleway / footway. However, due to the level change from the proposed site access road and Ashleigh Terrace of approximately 3.8m it is likely a convoluted chicane would be required in line with guidance on gradients for shared cycleways.
- 1.11 At present the gradient is 44% (3.8m/8m (length of stairway) x100), ATAG suggests that in order to achieve a gradient of 2% the desirable maximum gradient distance is 150m, however, given the significant level changes, a gradient of 2.5% is only achievable over this length.
- 1.12 By facilitating these works, the walking distance for pedestrians would not change as access is already provided via the stairs albeit this does not accommodate those with physical impairments.
- 1.13 For cyclists, this would only reduce the cycling distance by 200m (350m actual betterment – 150m new chicane cycleway) which equates to less than a minute reduction in cycling time.
- 1.14 The development proposes that there will be one full time staff member on site at any one time, and up to two visiting contractors when necessary. As a worst-case scenario, it was assumed for assessment purposes that there would be four staff on site each day. As the proposed development is a low trip generator it is determined that such works to facilitate the shared cycleway connecting to Ashleigh Terrace is not conducive with the size and trip generation of the proposed development.

NPTCBC Active Travel Team Comments

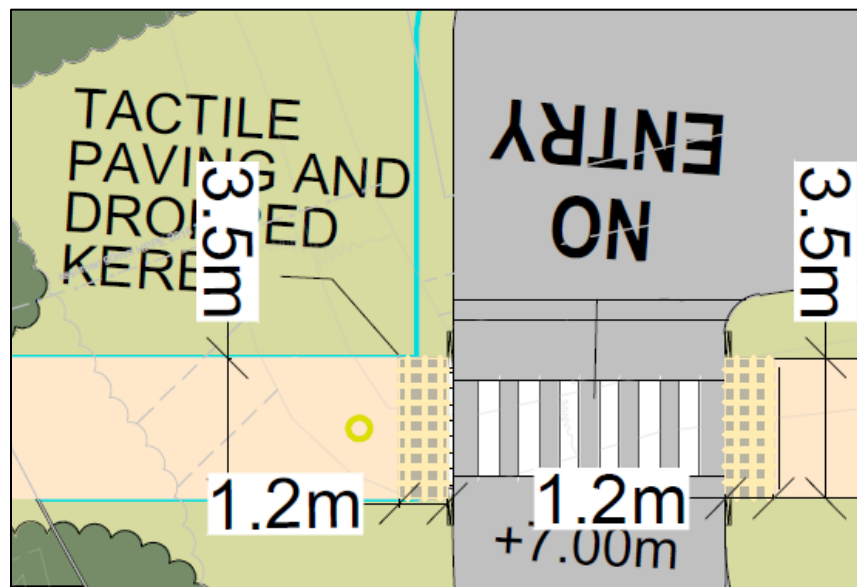
- 1.15 Paths need to be wide enough in order to meet ATAG standards.

RPS Response

- 1.16 ATAG Standards suggest for shared cycle and pedestrian paths **“width should reflect the level and type of use forecast with a minimum of 3.0m width on primary cycle routes, or 2.5m on less busy secondary routes”**. The route in question is classed as a less busy secondary route.

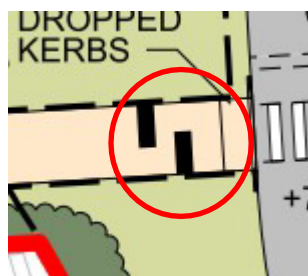
- 1.17 DE401 Shared pedestrian and cycle track, alongside road of the ATAG suggests ***“Unsegregated cycle tracks should include additional width where they are bounded by vertical features. Additional width required is:***
- ***Kerb up to 150mm high: add 200mm;***
 - ***Vertical feature 150-600mm high: add 250mm;***
 - ***Vertical feature above 600mm high: add 500mm.”***
- 1.18 The shared cycleway has fencing along both sides, which is more than 600mm high. On that basis, the 3m shared cycleway detailed below has been increased to 3.5m, which allows for the additional 500mm suggested in ATAG.
- 1.19 This is shown on **Figure 1** below and on the Site Layout Plan at **Annex 2**.

Figure 1: Shared Cycleway Width



NPTCBC Active Travel Team Comments

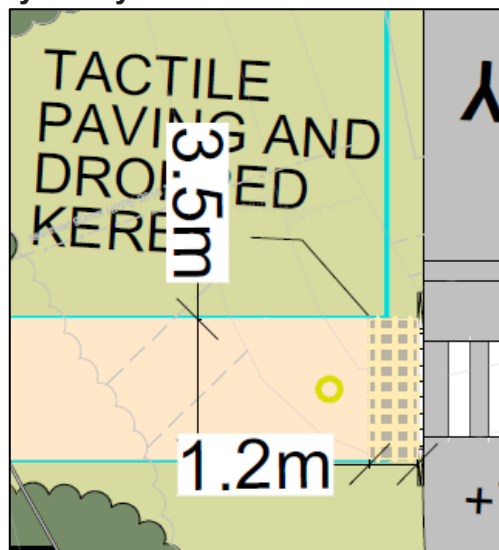
- 1.20 Please confirm what the two black features on the path circled are. Please refer to ATAG (ref 15.3.5 p263). It is recommended that any barriers are replaced with bollards as it will create better permeability through the site.



RPS Response

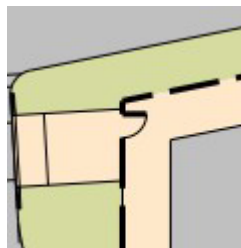
- 1.21 The black features identified above are barriers to stop, or slow, cyclists at the end of a path for safety reasons.
- 1.22 As per ATAG (ref 15.3.5 p263) these have been amended and now include a single central bollard, as shown on **Figure 2** below and on the Site Layout Plan at **Annex 2**.

Figure 2: Shared Cycleway Bollard



NPTCBC Comments

- 1.23 Please confirm the gate width. A minimum of 1.5m is required when open, as per ATAG (ref 9.17.10 p107).

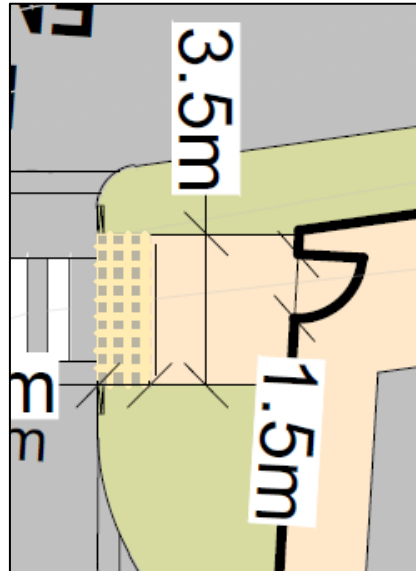


- 1.24 Paths need to be wide enough in order to meet ATAG standards.

RPS Response

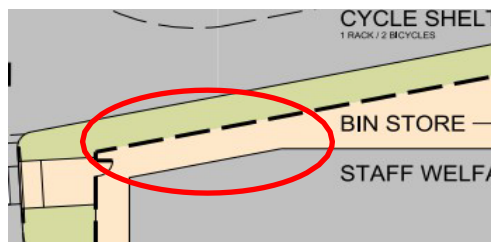
- 1.25 The gate width has been increased to 1.5m and is now in accordance with ATAG standards. This is shown on **Figure 3** below and on the Site Layout Plan at **Annex 2**.

Figure 3: Gate Width



NPTCBC Active Travel Comments

- 1.26 Please confirm the width of the expected shared use path from the gate to the cycle storage meets ATAG standards (as highlighted below).
- 1.27 Paths need to be wide enough to allow shared use to meet ATAG standards (DE401 p380).
- 1.28 The black dashed line appears to be a fence. DE401 states, vertical features above 600mm high require an additional 500mm to the path width.



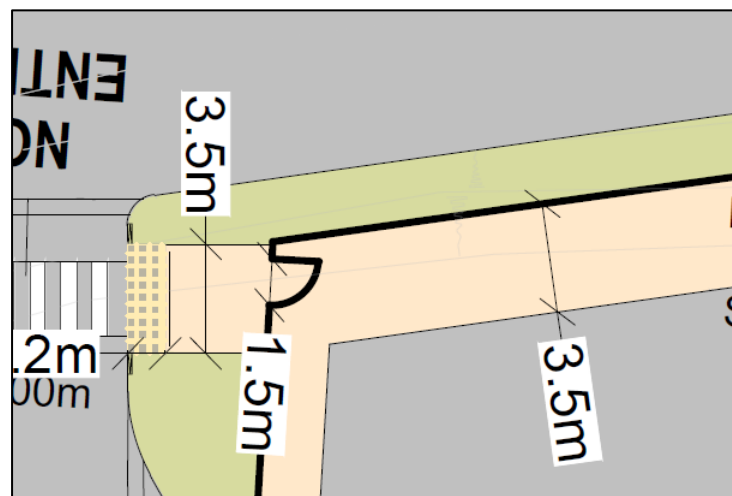
- 1.29 There also appears to be a lighting column in the narrow section, this would further restrict access. Can this be relocated please.



RPS Response

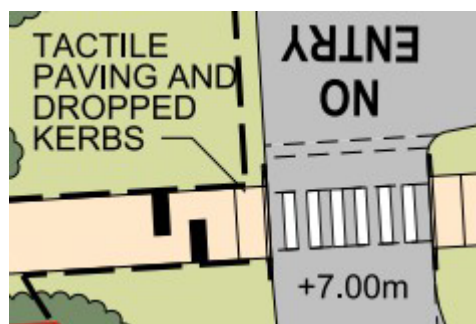
- 1.30 The shared cycleway has fencing along its northern boundary, which is more than 600mm high. On that basis, this shared surface has been increased to 3.5m, which allows for the additional 500mm suggested in ATAG.
- 1.31 This is shown on **Figure 4** below and on the Site Layout Plan at **Annex 2**.
- 1.32 A Lighting Strategy was submitted as part of the planning application. This has been included within **Annex 3** for reference. It is however anticipated that a detailed Lighting Strategy will be required by Condition.

Figure 4: Shared Cycleway Width



NPTCBC Active Travel Comments

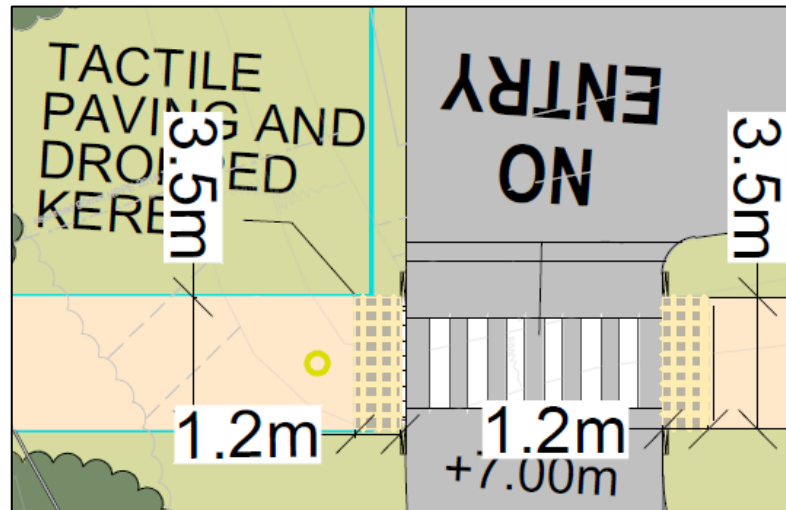
- 1.33 Please confirm the tactile dimensions and ensure they meet standards as per the *Guidance of the Use of Tactile Paving Surfaces*:
<https://assets.publishing.service.gov.uk/media/61df0c91e90e07037794fe90/guidance-on-the-use-of-tactile-paving-surfaces.pdf>



RPS Response

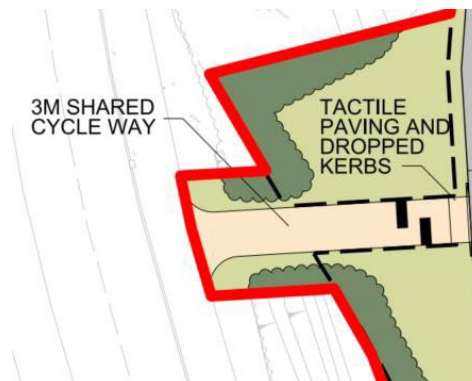
- 1.34 The dimensions of the tactile paving (3.5m x 1.2m) are shown on **Figure 5** below. The dimensions meet standards as per the *Guidance of the Use of Tactile Paving Surfaces*.

Figure 5: Tactile Paving Dimensions



NPTCBC Active Travel Comments

- 1.35 The black dashed line appears to be a fence. DE403 states, vertical features above 600mm high require an additional 500mm to the path width. This could potentially add 1m to the width of the path. Please confirm this feature meets ATAG requirements.



RPS Response

- 1.36 The shared cycleway has fencing along both sides, which is more than 600mm high. On that basis, the 3m shared cycleway detailed below has been increased to 3.5m, which allows for the additional 500mm suggested in ATAG.
- 1.37 This is shown on **Figure 5** above and on the Site Layout Plan at **Annex 2**.

NPTCBC Active Travel Comments

- 1.38 The amount, type and spacing of cycle storage needs to comply with the Active Travel Act Guidance (see page 241 of the ATAG and extract below on the required number).

RPS Response

- 1.39 The land use being proposed is not cited within the cycle parking standards contained within the ATAG, as it is bespoke in nature. The development proposals will, by their very nature (Hydrogen Refuelling Station), generate very few trips by active modes. This, coupled with the fact that there will be one member of staff on site at any one time, means that the provision of two cycle parking stands is sufficient to meet demand.

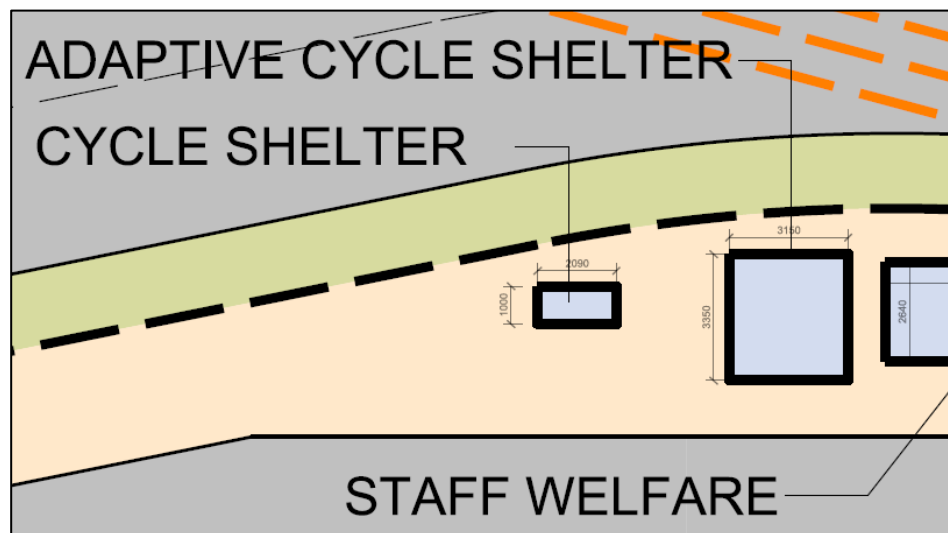
NPTCBC Active Travel Comments

- 1.40 The cycle storage appears to show a total width of 1.09m with a central Sheffield derived stand. This would not meet ATAG standards as per Figure 14.25 below.
- 1.41 Please note the requirement for adaptive cycles parking for disabled people. 1 space minimum. 10% (up to 50 spaces).

RPS Response

- 1.42 The cycle parking on site has been amended and now shows a separate adaptive cycle parking shelter for two adaptive cycles. The shelter is 3.3m long by 1.9m wide to accommodate the Cycle Design Vehicle, with 1.2m additional level transfer/dismount width. This is in accordance with standards suggested in <https://wheelsforwellbeing.org.uk/guide-to-inclusive-cycle-parking>, and is shown on **Figure 6** below and on the Site Layout Plan at **Annex 2**.

Figure 6: Cycle Parking



Annexes

Annex 1 – NPTCBC’s Active Travel Team Response



NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

ENGINEERING & TRANSPORT

ACTIVE TRAVEL OBSERVATIONS

PLANNING APPLICATION NO:	P2025/0124
APPLICANT:	Adam Porteous 95 Gresham Street London EC2V 7AB
LOCATION:	Land to the east of Amazon, Ffordd Amazon, Crymlyn Burrows SA1 8QX
PROPOSAL:	Development of a Hydrogen Refuelling Facility with hydrogen buffer storage, tube trailer loading, HGV, bus and car refuelling dispensers, DNO substation, hardstanding and demountable/containerised storage and demountable welfare area (container) together with boundary fences, gates and ancillary infrastructure
PLANNING OFFICER:	Claire Hall c.hall@npt.gov.uk
DATE REQUIRED BY:	Received 24/03/2025

The **Active Travel Team** in responding to the above application, provides the following substantive response:

No comment	☐
No objection (subject to any specified conditions below)	☐
Concerns have been identified (see below for how those concerns can be addressed by the applicant)	☒
Objection – on the grounds set out below	☐



THE ACTIVE TRAVEL TEAM OBSERVATIONS ON THIS PROPOSAL ARE:-

1 Policy Requirements.

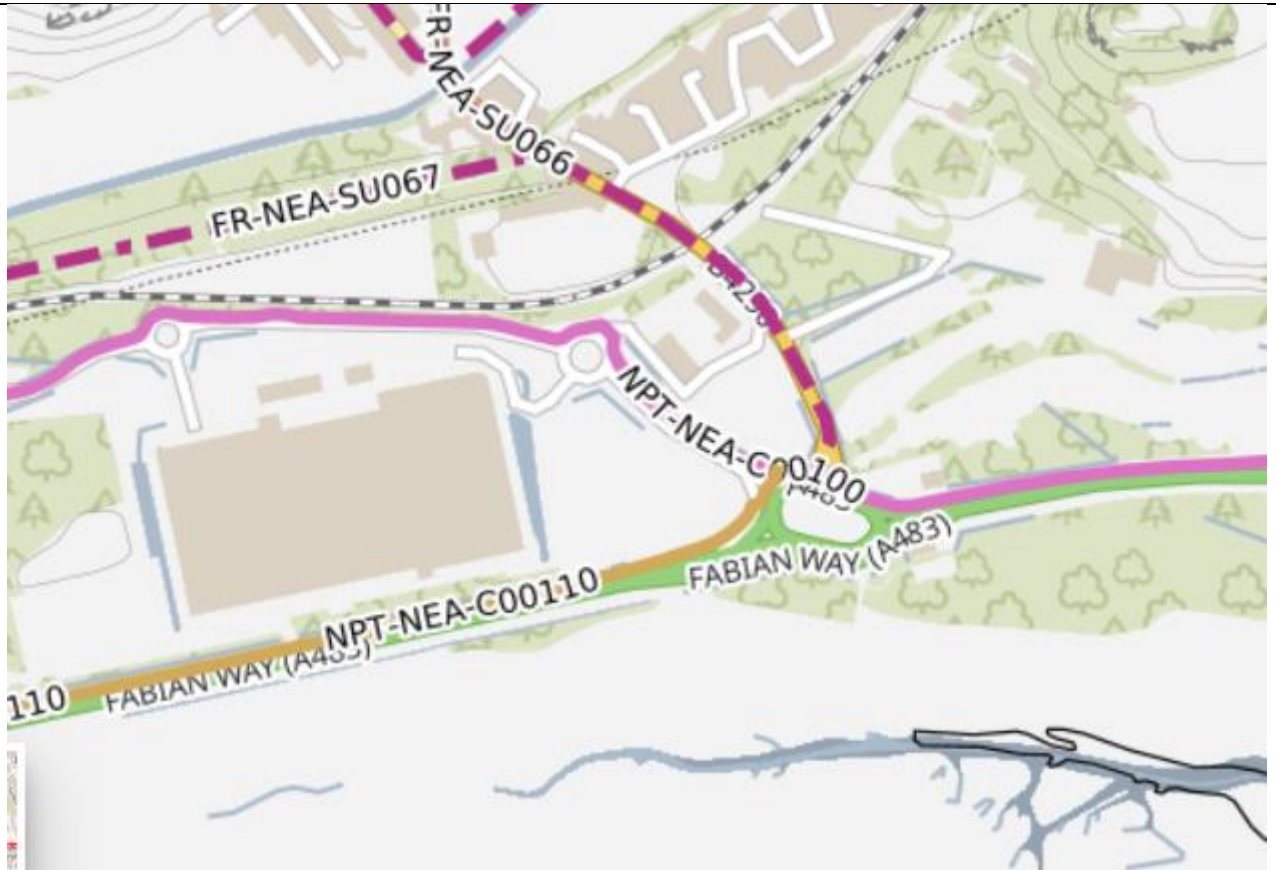
All walking and cycling infrastructure should be designed to comply with the Welsh Governments [Active Travel Act Guidance](#) (ATAG).

2 Active Travel Links in the area

2.1 The Councils [Active Travel Network Map](#) (ATNM) shows both existing (solid lines) and future routes (dotted lines) in the vicinity of the proposed development.

2.2 The future routes show where routes need improvement and/or a new link is required, and existing routes represent a route that has passed an audit and therefore meets active travel requirements.

Screenshot of NPT 's ATNM.

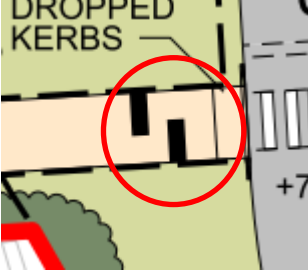
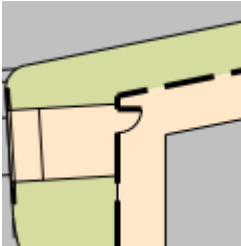


3 Connections to the Wider Area/ Accessibility

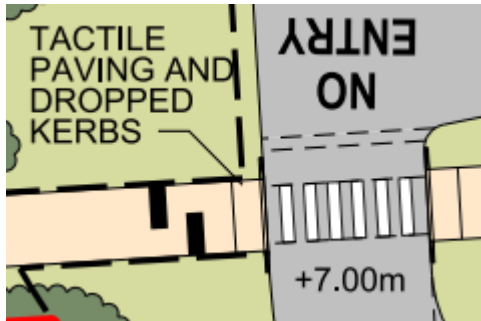
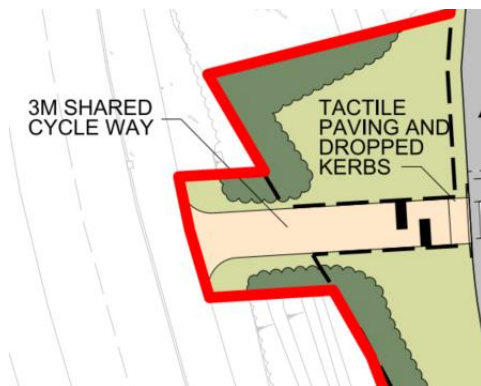
3.1 To allow staff to travel actively to the site, shared-use paths meeting ATAG standards are required in the following location.

3.1.2 Active travel links to Jersey Marine are currently via stairs, an active travel link that is accessible for all would be beneficial for potential staff living in Jersey Marine.



4 Widths	
4.	Paths need to be wide enough in order to meet ATAG standards.
4.1	Please confirm what the two black features on the path circled are. Please refer to ATAG (ref 15.3.5 p263). It is recommended that any barriers are replaced with bollards as it will create better permeability through the site. 
4.2	Please confirm the gate width. A minimum of 1.5m is required when open, as per ATAG (ref 9.17.10 p107). 
4.3	Please confirm the width of the expected shared use path from the gate to the cycle storage meets ATAG standards (as highlighted below). Paths need to be wide enough to allow shared use to meet ATAG standards (DE401 p380). The black dashed line appears to be a fence. DE401 states, vertical features above 600mm high require an additional 500mm to the path width.  There also appears to be a lighting column in the narrow section, this would further restrict access. Can this be relocated please.



		
4.4	Please confirm the tactile dimensions and ensure they meet standards as per the <i>Guidance of the Use of Tactile Paving Surfaces</i>: https://assets.publishing.service.gov.uk/media/61df0c91e90e07037794fe90/guidance-on-the-use-of-tactile-paving-surfaces.pdf 	
4.5	The black dashed line appears to be a fence. DE403 states, vertical features above 600mm high require an additional 500mm to the path width. This could potentially add 1m to the width of the path. Please confirm this feature meets ATAG requirements. 	
5 Cycle Parking		
5.1	The amount, type and spacing of cycle storage needs to comply with the Active Travel Act Guidance (see page 241 of the ATAG and extract below on the required number). The cycle storage appears to show a total width of 1.09m with a central Sheffield derived stand. This would not meet ATAG standards as per Figure 14.25 below. Please note the requirement for adaptive cycles parking for disabled people. 1 space minimum. 10% (up to 50 spaces).	

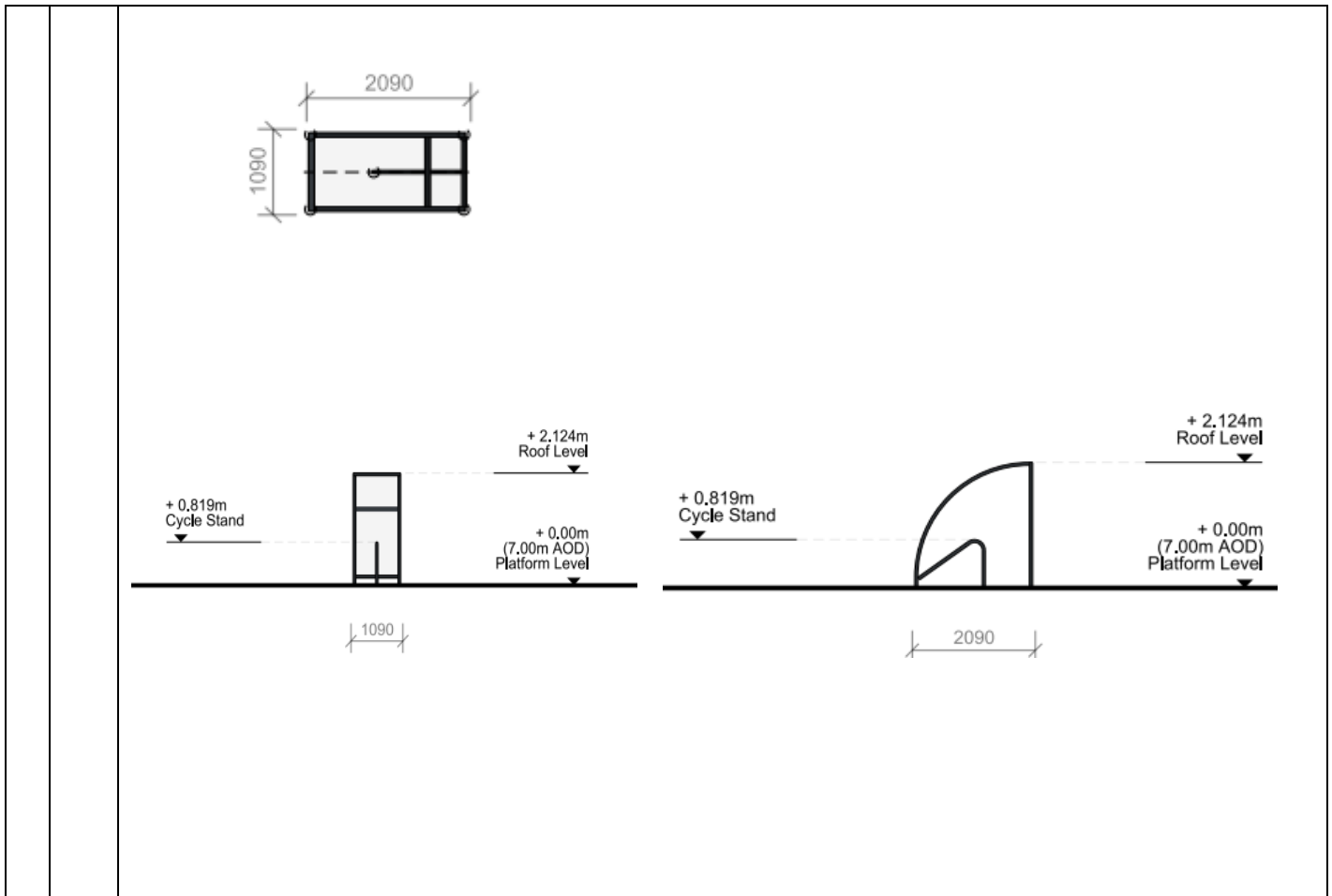




Table 14.4 – Cycle parking quantities for new development

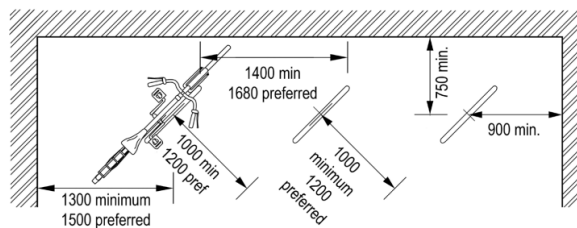
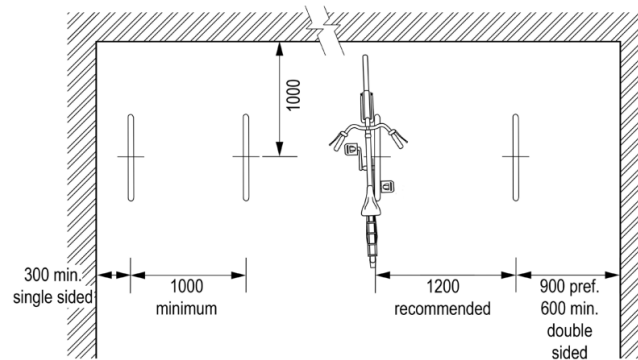
Land use type	Sub category	Short stay requirement (obvious, easily accessed and close to destination)	Long stay requirement (secure and ideally covered)
All	Parking for adapted cycles for disabled people	1 space minimum. 10% (up to 50 spaces) 5% of total capacity (over 50 spaces) co-located with disabled car parking	1 space minimum. 10% (up to 50 spaces) 5% of total capacity (over 50 spaces) co-located with disabled car parking
Retail	Small (<200m ²)	1 per 100m ²	1 per 100m ²
	Medium (200-1,000m ²)	1 per 200m ²	1 per 200m ²
	>1,000m ²	1 per 250m ²	1 per 500m ²
Employment	Office/finance (A2/B1)	1 per 1000m ²	1 per 200m ²
	Industrial/warehousing (B2/B8)	1 per 1000m ²	1 per 500m ²
Leisure and institutions	Leisure centres, assembly halls, hospitals and	Greatest of 1 per 50m ² or 1 per 30 seats/capacity	1 per 5 employees
	Educational institutions		Separate provision for staff and students. Based on travel plan mode share targets, minimum: Staff: 1 per 20 staff Students: 1 per 10 students
Residential	All except sheltered/elderly housing or nursing homes		1 per bedroom
	Sheltered/elderly housing/nursing homes	0.05 per residential unit	0.05 per bedroom
Public transport interchange	Standard stop	Upon own merit	
	Major interchange	1 per 200 daily users	



Table 14.6 – Space required for cycle parking

Situation	Dimensions	Area per cycle
Stands on street	1.8m x 0.5m	1m ²
Within building – minimum	1.8m x 0.5m spaces plus 1.8m aisle	1.35m ²
Within building – desirable	2.0m x 0.75m spaces plus 3.0m aisle	2-3m ²

Figure 14.25 – Recommended layouts and dimensions for Sheffield stands – perpendicular and echelon





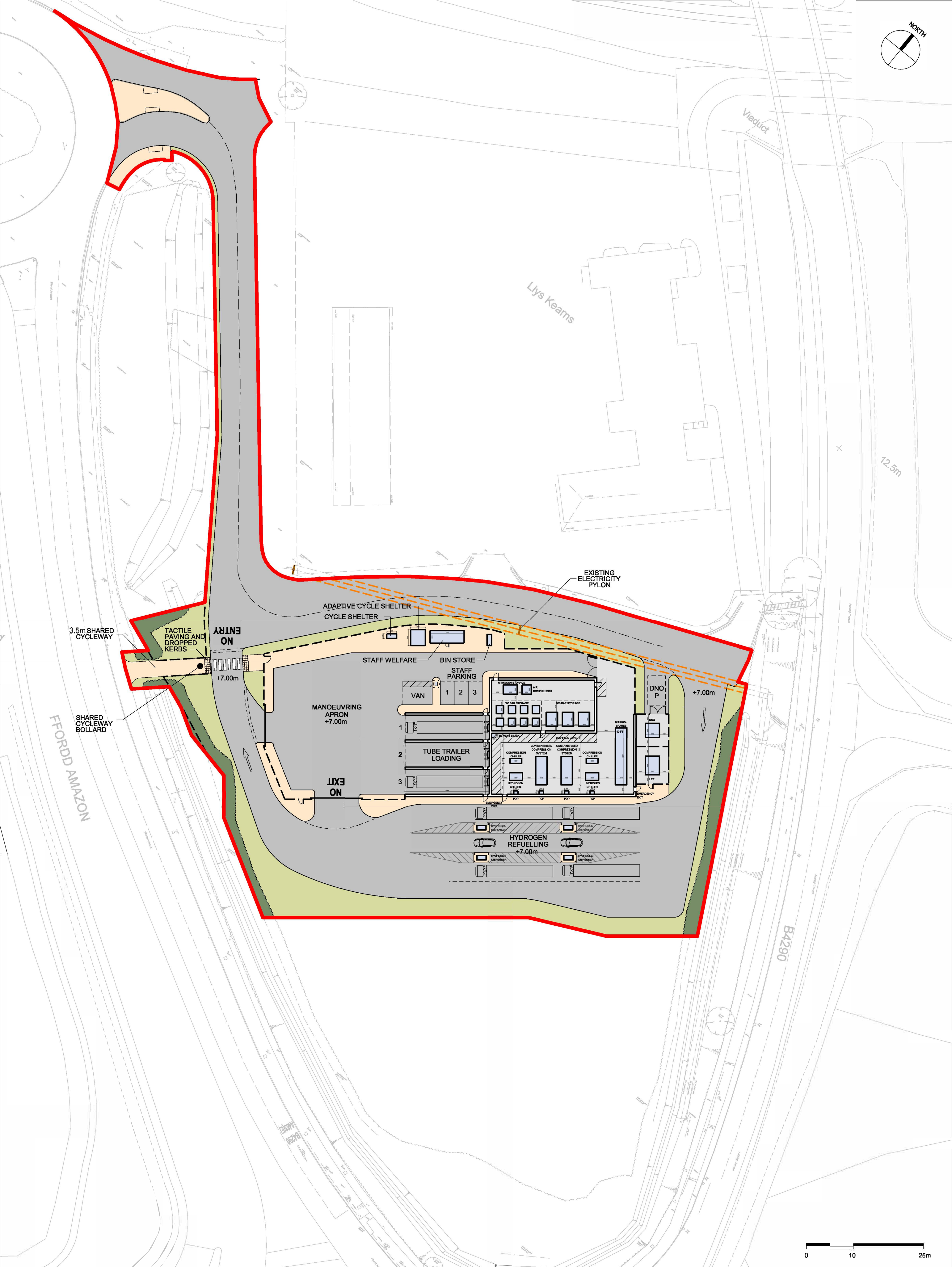
NOTES TO PLANNER

Hello Claire. In point 5.1 we are unsure of the 'Land use type' and size of the site in square meters. Please can you confirm and calculate the required number of spaces required as guided in table 14.4. Thanks

DATE COMMENTS SUBMITTED:

24/03/2025

Annex 2 – Site Layout Plan



NOTE

- THIS DRAWING IS COPYRIGHT GSDA LTD.
- THE CONTRACTOR MUST NOT SCALE FROM THE DRAWING ALL DIMENSIONS TO BE TAKEN FROM DIMENSION STRINGS.
- WHERE ANY DISCREPANCIES ARE FOUND BETWEEN DIMENSIONS THESE MUST BE BROUGHT TO THE ATTENTION OF THE ARCHITECTS FOR RESOLUTION.
- WHERE DISCREPANCIES EXIST BETWEEN REFERENCE OR ASSEMBLY DRAWINGS & DETAIL DRAWINGS, THE LATTER TAKE PREFERENCE.

LEGEND

RED LINE APPLICATION BOUNDARY

GRASSLAND

FOLIAGE AND TREES

PEDESTRIAN WALKWAY

ROADS

HARDSTANDING

OVERHEAD ELECTRICITY CABLES

PROJECT

SWANSEA HYDROGEN

DRAWING

Proposed Site Plan

FOR PLANNING

1:250@A0 25/05/16

SCALE 1:500@A2 DATE

1463 PL011 A

DWG. NO. REVISION

- 25/01/20

Issued for Planning

A 25/05/16

Issued for Planning

GSDA

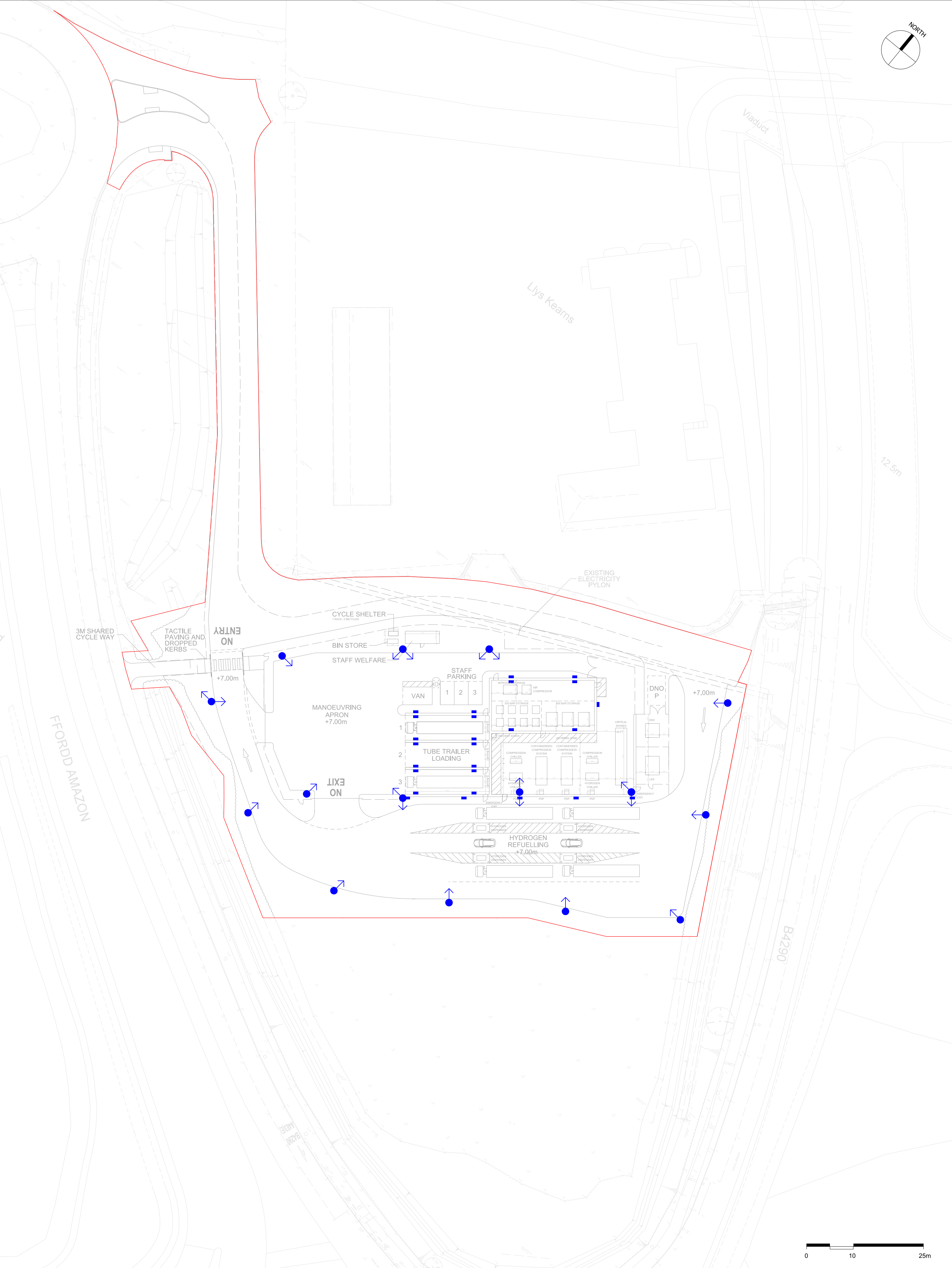
GARRY STEWART DESIGN ASSOCIATES

01 Meadwell Place, Thorne Lea Rd, Egham,
Surrey TW20 8HE, United Kingdom
T: +44 (0)20 7531 2852/1

Marubeni

95 Gresham Street
London
EC2N 7AB
+44 (0)20 7538 8811
www.marubeni-europe.com

Annex 3 – Lighting Strategy



NOTE 1. THIS DRAWING IS COPYRIGHT GSDA LTD. 2. THE CONTRACTOR MUST NOT SCALE FROM THE DRAWING ALL DIMENSIONS TO BE TAKEN FROM DIMENSION STRINGS. 3. WHERE ANY DISCREPANCIES ARE FOUND BETWEEN DIMENSIONS THESE MUST BE BROUGHT TO THE ATTENTION OF THE ARCHITECTS FOR RESOLUTION. 4. WHERE DISCREPANCIES EXIST BETWEEN REFERENCE OR ASSEMBLY DRAWINGS & DETAIL DRAWINGS, THE LATTER TAKE PREFERENCE.		LEGEND RED LINE APPLICATION BOUNDARY COLUMN MOUNTED LIGHTING WALL / FENCE MOUNTED LIGHTING	PROJECT SWANSEA HYDROGEN DRAWING Lighting Design FOR PLANNING 1:250@A0 25/01/30 1:500@A2 DATE 1463 IL002 DWG. NO. REVISION
---	--	--	--