

Consultation Response from KC Waste Strategy (Refuse & Cleansing)		
PA no. & address: 2020/94285 22-26, Wellington Road, Dewsbury, WF13 1HL		
Proposal: Alterations to office building to form 20 flats and associated office space and laundry (Listed Building within a Conservation Area) – AMENDED GROUND FLOOR AND LAYOUT PLANS		
Date Responded: 12/07/2021	Responding Officer: Carol Oakden	Responding Ref: WPN-20-065R1

NOTES/COMMENTS:

The following comments relate to revised drawings 556.22 (--) 007 Layout plan, and 556.22 (--) 002RevF Ground floor plan.

The revised plans now show 3 x 1100ltr bins to be stored to the front of the building within a low-level stone-built enclosure with double doors for each bin. This still falls short of the Authority's requirements in that:

1. The proposed storage doesn't accommodate the required number of bins for the size of the development. As previously stated, 6 x 1100ltr bins are required in line with the Authority's fortnightly collection schedule and allowing for recycling facilities to be included. Failure to provide sufficient space will most likely result in extra collections being required. Extra collections will attract a charge from the Authority, and we cannot guarantee being able to provide such a service. Overspill waste resulting from inadequate storage will be the responsibility of the landlord to deal with. More regular private waste collections could be purchased by the landlord/building management company to overcome this, but the details of such arrangements would have to be specified via a pre-occupation Planning condition to ensure that adequate and traceable arrangements are in place in accordance with the statutory responsibilities of the Waste Collection Authority.
2. The design of the store with the inclusion of doors (presumably lockable) does provide secure facilities for bins – helping to prevent them being moved around/stolen, targeted for arson or mis-used. However, with no roof, being within 6m of the residential building and being close to the principal egress route for residents, the fire risk presented by the bins is not adequately mitigated. **Upon inspection, Building Control and/or the Fire Authority may request changes to the construction of the bin store to mitigate the risk and may even require it to be relocated.** It would therefore be prudent to address this as soon as possible.

Original comments (09/02/21):

The following comments are made without prejudice and purely from the point of view of the Waste Collection Authority.

The application is for the formation of 20 flats within the existing building. It is not clear from the submitted information where waste generated by the residents of the flats will be stored or collected from. **Without this detail the application cannot be supported**

by the Waste Collection Authority as it contravenes the requirements set out in policy LP24 part d (vi) and LP43. Failure to provide suitable waste management facilities would likely result in communal bins being stored on the street, creating an unacceptable visual impact; potential for spillage of waste into the street; potential for unauthorised use/theft/damage to bins, and vermin and odour issues; and a potential fire risk to residents and to surrounding buildings.

Further information is required to demonstrate waste management solutions appropriate to the location and size of the development, addressing the following:

- The proposal is for 20 flats which would generate a waste storage requirement for 10 x 660ltr communal bins (5 for general waste and 5 for recyclable waste) OR 6 x 1100ltr Eurobins (3 for general waste and 3 for recyclables). The smaller bins are preferred as they are more suitable for residential uses and present fewer problems for manoeuvring in and out of smaller spaces.
- If external space can be found for bin storage it must be either 6m away from this or other buildings to mitigate the fire risk, or if this is not possible, storage should be constructed using fire resistant materials and not be located close to doors or windows.
- If internal space can be found for bin storage, it must conform to Building Regulations 2010 Part H6 and British Standard 5906:2005 Waste Management in Buildings Code of Practice, which specify the solutions for fire resistance.
- Wherever bins are located, they will need to be secure, safe and efficient for both residents and collection crews to access; must be on a hard, level surface and be well ventilated with suitable vermin control measures where necessary; must not cause obstruction or be obstructed from being manoeuvred to the nearest adopted highway for collections; and will need to be part of the remit of a management company to manage and maintain.

Policy context:

1. Local Plan Policy LP24 (part d.vi) and National Planning Policy for Waste (para 8) by –“incorporating adequate facilities to allow occupiers to separate and store waste for recycling and recovery that are well designed and visually unobtrusive and allows for the convenient collection of waste”
2. Local Plan Policy LP43 Waste Management Hierarchy “The council will encourage and support the minimisation of waste production and support the re-use and recovery of waste materials including, for example, recycling, composting and Energy from Waste recovery”.
3. Scheme design should conform to Building for a Healthy Life (2020); Building Regulations 2010 part H6; and British Standard 5906:2005 Waste Management in Buildings Code of Practice.
4. Further advice and full guidance is contained in the Kirklees Highway Design Guide SPD at <https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx> and the Kirklees Waste Management Design Guide available from waste.planning@kirklees.gov.uk with further context provided in the [National Design Guide, October 2019](#)