

**Consultation Response from Mike Hibbert,
KC Waste Strategy(Refuse & Recycling)**

**2022/93938 First and Second Floors, Shopping Precinct, New Street and Albion Street,
Huddersfield, HD1 2TR**

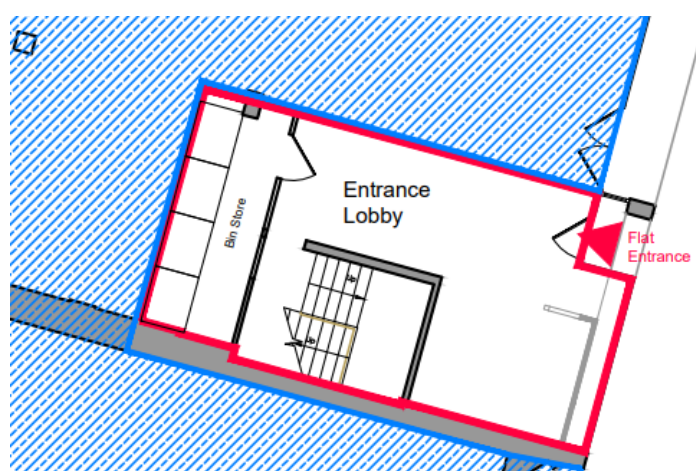
**Change of use from A1 (business retail and storage) to C3 (residential) 18 studio flats at first
and second floors and external alterations**

Date Responded: 25/10/2023.

Responding Officer: Mike Hibbert

Responding Ref: WPS 22-077 Revised 25.10.2023.

The WCA welcomes the revised details and Proposed Ground & First Floor Plans Rev C dated 15/9/23 that reflect the alteration in the number of apartments within the development and shows the location of an internal bin store.



- The waste storage provision for 18 x one-bedroom apartments is 1800ltrs for both residual and recyclates so the proposal to have 4x 1100ltrs wheeliebins is acceptable. In light of the recent announcement by the Government on "Simpler Recycling" thought should be given to provision of storage for food waste. It is noted that applicant is intending to use a private sector waste collection company and frequency of collection may be more than alternate weekly. It is recognised that this could enable the size of the bin store and number of containers to be reduced below that required if the collection regime was alternate weekly collections. Section 45 (1)(a) of the Environmental Protection Act 1990 imposes a duty on the Waste Collection Authority to arrange for the collection of household waste in its area. Regardless of the whether a private collection contractor is used the WCA would wish to ensure there is sufficient waste storage capacity on site, appropriate access, and that if the responsibility for collection falls to the WCA in future that efficient waste collection can be achieved.
- Guidance indicates the floor space for a 1100ltrs wheeliebins is 1575mmx1190mm with space to manoeuvre the bins within the store so the bin store dimensions would depend on configuration within the store. The internal bin store dimensions appear to be 2m x 5.3m and therefore maybe too small to accommodate four x1100ltrs wheeliebins. The door to the store is approximately 1m wide so may need adjusting to enable easy passage of a wheeliebin.

- An internal bin store presents a fire risk and must comply with fire regulations (refer to BS 5906:2005 Waste Management in Buildings; Building Regs 2010 Part H6, CFPA-E Guideline No 7:2022 F, BS476-22:1987: Fire tests on building materials and structures; and BS EN 1634-1:2008: Fire resistance and smoke control tests for door, shutter and openable window assemblies and elements of building hardware for internal compounds.
- BS5906:2005 states “Waste storage chambers should preferably be away from the main entrance to the building and should be constructed such that containers can be removed directly to the outside, without passing through any part of the building served by the chamber except by way of passage.” On this basis the applicant should consider whether to relocate the waste store within the entrance lobby such that so there is residents’ access from inside the building and direct access to the highway for waste collection.
- The bin storage area and access routes to the Bin Collection Point (BCP) should be constructed to withstand point loading and movement, impacts of larger bins over time, and to resist future rutting, pitting, cracking or other such surface degradation that would impair bin manoeuvring. To facilitate loading of full wheeliebins the surface between the bin store and BCP/ highway should be smooth hard surface without kerbs. The proposed layout must ensure that parked cars do not obstruct the route between the bin store and loading point.

If the application is approved, it is recommended that the following condition, or similar, is applied:

“Before development commences, details of the management and maintenance of communal refuse storage areas by a designated private management company shall be submitted to and approved by the Local Planning Authority. The approved details shall be provided before first occupation and shall be so retained thereafter”.

Full detailed guidance on waste management requirements can be found in in the [Kirklees Waste Management Design Guide 2020](https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx) (available on the Planning advice notes page at: <https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx>)

Policy context:

- 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”
- 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”.
- Local plan Policy LP15 – residential use in town centres part h: provision of refuse storage and collection.
- 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.

Further advice on Highway matters is contained in the [Kirklees Highway Design Guide SPD](https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx) which can be found at <https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx>