

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

2022/93938 Piazza Shopping Centre, New Street and Albion Street, Huddersfield, HD1 2TR

Change of use from A1 (business retail and storage) to C3 (residential) 34 studio flats at first and second floors and external alterations

Date Responded: 20/12/2022

Responding Officer: Mike Hibbert

Responding Ref: WPS 22-77

NOTES/COMMENTS:

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

To meet the operational requirements of the Authority the following issues need to be addressed. Solving these will help create an environment that functions safely and efficiently for waste management; and reduce the negative impacts of bin blight on the neighbourhood. This will also enable the proposal to better meet the policy requirements of LP24 part d (vi), LP43 and the Kirklees Highway Design Guide SPD in respect of refuse collection. Ultimately this will be to the benefit both residents and the Authority for the life of the development.

Waste storage and presentation:

The proposal is for the conversion of vacant first floor and second floor space above retail premises on New Street and Albion Street, Huddersfield, HD1 2TR to provide residential accommodation comprising of 34 one-bedroom studio apartments.

- Storage of wheeliebins on the pavement or roadway in New Street or Albion Street would not be acceptable.
- The applicant has not included any details on waste storage in the application form. The Design and Access statement dated 2/12/2022 states in Section 4.11 “Ample refuse storage is also provided for the proposal, with space allocated close to the proposed development to the internal courtyard of the site, as shown on the proposed site layout plan. Collections will be managed by a private collection company” and in Section 6.4 “Adequate refuse storage has been provided within the development to meet the needs of future residents for the lifetime of the development.” Despite reference to site plans proposed floor plan ref 22-60 .03 Rev A dated 7/12/2022 is not annotated to show details of a bin storage area.
- For 34 apartments the recommended waste storage provision is 6120 ltrs for both residual and recycling bins. Appropriate waste storage provision would be 12 X1100 ltrs wheeliebins.
- Guidance indicates the floor space for a 1100ltr wheeliebins is 1575mmx1190mm with space to manoeuvre the bins within the store so the bin store dimensions would depend on configuration within the store. There is no details of the exact location or design of the bin store provided. Additional information is required detailing waste storage, containers, capacity and design of the waste storage compound including,

screening, surfacing and security. Appropriate standards are detailed in the Kirklees Waste Management Design Guide 2020. Bin store surfaces should be durable and waterproof enough to withstand heavy duty cleaning such as power washing.

- Waste Storage and collection provision for waste arising from existing commercial premises needs to be maintained. Commercial waste must not be co-mixed with Household waste.
- 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.
- The walk distance from the entrance points of the block to proposed bin store(s) should be no more than the 30m as specified in guidance BS5906:2005.
- If sufficient waste storage cannot be accommodated, then there may need to be a review of the configuration of residual and recycling provision/ containers or the management company for the development could consider more frequent collections (e.g., weekly or more regular) on an additional paid for basis.
- RCV Cleansing staff will not pull out the bins from the internal bin stores. There are no details of presentation points indicated on the plan of the site layout. Further information is requested on the location of presentation points and the arrangements in place to get the bins to presentation points.
- Waste storage presents a fire risk. Any skip/ wheeliebin storage locations should be carefully considered when undertaking a fire risk assessment and may need relocating 6m away from buildings.
- An internal bin store presents a fire risk and therefore must therefore 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 open-able window assemblies and elements of building hardware) for internal compounds.
- The waste store should be secure to prevent theft, unauthorised use/ fly tipping or rough sleeping. If the doors to the bin store are to have a keypad to secure access these details will be required by the collection staff.
- 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.

Refuse Collection Vehicle access:

- Suitable site access and manoeuvrability space for a Refuse Collection Vehicle is vital to the Council's ability to discharge its obligation to collect waste from domestic properties. This obligation will exist in perpetuity on any residential development and as such will be a critical consideration.

The Authority defers to Highways colleagues for technical analysis of the road layout and swept paths in respect of RCV access, but offers the following observations in this regard,

- Buxton House is currently serviced by Kirklees MC waste so collection from the development is viable with the present RCV fleet. The Authority would require confirmation that the proposed waste storage and collection arrangements for the new development do not impact on current collection or storage arrangements for Buxton House.

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** (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>