Consultation Response from Mike Hibbert, **KC Waste Strategy(Refuse & Recycling)**
2023/90024 George Hotel, St George's Square, Huddersfield, HD1 1JA
Partial demolition of a Listed Building to facilitate refurbishment and extension of the George Hotel to form a 90+ room C1 hotel with associated ancillary uses (including bar, restaurant, gym, conference room) (within a Conservation Area)
Date Responded: **Responding Officer:** **Responding Ref:**

NOTES/COMMENTS:

The following comments are made without prejudice and purely from the point of view of the Waste Collection Authority. They are intended to help create an environment that functions safely and efficiently for waste management; and reduce the negative impacts of bin blight on the neighbourhood. Addressing these 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 operator of the hotel and the Authority for the life of the development.

Waste storage and presentation:

This application relates to refurbishment of The George Hotel building which is proposed to have 90+ bedrooms, reception, gym, conference room, bar and dining area, etc

The application form in the section relating to waste management references the Design and Access Statement submitted with the application. The DAS includes the following sections: -

3.4 TRANSPORT ASSESSMENT
General servicing, refuse collection and deliveries at the hotel will be undertaken via Railway Street and the train station car park on the western boundary of the site. The timings of deliveries refuse collection and any other general servicing will be co-ordinated to be primarily undertaken outside of peak hours.

5.12 SAFETY & SECURITY
Bin store is to be located within a building and to be locked to avoid unauthorised access to prevent bins being used for climbing.

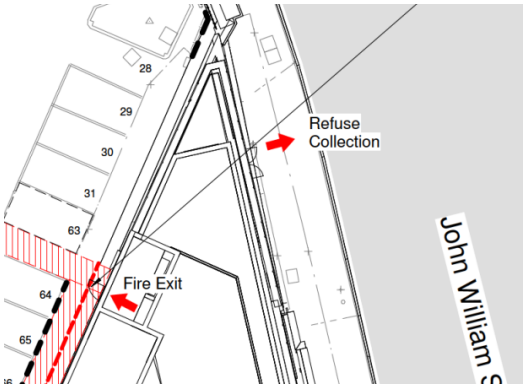
5.17 FIRE
No specific reference to waste storage

4.4 Waste
Waste reduction is a key principle of sustainable development, for this project it is construction waste that must be considered, the successful contractor will be expected to incorporate various techniques to reduce waste.

The site waste management plan will include procedures to sort, reuse and recycle construction waste and will result in various benefits for the project.

The application also includes several plans for the proposed site layout. Plan Ref: Basement - GA Plan - Block A 1176-BOW-ZZ-B1-DR-I-2900 P1 Dated 28/11/22 shows various storage areas / rooms but no details of specific waste storage areas.

The Transport Statement December 2022 includes a plan showing the location for refuse collection.



- Under Section 45 (1) (b) of the Environmental Protection Act 1990 It shall be the duty of each Waste Collection Authority (WCA), if requested by the occupier of premises in its area, to collect any commercial waste from the premises.

  The applicant may choose to use the waste service from Kirklees Council or a private contractor for collection and treatment of wastes arising on the site. Regardless of the contractor used the WCA does want to ensure any new developments have waste storage capacity on site for a range of source separated wastes and to maximise recycling and efficient collection. Appropriate waste storage is vital to prevent escape of waste, odour, or vermin problems. Evidence of a waste collection contract and Controlled Waste Transfer Notes (CWTN's) must be available if requested

  Any producer of controlled waste must ensure compliance with Section 34 Duty of Care etc. as respects waste.

- It is not clear as to the composition or quantity of waste that is expected to be generated on site. The Waste Strategy for England 2018 sets out targets to encourage minimising waste, promoting resource efficiency, and moving towards a circular economy. Implementation of these policies will result in the requirement to source segregate waste to enhance recycling and recovery. This will not increase the volume of waste overall but will require storage capacity for additional containers e.g., food waste from the kitchen area, glass / plastic containers and packaging in addition to residual wastes.

The ADEPT document MAKING SPACE FOR WASTE, Designing Waste Management in New Developments, A Practical Guide for Developers and Local Authorities dated 2010 provides some indicative figures for waste generation

Table 4.1 – Typical Provision for Waste Storage Capacity in Commercial Developments

Typical Provision for Waste Storage Capacity in Commercial Developments	
Development type	Litres of waste storage for every 1,000m_ gross floor space
Offices	2,600
Retail	5,000
Restaurants and fast-food outlets	10,000
Hotels	7,500

- These figures may not represent current projected waste arisings and the proposed operator Radisson Hotels are likely to have more detailed data from waste generation at other hotels they run. Details on likely waste generation are required. This data can then be used to calculate waste storage capacity/ number of waste containers required, whether wheeliebins or skips. Waste containers will be split between general residual, recyclate and potentially separate food wastes containers. The number of waste containers/ storage could be reduced with an increased frequency from weekly collections

- The overall waste storage capacity / storage volume and location within the building must be detailed.

- 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.

- Waste storage presents a fire risk. When undertaking a fire risk assessment for the premises the location of the bin store should be carefully considered and the store may need relocating away from the adjacent premises. The construction specification for the store should follow BS5906:2005, Building Regs 2010 Part H6 and CFPA-E Guideline No 7:2022 F.

- Additional information is required detailing design of the waste storage including storage capacity, screening, surfacing and security.

- The route between the store and bin collection point needs to be a hard smooth surface (not cobbles), have a drop kerb or absence of steps and a maximum gradient of 1:12. Guidance indicates that the maximum drag out distance for a full 1100ltr wheeliebin should be in the region of 15m.

- Storage of waste containers on the pavement or highway adjacent on John William Street is unacceptable.

Refuse Collection Vehicle access:

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.

- Suitable site access and manoeuvrability space for a Refuse Collection Vehicle is vital. This obligation will exist in perpetuity on any development and as such will be a critical consideration in the layout of the site.

- John William Street is a busy traffic route and therefore additional details are required about the access to the waste store or Bin Collection Point and how this will be serviced via an RCV, FEL or skip wagon. Unless active measures are taken parked vehicles may prevent collection or cause collection vehicles to block the carriageway. Any proposals should consider the potential impact on pedestrians and motorists when waste collection is occurring at the site.

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)

Waste policy context:

- 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".
- 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 which can be found at https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx