

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

**2023/90531 Highgate Beds Ltd, Bretton Street, Savile Town, Dewsbury, WF12 9DB**

**Demolition of existing warehouse building and erection of mixed use retail warehouse (Use Class B8), showroom (Ea) and office (B2)**

**Date Responded: 12/04/2023.**

**Responding Officer: Mike Hibbert**

**Responding Ref: WPN 23-015**

## **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; Addressing these will also enable the proposal to better meet the policy requirements of LP43 and the Kirklees Highway Design Guide SPD in respect of waste collection and management.

The application is for the demolition of existing structures and site clearance prior to construction of a retail warehouse, showroom and office.

The application form, in the Waste Storage and Collection section, does not include details of waste storage and collection arrangements. Proposed Site Plan Drawing No 003 Rev J dated 7/12/22 is not annotated with information about waste storage locations.

The Waste Collection Authority does not have a legal Duty to collect Commercial and Industrial wastes from the proposed premises unless requested to do so, in which case this would be a chargeable service. Alternatively, the applicant may use private sector waste contractor(s). Regardless of the contractor used to provide waste services on this development the WCA would wish to see adequate access to the site for RCV's, REL's, FEL's or skip wagons to enable waste collection.

Any producer of controlled waste must ensure compliance with Section 34 Duty of Care etc. as respects waste to prevent escape of waste, litter, odour or vermin problems. Evidence of a waste collection contract and Controlled Waste Transfer Notes (CWTN's) must be available if requested.

### **Waste storage and presentation:**

- With limited information included in the application it is therefore difficult to predict likely waste generation and therefore waste storage capacity required. As the applicant has an existing operational facility, waste arisings data should be available and there will be existing provision for waste collection generated from the site. If not using skips, the drag out distance for wheeliebins from a Bin store/ premises to the collection vehicle should preferably be under 15m. Any waste storage area should be secure to prevent theft, unauthorised use/ fly tipping, arson or rough sleeping.
- Waste storage presents a fire risk. Any skip/ wheeliebin storage location should be carefully considered when undertaking a fire risk assessment and may need relocating away from buildings.

- In line with Government's OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND and the requirement for waste producers to comply with Regulation 12 of The Waste (England and Wales) Regulations 2011 there should be separate provision for recyclates and residual wastes. Waste storage should be identified on site either internally or on the service yard to accommodate general waste and packaging/ cardboard skips. As the facility includes a canteen/ employee rest area then there should be thought to arranging separate collection of food waste and Dry Mixed Recyclables.
- Any waste storage compounds should be large enough to accommodate the waste being stored and constructed with an impermeable floor surface. Specification and guidance can be found in the [Waste Management Design Guide for New Developments \(kirklees.gov.uk\)](https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx)
- In compliance with the waste hierarchy the WCA would encourage reuse or recycling of demolition materials within the construction project.

**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-policy/adopted-supplementary-planning-documents.aspx) (available on the Planning advice notes page at: <https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx>)**

Waste 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 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>