

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

2023/91116 Land off, Primrose Lane, Hightown, Liversedge, WF15

Erection of 67 dwellings

Date Responded: 24/05/23.

Responding Officer: Mike Hibbert

Responding Ref: WPN 23 -022

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 applicant has submitted Refuse Plan - 3416-1-110 Rev F dated 31/3/2023 that is annotated to show the location of Bin Collection Points (BCP) in purple, combined BCP's/ Bin stores in purple/ blue, individual bin stores at properties in blue and bin presentation points in green. It is welcomed that the scheme includes a loop road enabling access to most of the proposed properties on the development.

- The plan shows provision on each individual plot (apart from apartment blocks) of bin storage at the rear of properties. The storage area footprint is approximately 2.2m x 1.6m that is large enough to accommodate for 3x240 ltrs wheeliebins.
- Access gates from rear gardens must be wide enough for bins to pass through (shown as approximately 900mm on the plan that is acceptable) and space available to navigate around parked cars in driveways.
- On collection day the residents would need to transfer bins to a presentation point close to the adopted highway and not left on the footway. The location of bin stores and presentation points are shown on the plan, and these arrangements are in compliance with guidance.
- Plot 1 is located off the adopted highway. But a BCP is shown within 25m on the access driveway for plots 1 and 2.
- The drag distance from Plot 9 to the BCP is approximately 35m that is in excess of the distance specified in guidance (max 25m). The drag distance from the Bin store to the BCP on the adopted highway is approximately 19m that is in excess 8m (for 240ltr bins). **Reversing RCV's is a recognised safety hazard and WISH guidance**

specifies a maximum reverse distance of 12m. Without provision of a turning head the reverse distance from the loop road to Plot 7 is approximately 35m that is not acceptable.

- Plots 10-15 and 16-21 consist of 6 apartments in three storey buildings. Bin storage areas are shown adjacent to the parking areas for block 10-15 and at the rear (but with access to the highway) for block 16-21. Bin stores currently are shown as 2.5m and 4m from buildings. No details are provided about the construction specification or screening of the bin stores.
- Waste arisings from 6 apartments will be approximately 1080ltrs. This could be serviced either by each apartment having 2 wheeliebins (1x residual and 1x recycle), so 12 bins in total, or provisional of a communal store consisting of 2x1100ltrs wheeliebins with preferably spare for a third bin to accommodate garden waste or glass.
- Guidance indicates the floor space for 1100ltrs wheeliebins is 1575mmx1190mm with space required to manoeuvre the bins within the store. The footprint for storage of wheeliebins is detailed in the Design guide.
- The communal waste storage area should be secure to prevent unauthorised use, damage or theft. The gates to the communal store should be secured but enable access by residents and collection staff. The gates need to be wide enough to enable a wheeliebin to pass through.
- The store should have walls/ fencing slightly higher than the bins and open access to allow users to see into the store before entering. The base of the store must 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.
- Access from the bin store to the highway/ RCV collection point should be less than 10m and have a smooth surface with a gradient no more than 1:12. A drop kerb should be installed if there is a change of levels from the access path to the highway. The location of the bin store for block 10-15 may mean access is impeded by parked cars between the store and highway. Consideration should be given to relocating the bin stores closer to the highway. If individual bins are provided householders would need to present bins at a BCP on collection day.
- Storage should address the fire risk issues presented by large quantities of waste. For communal stores they should be located either 6m away from the building or be constructed of suitable material to contain and prevent the spread of fire. See BS5906:2005, Building Regs 2010 Part H6 and CFPA-E Guideline No 7:2022 F.
- Consideration must be given to the process of waste collection for properties that are occupied before the whole site is complete. Temporary measures may be required to allow waste to be stored/presented at an accessible location adjacent to the nearest adopted highway. The Authority will not enter construction sites for the purpose of

waste collection. If the application is approved, the following condition is requested to cover any phased occupation of the site:

“Where implementation of the development hereby approved is to be phased, and/or any of the dwellings hereby approved are to become occupied prior to the completion of the development, details of temporary arrangements for the storage and collection of wastes from those residential units, and details of temporary arrangements for the management of waste collection points, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of those residential units. The temporary arrangements so approved shall be implemented prior to first occupation of those residential units and shall be so retained thereafter for the duration of the construction works unless otherwise agreed in writing by the Local Planning Authority.”

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 in the layout of the site if outline/full approval is granted.
- Refuse collection vehicles RCV’s will not routinely enter private drives unless they are constructed to adoptable standards.
- Where turning is necessary, the turning facilities must be demonstrably sufficient for an 11.22m refuse collection vehicle and opportunities for parking in the turning areas must be designed out. Swept path analysis must show the manoeuvrability of this vehicle throughout the site, demonstrating the safe passing of other vehicles likely to be using the road – either parked or moving.
- On sites such as this, waste storage and collection can require careful consideration and the identification of space within the site layout is critical. As such, the details of these arrangements must not be left to Planning conditions

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 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”.
- 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>