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

2023/91300 Newsome Mills, Hart Street, Newsome, Huddersfield, HD4 6JF

Redevelopment, consisting of the alteration, extension, and part demolition of Grade II listed Newsome Mills complex to host 45 apartments and erection of 33 dwellings, with associated works (Listed Building)

Date Responded: 14/06/2023.
Responding Officer: Mike Hibbert
Responding Ref: WPS 23- 029

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 residents and the Authority for the life of the development.

The proposed development is for 45 apartments in two blocks and erection of 33 dwellings in four terraces.

The applicant has submitted Bin Strategy Site Plan Drawing Ref Drg NSM - TRI - ZZ - ZZ - DR - A – 3020 Rev P04 dated 28.04.23.

Waste storage and presentation:

- It is welcomed that the layout plan shows all dwellings have bin storage.

- The drawing shows provision on each individual plot (other than apartments) for bin storage at the rear of properties for 3x 240ltrs wheeliebins. The storage area footprint is approximately 2.1m x 1.0m that is within design guide dimensions. Bin storage should avoid the need to keep bins under windows/close to doors.

- As the proposed dwellings have private gardens, opportunities to encourage composting should be sought to better meet the Council's 'clean and green' objectives for waste reduction.

- Access gates from rear gardens must be wide enough for bins to pass through.

- 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. It is important to ensure that bins do not cause obstruction to pedestrians or other highways users when presented for collection, particularly where space requires these to be left in clusters. Bin presentation space should be on a hard surface and where a refuse collection vehicle (RCV) can be easily reached. The location of Bin Collection Point 1 (6 bins), Collection Point 2 (10 bins), Collection Point 3 (4 bins), Collection Point 4 (8 bins), Collection Point 5 (3 bins) and Collection Point 6 (3 bins) are shown on the plan. All the stores are

within the recommended maximum drag distance of 25m and have sufficient storage space for the number of properties. Pathways to Bin Collection Points (BCP's) must be wide enough to accommodate bins.

- Plots 1b, 9b and 17a are flats and have provision of two bins (residual and recycling) as they do not have gardens. The location of the bins at the bottom of the staircases to the flats is inappropriate due to fire risk.

- The apartments are provided with separate bin stores adjacent to the blocks: -

BIN STORE 1				
Waste Type	Bin Size (litres)	Quantity	Dwellings Served	Volume/ Dwelling (litres)
General	1100	2	8	275
Recycling	1100	2	8	275

BIN STORE 2				
Waste Type	Bin Size (litres)	Quantity	Dwellings Served	Volume/ Dwelling (litres)
General	1100	8	37	178
Recycling	1100	8	37	178

The size, number of bins and total storage capacity are appropriate for the number of dwellings serviced and are within the 30m walk distance as specified in guidance.

- The site plan shows the location of the communal bin stores under windows within the building, these should relocated.

- Storage should address the fire risk issues presented by large quantities of waste – it must be 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.

- The communal waste storage area should be secure to prevent unauthorised use, damage or theft. The doors to the communal store should be secured but enable access by residents and collection staff. The external doors 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 that 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.

- If properties are to be occupied before the site construction is complete, provision must be made for temporary waste collection in consultation with the Council's waste teams to ensure that new residents can receive a collection service whilst construction work on the site is still live. RCVs will not enter a construction site. Therefore, the following condition is recommended to cover this:

"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 (RCV) 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 approval is granted.

- Refuse collection vehicles RCV's will not routinely enter private drives unless they are constructed to adoptable standards. Confirmation is sought about construction specifications.

- The plan shows turning heads adjacent to Plot 16 and to the Northwest of apartment blocks. 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. Active measures should be taken to prevent parking in the turning heads as otherwise an RCV would have a long reverse manoeuvre that is a recognised safety risk.

- Reversing causes a disproportionately large number of moving vehicle accidents in the waste/recycling industry. Injuries to collection workers or members of the public by moving collection vehicles are invariably severe or fatal. Waste Industry Safety and Health Forum (WISH) and BS 5906: 2005 recommends a maximum reversing distance of 12 m longer distances can be considered, but any reversing routes should be straight and free from obstacles or visual obstructions. **The reversing distances to service Bin Store 1 (38m) and Bin Store 2 (20m) are in excess of the 12m limit.**

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