

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

2023/92448 Former Cooper Bridge Water Treatment Works, Leeds Road, Huddersfield, WF14 0BT

Outline application for erection of B8 industrial unit

Date Responded: 31/08/2023.

Responding Officer: Mike Hibbert

Responding Ref: WPN 23-047

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 redevelopment of the former sewage treatment works (now demolished) and construction of a new warehouse. The WCA welcomes the proposals outlined in the Design and Access statement that on-site material will be used for site preparations where possible and that imported material, if required, will be secondary recycled aggregate in preference to natural aggregates. It is also noted that contractors will be required to implement and monitor a Site Waste Management Plan (SWMP) to promote segregation and recycling of wastes resulting from construction.

The Waste Collection Authority does not have a legal Duty to collect Commercial or Industrial wastes from the proposed warehouse premises unless requested to do so, in which case this would be a chargeable service. Alternatively, tenants on the site 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:

- The application form does not include any details on waste storage within the proposed development and no locations for waste storage are identified on Site Plan No2001 dated June 2023.
- With limited information included in the application it is difficult to predict likely waste generation and therefore waste storage capacity required. As the applicant has two existing warehouses in Ravensthorpe and Bradford in addition to the manufacturing site next to the proposed development waste arisings data should be available and there will be existing provision for waste generated at those sites. 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 within the warehouse or on the service yard to accommodate general waste and packaging/ cardboard skips, etc.
- 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)

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.

- As the site is designed to enable access by articulated trucks the road layout into and within the site should be able to accommodate RCV's, FEL's or skip wagons.

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-applications/guidance-and-advice-notes.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>