

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

2023/92490 Former Dowker Works, Dowker Street, Milnsbridge, Huddersfield, HD3 4JX

Erection of 38 dwellings with associated access and landscaping (within a Conservation Area)

Date Responded: 25/09/2023.

Responding Officer: Mike Hibbert

Responding Ref: WPS 23-050

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 development will entail a total of fourteen houses, six 2 bed 3- person houses, two 2 bed 4-person houses, four 3 bed 4-person houses and two 3 bed 5-person houses each with a private garden per housing unit. The development will also entail a total of 24 flats, 16 1 bed 2-person flats and 8 2 bed 3-person flats.

The applicant has submitted Waste Management Plan Dwg DS-BTP-00-SP-DR-A-4016_107.1 Rev 1 dated 24.08.23, Proposed Site Plan Dwg DS-BTP-00-SP-DR-A-4016_105.1 Rev 1 dated 11.08.23 and Boundary Treatment Plan DS-BTP-00-ZZ-DR-A-4016_106.1 dated 11.08.23. These plans show the location of bin storage, communal bin stores and Bin Collection Points (BCP's). The boundary finish of the bin stores (shown as a Pink Line) consists of 2.1m high reconstituted stone wall.

The Design and Access document for Dowker Street, Milnsbridge, Huddersfield, HD3 4JX dated July 2023 states "For flats, a bin store is located adjacent to each entrance of the access road. The bin store has been designed with smooth continuous surfaces for easy horizontal movement. Each apartment will have space to segregate waste, residents will take their sorted household waste and recycling to the bin store. The building management team will arrange for bins to be relocated to a temporary position on bin collection day for easy collection by the local council. The bins will then be relocated back to the bin store for residents to use."

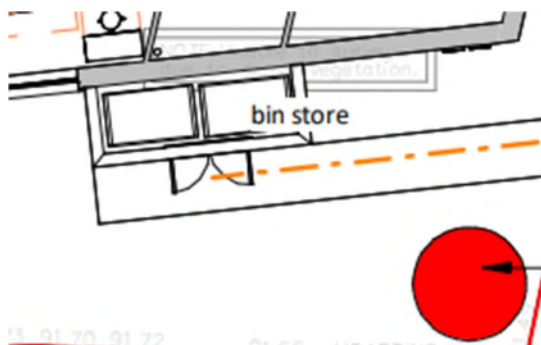
Waste storage and presentation:

- It is welcomed that Plots 7 to 16 and 35 to 38 are provided with storage space for 3x 240ltrs wheeliebins in the rear gardens of properties. Pathways and gates appear to be wide enough for 240ltrs wheeliebins to pass through. No details are shown as to the location of Bin Collection Points (BCP's) for these properties. The route from the bin store to the highway for Plot 8 is convoluted but this arrangement is preferable to storage at the front of the property.

- A communal bin store (No1) and a BCP for Plots 1-6, consisting of 2x1100ltrs wheeliebins, is shown adjacent to Armitage Road. Location of the gate is such that both bins must be removed to be able to get the back bin out the store.
- A communal bin store (No2) and a BCP for Plots 18 to 21 consisting of 4x1100ltrs wheeliebins, is shown adjacent to the internal access road.
- A communal bin store (No3) and a BCP for Plots 29 to 34 consisting of 4x1100ltrs wheeliebins, is shown to the south of Plots 35 and 36 and adjacent to the internal access road. The access route between Store 3 and the BCP appears to require traversing the car parking place for Plot 25.
- A communal bin store (No4) and a BCP for Plots 23 to 28 consisting of 2x1100ltrs wheeliebins, is shown close to the junction of Dowker Street and George Street. The bins are contained in a purpose design store.



From the plan it appears that wheeliebins cannot be removed individually from the store due to configuration of the door alignment.



- The wheeliebins on the plans appear to have dimensions of 1600mm x 950mm. Guidance indicates the floor space for a 1100ltrs wheeliebin is 1575mmx1190mm with space to manoeuvre the bins within the store. Bin store dimensions depend on

configuration within the store. The bin stores appear to be large enough to accommodate the bins however the width of the access gate to the stores are approximately 850mm that is too narrow for a wheeliebin to pass through. Location of the gates in some cases is such that a number of bins must be removed to be able to get the back bin out the store. The bin storage area and access routes to the Bin Collection Point (BCP) should 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. To facilitate loading of full wheeliebins the surface between the bin store and BCP/ highway should be smooth hard surface without kerbs.

- Bin store presents a fire risk. Guidance indicates communal bin stores should be 6m from buildings unless designed to comply with fire regulations (refer to BS 5906:2005 Waste Management in Buildings; Building Regs 2010 Part H6 and CFPA-E Guideline No 7:2022 F).
- 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.

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 notes that the applicant in the Access and Design document states “A turning head is provided to allow an 11m bin wagon to enter the site and collect residents’ waste from a bin collection point. “

The WCA has a strong preference for looped road designs in developments and therefore welcomes the access road from George Street through to Dowker Street.

- Suitable site access and manoeuvrability space for a large 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, manoeuvrability must be demonstrated from the outset.
- The WCA will not routinely take a Refuse Collection Vehicle into a private drive unless constructed to an adoptable standard.
- Parked cars are a perpetual problem for RCV access and as such it is important to account for potential parking spaces, even where these are undefined when assessing RCV access around the site.

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.”

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. Local plan Policy LP15 – residential use in town centres part h: provision of refuse storage and collection.
4. 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.
5. Further advice and full guidance is contained in the [Kirklees Waste Management Design Guide 2020](https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx) (found at <https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx>) and the [Kirklees Highway Design Guide SPD](https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx) found at <https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx>