

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

2023/93031 Wappy Springs Inn, Lindley Moor Road, Lindley Moor, Huddersfield, HD3 3TD

Erection of mixed industrial development (Use Classes E(g)(i, ii, iii), B2 and B8); including demolition of existing structures, new yard, parking, landscaping, drainage features and ancillary structures

Date Responded:16/11/2023.

Responding Officer: Mike Hibbert

Responding Ref: WPS 23-060

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 a proposed business “Nano Park” development on the site of the former Wappy Spring Inn, Lindley Moor Road, Huddersfield.

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:

The section on Waste Storage and Collection in the application form states, “Internal bin storage in segregated streams”. No storage or loading locations appear to be shown on the Plan ref Job Number 22078 Plan number 2002 rev A dated 08/12/22.

- With limited information included in the application on the likely tenants, it is difficult to predict likely waste generation and therefore the waste storage capacity required. As the applicant has a similar Nano Park at Newhall, Bradford some baseline waste arisings data may be available.
- 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. It is noted this is stated in the application form.

- Any waste storage compounds/ areas 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)
- The drag out distance for wheeliebins from a Bin store/ premises to the collection vehicle should preferably be under 15m. The waste storage areas should be secure to prevent theft, unauthorised use/ fly tipping, arson or rough sleeping.
- Waste storage presents a fire risk and should be carefully considered when undertaking a fire risk assessment, If there is a waste storage compound external to the buildings it should be more than the 6m from properties as specified in guidance.

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.

- Suitable site access and manoeuvrability space for a Refuse Collection Vehicle is vital enable collection of waste. This obligation will exist in perpetuity on any development and as such will be a critical consideration. As the site is designed for deliveries to the units by commercial vehicles it is not envisaged that access will be a significant issue.
- Where turning is necessary, the turning facilities must be demonstrably sufficient for a refuse collection vehicle. 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 access – either parked or moving.

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:

- 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 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>