

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

2023/93113 30, Market Street, Huddersfield, HD1 2HG

Change of use and alterations to form student living accommodation with ancillary concierge and communal facilities including roof extension and roof terrace

Date Responded: 12/02/2024.

Responding Officer: Mike Hibbert

Responding Ref: WPS 23-076

## NOTES/COMMENTS:

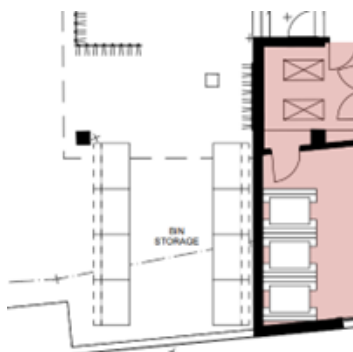
The following comments are made without prejudice and purely from the point of view of the Waste Collection Authority. They are intended to help create an environment that functions safely and efficiently for waste management; and reduce the negative impacts of bin blight on the neighbourhood. Addressing 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 scheme consists of conversion of the existing office building into 107 student apartments. The scheme will include a new concierge entrance.

The applicant has submitted Drawing Market Street, Huddersfield Ground Floor Plan as Proposed NTL-PL-006 dated 29/09/2023.

Page 16 of the planning statement details the proposals in relation to waste management: -  
“Waste Management and Servicing Bin and recycling storage will be provided in a purpose designed store capable of accommodating euro bins to serve the operational needs of the development. Residents will have access to separate bins for the storage of refuse and recyclable materials. Waste collections will take place as existing from the external yard which is accessed from Threadneedle Street which is of sufficient width and length to accommodate a refuse vehicle. The waste and recycling store is proposed to be emptied weekly. Visually the storage of bins within an allocated area in the yard avoids a requirement to store bins at the front of the building and the associated negative impact this would have on the town centre. The proposed servicing arrangements will ensure the efficient operation of the development.”

The layout drawing shows the location of a Refuse store on ground level at the Southern end of the service yard at the rear of the building.



- Section 45 (1)(a) of the Environmental Protection Act 1990 imposes a duty on the Waste Collection Authority to arrange for the collection of household waste in its area.”. The WCA would wish to ensure there is sufficient waste storage capacity on site, appropriate access, and that efficient waste collection can be achieved.
- It is welcomed that storage or presentation of wheeliebins will not take place on the pavement or roadway in Market Street with the proposal is for waste storage and collection via Threadneedle Street.
- For 107 apartments the recommended waste storage provision is between 10,700 ltrs (107X100 ltrs) and 19,260 ltrs (107X180 litres) for both residual and recycling bins. Appropriate waste storage provision would be 20 x 1100ltrs wheeliebins (10x Recycling and 10 x residual). It may be unrealistic to store this number of bins and provision of a compactor skip, or large containers maybe more appropriate. The applicant may have baseline data from other similar developments that can be used to refine the likely waste arisings.
- The waste store is shown as containing eight bins of approximately 1350mm x 1070mm. Guidance indicates the floor space for a 1100ltr wheeliebins is 1575mmx1190mm with space to manoeuvre the bins within the store. Additional information is required detailing waste storage, containers, capacity and design of the waste storage compound including, screening, surfacing and security. Appropriate standards are detailed in the Kirklees Waste Management Design Guide 2020. Bin store surfaces should be durable and waterproof enough to withstand heavy duty cleaning such as power washing.
- If sufficient waste storage cannot be accommodated, then there may need to be a review of the configuration of residual and recycling provision/ containers or the management company for the development could consider more frequent collections (e.g., weekly as proposed in the application or more regular) on an additional paid for basis.
- It is not clear if the Concierge service will be responsible for collecting waste from students and transfer to the bin store or if students will deliver their own waste. The walk distance from the entrance points of the block to proposed bin store(s) should be no more than the 30m as specified in guidance BS5906:2005.
- The retail space at the front of the building on the ground floor is to remain as a commercial unit. Waste Storage and collection provision for waste arising from commercial operations needs to be included. Commercial waste must not be co-mixed with Household waste.
- Bin storage 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 CFWA-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:**

Access is from Threadneedle Street to a bin store located in the service yard.

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 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.
- The location of BCP's for communal bin stores should minimise the need to reverse RCV's more than 12m as this is a recognised safety risk.
- It is noted that the bin store area is located through an archway. This will impose a height restriction for an RCV (RCV standard height 3584mm skip wagons and FEL's and RoRo skips are higher). There is also a traffic control barrier that would prevent RCV access. On this basis it will be necessary to move wheeliebins from the bin store to a Bin Collection Point (BCP) within the curtilage, adjacent to but not on the pavement or highway. The drag out distance of 20m is in excess the 10m specified in guidance.
- Relocation of the bin store to the area shown on the plan as staff carparking would be preferable for RCV access but would require screening including from above.
- 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 to the site.

If the application is approved, it is recommended that the following condition, or similar, is applied:

**“Before development commences, details of the management and maintenance of communal refuse storage areas by a designated private management company shall be submitted to and approved by the Local Planning Authority. The approved details shall be provided before first occupation and shall be so retained thereafter”.**

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>

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”.
- Local plan Policy LP15 – residential use in town centres part h: provision of refuse storage and collection.
- 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>