Consultation Response from Mike Hibbert, KC Waste Strategy(Refuse & Recycling)
2023/93350 former Deighton Centre, Deighton Road, Deighton, Huddersfield, HD2 1JP
Development of former Deighton Centre (previously Deighton High School) comprising Social Emotional and Mental Health School (use class F1) comprising single and two storey educational buildings; roof mounted photo-voltaic panels; sensory garden spaces; multi-use games areas; landscaping; hardstanding areas; carparking; access with secure fencing and ancillary development
Date Responded: 13/12/2023. Responding Officer: Mike Hibbert Responding Ref: WPS 23-063

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 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 facility managers and the Authority for the life of the development.

The proposal is for construction of the new school building and provision of waste storage facilities to service the new site.

In compliance with the waste hierarchy the WCA would encourage reuse or recycling of demolition materials within the construction project.

Details of the new building are shown on Dwg L-2352-GAP-1000 Rev 31 Dated 21.09.23.

Wastes from premises forming part of a university, school or other educational establishment are classified as Household Waste for which the WCA has a duty to collect but would make collection and disposal charges for that service. The WCA currently collects 3x1100ltrs wheeliebins fortnightly from the site.

Waste generated on site is likely to consist primarily of arisings from catering, refreshments/ drinks and general municipal type wastes with less frequent collections of clinical/ sanitary wastes. Provision should be made for storage of wastes arising on site, preferably with separate containers for residual and recyclates e.g., paper/cardboard and glass. On this basis the bin store should be large enough to accommodate additional wheeliebins.

- The proposed bin store on the plan is located to the north of the car parking area. The bin store on the plan is approximately 4.3mx 6.2m. Guidance indicates the floor space for 1100ltrs wheeliebins is 1575mmx1190mm with space required to manoeuvre the bins within the store. On this basis the store should be large enough to accommodate the number of bins required. The store has a gate opening of 2m that is sufficient.

- The waste storage area should be secure to prevent unauthorised use, damage or theft. The doors to the bin store should be secured but enable access by facilities management and collection staff. Collection staff will require details of a keypad code if used to secure the store.

- The store should have walls/ fencing slightly higher than the bins (approximately 2.4m as shown on the plan) 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. Additional information is required detailing design of the waste storage compound including storage capacity, screening, surfacing and security.

- Waste storage presents a fire risk. Any wheeliebin storage location should be carefully considered when undertaking a fire risk assessment and may need relocating away from buildings. Guidance indicates the store 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 Plan show the store to be in excess of 6m from the main campus building.

- The route between the store and bin collection point needs to be a hard smooth surface. This appears to slab paving on the plan. The drag out distance for wheeliebins from a Bin store to the collection vehicle should preferably be under 10m and from the proposed plan this does appear to be acceptable. There should be a drop kerb between the pavement and highway.

- As the proposal includes allotment gardens/ raised beds, opportunities to encourage composting should be sought to better meet the Council's 'clean and green' objectives for waste reduction.

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 Waste Collection Vehicles is vital to collect waste from properties. This obligation will exist in perpetuity on any development and as such will be a critical consideration. Confirmation is sought that access roads will be constructed to adoptable standards or a specification appropriate for access by RCV's

- **Reversing of Refuse Collection Vehicles (RCV's) is a recognised safety risk. Injuries to collection workers or members of the public by moving collection vehicles are invariably severe or fatal. This should be a key consideration in a school environment and therefore the need for reversing to access the bin store should avoided.**

- Where turning is necessary, the turning facilities must be demonstrably sufficient for an 11.22m refuse collection vehicle. Confirmation is sought that the turning area is of sufficient size to accommodate an RCV.

- 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 road – either parked or moving.

- 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.

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 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