

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

2023/93495 Land rear of, Yorkshire House, South Street, Dewsbury, WF13 1JT

Erection of hotel (within a Conservation Area)

Date Responded:10/07/2024.

Responding Officer: Mike Hibbert

Responding Ref: WPN 24-014

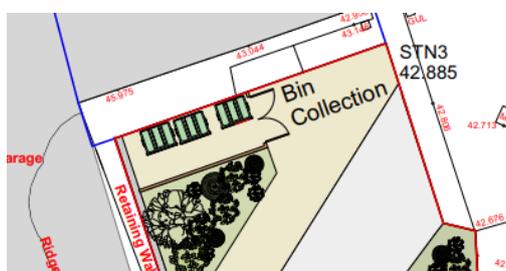
NOTES/COMMENTS:

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 operator of the hotel and the Authority for the life of the development.

This application relates to erection of a 33-room hotel.

Waste storage and presentation:

- The applicant has submitted Site Plan and Elevations As proposed Drawing No 21-055-50B dated 05/06/24 that shows the bin store located adjacent to the access road at the northern end of the site.



- Under Section 45 (1) (b) of the Environmental Protection Act 1990 It shall be the duty of each Waste Collection Authority (WCA), if requested by the occupier of premises in its area, to collect any commercial waste from the premises.

The applicant may choose to use the waste service from Kirklees Council or a private contractor for collection and treatment of wastes arising on the site. Regardless of the contractor used the WCA does want to ensure any new developments have waste storage capacity on site for a range of source separated wastes and to maximise recycling and efficient collection. Appropriate waste storage is vital to prevent escape of waste, odour, or vermin problems. Evidence of a waste collection contract and Controlled Waste Transfer Notes (CWTN's) must be available if requested

Any producer of controlled waste must ensure compliance with Section 34 Duty of Care etc. as respects waste.

It is not clear as to the composition or quantity of waste that is expected to be generated on site. The Waste Strategy for England 2018 sets out targets to encourage minimising waste, promoting resource efficiency, and moving towards a circular economy. The requirements to source segregate recycle and residual wastes will be implemented by Simpler Recycling legislation when it is enacted.

- The bin store is shown on the plan has dimensions of 4.85m by 2.05m with a gate opening of 1.84m. There are three wheeliebins shown in the store (approximately 1210mm x 830mm). Current Wheeliebin sizes are for 660 ltrs 1360x770 (floor space 1560x970) and for 1100ltrs 1375x990 (floor space 1575x1190). The overall bin store size is potentially adequate to accommodate the waste generated on site particularly if the frequency of collection is weekly.
- 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.
- Waste storage presents a fire risk. When undertaking a fire risk assessment for the premises the location of the bin store should be carefully considered and the store may need relocating away from the adjacent premises. The construction specification for the store should follow BS5906:2005, Building Regs 2010 Part H6 and CFPA-E Guideline No 7:2022 F.
- Additional information is required detailing design of the waste storage compound including screening, surfacing and security.
- The route between the store and bin collection point needs to be a hard smooth surface), have a drop kerb or absence of steps and a maximum gradient of 1:12. Guidance indicates that the maximum drag out distance for a full 1100ltr wheeliebin should be in the region of 15m. Compliance with this drag out limit should be should achievable on this site.

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. This obligation will exist in perpetuity on any development and as such will be a critical consideration in the layout of the site.
- School Street has a One Way/ uni-directional traffic flow. Unless active measures are taken parked vehicles may prevent collection or cause collection vehicles to block the carriageway. It is not clear if the intention is for an RCV to reverse into the site from School Street to the bin store. Reversing of RCV's presents an established health and

safety risk. Any proposals should consider the potential impact on pedestrians and motorists when waste collection is occurring at the site.

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 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 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](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>