

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

2023/93539 Land adj, Ledgard Bridge Mill, Back Station Road, Mirfield, WF14 8NZ

Outline application, including the considerations of access appearance, layout, and scale, for the erection of a six-storey building to host 76 residential apartments (C3 use) and ancillary works comprising demolition of vacant building, formation of new access, parking areas, open space and landscaping; erection of cycle and bin refuse storage structures

Date Responded: 03//1/2024

Responding Officer: Mike Hibbert

Responding Ref: WPN 23-065

NOTES/COMMENTS:

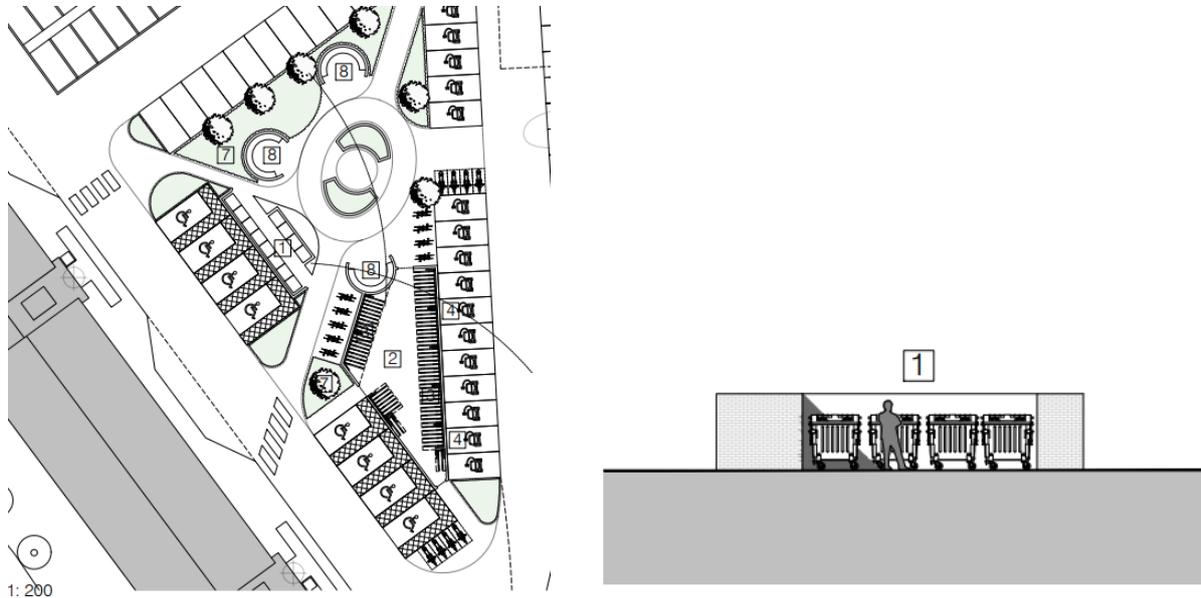
The following comments are made without prejudice and purely from the point of view of the Waste Collection Authority.

To meet the operational requirements of the Authority the following issues need to be addressed. Solving these will help create an environment that functions safely and efficiently for waste management; and reduce the negative impacts of bin blight on the neighbourhood. This 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.

Waste storage and presentation:

- The application includes Planning Policy Supporting Statement – Phase II Former Ledgard Bridge Mills, Back Station Road, Mirfield, WF14 8NZ – (Revised) dated 5/12/2023 that states “Servicing and Waste Collection Delivery and refuse collection vehicles will be able to access the development via the existing site access. The proposed bin store is located towards the southern end of the courtyard car park and vehicles will be able to drive through the site to reach this point in a forward gear, before then continuing via a loop arrangement and egressing the site in a forward gear. Swept paths are provided in the accompany Transport Statement. The bin store is located less than 30 metres away from the building entrances in the central hub area. Replacement refuse bin stores are also proposed for the existing development, and these will be located to the south of Ledgard Bridge Mill, also under 30 metres away from the building entrances. The existing development has 18 x 1,100 Litre Eurobins. These are currently situated near the vehicular access and are proposed to be re-located to the location shown on the proposed layout plan. The proposed development of 76 apartments proposes 12 1100l Eurobins. These are shown on the plans in the central hub area. Other information requested Swept path analysis is provided within the Transport Assessment at Appendix BGH 15.”
- The location of the new and relocated bin stores are shown on Dwg Title (17001)2_Site Plan Rev F Dated December 2023 and Dwg Title (17001)13_Landscape Hub Rev A Dated Nov 23 Car Park Hub 1_ Refuse/recycling store. The landscape drawing is annotated with the detail of Brickwork enclosure with returns. The stores are <30m from building entrances (indicated with dotted

line). It is welcomed the applicant has arranged the location of the bin stores to comply with guidance in The Kirklees Waste Management Design Guide, BS5906:2005 and Building Regulations 2010 Part H6 that require that residents should not be expected to carry waste more than 30m to a shared storage facility.



Bin stores for new development

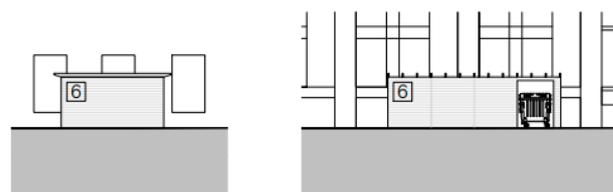
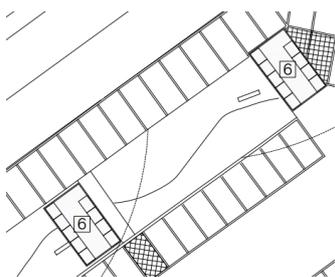
- Guidance indicates that for 76 apartments the recommended waste storage provision is approximately 13,680ltrs (76X180 ltrs) for both residual and recycling bins covering an alternate weekly collection cycle. Current collection provision for the existing block is 18 x1100ltrs wheeliebins servicing 119 apartments. Using this existing data then the proposed store containing 12x 1100ltrs wheeliebins for the new block should be adequate. Consideration will have to be given to separate bins for recycle and residual wastes plus some storage provision should be included for separate collection of food waste to ensure compliance with forthcoming Government Simpler Recycling legislation.
- If adequate storage cannot be accommodated on site, then there may need to be a review the of configuration of residual and recycling provision or the management company for the development could consider more frequent collections (e.g., weekly residual) on an additional paid for basis. KC Trade waste staff can arrange to meet on site and discuss potential solutions.
- Guidance indicates the floor space for a 1100ltrs wheelibins is 1575mmx1190mm with space to manoeuvre the bins within the store. The bin stores are screened and are approximately 11.5m and 5.8m long respectively. Using these dimensions, the wheeliebins, eight and four respectively, should just fit in the stores. Bin store surfaces should be durable and waterproof enough to withstand heavy duty cleaning such as power washing.

- The waste stores should be secure to prevent theft, unauthorised use/ fly tipping or rough sleeping. If doors to the bin store are installed or there is use of locks or a keypad to secure access, these details will be required by the collection staff.
- Waste storage should address the fire risk issues presented by large quantities of waste. See BS5906:2005, Building Regs 2010 Part H6 and CFP-A-E Guideline No 7:2022 F. The stores are 6m away from the buildings and constructed of suitable material to contain and prevent the spread of fire.
- The bin storage areas and access routes to the Bin Collection Points (BCP's) 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 should be smooth hard surface. **If not already in the design, drop kerbs should be installed at both pedestrian crossings to enable transfer of wheeliebins from the path to the carpark for loading onto an RCV.** Maximum drag out distance from the bin store to BCP is approximately 10m that is acceptable. The proposed layout must ensure that parked cars do not obstruct the route between the bin store and loading point.
- Ideally the waste stores will be constructed and available for use prior to residents moving in. If this is not the case consideration must be given to the process of waste collection for properties that are occupied before the whole site is complete. Temporary measures may be required to allow waste to be stored/presented at an accessible location. The Authority will not enter construction sites for the purpose of domestic waste collection. A pre-occupation condition will be required to address this and any other outstanding waste collection details.

Revision of bin stores for existing apartments

It is welcomed that the application includes redevelopment and improvement of the existing bin stores. The provision of waste facilities for the existing Ledgard Mill development have not been successful with contamination of recycling containers and considerable amounts of side waste left next to bins. The appropriate use of waste containers has not been aided by the walk distance to one of the bin stores being excessive resulting in heavy use of the nearest store.

The new stores [6] shown on the drawings are within 30m of the building, with screening and better access for an RCV.



Timber Clad Refuse/ Recycling Store Elevations 1: 100

- The floorplans are large enough to accommodate the nine wheeliebins shown in each store.
- It is not clear from the plan how bins will be removed from the Northern store onto the car park. It may be more appropriate to alter the access to the bin store and hatch the nearest parking space or maybe reorientate the store into the hatched parking areas and create a new access point.
- **If not already in the design, drop kerbs should be installed to enable transfer of wheeliebins from the store/ path to the carpark for loading onto an RCV.**

Refuse Collection Vehicle access:

The WCA defers to highways colleagues in relation to swept path analysis of RCV's through the site, but the following points need to be considered.

- Suitable site access and manoeuvrability space for a 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 will be a critical consideration in the layout of the site.
- 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, in the swept path analysis.
- The Authority will not generally take an RCV into roads that are not built to adoptable standards.

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”.
- 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>