

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

2023/93667 Storthes Hall Student Village, Storthes Hall Lane, Kirkburton, Huddersfield, HD8 0WA

Outline application for demolition of buildings and erection of residential development (up to 261 dwellings), redevelopment of Lodge Cottage for residential use and associated works

Date Responded: 10/01/2024.

Responding Officer: Mike Hibbert

Responding Ref: WPS 23-69

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 proposal is for a mix of 261 detached, semi-detached, terraced dwellings and a small apartment block.

The section in the application form relating to waste and recycling states "Please see Site Layout Plan" however neither of the Proposed Site layout plans ref 1826-SI-02 Rev B dated 6/11/23 or SI-03 Rev A dated 6/11/23 show details of the location of bin storage or collection points.

- In compliance with the waste hierarchy the WCA would encourage reuse or recycling of demolition materials within the construction project.
- The Authority will not routinely take a refuse collection vehicle into unadopted roads. It is not clear from the plans if the existing road network particularly between Plots 25 and 205 will be accessible with a RCV as this will impact on the ability to service many dwellings on the site.
- Layout drawings for approval will need to show bin storage and presentation points for all dwellings to demonstrate sufficient space and efficient collection arrangements – these must not cause obstruction to the highway, driveways or be blocked in by cars.
- All dwellings will require space to store 3 x 240ltrs wheeled bins. As the proposed dwellings have private gardens, opportunities to encourage composting should be sought to better meet the Council's 'clean and green' objectives for waste reduction.
- Waste storage to the rear of properties is preferable but must be easily accessible for residents and not reached via convoluted pathways routed across the back of multiple other properties as this discourages residents from returning bins to the rear, resulting in bin blight in the Streetscene. Access gates from rear gardens must be wide enough

for bins to pass through and space available to navigate around parked cars in driveways.

- Details are required about access to the rear of dwellings on the following plots (6&7, 10&11, 14,15,16,19&20 within terraced blocks), 23&24, 29 to 34,35,49,52,55,64, 126,(128 to129,135 to136 within terraced blocks) 133, 162,164,171 to187 (Potential Communal bin store required),(196 to 198, 215 to 221 and 223 & 224 within terraced blocks).
- Terraced properties will need to be carefully considered in terms of waste storage, most likely requiring suitable storage to the front. This must be screened to help reduce the visual impact of bins, to contain any overspill waste from spreading into the street and to help prevent unauthorised use/theft/damage to bins. The specification for bin stores is detailed in the Kirklees Waste Management Design Guide 2020.
- There appear to be nineteen private drives shown on the plans. Shared private drives will require communal Bin Collection Points (BCP's) for wheeliebins. These must be large enough for the number of bins to be collected and be on level, hard surfaces such that grouped bins do not cause obstruction to the highway, drives or pedestrian movement on collection day, and so they are accessible for collection. Details are required for Plots 27 - 34, 89 - 91,125-138,146,153-155,156 -158, 190-191,221-222,231-234,246-47,256-7 and 259- 261.
- The maximum drag out distance by residents, specified in guidance BS5906:2005 and Building Regs, from the curtilage of properties to BCP's is 25m.
- 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 adjacent to the nearest adopted highway. The Authority will not enter construction sites for the purpose of domestic waste collection. A pre-occupation condition will be required to address this.
- On large sites such as this, waste storage and collection can require careful consideration and the identification of space within the site layout is critical. As such, the details of these arrangements should not be left to Planning conditions.

Refuse Collection Vehicle access:

With regards to turning circles and sweep analysis colleagues in Highway Development will be able to provide more informed comments but the following observations should be addressed:

- Suitable site access and manoeuvrability space for a Refuse Collection Vehicle (RCV) 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 if approval is granted.

- Refuse collection vehicles RCV's will not routinely enter private drives. Where the Plan shows shared surface streets/ block paving, confirmation is sought these are adopted/ constructed to adoptable standard.
- **The WCA has a strong preference for looped roads rather than use of turning heads.**
- **There are nine turning heads shown on the layout plans between plot numbers 53-54,93-94,131-132,147-152, 157-159, 193-201,234-238,241-244 and 246-261.** Turning heads have a significant impact on waste collection operations. Where RCV's needs to turn around it is slow/ add to collection time that is a long-term impact on collection efficiency for the lifetime of the property compared to looped roads. Reversing is a recognised safety risk for crews and pedestrians. The waste sector has the second highest fatality rate across UK industry and an accident rate 10X all industry average.
- Park cars in turning heads are frequent. This results in missed collections, damage to vehicles or long reversing manoeuvres from blocked turning heads. The maximum reversing distance laid out in HSE/ WISH guidance for an RCV is 12m.
- Where turning is necessary, the turning facilities must be demonstrably sufficient for an 11.22m refuse collection vehicle. **Active measures should be taken to prevent parking in the turning head as otherwise an RCV would have a long reverse manoeuvre that is a recognised safety risk and is not acceptable.**
- 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 road – either parked or moving.
- Angular road shapes such as that shown in the turning heads and driveways present difficulties for street cleaning and are a common area for litter and dirt to accumulate. This needs to be properly considered.

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](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>