

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

2024/90255 Land Off, Burn Road, Birchencliffe, Huddersfield, HD3 3BT

Reserved matters application, including the considerations of appearance, landscape, layout, and scale for the erection of 26 dwellings pursuant to outline permission 2019/94051 (outline application of up to 39 dwellings and associated works), discharge of conditions 27 (Arboriculture Assessment), 28 (Ecological Assessment), 29 (Public Right of Way)

Date Responded: 05/03/2024.

Responding Officer: Mike Hibbert

Responding Ref: WPS 24- 009

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 26 properties with a mix of detached, semi-detached, and terraced.

The applicant has submitted Plan site layout Dwg No 23109-0301-P05 Dated 11/01/24 that is annotated with the location of Bin Store locations and Bin Collection Points BCP's.

The application also includes a Design and Access statement Residential Development land adjacent to Cliffe Farm, Burn Road, Birchencliffe, Dated 31/1/2024 that states: -

Page 10 The provision of an adoptable highway, along with the shallow gradients, bin carry distances, refuse turning area, created a predicament that had considerable impact on the layout. This has resulted and a reduction in adoptable highway. Consultations have taken place with Building Control in regards to Bin Carry distance, since these cannot be achieved for certain plots, it was deemed a satisfactory shortfall in lieu of providing adequate plots, a considered highway design, refuse area and parking.

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Each dwelling has been accommodated with a bin store and collection point. To keep travelling distances convenient for occupants and refuse vehicle personnel, a turning head has been positioned to the west of the site in order to comply with Highways Policies.

Waste storage and presentation:

- Space will be required for 3 x 240ltr bins at each property, 1x240ltr Residual, 1x240ltr Recycling and as the properties have gardens the space to accommodate a third bin for garden waste or to accommodate future changes to waste collection due to the implementation of Simpler Recycling legislation. 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. There is bin storage shown in rear gardens on the plan and there should be sufficient space

available to accommodate three bins. Other than Plots 11,12 and 13 there is access from the rear gardens to the highway.

- Guidance indicates the storage footprint for a 240ltrs wheeliebin is 940mm x 780mm with enough room to allow removal of the bin from the storage location. The floor plan for storage must be large enough to accommodate 3 x240ltrs bins for each dwelling.
- Preference is for storage of waste bins in rear gardens. Where bin storage is in the rear gardens gated access should be shown to be secure, gates wide enough to pass through and the route between the rear gardens and the front access road must not require residents to pull bins up/down gradients of more than 1:12.
- Plot 25 has a convoluted access around the rear of plot 26. However, bin storage in the rear garden is preferable to a bin store to the front of the property that would impact on the Streetscene.
- The WCA will not take a Refuse Collection Vehicle onto private drives. e.g. Plots 11 to 15 and 22 to 26. The residents will use Bin Collection Points (BCP's) for presentation of wheeliebins adjacent to the adopted highway. The plan shows Bin Collection points on the grassed area adjacent to the sections of the retained dry-stone wall at the end of each spur of the turning head. It is important to ensure that bins do not cause obstruction to pedestrians or other highways users when presented for collection, particularly where space requires these to be left in clusters. Bin presentation space should be on a hard surface and where a refuse collection vehicle (RCV) can be easily reached. Guidance BS5906:2005 specifies that the maximum drag out distance from the property to the Bin Collection Point (BCP) is 25m. Due to the layout and topography of the site the drag out distances are from Plot 11 (approximately 67m) and Plot 25 (approximately 64m) significantly more than this limit. Without reallocation of Plots within the site that would have impact on access and road design then there appears to be limited options other than the layout proposed.

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 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.
- There is a turning head shown on the layout plan between plot numbers 16 and 21.
- Turning heads have a significant impact on waste collection operations. Where RCV's needs to turn around it is slow/ adds 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 Industry Safety and Health (WISH) Forum guidance states "Reversing causes a**

disproportionately large number of moving vehicle accidents in the waste/recycling industry. Injuries to collection workers or members of the public by moving collection vehicles are invariably severe or fatal. BS 5906: 2005 recommends a maximum reversing distance of 12 m.”

- 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 very long reverse manoeuvre to the entrance to the site 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.
- The Authority will not take an RCV into private drives or roads that are not built to adoptable standards. Where the Plan shows shared surface streets, confirmation is sought these are adopted/ constructed to adoptable standard.
- The Waste Collection Authority will not enter active construction sites with a Refuse Collection Vehicle (RCV). The rationale is to avoid damage to RCV's due to inadequate roadways, potential impact between RCV's or collection crew with contractors' plant/ delivery vehicles and remove the necessity for collection staff to undertake mandatory health and safety induction by the site manager.
- The WCA will require the identification of a location close to the entrance of each phase, accessible from an adopted highway or other accessible road within the development, where temporary waste collection or bin collection points can be established.

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>