

**Consultation Response from Alan Smith,
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 22 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: 07/08/2025

Responding Officer: Alan Smith

Responding Ref: WPS 25 027

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

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.

The applicant has submitted the drawing; “23109 - 0301 - P13”, dated December 2023.

Waste storage and presentation:

- It is welcomed the plan shows the storage location and collection points for 3 x 240ltr wheeled bins. The storage footprint for a 240ltr wheeled bins is 940mm x 780mm with enough room to allow removal of the bin from the storage location. The floor plan for the bin storage appears large enough to accommodate 3 x 240ltr bins for each dwelling.
- 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.
- It is important to ensure bins do not cause obstruction to pedestrians or other highway users when presented for collection, particularly where space requires these to be left in clusters. Bin Collection Points (BCP) are shown on the plan. Bin presentation space should be on a hard surface and where a refuse collection vehicle (RCV) can be easily reached.
- Measures should be taken to ensure access to the BCP is not impeded by parked cars between the storage area and highway.
- Consideration must be given to the process of waste collection for properties which 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 and any other outstanding waste collection details.
- **Developers are encouraged to bulk order 240ltr wheeled bins directly from the WCA that they can then distribute to residents when they take possession of their new homes. This approach optimises delivery rather than individual homeowners having to contact Kirklees Council to request their own bins. To enquire about ordering wheeled bins please email trade.waste@kirklees.gov.uk**

Specific comments for different plots on the site are as follows:

- Plots 7, 8, 21 and 22 have a BCP which is over 60m away from the carriageway. The danger with a bin drag of this distance is that residents may leave their wheeled bins at the front of their properties. One option is to build a suitable bin storage area in the front of the plots to hold at least 3 x 240ltr bins. Storage to the front of houses should be screened and avoid wheeled bins being left adjacent to doors and under windows.
- It is welcomed that 2 BCP have been identified by the turning head for plots 7-11 and 18-22.

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.

- The WCA currently collects from properties on Woodlands Court.
- Section 45 (1)(a) of the Environmental Protection Act 1990 imposes a duty on the Waste Collection Authority to arrange for the collection of household waste in its area. Regardless of the whether a private collection contractor is used the WCA would wish to ensure there is sufficient waste storage capacity on site, appropriate access, and that if the responsibility for collection falls to the WCA in future that efficient waste collection can be achieved.
- Suitable site access and manoeuvrability space for a 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.
- It is welcomed that the turning head is active, this should reduce the likelihood of cars being parked impeding the refuse collection service. 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 which 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 an RCV. The rationale is to avoid damage to the vehicle 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, where the development is phased.

If the application is approved, the following conditions are requested to cover any phased occupation of the site:

- A) Where implementation of the development hereby approved is to be phased, and / or any of the dwellings hereby approved are to become occupied prior to the completion of the development, details of temporary arrangements for the storage and collection of wastes from those residential units, and details of temporary arrangements for the management of waste collection points, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of those residential units. The temporary arrangements so approved shall be implemented prior to first occupation of those residential units and shall be so retained thereafter for the duration of the construction works unless otherwise agreed in writing by the Local Planning Authority.

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 for a Healthy Life (2020); Building Regulations 2010 part H6; and British Standard 5906:2005 Waste Management in Buildings Code of Practice.
- Further advice and full guidance is contained in the [Kirklees Waste Management Design Guide 2020](https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx) (found at <https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx>) and the [Kirklees Highway Design Guide SPD](https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx) found at <https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx> [Kirklees Local Plan](#) can be found at [Kirklees Local Plan Strategy and Policies](#).