

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

2024/92236 Wood Street Mills, Wakefield Road, Scissett, Huddersfield, HD8 9JS

Demolition of existing industrial building and erection of storage and distribution building with car park and associated engineering works

Date Responded: 17.09.2024.

Responding Officer: Mike Hibbert

Responding Ref: WPN 24-034

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; Addressing these will also enable the proposal to better meet the policy requirements of LP43 and the Kirklees Highway Design Guide SPD in respect of waste collection and management.

The application relates to demolition of existing industrial building and erection of storage and distribution (B8) including car park and associated engineering works

With reference to Kirklees Metropolitan Council Local Plan Strategy and Policies 2019 Section 16.4 states: - In the National Planning Policy for Waste central government sets out its commitment to the aims for sustainable waste management which are summarised in the 'waste hierarchy':

On this basis the Authority would encourage reuse, recycling and recovery of excavation and demolition wastes from the redevelopment and make applicants and their contractors aware of the requirements of The Waste (England and Wales) Regulations 2011 Regulation 12 Duty in relation to the waste hierarchy

Some parts of the factory unit proposed for demolition appears from photographs to be clad with bonded asbestos cement sheets in which case this could be hazardous waste and should be dismantled and disposed of at a suitably permitted waste management facility accompanied by a Hazardous Waste consignment note as detailed in Hazardous Waste Regs 2005 and Guidance WM3 v1.2 GB

The Waste Collection Authority does not have a legal Duty to collect Commercial or Industrial wastes from the proposed premises unless requested to do so, in which case this would be a chargeable service. Alternatively, tenants on the site may use private sector waste contractor. Regardless of the contractor used to provide waste services to tenants on this development the WCA would wish to see adequate access to the site for RCV's, REL's, FEL's or skip wagons to enable wate collection.

Access/ sweep path analysis should recognise the dimensions and weight of waste collection vehicles and that parked vehicles could obstruct the route through the site and access to bin stores

Waste storage and presentation:

The applicant has submitted Proposed Site Plan (Floor Plan) PTWR - MWA - XX - XX - DR - A – 0005 Rev P1 dated 31/07/24. The application form states that the application does not include details of waste storage or recycling.

- With limited information included in the application, it is difficult to predict likely waste generation and therefore waste storage capacity required.
- As the applicant has existing warehouse and manufacturing buildings in Scissett waste arisings data should be available and there will be existing provision for waste generated at those sites. Any waste storage area should be secure to prevent theft, unauthorised use/ fly tipping, arson or rough sleeping.
- Waste storage presents a fire risk. Any skip/ wheeliebin storage location should be carefully considered when undertaking a fire risk assessment and may need relocating away from buildings.
- In line with Government's OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND and the requirement for waste producers to comply with Regulation 12 of The Waste (England and Wales) Regulations 2011 there should be separate provision for recyclates and residual wastes. Waste storage should be identified on site either within the warehouse or on the service yard to accommodate general waste and packaging/ cardboard skips, etc.
- Any waste storage compounds should be large enough to accommodate the waste being stored and ensure skips are on an impermeable surface with sealed drainage to ensure avoidance of contamination of ground or surface water.

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.

- As the company may currently have waste contractors servicing the site. If the new building alters the road layout the site must be able to accommodate RCV's, FEL's or skip wagons.

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:

1. 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”

2. 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”.
3. Scheme design should conform to 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>