

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

2024/92779 land at Providence Street, Earlsheaton, Dewsbury, WF12 8HZ

Outline application for residential development

Date Responded: 20/11/2024.

Responding Officer: Mike Hibbert

Responding Ref: WPN 24-043

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.

This outline application relates to a development of up to 30 dwellings. The applicant has submitted an Illustrative Masterplan Drawing Number 24 5721 02 Coloured Dated August 2024 that shows the proposed site layout. The topography of the site falls in a southeasterly direction ranging between approximately 63.0m to 93.5 m AOD that provides constraints on the arrangement of properties within the site.

The PROPOSED RESIDENTIAL DEVELOPMENT Providence Street, Earlsheaton Design and Access Statement Rev O dated 22.08.2024 produced by JRP in the section on Bin Storage and Collection states "Providing convenient, dedicated bin and recycling storage where bins and crates can be stored out of sight is essential in any residential development and further checks will be made with the local authority to determine exactly what space is required through the course of the application. In order to establish a successful development

- The distance between storage areas and collection points should be minimised within the development.
- Where terraced housing is proposed, secure rear paths should be provided to the rear of properties allowing access to rear gardens for storage. These need to be limited to a maximum of 2 dwellings and these should be gated to prevent casual access and eradicate issues of security breaches.
- Any detached or semi-detached properties should be provided with individual access to their garden to allow bins/recycling to be stored safely in rear gardens"

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.

- 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. For plots 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.
- There is no indication of space for the presentation of bins on collection day. 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 identified for each plot, on a hard surface and where a refuse collection vehicle (RCV) can be easily reached.
- The WCA will not take a Refuse Collection Vehicle onto private drives. The layout plan must show the location of Bin Collection Points (BCP's) for presentation of wheeliebins adjacent to the adopted highway. Bin Collections Points will be required for Plots located of the Southern end of the lower access road. Guidance BS5906:2005 specifies that the maximum drag out distance from the property to the Bin Collection Point (BCP) is 25m.
- On 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 must not be left to Planning conditions.

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 has a strong preference for looped roads rather than use of turning heads.**
- 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.
- The road arrangement has angular road shapes that present difficulties for mechanical street cleaning, being a common area for litter and dirt to accumulate. This needs to be properly considered in any detailed proposals.
- 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 of the lower access road as otherwise an RCV would have a long reverse manoeuvre to the entrance to the site on Providence Street 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 e.g. block paving, 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>