

**Consultation Response from Alan Smith,
KC Waste Strategy (Refuse & Recycling)**

2024/92848 Marsh Carpets, 82-84, Westbourne Road, Marsh, Huddersfield, HD1 4LF

Alterations to convert first floor to 2 dwellings; sub-division of one ground floor retail unit to three retail units (use class Ea); installation of new shop fronts to south and east elevations and construction of external staircase to northern elevation including associated works

Date Responded: 11/09/2025

Responding Officer: WPS 25 040

Responding Ref: Alan Smith

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. This will be to the benefit both residents and the Authority for the life of the development.

The applicant has submitted “*Site and Location Plan, Dwg No. UD-556*”.

Notes and comments:

Comments for residential properties:

- Each dwelling will need space for 2 x 240ltr bins, 1 x 240ltr for residual waste and 1 x 240ltr for recyclable waste. Due to future changes to waste collection, due to the implementation of Simpler Recycling legislation, space will be needed for an additional 1 x 240ltr bin.
- Access to and from the bin storage area should be constructed to withstand point loading and movement, impacts of larger bins over time, and to resist future rutting, pitting, cracking or other such surface degradation that would impair bin manoeuvring.
- Any waste store should be secure to prevent theft, unauthorised use / fly tipping or rough sleeping. If there are doors to the bin store and have a key / keypad to secure them these access details will be required by the collection staff. It should also be of suitable dimensions to accommodate the necessary bins and constructed in compliance with the details specified in the design guide.
- Any bin store must comply with fire regulations (refer to BS 5906:2005 Waste Management in Buildings; BS476-22:1987: Fire tests on building materials and structures; and BS EN 1634-1:2008: Fire resistance and smoke control tests for door, shutter and open-able window assemblies and elements of building hardware). Further details on bin stores can be found in the following document, [Providing for bin storage on new housing developments - NHBC](#).
- Layout drawings for this development site will need to show bin storage and bin collection 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. Bin presentation space should be identified for each plot, on a hard surface and where a refuse collection vehicle (RCV) can be easily reached.
- If appropriate, 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.

- The Authority will not take an RCV into private drives or roads that are not built to adoptable standards. Guidance BS5906:2005 specifies that **the maximum drag out distance from each individual property to the Bin Collection Point (BCP) is 25m.**

Comments for commercial properties:

- Under Section 45 (1) (b) of the Environmental Protection Act 1990 It shall be the duty of each Waste Collection Authority (WCA), if requested by the occupier of premises in its area, to collect any commercial waste from the premises.
- The applicant / tenants may choose to use the Trade Waste service from Kirklees Council, a private contractor or reverse logistics for collection and treatment of wastes arising on the site. Regardless of the contractor used, providing appropriate waste storage is vital to prevent escape of waste, odour, or vermin problems. Evidence of a waste collection contract and Controlled Waste Transfer Notes (CWTN's) must be available if requested.
- The UK's new Simpler Recycling legislation was introduced on the 1st April 2025 and requires any business with 10 or more employees across England to separate their food waste from other waste streams. All mixed recycling, including cardboard, plastics, glass, and metal, should be carefully separated and disposed of in accordance with the new guidelines to ensure that each material is recycled appropriately and to minimise environmental impact. If a business produces more than 5kg of food waste per week, it must arrange a separate collection by licensed waste carriers.

Waste storage and collection:

Additional information is required detailing waste storage, number and size of containers, capacity and design of the waste storage compound(s) including, surfacing, security and fire prevention measures.

- The waste stores should be secure to prevent theft, unauthorised use/ fly tipping or rough sleeping. If the doors to the bin store are to have a key / keypad to secure access these details will be required by the collection staff. The bin store should be of suitable dimensions to accommodate the necessary bins and constructed in compliance with the details specified in the design guide.
- Before development commences, details of the management and maintenance of communal refuse storage areas by a designated private management company shall be submitted to and approved by the Local Planning Authority. The approved details

shall be provided before first occupation and shall be so retained thereafter.

- If appropriate any internal bin store must comply with fire regulations (refer to BS 5906:2005 Waste Management in Buildings; BS476-22:1987: Fire tests on building materials and structures; and BS EN 1634-1:2008: Fire resistance and smoke control tests for door, shutter and openable window assemblies and elements of building hardware) for internal compounds.

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.

- 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.
- Turning heads have a significant impact on waste collection operations. Where RCV's needs to turn around it is slows / adds to collection time which has 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 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 very long reverse manoeuvre which is a recognised safety risk and is not acceptable.**
- 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.
- If appropriate 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. Before development commences, further details to ensure suitable storage, and access for collection of wastes from the dwellings and commercial properties shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be provided before first occupation and shall be so retained thereafter.
- B. Before development commences, details of the management and maintenance of communal refuse storage areas by a designated private management company shall be submitted to and approved by the Local Planning Authority. The approved details shall be provided before first occupation and shall be so retained thereafter.

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](#) found at <https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx> and the [Kirklees Highway Design Guide SPD](#) 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](#).