

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

2024/93156 Healey Lane Mills, Healey Lane, Healey, Batley, WF17 7SH

Outline application for redevelopment of existing Islamic Centre

Date Responded: 23/12/2024.

Responding Officer: Mike Hibbert

Responding Ref: WPN 24-049

NOTES/COMMENTS:

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

The proposal is for a proposal for the partial demolition of industrial/commercial buildings, part change of use to F1/F2 community uses, and the construction of new Mosque and Madrasa.

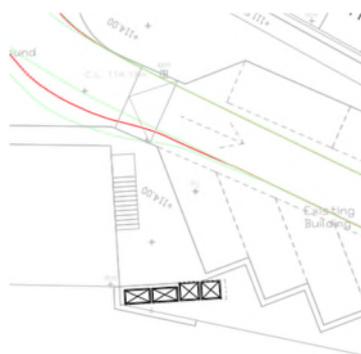
Under The Controlled Waste (England and Wales) Regulations 2012 waste arising from a place of worship is classified as Household waste.

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 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

Waste storage and presentation:

- Waste storage for the development is shown on Site Plan Drawing ref 20185-D02 Rev A dated 9/7/2023 that shows the proposed location of wheeliebin storage within the site.



- It is not clear as to the composition or quantity of waste that is expected to be generated on site. The Waste Strategy for England 2018 sets out targets to encourage minimising waste, promoting resource efficiency, and moving towards a circular economy. The Strategy will be implemented by the introduction of Simpler Recycling legislation that from March 2025 will require separate storage capacity for food waste from the kitchen area, recyclate such as glass, plastic, metals, packaging and card/paper in addition to residual wastes.
- The Healey Islamic Trust building currently on the site has a waste collection once a fortnight of 1x 1100ltrs wheeliebin. Future choice of wheeliebin containers and numbers will need to reflect the waste volumes generated. The dimensions of a 1100ltrs Wheeliebin is 1375x990 (floor space 1575x1190). There also needs to be space within the store to enable access to bins by residents and collection staff for servicing
- Wheeliebins should be screened or contained within a purpose designed store. Details of bin store construction can be found in the Kirklees Waste Management Design Guide 2020.
- The waste store should be secure to prevent theft, unauthorised use/ fly tipping or rough sleeping. If the doors to the bin store are to have a keypad to secure access these details will be required by the collection staff.
- Waste storage presents a fire risk. When undertaking a fire risk assessment for the premises the location of the bin store should be carefully considered. The construction specification for the store should follow BS5906:2005, Building Regs 2010 Part H6 and CFPA-E Guideline No 7:2022 F.
- It is not clear from the proposal the location of the Bin Collection Point (BCP) within the car park. The carpark may need to be marked to ensure parked cars do not block the Bin Collection Point.
- The route between the store and bin collection point needs to be a hard smooth surface, have a drop kerb and a maximum gradient of 1:12. Guidance indicates that the maximum drag out distance for a full 1100ltr wheeliebin should be in the region of 15m.

Additional information is required detailing waste storage, containers, capacity and design of the waste storage compound including, screening, surfacing and security

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. This obligation will exist in perpetuity on any development and as such will be a critical consideration in the layout of the site.
- The applicant has submitted a transport statement dated August 2024 Ref 21-382-003.04 that in Section 5.30 states “Servicing vehicles will enter the site the same way as any other vehicles. Swept path analysis attached at Appendix BGH10 has been undertaken of a private refuse vehicle which demonstrates that the refuse vehicle can enter, collect the bins and exit the site with no issues. Refuse will be collected at quieter times of the day.”
- The swept path analysis of Refuse vehicle Drawing No: 21/382/ATR/002 dated 16.07.2024 models a Phoenix 2 Duo 10.2m long RCV whereas the Kirklees standard RCV as set out in the Kirklees Waste Management Design Guide 2020 is 11.22m long.

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:

- 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 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>