

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

2025/91122 Turnbridge Mills, Quay Street, Huddersfield, HD1 6QT

Redevelopment of site for mixed-use E(g) (i, ii and iii) and B8 including: demolition of buildings and re-cladding of southern elevation of retained adjoining building; retention, conversion and renovation of existing mill/office/workshop/engine house building including alterations; erection of two new buildings; formation of two vehicular access points, service yard and parking areas; and other associated works.

Date Responded: 23/06/2025

Responding Officer: Alan Smith

Responding Ref: WPS 25 - 015

General 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.

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.

From 31 March 2025, Government legislation requires businesses to separate dry mixed recycling and food recycling as part of the Environment Act 2021(Commencement No. 9 and Transitional Provisions) Regulations 2024, ensuring recycling across England is standardised. 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. This includes biodegradable materials from processing or preparing food, such as inedible parts like bones, eggshells, fruit and vegetable skins, tea bags, and coffee grounds. The new legislation excludes micro-firms (businesses with fewer than ten full-time equivalent employees).

Waste storage and collection:

In the application it is noted that there is currently no arrangements for the handling and collection of waste. With a new commercial development, it is difficult to accurately estimate the potential waste generation unless the site operator has experience from comparable sites. If the operator is not intending to store waste within the buildings and utilising reverse logistics with delivery vehicles being used to transport packaging and food wastes to a central collection or distribution depot for onward treatment, recycling/disposal or direct delivery to treatment facilities then there needs to be a waste compound on site.

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 storage area should be secured to prevent unauthorised use. 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.

- 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.
- 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.
- 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 open-able 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.

Confirmation is sought that the road layout enables vehicular access to the Bin Collection Point(s) and details are required as to show how waste collection will be achieved via an RCV, FEL or skip wagon. There is no indication as to whether bins will be dragged from the rear of the retail units to bin collection points for loading. Reversing of RCV's presents an established health and safety risk. Any proposals should consider the potential impact on pedestrians and motorists when waste collection is occurring at the site.

In conclusion, further details are required regarding waste storage and collection.

Full detailed guidance on waste management requirements can be found 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>)

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 commercial units, 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 refuse storage areas by a designated private management company shall be submitted to and approved by the Local Planning Authority, including access for waste crews.

The approved details shall be provided before first occupation and shall be so retained thereafter.

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 for a Healthy Life (2020); Building Regulations 2010 part H6; and British Standard 5906:2005 Waste Management in Buildings Code of Practice.
4. 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>