

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

**2025/91184 land off, Bretton Street, Savile Town, Dewsbury, WF12 9BZ**

**Erection of two storey industrial unit (Use Class E(g)(iii)), with associated car park, service area  
and other associated works**

**Date Responded: 21/08/2025**

**Responding Officer: Alan Smith**

**Responding Ref: WPN 25 020**

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

The proposal is the “*Erection of two storey industrial unit (Use Class E(g)(iii)), with associated car park, service area and other associated works*”.

The developer has included the drawing, “Proposed site location”, Revision B 14-5-2025.

### **Waste storage and presentation:**

- The WCA 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(s). Regardless of the contractor used to provide waste services on this development the WCA would wish to see adequate access to the site to enable waste collection.
- 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).
- The proposed bin store is approximately 3m x 4m. This should be of a sufficient size to accommodate a range of waste containers allowing for any extra containers to meet Simpler Recycling legislation.
- Any producer of controlled waste must ensure compliance with Section 34 Duty of Care etc. as respects waste to prevent escape of waste, litter, odour or vermin problems. Evidence of a waste collection contract and Controlled Waste Transfer Notes (CWTN's) must be available if requested.
- Waste storage presents a fire risk and should be carefully considered when undertaking a fire risk assessment. The proposed bin storage location is an acceptable

distance from any buildings.

- The bin compound shown in the south of the site is more than 6m away from the building. If not using skips or FEL bins, the drag out distance for wheeled bins from a bin store / premises to the refuse collection vehicle (RCV) should preferably be under 15m. 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. From the plan the bin store appears to be readily accessible with minimal drag out distances.
- 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
- If applicable 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.
- In compliance with the waste hierarchy the WCA would encourage reuse or recycling of any demolition materials within the construction project.

#### **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.

1. Suitable site access and manoeuvrability space for a RCV is vital to enable collection of waste. This obligation will exist in perpetuity on any development and as such will be a critical consideration. As the site is designed for deliveries to the units by commercial vehicles it is not envisaged that access will be a significant issue.

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