Consultation Response from Alan Smith, KC Waste Strategy(Refuse & Recycling)
2025/91370 Land at, Gynn Lane, Honley, Holmfirth, HD9 6LF
Demolition of existing dwelling and erection of 50 dwellings with associated access, infrastructure and associated works
Date Responded: 01/07/2025 Responding Officer: Alan Smith Responding Ref: WPS 25 018

Kirklees COUNCIL

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 for the "Demolition of existing dwelling and erection of 50 dwellings with associated access, infrastructure and associated works".

The applicant has submitted Planning layout "Proposed Site / Block Layout [id 1091727] Size: 9.9MB 11/06/2025 - 2479-0301-R13 - Site layout."

Waste storage and presentation:

- It is welcomed the plan shows the storage location and collection points for wheeled bin. However, it is noted the plans only show storage points for 2 x 240ltr bins.

- Any proposed waste storage area must be able to hold other necessary containers as required, at least 3 x 240ltr bins.

- Guidance indicates the storage footprint for a 240ltr wheeled bins 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 x 240ltr bins for each dwelling.

- 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.

- It is important to ensure bins do not cause obstruction to pedestrians or other highway users when presented for collection, particularly where space requires these to be left in clusters. A Bin Collection Point (BCP) is shown on the plan. Bin presentation space should be on a hard surface and where a refuse collection vehicle (RCV) can be easily reached.

- Measures should be taken to ensure access to the BCP is not impeded by parked cars between the storage area and highway.

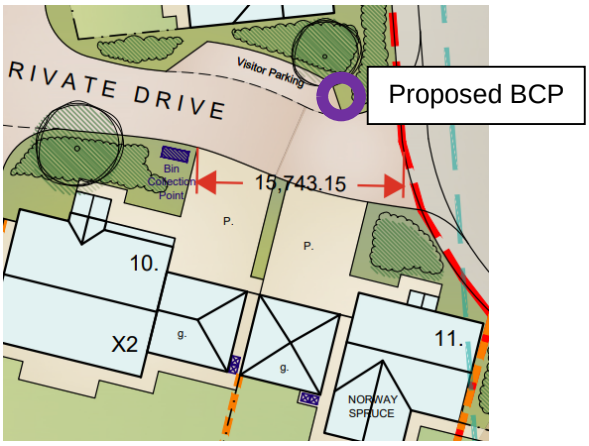
- Consideration must be given to the process of waste collection for properties which are occupied before the whole site is complete. Temporary measures may be required to allow waste to be stored/presented at an accessible location adjacent to the nearest adopted highway. The Authority will not enter 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 WCA encourages developers to bulk order 240ltr wheeled bins directly from the WCA that they can then distribute to residents when they take possession of their new homes. This approach optimises delivery rather than individual homeowners having to contact Kirklees Council to request their own wheeled bins.**

Specific comments for different plots on the site are as follows:

- Plots 6 and 40 are both mid-terrace properties. For plot 6 the plan shows a bin storage point at the rear of plot 7, the drag out distance from the bin storage location to BCP is approximately 38m. For plot 40 the drag out distance from the storage point to BCP is approximately 43m. The BCP should be no more than 25m from the storage point. The issue with this long distance is the resident could opt to keep their bins at the front of the property. The options are to change the storage and BCP points or alternatively build a suitable and bin storage area in the front of plots 6 and 40 to hold at least 3 x 240ltr bins.

- Plots 9, 10 and 11 have a shared BCP outside plot 10. The proposed BCP is 15m from the main road nearly more than double the recommended 8m. Ideally a new BCP is installed at the right-hand side of the visitor car park opposite plot 11, as indicated on the plan below.



- Plots 25, 26, 27, 28, 29, These properties all share a common BCP. This is acceptable if the BCP is built to a sufficient size to accommodate at least 5 x 240ltr wheeled bins and is landscaped to avoid bin blight. With these properties being 4 and 5 bedroom houses it is likely there will be more than 5 wheeled bins put out for each collection; therefore, it is recommended the BCP be made to hold more than 5 wheeled bins. Storage to the front of houses should screened and avoid wheeled bins being left adjacent to doors and under windows.

- Plots 25, 26, 27, 28 have a drag out distance from their bin storage point to their BCP more than 25m. There is a danger the residents could leave their wheeled bins at the front of their property which is of concern to the Council. The options are to change the storage and BCP points or alternatively build a suitable and bin storage area in the

front of the plots to hold at least 3 x 240ltr bins. Storage to the front of houses should be screened and avoid wheeled bins being left adjacent to doors and under windows.

- The turning head between plots 31 and 32 could be an issue with parked cars. The RCV will drive into this area to reverse down to the BCP for plots 24-28. With the properties on this part of the street being 4 and 5 bedroom houses it is possible there will be insufficient car park spaces and the turning head could be used for additional parking. This will make it unsafe for the collection vehicle to use. It is advisable that the turning head be turned into an active turning head so cars cannot park there and block the access for the RCV.

- Plots 46-49 will need a combined waste storage capacity of 4 x 180ltr – 720ltr. Therefore, there will be a requirement for 1 x 1,100ltr grey bin (residual) and 1 x 1,110ltr green bin (recycling). With the introduction of Simpler Recycling, it advisable to make the bin store large enough to hold 3 x 1,100ltr bins. The floor space required for each 1,100ltr bin is 1560mm x 1190mm, to allow safe manoeuvring of the bins. It is noted that arrangements will be made to ensure the correct bin is placed at the BCP on collection day. It is noted the bins store is 6m away from the nearest property.

  The bin 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 key/keypad to secure access these details will be required by the collection staff.

- Plots 26, 27, 28, 29, 30 and 31. The plan for these properties appears to show the bin storage areas for these properties are at the rear and the bins will have to be moved up and down stairs. There is a danger the residents could leave their wheeled bins at the front of their property which is of concern to the Council. The options are to change the bin storage location or alternatively build a suitable and bin storage area in the front of the plots to hold at least 3 x 240ltr bins. Storage to the front of houses should be screened and avoid wheeled bins being left adjacent to doors and under windows to negate any potential fire risk.

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 currently collects from properties on Gynn Lane.

- 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.

- There is a turning head shown on the layout plan between plot numbers 31 and 32. Turning heads have a significant impact on waste collection operations. Where RCV's needs to turn around it is slow/ 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 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 as otherwise an RCV would have a very long reverse manoeuvre which 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, confirmation is sought these are adopted/ constructed to adoptable standard.

- The Waste Collection Authority will not enter active construction sites with an RCV. The rationale is to avoid damage to the vehicle 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, 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 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, including access for waste crews. The approved details shall be provided before first occupation and shall be so retained thereafter.

C) Where implementation of the development hereby approved is to be phased, and/or any of the dwellings hereby approved are to become occupied prior to the completion of the development, details of temporary arrangements for the storage and collection of wastes from those residential units, and details of temporary arrangements for the management of waste collection points, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of those residential units. The temporary arrangements so approved shall be implemented prior to first occupation of those residential units and shall be so retained thereafter for the duration of the construction works unless otherwise agreed in writing by the Local Planning Authority.

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