Consultation Response from Alan Smith, KC Waste Strategy (Refuse & Recycling)
2025/91638 The Mansion House, Heaton Lodge, Bog Green Lane, Colne Bridge, Huddersfield, HD5 0RF
Outline application for erection of residential development (5 dwellings)
Date Responded: 02/10/2025 Responding Officer: Alan Smith Responding Ref: WPN 25 026

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 Council takes the issue of bin blight seriously and encourages developers to ensure that the street scene for new developments is not spoilt by the poor design for refuse storage and collection. **There is a link for the "*Avoiding Rubbish Design*" guide at the end of this document.**

Waste storage and presentation:

The applicant has submitted the drawing; *"Proposed residential development, Dwg No. 16 J 28, 10B, dated May 2025".*

- Space will be required for 3 x 240ltr bins at each property, 1 x 240ltr residual waste, 1 x 240ltr recycling and, as the properties have gardens, the space to accommodate a third bin for garden waste or to accommodate future changes to waste collection due to the implementation of Simpler Recycling legislation. The floor space required for each 240ltr wheeled bin is 940mm x 780mm.

- The bin storage should be in the rear gardens, gated access should be shown to be secure, gates wide enough for bins to pass through and the route between the rear gardens and the front access road must not require residents to pull bins up / down gradients of more than 1:12.

- Layout drawings for this development site will need to show a bin collection point (BCP). The BCP should be on a solid surface and where a refuse collection vehicle (RCV) can be easily reached, adjacent to the nearest highway.

- Consideration must be given to the process of waste collection for properties which are occupied before the entire 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.

- **Developers are encouraged to bulk order 240ltr wheeled bins directly from the WCA which they can then distribute to residents as they take possession of their new homes. This approach optimises delivery rather than individual homeowners having to contact Kirklees Council to request their own bins. To enquire about ordering wheeled bins please email trade.waste@kirklees.gov.uk.**

- The Authority will not take an RCV onto 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 BCP is 25m**.

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 an 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. The WCA would want reassurance that there is acceptable, unhindered access to the site.

- Where turning is necessary, the turning facilities must be demonstrably sufficient for an 11.85m refuse collection vehicle. **Active measures should be taken to prevent parking in the turning head as otherwise an RCV would have a long reverse manoeuvre which is a recognised safety risk and is not acceptable.**

- 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."**

- There is concern that the road down to the new development from Bog Green Lane is unadopted. Elements such as potholes, overgrown trees, flooding, debris, gravel and cracks found in these locations all contribute to damage collection vehicles which are expensive to repair. If an RCV cannot reach the properties a bin collection point closer to Bog Green Lane will be required.

- The Waste Collection Authority will not enter active construction sites with an RCV. The rationale is to avoid damage to RCV's 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.

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 waste storage, bin screening (where applicable), and bin collection point for the 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. The WCA requires confirmation of who will be responsible for repairing the road when required and for cutting back overhanging trees so that the collection service is not hindered. 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 Waste Management Design Guide for New Developments and the Kirklees Highway Design Guide SPD found at Kirklees Highway Design Guide Kirklees Local Plan can be found at Kirklees Local Plan Strategy and Policies. Avoiding Rubbish Design can be downloaded from Avoiding Rubbish Design.