

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

2025/92443 Huddersfield Open Market, Brook Street, Huddersfield, HD1 1DY

External works to Market Building and wider site including alteration and demolition of modern additions to the Market building, new glazed screens, new WC and welfare facilities, provision of services and lighting including associated works, remodelling to the stone annexe, alterations to catering facilities, and self-contained commercial units, works to floor surfaces of Market Building. Use of Market Building and Market Yard for a mix of uses (sui generis) including retail, hot food takeaway, drinking establishment, restaurant / café uses, market office, public welfare facilities, storage facilities as well as provision of areas that provide a mix of fixed and flexible indoor and outdoor market stalls. Creation of areas for open market and market yard, siting of associated structures, installation of new fixed market stalls demolition of external bin store and creation of waste compound area, creation of new pavilion, storage compounds, vehicular parking, remodelling and surfacing of areas of hardstanding, street furniture, car park layout, landscaping and associated works (Listed Building within a Conservation Area)

Date Responded: 13/10/2025

Responding Officer: Alan Smith

Responding Ref: WPN 25 041

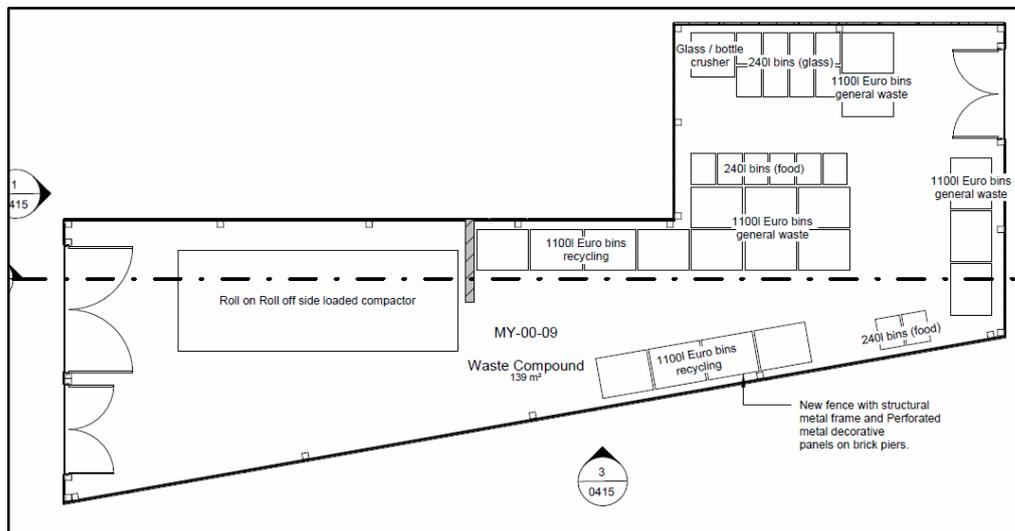
NOTES / COMMENTS:

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

To meet the 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. This will also enable the development to better meet the Kirklees Council policy requirements and the Kirklees Highway Design Guide SPD in respect of waste collection. Ultimately this will be to the benefit for stall holders, facilities managers, and waste contractors for the lifetime of the development.

The application relates to, *“External works to Market Building and wider site including... demolition of external bin store and creation of waste compound area”*.

The developer has submitted the Waste Management Strategy for the site, including the design for the new bin store shown below.



Waste storage and presentation:

- 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.
- The waste strategy outlines the types and quantity of waste that the Market is likely to produce.

- As well as a compactor for cardboard the compound also holds bins for general waste and recycling waste including bins for glass and food waste. This should ensure that the market meets the requirements of Simpler Recycling Legislation.
- 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. 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.
- If appropriate 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 openable window assemblies and elements of building hardware) for internal compounds.
- The waste stores should be screened to avoided impact on street scene and be secure to prevent unauthorised use, minimise risk of arson and avert use by rough sleepers. Details of bin store construction requirements can be found in the Kirklees Waste Management Design Guide 2020.
- Bin store surfaces should be durable and waterproof enough to withstand heavy duty cleaning such as power washing. The storage area needs to have suitable drainage, with water discharging into a sewerage drain, (not into surface water or onto the highway), to allow the washing of bins.
- The bin storage area and access routes to the Bin Collection Point (BCP) 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.
- To facilitate loading of full wheeled bins the surface between the bin store and the loading point should be smooth hard surface without kerbs. Guidance states that the maximum drag out distance for bins should be 10 metres.

Refuse Collection Vehicle access:

- Suitable site access and manoeuvrability space for a Refuse Collection Vehicle is vital to the contractor's ability to collect waste. Reversing of RCV's and Ro-Ro vehicles is a recognised safety risk (particularly in locations such as town centres with proximity to members of the public). Therefore, provision of turning points and good layout of skip compounds and wheeled bin storage areas should be a critical consideration in the layout of the site.
- Parked cars are a perpetual problem for RCV access, and it is important to account for potential parking spaces even where these are undefined.

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> [Kirklees Local Plan](#) can be found at [Kirklees Local Plan Strategy and Policies](#). [Avoiding Rubbish Design](#) can be downloaded from [Providing for bin storage on new housing developments - NHBC](#)