

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

2025/92467 The Grove United Reform Church, Oxford Road, Gomersal, Cleckheaton, BD19 4JY

Change of use and alterations to convert church into 4 flats, offices and meeting room (Listed Building within a Conservation Area)

Date Responded: 10/11/2025

Responding Officer: Alan Smith

Responding Ref: WPN 25 037

1. Introduction

This response is provided by the Waste Collection Authority (WCA) and outlines operational requirements for waste storage and collection. These comments aim to support compliance with Kirklees Local Plan policies LP24 (d.vi), LP43, and the Highway Design Guide SPD. The aim is to achieve a safe and efficient waste collection service.

Section 45(1)(a) of the Environmental Protection Act 1990 places a duty on the Waste Collection Authority (WCA) to arrange for the collection of household waste within its area. Regardless of whether a private contractor is engaged, the WCA must ensure that there is adequate on-site waste storage capacity, suitable access for collection vehicles, and that, should the responsibility for collection revert to the WCA in the future, the process can be carried out efficiently.

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.

The applicant has submitted a drawing, “*Site Plan, Dwg No. 25/51/D*”.

2. Household Waste Storage Requirements

Each apartment must accommodate:

- **3 x 240L wheeled bins for:**
 - Residual waste – collected on alternative weeks
 - Recyclable waste – collected on alternative weeks
 - For future Simpler Recycling legislation provision
- **Bin space dimensions:**
 - floor space required is 940mm x 780mm per bin
- **Bin storage location:**
 - Must not obstruct highways or driveways
 - No gradients steeper than 1:12 or steps
 - Located at least 2.5m away from fire exits, doors and windows

3. Commercial Waste Storage Requirements

The amount of waste likely to be generated is unknown, however, it is likely that 2 x 1,100L waste containers will be needed, one for residual waste and one for recycling waste.

- **Bin space dimensions:**
 - floor space required is 1,575mm x 1,1900mm per bin
- **Bin storage location:**
 - Must not obstruct highways or driveways
 - No gradients steeper than 1:12 or steps
 - Located at least 6m away from fire exits, doors and windows
 - Not located underneath fire escapes
 - Where the containers cannot be located 6m away from a property then it is necessary that the adjacent structure is fire resistant, which has a resistance to fire of 30 minutes
- 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.

- 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.

4. Bin Collection Points (BCPs)

- Must be shown on a layout plan
- No gradients steeper than 1:12 or steps from storage area to BCP
- Located adjacent to an adoptable highway
- Solid surface required, resistant to constant wear and tear
- The maximum drag out distance from bin storage area to BCP is 25m (BS5906:2005)
- Developers must bulk order bins for residents via: trade.waste@kirklees.gov.uk

5. Phased Development Considerations

For phased occupation:

- Temporary waste storage and collection arrangements must be approved prior to first occupation
- WCA will not collect from incomplete sites

6. Requested Planning Conditions

- **Pre-Occupation Waste Strategy**

Before development commences, further details to ensure suitable storage, and access for collection of wastes from the dwellings and commercial unit, 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.

- **Bin store management**

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.

- **Phased Occupation Waste Management**

Prior to commencement the developer must, where applicable, submit for approval temporary waste collection arrangements if the site becomes occupied prior to completion. The approved details shall be provided before first occupation and shall be so retained thereafter.

7. Policy Context

- **LP24 (d.vi):** Requires unobtrusive, well-designed waste facilities
- **LP43:** Supports waste minimisation and recovery
- **National Planning Policy for Waste (5.8):** Adequate storage facilities at residential premises

8. Design Guidance References

- [Waste Management Design Guide for New Developments](#)
- [Kirklees Highway Design Guide SPD](#)
- [Kirklees Local Plan Strategy and Policies](#)
- [Avoiding Rubbish Design Guide](#)

- [Building for a Healthy Life \(2020\)](#)
- [Building Regulations 2010 Part H6](#)
- BS5906:2005 Waste Management in Buildings