

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

**2026/90232 New Mills, Brougham Road, Marsden, Huddersfield, HD7 6AZ**

**Redevelopment of mill complex of 11,584 sqm for mixed use development, including building demolition, site clearance, site remediation works, the removal of buildings and floor slabs to open up the River Colne, repairs to retained buildings, conversion of lower ground floor of western mill to Class E (food and non-food retail, restaurant and cafe), new buildings providing light industrial / R&D uses (limited to Use Classes Eg(ii)(iii)), the alteration and repair of an office building (Use Class Eg(i)), the creation of a new public square and associated hard and soft landscaping, circulation and servicing space, car parking and ancillary structures**

**Date Responded: 06/05/2026**

**Responding Officer: Alan Smith**

**Responding Ref: WPS 26 023**

## 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, the Waste Management Design Guide 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.

## 2. Waste Storage Requirements

### Domestic waste storage requirements

- **East Block** - the 32 dwellings will require capacity of 32 x 180 L per week = 5,760 L, this is the equivalent of 6 x 1,100 L bins per week. Therefore, the flats will require 18 x 1,100 L bins:
  - **18 x 1,100 L wheeled bins for:**
  - 6 x residual waste – collected on alternative weeks
  - 6 x recyclable waste – collected on alternative weeks
  - 6 x future Simpler Recycling legislation provision
- **West Block** - the 28 dwellings will require capacity of 28 x 180 L per week = 5,040 L, this is the equivalent of 5 x 1,100 L bins per week. Therefore, the flats will require 15 x 1,100 L bins:
  - **15 x 1,100 L wheeled bins for:**
  - 5 x residual waste – collected on alternative weeks
  - 5 x recyclable waste – collected on alternative weeks
  - 5 x future Simpler Recycling legislation provision
- **Internal segregation:**
  - At least 25 to 40 L internal space within each dwelling for segregation of residual waste, recycling and food waste
- **Bin space dimensions:**
  - floor space required is 1575 mm x 1190 mm per bin
- **Bin storage location:**
  - Must not obstruct highways or driveways
  - Gated access must be secure and wide enough for bins to pass through
  - No gradients steeper than 1:12 or steps
  - Minimum 8 m clearance from fire exits, doors, and windows
  - If 8 m clearance is not feasible, adjacent structures must be fire-resistant to 30 minutes
  - Bin store must be secure to prevent theft, unauthorised use, fly-tipping, or rough sleeping

- Bins must face forwards in the bin store and not be side-on
- Any internal bin stores must comply with fire regulations

### **Commercial waste storage requirements**

The applicant may choose to use the waste service from Kirklees Council or a private contractor for collection and treatment of wastes arising on the site. Regardless of the contractor used the WCA does want to ensure any new developments have suitable access and waste storage capacity on site for a range of source separated wastes and to maximise recycling and efficient collection. 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. Any producer of controlled waste must ensure compliance with Section 34 Duty of Care etc. as respects waste.

- Currently it is unknown how much waste will be produced by the shops, offices and workshops, however, calculations on typical waste arisings for different types of business can be found in the document BS5906:2005
- For non-food premises waste containers will be required for recyclable and general waste.
- Food related premises will require bins for recyclable, general and food waste
- More information on food related premises can be found at; [Health, safety and food regulations | Kirklees Council](#)
- **Bin space dimensions:**
  - floor space required is 1575 mm x 1190 mm per 1,100 L bin
- **Bin storage location:**
  - Must not obstruct highways or driveways
  - Gated access must be secure and wide enough for bins to pass through
  - No gradients steeper than 1:12 or steps
  - Minimum 8 m clearance from fire exits, doors, and windows
  - If 8 m clearance is not feasible, adjacent structures must be fire-resistant to 30 minutes
  - Bin stores must be secure to prevent theft, unauthorised use, fly-tipping, or rough sleeping

### **3. Bin Collection Points (BCPs)**

- Must be shown on a layout plan for all properties
- 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 25 m (BS5906:2005)

### **4. Refuse Collection Vehicle (RCV) Access**

- The WCA will not enter:
  - Private drives
  - Roads not built to an adoptable standard
  - Active construction sites
- Road layout must:
  - Where applicable, turning heads must be suitable for an 11.85 m RCV

- Turning areas must be made active to avoid them being used for additional parking
- Reversing distance for an RCV must not exceed 12 m (WISH guidance)

## 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
- Developers must bulk order bins for residents via: [trade.waste@kirklees.gov.uk](mailto:trade.waste@kirklees.gov.uk)

## 6. Requested Planning Conditions

### ● **Pre-Occupation Waste Strategy**

Prior to commencement the developer must submit for approval details for bin storage, screening, BCPs, and RCV access. The approved details shall be provided before first occupation and shall be so retained thereafter.

### ● **Bin Store maintenance**

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. 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](#)
- [Safety Distances Between Waste Containers and Buildings](#)
- BS5906:2005 Waste Management in Buildings