

**Consultation Response from Mike Hibbert,  
KC Waste Strategy( Refuse & Recycling)**

**2023/91405 Part of former St Luke's Hospital site, Blackmoorfoot Road, Crosland Moor,  
Huddersfield, HD4 5RA**

**Erection of foodstore (class E) with associated access, parking, servicing area and  
landscaping**

**Date Responded:6/06/2023.**

**Responding Officer: Mike Hibbert**

**Responding Ref: WPS 23-023**

**NOTES/COMMENTS:**

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

Ensuring the development meets the Kirklees Council policy requirements and the Kirklees Highway Design Guide SPD in respect of waste collection ultimately will be to the benefit for customers, Lidl GB Ltd facilities managers, and waste contractors for the lifetime of the development.

The application relates to erection of a new Lidl food store (Use Class E) with associated car parking and landscaping. The following comments refer to Blackmoorfoot Road Proposed Site Plan Dwg P401 Rev B dated 14/03/2023.

It is stated on the application form that" All waste associated with the proposed foodstore to be stored internally." Also "All waste associated with the Lidl store will be separated, wrapped up and returned to the distribution centre for recycling as a return journey of the daily service vehicle delivery."

Additional information is provided in Chapter 7 of the Proposed Lidl Store, St Luke's Hospital Site, Crosland Moor, Huddersfield, Design and Access Statement dated April 2023.

**Waste**

- An Integrated Waste Management Policy - which complies with relevant legislation and minimises the impact of the foodstore on the environment – will be used with high packaging recoverability as a result of Lidl's efficient delivery and stocking system. Lidl will install waste handling equipment, such as plastic/cardboard baler, into the store.
- The store has been designed to accommodate a reverse vending scheme in line with and to comply with future Government legislation, whereby customers will be able to recycle waste packaging – including polyethylene terephthalate (PET) and High-Density polyethylene (HDPE) plastic bottles, steel and aluminium cans and glass bottles - in exchange for rewards. This will most likely be in the form of vouchers that can be spent on products within the store.

Lidl seeks to be a zero waste to landfill business, which means that it reduces, reuses and recycles as much as possible. As part of this, all of Lidl's cardboard and clear plastic wrap is recycled, and this equates to approximately 115,000 tonnes every year.

**Waste storage and presentation:**

Section 75(7) of the Environmental Protection Act 1990 defines waste produced by the premises as Commercial waste. The WCA does not have a duty to collect commercial waste but would if requested provide a chargeable trade waste collection service,

Regardless of the contractor used the WCA does want to ensure the new development has appropriate 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. Any producer of controlled waste must ensure compliance with Section 34 Duty of Care etc. as respects waste.

It is not clear as to the exact composition or quantity of waste that is expected to be generated but it is likely to correspond closely to the arisings from the existing Lidl stores.

The applicant has stated that all waste will be collected at the same time as deliveries are made. By utilising reverse logistics with delivery vehicles being used to transport packaging and food wastes to a central collection or distribution depot for onward treatment, recycling or disposal or direct delivery to treatment facilities there will not be a requirement for areas on the site for external waste skips or wheeliebins. On this basis there should be no additional highway access issues for collection vehicles above those already addressed regarding delivery of goods to the store.

- It is welcomed that the plan shows a space adjacent to the store entrance annotated as DRS Room to ensure compliance with proposed Deposit and Return Scheme legislation.
- A baler shown on the plan is located near the loading bay at the rear of the store. It is not clear if the DRS collected packaging will be baled on site and managed in the same manner as in-store generated waste. If so, this would entail transporting the waste or receptacles along the welfare corridor prior to storage and dispatch. If waste from DRS is to route via the pedestrian entrance, stored externally in additional containers or will have provision for a separate contractor to collect these materials with specialist waste vehicles this will impact on location of any waste storage compound and highway specification for turning points and therefore should be addressed.
- The WCA would welcome provision of a mini recycling centre/ bring facility located within the development available to the general public within the Crosland Moor area.

**Refuse Collection Vehicle access:**

- Suitable site access and manoeuvrability space for a Refuse Collection Vehicles is vital to collect waste from any premises. Reversing of RCV's and skip wagons is a recognised safety risk (particularly in locations such as shopping centres with proximity to members of the public). and therefore, if not all waste is collected by the reverse logistic operations there will need to be provision of vehicle turning points and good

layout of skip/ wheeliebin compounds 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.

**Full detailed guidance on waste management requirements can be found in in the [Kirklees Waste Management Design Guide 2020](https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx) (available on the Planning advice notes page at: <https://www.kirklees.gov.uk/beta/planning-applications/guidance-and-advice-notes.aspx>)**

Waste policy context:

- 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 on Highway matters is contained in the [Kirklees Highway Design Guide SPD](https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx) which can be found at <https://www.kirklees.gov.uk/beta/planning-policy/adopted-supplementary-planning-documents.aspx>