



Cumberland and Westmorland & Furness Joint Waste Needs Assessment 2025/26

Scoping of 'Other' Waste Streams

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Abbreviations and Glossary

Abbreviations	Terms
AD	Anaerobic Digestion
AMP	Asset Management Plan
C & I	Commercial & Industrial Waste
C, D & E / CDEW	Construction, Demolition & Excavation Waste
CSO	Combined Stormwater Outfall
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EfW	Energy from Waste
EWC	European Waste Catalogue
HLW	High Level Radioactive Waste
HWDI	Hazardous Waste Data Interrogator
HWRCs	Household Waste Recycling Centres
IDP	Infrastructure Development Plan
ILW	Intermediate Level Radioactive Waste
LACW	Local Authority Collected Waste
LLW	Low Level Radioactive Waste
MRS	Metal Recycling Site
MRF	Material Recycling Facility
Ofwat	Office of Water services aka the Water Services Regulation Authority
PFAs	Per- and Polyfluoroalkyl Substances
STC	Sludge Treatment Centre
STW	Sewage Treatment Works
TDS	Tonnes Dry Solids
VLLW	Very Low-Level Radioactive Waste
WDF	WasteDataFlow
WDI	Waste Data Interrogator
WNA	Waste Needs Assessment
WPA	Waste Planning Authority
WRMP	Water Resource Management Plan
WwTW	Wastewater Treatment Works

Term	Definition
Agricultural Waste	Waste produced on a 'farm' in the course of 'farming'. Agricultural waste takes both 'natural' (or organic) and 'non- natural' forms e.g. plastics and metal.
Anaerobic Digestion	A process to manage organic matter including green waste and food waste broken down by bacteria in the absence of air, producing a gas (biogas) and nutrient rich solid or liquid (digestate). The biogas can be used to generate energy either in a furnace, gas engine, turbine or to power vehicles, and digestate can be applied to land as a fertiliser.
Asset Management Plan	An asset management plan produced by sewerage and water undertaking for approval by Ofwat includes an assessment of what assets make up the water, sewer or storm system in a particular area and plans to meet future needs within agreed budgets.
Biodegradable waste	Waste that can break down over time due to natural biological action/processes, such as food, garden waste and paper.
Bioresources	Term applied to solid residue from wastewater treatment works, formerly referred to as sewage sludge (aka biosolids).
Commercial Waste	Waste from factories or premises used for the purpose of trade or business, sport, recreation or entertainment
Controlled Waste	Waste subject to controls emanating from the (retained) EU Waste Framework Directive.
Construction, Demolition & Excavation Waste	Waste arising from the building process comprising demolition and site clearance waste and builders' waste from the construction/demolition of buildings and infrastructure. Includes masonry, rubble and timber.
Defra	The UK Government department responsible for developing national waste management policy (non planning).
Energy from Waste	The conversion of the calorific value of waste into energy, normally heat or electricity through applying thermal treatment of some sort. May also include the production of gas that can be used to generate energy.
Environment Agency	The body responsible for the regulation of waste management activities through issuing permits to control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection.
European Waste Catalogue (EWC)	Comprehensive listing of wastes divided into 20 chapters, most of which are industry-based, although some are based on materials and processes. Each waste type is assigned a unique six-digit code. Otherwise referred to as List of Waste (LoW).
Exemptions	Certain activities exempt from the need to obtain an environmental permit. Each exemption has specific limits and conditions that must be complied with to remain valid. Exemptions must be registered with the Environment Agency. Each registration lasts 3 years.
Hazardous Waste Landfill	Sites where hazardous waste may be disposed by landfill. This can be a dedicated site or a single cell within a non-hazardous landfill, which has been specifically designed and designated for depositing hazardous waste.
Hazardous Waste	Waste requiring special management under the Hazardous Waste Regulations 2005 due to posing potential risk to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste.
Incineration	The controlled combustion of waste. Energy may also be recovered in the form of heat (see Energy from Waste).
Industrial Waste	Waste arising from any factory and from any premises occupied by an industry (excluding mines and quarries).

Landfill (including land raising)	The permanent disposal of waste to land, by the filling of voids or similar features, or the construction of landforms above ground level (land-raising).
Local Authority Collected Waste	Waste collected by or on behalf of a local authority. Includes household waste and business waste where collected by a local authority and non-municipal fractions such as construction and demolition waste delivered to HWRCs. LACW is the definition used in statistical publications, which previously referred to municipal waste.
Materials Recycling Facility (MRF)	A facility for sorting recyclable materials.
Non-Hazardous Waste Landfill	A landfill permitted to accept non-inert (biodegradable) wastes e.g. municipal and industrial waste and other non-hazardous (including inert) wastes. May only accept hazardous waste if a special cell is constructed.
Ofwat	The regulatory body responsible for overseeing the privatised water and sewage industry in England and Wales.
Recovery	Subjecting waste to processes that recover value including recycling, composting or thermal treatment to recover energy.
Recycling	The reprocessing of materials extracted from the waste stream either into the same product or a different one.
Sewage	Wastewater from domestic and commercial premises.
Sewerage undertaker	A company or authority legally responsible for collecting, treating, and disposing of wastewater and sewage within a designated service area.
The Plan area	The area subject to the Local Plan to which this study relates. In this case the Districts of Cumberland and Westmorland & Furness which together formed the former county of Cumbria.
Waste Planning Authority (WPA)	The authority responsible for planning for waste within a specific administrative area. In this case both Cumberland and Westmorland & Furness councils
Wastewater	Water that has been adversely affected by use such that it requires treatment prior to discharge to controlled waters.
Waste Transfer Station	A site to which waste is delivered for sorting or baling prior to transfer to another place for recycling, treatment or disposal.
Water Resources Management Plans	Statutory documents that all water companies must produce at least every 5 years intended to set out how they will achieve a secure water supply while also enhancing the environment.

1. Context

- 1.1 In 2022 BPP Consulting produced a Waste Needs Assessment (WNA) for Cumbria County Council, covering the whole of Cumbria using data for 2020. Since then, in 2023, Cumbria County Council has been split into two unitary authorities, Cumberland Council and Westmorland & Furness Council (W&F), administering the former county of Cumbria. This means both Councils perform the statutory function of Waste Planning Authority, Waste Disposal Authority and Waste Collection Authority for their respective administrative area. The Lake District National Park Authority produces its own waste planning policies as part of its own Local Plan covering the national park.
- 1.2 This report forms part of a suite of documents that presents the outputs of the Cumberland and Westmorland & Furness Joint WNA 2025 consisting of the following documents:
1. Local Authority Collected Waste Management Requirements to 2045;
 2. Commercial & Industrial Waste Management Requirements to 2045;
 3. Construction, Demolition & Excavation Waste Management Requirements to 2045;
 4. Hazardous Waste Management Requirements to 2045; and
 5. Scoping Review of 'Other' Waste.
- 1.3 This report is concerned with updating the scoping review of 'other' waste streams using 2023 data, which covers:
- Wastewater
 - Agricultural Waste
 - Low Level Radioactive waste
- 1.4 As PPG advises Waste Planning Authorities (WPAs) to plan for these streams, this report is intended to determine if it is necessary to expressly provide for these 'Other' waste streams and therefore quantify provision for them in the updated Waste Needs Assessment with a view to inclusion of policy in the respective emerging Local Plans.
- 1.5 The principal data sources used to generate this Waste Needs Assessment are the Environment Agency's Waste Data Interrogator (WDI), and Hazardous Waste Interrogator (HWI) supplemented by reference to the Councils' entries into Waste Data Flow (WDF) as WDA/WCA. While the above data sources may be used to inform the generation of estimations for the principal waste streams, the data to estimate arisings of 'Other' waste streams is less readily available and as a result quantifying and forecasting arisings is more problematic. Given the scantness of information, this scoping assessment comprises a review of the previous WNA covering Cumbria as a whole produced in 2022 and provides updates where more current information is available.

2. Wastewater

Context

- 2.1 Future wastewater management needs in Cumberland and Westmorland & Furness are principally shaped by the statutory planning framework for water and sewerage undertakers. Wastewater treatment works (WwTWs) are classed as *waste developments*, meaning that planning applications for new, expanded or upgraded facilities are determined by either of the two unitary authorities acting as Waste Planning Authority for their respective areas. In line with Planning Practice Guidance (PPG), early engagement between local planning authorities and United Utilities is essential to ensure that planned growth, environmental obligations and local plan allocations for non-waste development is supported by the provision of appropriate wastewater infrastructure.¹
- 2.2 Every five years, each statutory water and sewerage undertaker must prepare Asset Management Plans (AMPs) and submit them to Ofwat for approval. These business plans set out required service improvements, enhancements to wastewater treatment capacity, storm overflow reductions, and environmental performance commitments. Long-term certainty regarding new or expanded wastewater infrastructure can only be secured once funding has been approved through the AMP process. The current cycle, AMP8 (2025–2030), is under regulatory review, with investment proposals covering resilience upgrades, water quality improvements and compliance with Environment Act 2021 requirements.
- 2.3 Under the Environment Act 2021, undertakers are also required to produce Drainage and Wastewater Management Plans (DWMPs).² These are 25-year strategic plans outlining how wastewater systems will be maintained, improved and expanded in response to population growth, climate pressures, surface water management needs, and environmental drivers such as storm overflow reductions and phosphorus management. For Cumbria, the United Utilities DWMP (2022–2027) provides the strategic basis for medium- to long-term wastewater investment, including catchment-level assessments for key growth areas such as Carlisle, Barrow-in-Furness, Workington, Penrith and Kendal. National policy also informs wastewater planning.
- 2.4 The National Policy Statement for Wastewater (NPS-Wastewater)³ provides strategic guidance for nationally significant schemes under the Planning Act 2008. While Cumbria is unlikely to host projects of national significance, the NPS remains a relevant material consideration for wastewater infrastructure with cross-boundary or strategic implications—particularly given Cumbria’s sensitive environmental context, including the Lake District National Park, designated rivers, and protected coastal waters.

¹ [Water supply, wastewater and water quality Guidance](https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality) <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>

² [About the guidance and planning for drainage and wastewater management Guidance \(May 2025\)](#)

³ <https://www.gov.uk/government/publications/national-policy-statement-for-waste-water>

Terms

- 2.5 The term 'sewage' specifically refers to wastewater containing human waste, while the term 'wastewater' encompasses all discharges of effluent including from domestic, industrial, and commercial sources. For this report, the term 'wastewater' is used as the default. Both are generally managed/ treated in the same facilities. Such facilities may be referred to either as Sewage Treatment Works (STW) or Wastewater Treatment Works (WwTWs) and for the purposes of this report 'WwTW' is used as the default, though if a site is named as STWs, that term is used when making a specific reference to that facility.
- 2.6 Some WwTWs only undertake primary treatment only, meaning that the resultant solids need to be treated at 'next step' facilities. These next step facilities are normally referred to as Sludge Treatment Centres. In other cases a WwTW may include sludge treatment as part of the total treatment process.
- 2.7 United Utilities (UU) is the appointed water and sewerage undertaker responsible for wastewater collection, treatment and sludge management for the whole of Cumbria, covering both Cumberland and Westmorland & Furness. Within Cumbria, the company operates an extensive network of wastewater treatment works (WwTWs), pumping stations, combined sewer overflows (CSOs), storm storage assets, and facilities linked to regional sludge-treatment centres.
- 2.8 This Waste Needs Assessment draws upon the following key evidence sources:
- United Utilities AMP8 (2025–2030) business plan, including investment commitments relevant to Cumbria.⁴
 - United Utilities Drainage and Wastewater Management Plan (DWMP)⁵, outlining long-term capacity, resilience, climate-risk and environmental requirements.
 - United Utilities Bioresources Market Information Report⁶, setting out sludge-treatment capacity, transfer routes and operational constraints.
- 2.9 UU's AMP8 (2025–2030)⁷ proposes a £13.7 billion capital and operational programme across its operating region. This includes major statutory programmes focused on:
- Storm-overflow reduction and spill-frequency control
 - Compliance improvements at wastewater treatment works
 - Network resilience upgrades
 - Environmental water-quality enhancements

⁴ <https://www.unitedutilities.com/corporate/about-us/our-future-plans/our-business-plan-submissions/our-business-plan-submissions-for-2025-2030/>

⁵ <https://www.unitedutilities.com/corporate/about-us/our-future-plans/Our-long-term-plans/>

⁶ <https://www.unitedutilities.com/corporate/about-us/what-we-do/bioresources/>

⁷ <https://www.unitedutilities.com/corporate/newsroom/latest-news/record-13.7bn-investment-in-the-pipeline-for-north-west/>

2.10 Although AMP submissions are approved for the company operating region as shown in Figure 1, UU has also produced a series of more locally focussed strategies setting out its programme of investment.⁸ This includes upgrades to improve river water quality, reduce CSO spills, address phosphorus compliance, and modernise treatment works that currently constrain development or environmental performance. In the case of the Plan area, there is a Cumbria Catchment Strategy.⁹

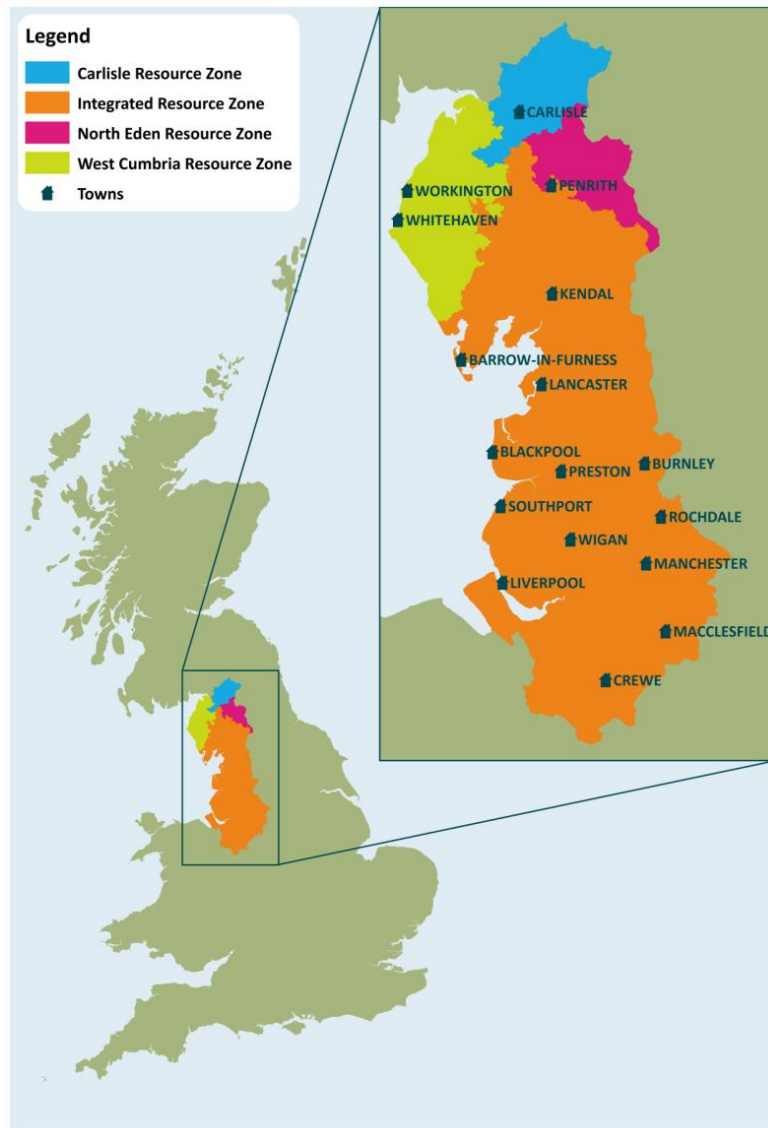


Figure 1: United Utilities water supply area¹⁰

⁸ <https://www.unitedutilities.com/my-local-area/news-in-your-area/cumbria/windermere/action-windermere/>

⁹ https://pr24.unitedutilities.com/pdfs/UUW06R_chapter_6.pdf

¹⁰ https://www.unitedutilities.com/globalassets/z_corporate-site/about-us-pdfs/water-resources/2018-drought-plan-final.pdf

Planning for Wastewater

2.11 Waste planning policy must consider two distinct aspects of wastewater management:

1. **Wastewater treatment capacity** – the ability of Cumbria's wastewater treatment network to accommodate existing and planned development.
2. **Bioresources (sludge) treatment capacity** – the capacity of facilities required to manage the solid residues generated by wastewater treatment.

Each of these components is assessed in the following sections.

Wastewater Treatment Capacity

2.12 Within UU's AMP8 (2025–2030) that applies to UU's whole operating region, the emphasis is on upgrades to existing wastewater treatment works (WwTWs) and network resilience, rather than constructing new greenfield treatment plants.

2.13 Both Cumberland and Westmorland & Furness council will need to address housing and employment growth pressures in their updated Local Plans, particularly in light of the significantly increasing housing targets now set by the Government. This will place additional demands on existing wastewater and drainage infrastructure. To support planned development while maintaining environmental compliance, United Utilities has indicated that future wastewater treatment needs will largely be addressed through targeted enhancement of the existing asset base. This includes process optimisation at wastewater treatment works, expansion of storm storage capacity to manage hydraulic pressures, and phosphorus-removal upgrades where required to meet Water Framework Directive objectives and permit limits.¹¹

Management of Sewage Sludge (Bioresources)

2.14 Sludge produced during wastewater treatment requires separate management due to its need for specialist processing (thickening, digestion, dewatering).¹² Table 1 sets out data for inputs of sludge and outputs to the two principal Sludge Treatment Centres (STCs) located in Cumbria. In both cases the sludge received was exclusively from Cumbria itself.

¹¹ <https://www.unitedutilities.com/corporate/newsroom/latest-news/upgrades-for-rural-wastewater-treatment-works-across-cumbria-in-fast-track-project-to-enhance-river-quality/>

¹² <https://www.gov.uk/government/publications/environment-agency-strategy-for-safe-and-sustainable-sludge-use/environment-agency-strategy-for-safe-and-sustainable-sludge-use>

Table 1: Sludge Treatment Centres in Cumbria operated by United Utilities.
Source: *United Utilities Bioresource Market Information (2023/2024)*¹³ & WDI 2023

Site Name	Type of Site	Inputs (tonnes)	Output (tonnes)	Fate
Barrow WwTW	Dewatering Centre	23,039	8,805	AD digestate to restoration predom. to Scotland
Carlisle WwTW	Treatment Centre	21,295	15,870	AD digestate to agriculture in Cumbria

Baseline and Updated Sludge Arisings

2.15 The previous WNA (2022) estimated that 77,000 tonnes of sewage sludge were produced in Cumbria in 2019. The WDI 2023 reports 81,706 tonnes of sewage sludge from Cumberland and Westmorland & Furness produced at permitted facilities—representing a modest increase relative to 2019. Of this, **44,334 tonnes** were treated at the two main WwTW located in Cumberland and Westmorland & Furness. In addition to the two Sludge Treatment Centres located in Cumbria as a whole, a facility located in Lancashire is reported as having received just over 37,000 tonnes of Cumbrian sludge in 2023.

Sludge Outputs and Adjusted Arisings

2.16 WDI 2023 reports combined output from the two Cumbrian WwTWs of c.5,000 tonnes of treated digestate, and 19,519t of sludges of which:

- 8,850 tonnes was exported outside Cumberland and Westmorland & Furness for management; and
- c.16,000 tonnes was recorded as having been managed within Cumbria as a whole.

¹³ <https://www.unitedutilities.com/corporate/about-us/what-we-do/bioresources/>

Sludge Storage Exemptions

- 2.17 The storing sludge at a place where it is to be used in accordance with the Sludge (Use in Agriculture) Regulations 1989 is currently covered by an exemption from permitting (S3).¹⁴ This exemption allows up to 1,250 tonnes of sludge to be stored at a location at any one time. Material may be stored for up to 12 months prior to spreading on agricultural land, provided this complies with the Sludge (Use in Agriculture) Regulations 1989 and associated best practice guidance. These sites are typically used as temporary holding points to support the agricultural recycling of treated biosolids.
- 2.18 The Environment Agency's exemption register shows that United Utilities (UU) holds almost 5,000 S3 exemptions across its operating area. Because the public register groups exemptions under "Cumbria and Lancashire," it is not possible to isolate precisely how many relate specifically to **Cumberland** and Westmorland & Furness. However, the register identifies 40 exemptions associated with Carlisle WwTW, with none associated with Barrow WwTW. Exemptions last for three years, after which they must be renewed.
- 2.19 Importantly, these exemptions provide interim storage only. They support the onward use of sludge on agricultural land but do not represent additional treatment capacity. They should therefore be viewed as complementary to, rather than substitutes for, wastewater sludge treatment infrastructure operated by UU.

Inputs of Other Waste to Wastewater Treatment Works in Cumbria

- 2.20 Wastewater Treatment Works (WwTWs) in Cumbria also manage certain non-wastewater liquid and sludge wastes such as septic tank contents and tanker-delivered liquid wastes.¹⁵ WDI 2023 data shows that the two Cumbrian WwTW reported accepting quantities set out in Table 2.

Table 2: Inputs to Permitted WwTW in Cumberland & Westmorland & Furness (excluding EWC 19 08 05 and 20 03 04)

Source: WDI 2023

EWC Waste Description	Barrow WwTW	Carlisle WwTW	Grand Total
16 10 02 - aqueous liquid wastes	2,015	351	2,366
19 07 03 - landfill leachate ¹⁶	9,973	851	10,824
19 08 12 - sludges from biological treatment of industrial wastewater	0	10,506	10,506
19 09 02 - sludges from water clarification	54,447	12,447	66,894
Total	66,435	24,155	90,590

¹⁴ <https://www.gov.uk/guidance/waste-exemption-s3-storing-sludge>

¹⁵ [https://www.unitedutilities.com/Business-services/tankered-industrial-and-domestic-wastes/#:~:text=Tankered%20domestic%20waste%20\(septic%20tank,septic tanks@uuplc.co.uk](https://www.unitedutilities.com/Business-services/tankered-industrial-and-domestic-wastes/#:~:text=Tankered%20domestic%20waste%20(septic%20tank,septic tanks@uuplc.co.uk)

¹⁶ It should be noted that recently concerns have been raised about the possible effect of contaminants such as PFAs 'forever chemicals' present in landfill leachate might have on the quality of sludge applied to agricultural land and alternative arrangements for its management may need to be made in the future.

- 2.21 The WDI data indicate that a total of 90,590 tonnes of non-sewage waste were accepted at the UU WwTW in 2023. The majority of this comprised sludges from water clarification (EWC 19 09 02), representing almost three-quarters of all inputs and managed largely at Barrow WwTW. Smaller but notable streams included landfill leachate (EWC 19 07 03) and aqueous liquid wastes (EWC 16 10 02), which were received by both sites. In addition, around 10,000 tonnes of industrial biological sludge (EWC 19 08 12) was accepted at Carlisle WwTW.
- 2.22 The differences in waste types accepted are believed to reflect the varying treatment capabilities at each of the facilities, as well as their roles in supporting wider waste and wastewater management needs of UU within Cumbria.

Conclusion

- 2.23 The WDI 2023 data shows that sewage sludge inputs to Barrow and Carlisle WwTWs stood at approximately 44,000 tonnes. These two facilities account for around 95% of all sludge managed in Cumbria, highlighting their critical role in supporting the area's wastewater infrastructure.
- 2.24 Non-sewage waste inputs also form a substantial and consistent component of inputs to the two WwTWs. In 2023, a combined 90,590 tonnes of additional waste—including aqueous liquids, landfill leachate, industrial biological sludges, and sludges from water clarification—were received. These inputs demonstrate the broader function of WwTWs in accommodating regional waste management needs beyond conventional wastewater treatment.
- 2.25 Sludge storage exemptions across Cumbria (and Lancashire) provide limited but necessary buffer capacity for application to agricultural land. However, these exemptions do not increase treatment capacity and therefore do not materially alter long-term wastewater planning considerations.
- 2.26 Taken together, the evidence suggests that existing wastewater treatment works will remain the primary locations for future capacity provision. As a result, future needs are expected to be met through upgrades, intensification, and expansion of existing infrastructure. Ongoing and proactive engagement with United Utilities will remain essential to ensure that wastewater planning keeps pace with housing growth, climate-driven resilience requirements, and evolving regulatory expectations. Continued monitoring of sludge arisings, non-sewage inputs, and WwTW performance will ensure that any future pressure points can be addressed through the Local Plan evidence base.

2.27 A review of the available evidence indicates that three key factors shape wastewater and sludge management capacity in Cumberland and Westmorland & Furness:

1. Planned housing growth across both plan areas. This is expected to place additional demand on existing wastewater treatment infrastructure and to increase wastewater sludge arisings.
2. United Utilities' AMP8 (2025–2030) investment strategy, which places emphasis on the enhancement and optimisation of existing wastewater and sludge treatment assets, including storm overflow improvements, river water quality enhancements and phosphorus-removal upgrades, rather than the delivery of new greenfield wastewater treatment works. This approach reflects both regulatory expectations and the efficient use of established strategic infrastructure within the region.
3. Increasing utilisation of existing wastewater treatment works for sludge and non-sewage waste management, reflecting wider industry trends towards the consolidation of treatment at established facilities. Analysis of Environment Agency Waste Data Interrogator returns indicates that larger regional works, including **Barrow and Carlisle**, play an important role in accommodating sludge movements and imported waste streams, reinforcing their function as key strategic assets within the sub-regional wastewater and sludge management network.

3. Agricultural Waste

Context

- 3.1 Agricultural waste became subject to regulation as controlled waste in England and Wales through the Waste Management Regulations 2006.¹⁷ Before this, much agricultural waste was disposed of by on-farm burning or burial practices.
- 3.2 To establish whether waste from agricultural sources needs separate consideration when formulating waste policies for inclusion in the Cumberland and Westmorland & Furness Local Plans respectively, the following three aspects have been considered for Cumbria as a whole:
1. the nature of different agricultural wastes arising;
 2. the likely current level of arisings;
 3. the way in which the arisings are managed.

Agricultural Waste Arisings

- 3.3 To be regarded as agricultural, waste must have been produced on a 'farm' in the course of 'farming'. Agricultural waste takes both 'natural' (or organic) and 'non-natural' forms.

Natural (Organic) Agricultural Waste Arisings

- 3.4 Natural agricultural wastes include:

- manures and slurries
- spoiled straw
- bedding materials; and
- other biodegradable livestock wastes.

In the UK, manures and slurries applied to agricultural land for benefit are classed as a by-product rather than waste, with their management controlled by separate environmental and nutrient-management regulations.¹⁸ However, recent case law — notably a High Court judgment on a case brought by the National Farmers Union against Herefordshire Council¹⁹ — challenges the previous assumption that all manure arising on farms should always be classed as a by-product. The judgment implies that, depending on use, storage, or transfer off-farm, certain manures may fall within waste controls. This issue may need ongoing consideration as the waste policies for the respective Local Plans develop, particularly if it relates to intensive livestock operations, but it does not materially affect the current WDI-based assessment of arisings.

¹⁷ Waste Management (England and Wales) Regulations 2006.

¹⁸ Defra, *Guidance on the use of manures and slurries (Nutrient Management)*.

¹⁹ *The National Farmers' Union v Herefordshire Council & Ors* [2025] EWHC 536 (Admin) (10 March 2025) (Admin)

Non-Natural Agricultural Waste Arisings

- 3.5 Non-natural agricultural waste includes waste not directly derived from agricultural processes²⁰. Examples include:
- plastics (silage wrap, crop cover, feed bags, bale twine)
 - chemical containers and fertiliser bags
 - waste oils and filters
 - metals and machinery parts
 - tyres (from mobile machinery such as tractors)
 - construction and demolition materials.
- 3.6 The most authoritative national dataset for estimating non-natural agricultural waste remains the Environment Agency's 2001 report "Towards Sustainable Agricultural Waste Management", which estimated arisings nationally in 1998.²¹ For the Northwest region, non-natural agricultural waste was estimated to be approximately 35,587 tonnes per year. While this data remains the baseline for generating local estimates, agricultural practices have changed considerably in some respects over the 25 years since the assessment.

Management Options

- 3.7 The *Defra Waste Minimisation Manual: A Practical Guide for Farmers and Growers* (2006) identified three principal routes for managing agricultural waste, and these remain broadly consistent with current practice under the *Environmental Permitting (England and Wales) Regulations 2016*, as follows:
1. Transfer of waste off farm to an appropriately permitted facility.
 2. Operation of on-farm waste management activities under an environmental permit.
 3. Registration of an exemption with the Environment Agency to allow certain low-risk waste recovery or disposal activities on-farm.
- The contribution each route makes to the management of agricultural waste arising in Cumbria as a whole is explored below.

²⁰ <https://assets.publishing.service.gov.uk/media/5a74be3aed915d502d6caa08/geho0003bieo-e-e.pdf>

²¹ [Towards Sustainable Agricultural Waste Management](#)

Transfer to a Permitted Facility

- 3.8 Waste delivered to a permitted facility is reported through the Environment Agency Waste Data Interrogator (WDI) on an annual basis. Agricultural wastes typically fall under EWC chapter 01 (agricultural waste) and partially 02 01 (agricultural and food preparation waste) although it should be noted that food preparation waste is classed as industrial and there can be a fine line between this classification, for example waste arising from the operation of on-farm dairies.
- 3.9 The WNA 2022 identified approximately 27,000 tonnes of agricultural waste from Cumbria managed at permitted facilities in 2019. In contrast the WDI 2023 Waste Received dataset identifies c.13,000 tonnes from Cumberland and Westmorland & Furness managed at permitted sites—a drop of around 14,000 tonnes on the 2019 dataset. Table 3 identifies the key permitted facilities receiving waste from agricultural sources arising in Cumberland and Westmorland & Furness in 2023.

Table 3: Permitted Sites Receiving Agricultural Waste from Cumberland and Westmorland & Furness

Source: WDI 2023

WPA	Site Name	Anaerobic Digestion	Composting	Non-Haz Waste Transfer	Grand Total
Cumbria	Eden Organics Composting Site	0	2,378	0	2,378
	North West Recycling	0	0	200	200
	Stanley Renewable Energy Limited	4,384	0	0	4,384
Total Managed in Plan Area		4,384	2,378	200	6,962
Leeds	Ridge Road Farm Anaerobic Digestion Facility	702	0	0	702
Redcar and Cleveland	Imperial Park AD Plant	5,350	0	0	5,350
Total Managed outside Plan Area		6,053	0	0	6,066
Grand Total		10,437	2,378	200	13,028

- 3.10 Notably, the quantity of waste treated via anaerobic digestion has declined from around 20,000 tonnes in 2019 to 10,500 tonnes in 2023, largely due to the absence of reported inputs to the Solway Heat & Power Ltd facility located at Kirkbride, Wigton. which previously provided on-farm AD capacity for up to c7,500tpa of agricultural waste.

- 3.11 All of the total c.**13,000** tonnes of waste reported as managed was organic.

Registering an Exemption

3.12 Smaller-scale activities may operate under waste exemptions registered with the Environment Agency. These exemptions allow certain on-farm waste-related activities to be carried out without an environmental permit, provided they meet the relevant tonnage limits, feedstock restrictions and environmental controls set out.

Table 4: Numbers of Registered Agricultural Waste Exemptions in Cumbria as a whole

Source: Environment Agency Exemption Register 2024

Exemption	Activity	Numbers Registered
T24	Anaerobic digestion on farms	3 - 22
U10	Spreading waste to benefit agricultural land	38 - 943
U14	Mixing ash back into soil	Up to 145
U15	Mixing pig and poultry ash with manure	3 - 53
D4	Depositing diseased crops under a Plant Health Notice	1 - 259

3.13 Table 4 sets out the number of exemptions for agricultural specific waste activities registered in Cumbria at the end of 2024. A number of each type of exemption is registered as standalone - T24 (3), U10 (38), U15 (3) and D4 (1), while a number are registered as part of a group of exemptions. It should be noted that until 2025 the registering of such exemptions attracted no fee, so there was no disincentive for registrants to register any that may prove to be applicable, even if they do not intend to actually rely on them. This is why Table 4 shows a range for the number of exemptions registered by type. In addition to the exemptions relating exclusively to agricultural waste, other general waste exemptions may also be relied upon for the management of certain agricultural waste; however, it is not possible to distinguish registration of these from the wider registered exemption data set.

Conclusion

- 3.14 The estimated amount of agricultural waste from Cumberland and Westmorland & Furness undergoing formal management in **2023** was approximately **13,000 tonnes**, representing a decrease of around **14,000 tonnes** compared with 27,000 tonnes in the WNA 2022 based on 2019 data.
- 3.15 This largely reflects the apparent closure of a significant local on-farm AD facility (Solway Heat & Power), with no apparent alternative outlet being utilised. It does however appear that the waste management network serving Cumbria as a whole currently accommodates agricultural waste arisings.
- 3.16 Exempt activities also provide management capacity for a proportion of agricultural waste arisings, but the scale is unknown. Moreover, it is likely that some exempt-managed wastes will ultimately enter the permitted system and are therefore partially captured in the WDI reported tonnages. It should also be noted that the exemption system is currently subject to reform which may constrain the future availability of such capacity, meaning that more waste may need to be managed directly through the permitted system.
- 3.17 Based on current evidence, there is no clear need to plan for additional dedicated agricultural waste management facilities. It appears that the existing network—comprising on-farm arrangement, exemptions, and a mix of local and regional permitted facilities—remains capable of meeting the waste management needs of farms across Cumbria. Continued monitoring of WDI data and engagement with local operators/producers should ensure that any future changes in arisings or management capacity availability can be responded to appropriately.

4. Low-Level Radioactive Waste

4.1 Solid radioactive waste in the UK is categorised according to its level of radioactivity and the heat it generates.²² The principal categories (plus one sub-category) are:

- **High-Level Radioactive Waste (HLW):** Highly radioactive waste that generates significant heat. Storage and disposal facilities must therefore incorporate heat-management considerations.
- **Intermediate-Level Radioactive Waste (ILW):** Lower activity than HLW and does not produce heat at levels requiring special engineering measures.
- **Low-Level Radioactive Waste (LLW):** Waste with low levels of radioactivity. Although LLW makes up more than 90% of the UK's radioactive waste by volume, it contains less than 0.1% of total radioactivity.
- **Very Low-Level Waste (VLLW):** A sub-category of LLW. VLLW is further differentiated into low-volume and high-volume categories, primarily based on the controls required for disposal at receiving sites.

4.2 Cumberland and Westmorland & Furness hold a unique national position in both the generation and management of LLW.²³ In addition to the smaller LLW arisings common to most areas (e.g., hospitals, universities), the area contains nationally significant nuclear-sector facilities.

- Sellafield, located in Cumberland, is the UK's only producer of HLW and manages all associated treatment and storage on site. Although no longer power-generating, it continues to reprocess spent fuel, producing HLW as a by-product. Sellafield handles approximately 74% of all UK LLW.²⁴
- The Low-Level Waste Repository (LLWR) at Drigg, also in Cumberland, is the national LLW disposal facility.
- Additional LLW arises from sources including the three acute hospitals in the area and BAE Systems Marine Ltd in Barrow.

4.3 This combination of nationally strategic facilities means that Cumberland and Westmorland & Furness must plan for LLW in ways that extend beyond the typical duties of waste planning authorities.

²² https://ukinventory.nda.gov.uk/wp-content/uploads/2021/03/20201222-Official-Rep-PO023346_fact-sheet-03.pdf

²³ <https://www.gov.uk/government/organisations/low-level-waste-repository-ltd/about#:~:text=LLWR%20Ltd.,means%20of%20disposal%20where%20practicable.>

²⁴ <https://www.gov.uk/government/organisations/sellafield-ltd>

Policy Relevant to Arisings of Low-level Radioactive Waste from Cumbria

- 4.4 The key national policy document is the UK Strategy for the Management of Solid Low-Level Waste from the Nuclear Industry (2016).²⁵ It identifies three overarching strategic principles:
- Application of the waste hierarchy;
 - Making the best use of existing LLW management assets;
 - Developing new, fit-for-purpose routes where needed.
- 4.5 NuLeAF's *Advice on Approaches to Radioactive Waste Management in Local Plans* (2020)²⁶ provides further guidance, including:
- Local Plans must clearly state how and where radioactive waste arising in the area will be managed, with appropriate collaboration under the Duty to Co-operate.
 - For nuclear industry wastes, disposal should ideally occur on the site where it arises, unless this conflicts with end-state aspirations.
 - Where this is not practicable, use of existing or planned conventional waste facilities within the waste planning authority area should be considered.
 - If no suitable local facility exists, engagement with other authorities under the Duty to Co-operate is required.
- 4.6 An updated policy was published in May 2024, *Managing Radioactive Substances and Nuclear Decommissioning: UK Policy Framework*.²⁷ This report focuses on:
- Innovations in nuclear waste treatments to increase recycling.
 - To reduce the impact on the environment and propose near-surface disposal facilities to dispose of less hazardous radioactive wastes.
 - Introduce measures to allow for quicker, safer decommissioning.
- 4.7 In the future, there may be a greater need for recycling facilities for radioactive wastes, due to certain intermediate-level waste being reclassified as low-level waste that is potentially suitable for recycling rather than requiring disposal.²⁸ There could be an increase in demand for specialist recycling facilities, such as Cyclife UK Ltd²⁹, particularly as decommissioning works get underway.

²⁵ https://assets.publishing.service.gov.uk/media/5a8087a3ed915d74e622efc0/NI_LLW_Strategy_Final.pdf

²⁶ <https://www.nuleaf.org.uk/policy-communications/briefing-papers/>

²⁷ [Managing Radioactive Substances and Nuclear Decommissioning- UK Policy Framework.pdf](#)

²⁸ [Reworking Intermediate Level Radioactive Waste.GOV.UK](#)

²⁹ <https://www.cyclife-edf.com/en/cyclife/governance/cyclife-uk>

Low-Level Radioactive Waste from Nuclear and Non-Nuclear Sources

Nuclear Sources

- 4.8 The majority of LLW in the area arises from nuclear-sector activities such as power generation (historic), fuel reprocessing, and site decommissioning. Cumberland (and Westmorland & Furness) therefore have significantly higher levels of LLW activity than most UK areas, hosting:
- the only former nuclear power station producing HLW (now being decommissioned),
 - the national LLWR disposal facility at Drigg,
 - extensive nuclear-associated industrial operations at Sellafield.

Non-Nuclear Sources

- 4.9 Non-nuclear sources of LLW include healthcare, pharmaceuticals, research and higher education establishments, as well as occasional industrial users and land contamination sites. Individually, these sectors generate relatively small volumes of radioactive waste, but collectively they constitute a consistent, nationally significant waste stream.
- Hospitals and Healthcare – Solid LLW arises primarily from traces of radiopharmaceuticals used in diagnostic and therapeutic medicine. This includes used syringes, vials, absorbent materials, and protective equipment contaminated with minute amounts of radioactive material. While much of this waste is managed through the clinical waste stream (typically incineration), hospitals are increasingly encouraged to segregate LLW from non-radioactive clinical waste to ensure that only materials requiring radioactive disposal are treated as such.³⁰
 - Pharmaceutical and Biotechnology Industry – These sectors use radioactive isotopes for product development, research, and quality control. Resulting LLW typically consists of laboratory plastics, sharps, gloves, and absorbent materials. The volume is modest but continuous. Waste is managed under the Environmental Permitting (England and Wales) Regulations 2016 through permits issued by the Environment Agency.
 - Research and Education – Universities and research institutions use radioactive tracers to study chemical and biological processes. Their LLW is similar in composition to hospital waste, consisting of disposable laboratory materials and small amounts of scintillation fluids. In agricultural and veterinary research, waste may also include contaminated plant material or animal bedding, which requires special packaging and disposal through authorised facilities.³¹
 - Contaminated Land – Radioactive waste can also arise from the remediation of sites historically affected by legacy industrial or medical activities. These wastes are often bulky soils with very low but measurable levels of contamination. The Government's LLW strategy does not expect waste planning authorities to make specific site allocations for such arisings, given their sporadic and site-specific nature, but recommends that local plans acknowledge the potential for such waste and ensure that appropriate disposal routes (e.g., permitted landfill) are available if required.³²

³⁰ Environment Agency (2023) *Guidance on the Management of Radioactive Waste from Hospitals and Medical Practices*, EA Regulatory Guidance Note RGN 2.

³¹ UK Radioactive Waste Inventory (2022) *Detailed Data Report*, Department for Energy Security and Net Zero and Nuclear Decommissioning Authority, February 2023.

³² Department for Levelling Up, Housing and Communities (2021) *National Planning Policy for Waste*, Paragraph 7, and DESNZ et al. (2021) *UK LLW Strategy* (Section 3.2.2).

Quantities

- 4.10 The total volumes of solid low-level radioactive waste (LLW), including very low-level waste (VLLW), produced by the non-nuclear sectors remain extremely small in national terms when compared with municipal, industrial, and construction waste streams. Government estimates indicate that non-nuclear LLW accounts for well below 0.1% of the total waste generated annually in England.³³ National data compiled under the *UK Radioactive Waste Inventory (2022)* show that the non-nuclear industry contributes less than 1,000 m³ of solid LLW per year, a figure that has remained broadly stable over the past decade.

Management of VLLW and LLW

Very Low-Level Waste (Exempt Waste)

- 4.11 Very Low-Level Waste (VLLW) is defined by the Environment Agency as *solid radioactive waste that contains such small concentrations of radioactivity that it can be safely disposed of with ordinary refuse*, provided specified activity limits are met.³⁴ Sites generating small volumes of VLLW — typically less than 50 m³ per year — are regarded as *low-volume producers* and may operate under the exemptions regime set out in the *Environmental Permitting Regulations 2016*.³⁵

Low-Level Waste

- 4.12 The low, dispersed arisings of LLW seldom justify dedicated facilities. Therefore, most LLW producers rely in the broader waste infrastructure used for larger waste streams. LLW disposal requires a permit for both the producer and the receiving facility. LLW may be disposed via:

- Controlled burial at permitted landfills;
- Incineration, with or without energy recovery; and
- The national LLWR at Drigg (reserved for particular LLW types);

- 4.13 In England, only three landfill sites are currently permitted to accept LLW. One of these, Lillyhall Landfill, is located in Cumberland and is therefore highly relevant to local planning. Lillyhall is permitted to accept up to 26,000 m³ of high-volume VLLW per year, with a total limit of approximately 582,000 m³ until its current permission expires in 2031.

Table 5: Landfill Sites Permitted to Receive LLW in the UK

³³ Department for Energy Security and Net Zero et al. (2021) *UK Strategy for the Management of Solid Low Level Radioactive Waste from the Non-Nuclear Industry*, Section 2.3.1; Department for Environment, Food and Rural Affairs (2023) *UK Waste Statistics Summary*, DEFRA Official Statistics, March 2023.

³⁴ Environment Agency (2023) *Guidance on the Management and Disposal of Very Low Level Radioactive Waste*, Regulatory Guidance Note RGN-LLW-V1, EA, Bristol.

³⁵ The Environmental Permitting (England and Wales) Regulations 2016 (as amended by the Environmental Permitting (England and Wales) (Amendment) Regulations 2023), SI 2023 No. 86

Site Name	Operator	Waste Type	Source Specific	Host WPA
Lillyhall Landfill Site	FCC Recycling (UK) Ltd	High Volume -VLLW	No more than 26,000 m ³ of HV-VLLW per year and if the landfill remains operational until 2031 no more than 582,000 m ³ of HV-VLLW in total. ³⁶	Cumberland
Clifton Marsh	Suez Recycling & Recovery Lancashire Ltd	LLW	Small quantities of lower activity low level radioactive wastes. Has ceased accepting radioactive waste of nuclear origin.	Lancashire
East Northants Resource Management Facility	Augean South PLC	LLW	Waste mainly generated from the decommissioning and cleanup of nuclear industry sites ³⁷	Northants

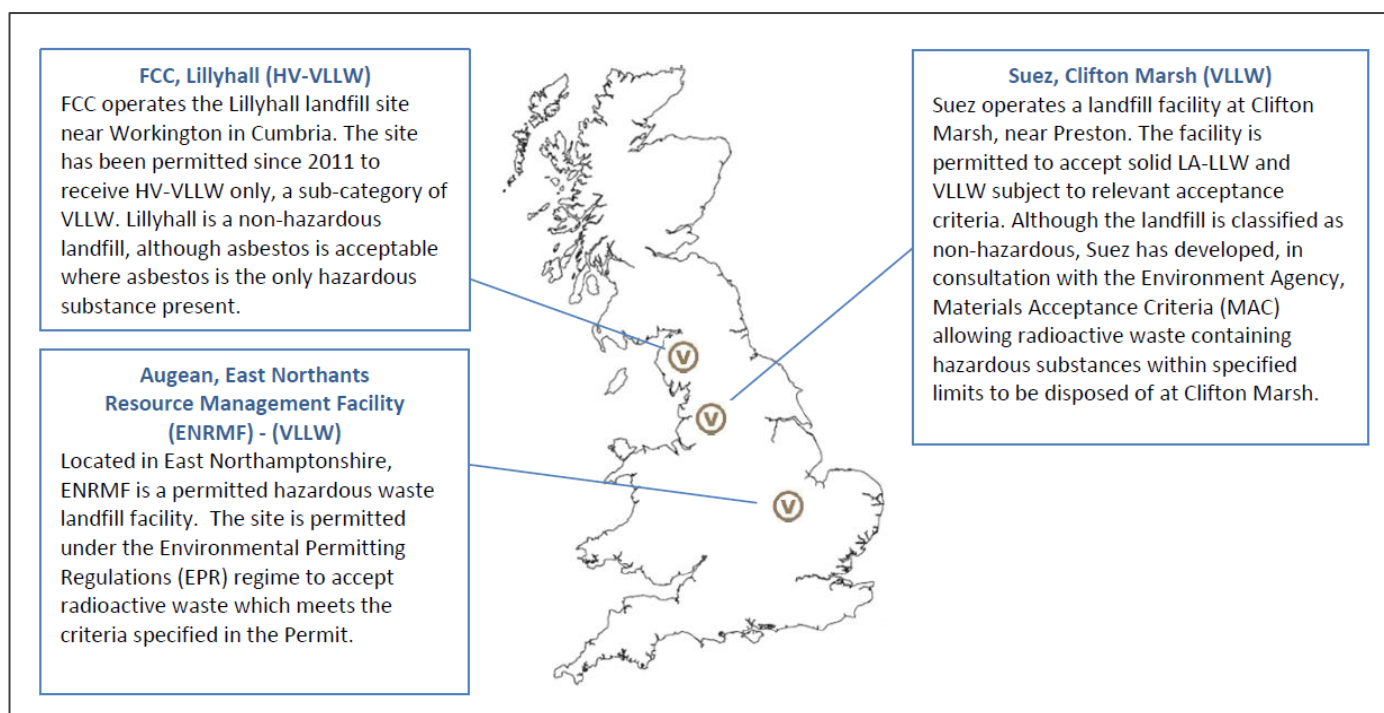


Figure 2: Landfill Sites Authorised to accept VLLW

Source: Very Low-Level Waste Service Guidance, LLW Repository Ltd, May 2017

³⁶ Environment Agency. 2011. Environmental Permitting (England and Wales) Regulations 2010 Decision Document. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/303034/WRG_Decision_Document.pdf

³⁷ <https://www.augeanplc.com/enrmf-planning/>

Planning for the Management of LLW

- 4.14 The LLW Strategy emphasises the need for LLW producers and planning authorities to work together through Local Plan preparation and planning decision-making. Proximity and suitability of disposal routes should be assessed, and joint working with neighbouring authorities is encouraged where shared facilities may be appropriate.

The Proximity Principle

- 4.15 For most non-nuclear VLLW, disposal routes depend on the general waste stream and cannot be directed by producers without segregation.³⁸
- 4.16 For LLW, producers are expected to consider proximity explicitly in their disposal planning. The level of importance varies according to waste type and available technologies. For example, proximity is less relevant where specialised national facilities are required (e.g. decontamination of large steel components) but more relevant where hospital LLW could feasibly be treated locally.
- 4.17 Communities benefiting from radioactive-material use (e.g., medical, economic) should, where possible, take a share of responsibility for managing associated wastes, while recognising that complete local self-sufficiency is neither practical nor expected.³⁹

Production and Management of LLW in Cumbria

- 4.18 A review of the Environment Agency public register shows **10 authorisations held by 12 entities** across Cumbria for the keeping, use, and disposal of radioactive materials. These include hospitals, research facilities, defence establishments, and energy-sector operators (see Table 6).

³⁸ https://assets.publishing.service.gov.uk/media/62d6c08ed3bf7f285c94b318/Waste_Characterisation_Report.pdf

³⁹ [World Nuclear Association](#)

Table 6: Radioactive Source Authorisations held within Cumbria as a whole

Source: Environment Agency Public Register accessed September 2025

Activity	Entity	Data Approved	Location
Keeping & Use of Radioactive Materials and Disposal of Radioactive Waste (G)	Amentum Clean Energy Ltd	02/02/2024	VJ Battery, MOD Eskmeals, Millom, LA19 5YR
	Cavendish Nuclear Limited	02/04/2012	Environmental Laboratory, Westlakes Science and Technology Park, Moor Row, Whitehaven, CA24 3HZ
	Chrysaor Resources Ltd	14/07/2023	Millom and Dalton Gas Fields, Offshore
	Energy Coast Laundry Limited	23/10/2018	Joseph Noble Road, Lillyhall Industrial Estate, Workington, CA14 4JX
	North Cumbria Integrated Care NHS Foundation Trust	19/12/2019	West Cumberland Hospital, Homewood, Whitehaven, CA28 8JG
		26/02/2020	Cumberland Infirmary, Newtown Road, Carlisle, CA2 7HY
	QinetiQ Limited	07/02/2020	MoD Eskmeals, Millom, LA19 5YR
	Spirit Energy Production UK Limited	15/02/2019	Offshore platforms, CPC1 & Satellites, Morecambe Gas Fields Support Base, Heysham, Offshore
		13/06/2022	North Morecambe, Millom, Dalton & Rhyl Gas Fields, North Morecambe Platform, East Irish Sea, Offshore
	The University of Manchester	22/10/2024	Dalton Cumbrian Facility, Crow Park Way, Westlakes Science and Technology Park, Moor Road, Whitehaven CA24 3HA
Keeping & Use of Radioactive Materials and Disposal of Radioactive Waste (F)	University Hospitals of Morecambe Bay NHS Foundation Trust	11/07/2022	Furness General Hospital, Nuclear Medicine Department, Dalton Lane, Barrow-in-Furness, LA14 4LF
Keeping & Use of Radioactive Materials and Disposal of Radioactive Waste (F)	Kingmoor Park Properties Limited	01/04/2018	Kingmoor Park, Kingstown, Carlisle, CA6 4RP

4.19 A further set of sites within Cumberland and Westmorland & Furness are subject to permits for the disposal of radioactive waste alone. These include the LLWR, Lillyhall Landfill, Sellafield, Cyclife, and major industrial operators such as BAE Systems (see Table 7).

Table 7: Sites in Cumbria Permitted for Disposal of Radioactive Waste

Source: Environment Agency Public Register accessed September 2025

Plan Area	Entity	Data Approved	Location
Cumberland	Cyclife UK Ltd	01/10/2022	Metal Recycling Facility, 1 Joseph Noble Road, Workington, CA14 4JX
	FCC Recycling (UK) Limited	23/05/2025	Lillyhall Landfill Site, Workington, CA14 4JH
	LLW Repository Ltd	01/04/2021	LLWR, Holmrook, CA19 1HX
	Sellafield Ltd	01/10/2023	Sellafield and Windscale Sites, Seascale, CA20 1PG
Westmorland & Furness	Spirit Energy Production UK Limited	25/07/2018	Barrow Gas Terminals, Rampside Road, Barrow-in-Furness, LA13 0QU
	BAE Systems Marine Limited	23/08/2022	Barrow Shipyards Nuclear Site, Bridge Road, Barrow in Furness, LA14 1AF

Conclusion

4.20 This review shows that Cumberland and Westmorland & Furness contain a concentration of nationally significant LLW infrastructure and producers, including Sellafield, the LLWR, and regionally important disposal and treatment facilities such as Lillyhall and Cyclife. There are also multiple non-nuclear sources generating small but continuous LLW arisings, such as hospitals and research establishments.

4.21 However, the absence of quantitative data linked to individual Environment Agency authorisations makes it impossible to estimate future LLW volumes arising within the local authority areas. As a result, while the current network of facilities appears suitable for present needs, the Local Plans for Cumberland and Westmorland & Furness should:

- continue close engagement with LLW producers and the Environment Agency,
- monitor developments relating to Lillyhall landfill's operational lifespan and national LLWR capacity, and
- ensure Local Plan policies remain aligned with the national LLW Strategy.

Maintaining ongoing dialogue with operators is therefore essential to ensure that any future changes in waste arisings, disposal capacity, or national policy are appropriately reflected in emerging waste planning policies.

5. Other Waste Scoping Conclusion

- 5.1 Wastewater and sewage sludge, the existing wastewater treatment works, and sludge treatment centres will remain the primary focus for meeting future needs. United Utilities' AMP8 and DWMP frameworks clearly indicate that capacity pressures arising from planned housing growth, climate change and tighter environmental standards will be addressed predominantly through upgrades, optimisation and intensification of existing infrastructure, rather than new standalone facilities. While sludge arisings have increased modestly since 2019, current treatment and export arrangements remain sufficient, and storage exemptions provide limited operational flexibility without fundamentally altering long-term capacity requirements. Continued close engagement with United Utilities is therefore essential to ensure that wastewater infrastructure investment aligns with spatial growth strategies and environmental objectives.
- 5.2 Agricultural waste, the analysis indicates that arisings managed through the permitted system are relatively modest and have declined since the previous WNA. The existing mix of on-farm management, exemptions, and access to local and regional permitted facilities appears capable of accommodating current and future needs. While ongoing reforms to the waste exemption regime may affect the future availability of on-farm options, there is no clear evidence at present to justify allocating new dedicated agricultural waste facilities within either plan area. Monitoring of exemption reform, WDI data and changes in farming practices will remain important.
- 5.3 Low-level radioactive waste represents a distinct issue for Cumberland and Westmorland & Furness. The presence of Sellafield, the Low-Level Waste Repository at Drigg, and permitted facilities such as Lillyhall Landfill places the area at the centre of the UK's LLW management system. While non-nuclear LLW arisings are relatively small, future needs will be shaped by national policy, decommissioning programmes and the operational lifespan of key disposal facilities, rather than by local growth alone. Given the limited availability of quantitative arisings data, Local Plans should focus on maintaining policy flexibility, safeguarding existing facilities, and supporting effective cross-boundary working.
- 5.4 Overall, the Waste Needs Assessment does not identify a requirement to provide additional infrastructure specific to wastewater, agricultural waste or radioactive waste management within the respective plan periods. Instead, the priority for both Cumberland and Westmorland & Furness should be to support the continued operation, enhancement and safeguarding of existing strategic facilities, maintain strong relationships with statutory undertakers and waste operators, and ensure that emerging Local Plan policies are responsive to evolving regulatory, environmental and national policy drivers.