



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

Review of Strategic Waste Flows for Cumbria as a whole for Duty to Cooperate

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Contents

Abbreviations	iv
Glossary of Terms	v
1. Introduction	1
2. Waste as a Strategic Issue	2
The Duty to Cooperate	2
Net Self Sufficiency	3
Identifying Waste Flows that might be Strategic	4
3. Waste Flows from Cumberland & Westmorland & Furness	5
Exports & Imports of Waste Cumberland & Westmorland & Furness (aka Cumbria)	5
Applying DtC thresholds	6
Cumbria Non-inert Waste Destinations	9
Inert Waste Destinations	10
Cumbria Hazardous Waste Destinations	11
4. Summary	13
Appendix 1: Historical Cross Check: Destination WPAs of Hazardous, Non-inert and Inert Waste exports from Cumbria 2021-2023	14
Appendix 2: Facilities that received tonnages of waste from Cumbria above initial screening thresholds pre-2023	16

Table of Tables

Table 1: Tonnages of 'Cumbria' waste managed in permitted facilities within 'Cumbria', and tonnage of waste imported to former Cumbria facilities 2020 & 2023.....	5
Table 2: Destination WPAs of Inert, Non-inert and Hazardous Waste exports from Cumbria	7
Table 3: Destination sites for Non-inert Waste 5,000t or more from Cumbria as a whole	9
Table 4: Destination sites for Inert Waste exports c10,000t or more in 2023 from Cumbria as a whole	10
Table 5: Destination sites for former Cumbria Hazardous Waste Exports.....	11

List of Figures

Figure 1: Waste import and export balance in Cumbria 2023 compared to 2020 by management method and waste type where known (tonnes)	6
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Abbreviations

Abbreviation	Term
AD	Anaerobic Digestion
C & I	Commercial & Industrial Waste
C, D & E / CDEW	Construction, Demolition & Excavation Waste
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EfW	Energy from Waste
ELV	End-of-Life Vehicle
HWRCs	Household Waste Recycling Centres
IVC	In-Vessel Composting
LAA	Local Aggregate Assessment
LACW	Local Authority Collected Waste
MBT	Mechanical Biological Treatment
MRS	Metal Recycling Site
MRF	Material Recycling Facility
MSW	Municipal Solid Waste
nPPG	national Planning Practice Guidance
NPPW	National Planning Policy for Waste
RDF	Refuse Derived Fuel
SNRHW	Stabilised Non-Reactive Hazardous Waste
VLLW	Very Low-Level Waste
WCA	Waste Collection Authority
WDA	Waste Disposal Authority
WDF	WasteDataFlow
WDI	Waste Data Interrogator
WNA	Waste Needs Assessment
WPA	Waste Planning Authority
WTS	Waste Transfer Station

Glossary of Terms

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.
Bio waste	Waste that can break down over time due to natural biological action/processes, such as food, garden waste and paper.
Commercial Waste	Waste from factories or premises used for the purpose of trade or business, sport, recreation or entertainment.
Composting	A process in which biodegradable waste (such as green waste and kitchen waste) is broken down in aerobic conditions by naturally occurring micro-organisms to produce a material suitable for use as a soil improver.
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.
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.
Green waste	Biodegradable plant waste from gardens and parks such as grass and hedge trimmings, from domestic and commercial sources suitable for composting.
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.
Household Waste	Waste from households collected through kerbside rounds, bulky items collected from households and waste delivered by householders to household waste recycling centres and "bring recycling sites". along with waste from street sweepings, and public litter bins.
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).
Inert Landfill	Landfill site permitted to only accept inert waste for disposal.
In Vessel Composting (IVC)	Composting materials within a closed system. Can be used to treat food and garden waste.
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).

Cumberland and Westmorland & Furness Joint WNA 2025/26

Retained EU Landfill Directive	European Union requirements restricting the landfilling of biodegradable municipal waste and requiring pre-treatment of all waste to be landfilled and separate disposal of hazardous, and non-hazardous and inert wastes.
Local Aggregate Assessment (LAA)	Annual local aggregate supply and demand assessment conducted by Mineral Planning Authorities which includes a survey of recycled aggregate producers within their particular Plan area.
Local Authority Collected Waste	Waste collected by or on behalf of a local authority. Includes household waste and business waste were 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.
Mass Balance	Method of assessing the quantity of waste that may be converted to recycled aggregate by comparing inputs and outputs for sites reporting through the WDI.
Materials Recycling Facility (MRF)	A facility for sorting recyclable materials from the incoming waste stream.
Mechanical Biological Treatment (MBT)	A waste facility that combines a sorting facility with a form of biological treatment such as composting or anaerobic digestion.
Municipal Solid Waste (MSW)	Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste and waste resulting from the clearance of fly-tipped materials.
Non-Hazardous Waste Landfill	A landfill permitted to accept non-inert (biodegradable) wastes e.g. municipal and commercial and industrial waste and other non-hazardous (including inert) wastes. May only accept hazardous waste if a special cell is constructed.
Open Windrow Composting	A process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a material suitable for use as a soil improver.
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.
Refuse Derived Fuel	A fuel produced to a contract specification by processing the combustible fraction of waste.
Residual Waste	<i>The Environmental Targets (Residual Waste) (England) Regulations 2023</i> , defines residual waste as any waste other than excluded waste that is (a) sent to landfill in the United Kingdom; (b) put through incineration in the United Kingdom; (c) used in energy recovery in the United Kingdom; or (d) sent outside the United Kingdom for energy recovery.
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 Collection Authority (WCA)	A local authority that has a duty to collect household waste. WCAs also have a duty to collect commercial waste if requested to do so and may also collect industrial waste. In this case both Cumberland and Westmorland & Furness councils.
Waste Disposal Authority (WDA)	A local authority responsible for managing the waste collected by waste collection authorities and the provision of household waste recycling centres. In this case both Cumberland and Westmorland & Furness councils
Waste Planning Authority	The authority responsible for planning for waste within a specific administrative area. In this case both Cumberland and Westmorland & Furness councils
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.

1. Introduction

- 1.1 The purpose of this report is to assess the nature and quantum of movements of waste (a.k.a. waste flows) between Cumberland and Westmorland & Furness (collectively as Cumbria) and other areas to determine which may be regarded as strategic for the purposes of engagement with other Waste Planning Authorities (WPAs) under the Duty to Cooperate (DtC).
- 1.2 In 2022 BPP Consulting produced a Waste Needs Assessment (WNA) for Cumbria as a whole County Council, using data from 2022. Since then, in 2023 Cumbria County Council has split into two unitary authorities, Cumberland Council and Westmorland & Furness (W&F) Council. However, given DtC is a joint exercise when considering waste as a strategic issue, the two unitary authorities have been considered as a whole (as Cumbria). This also allows for the comparison with the flows identified in the WNA 2022.
- 1.3 Duty to Cooperate engagement is intended to explore the likelihood of waste flows remaining, or becoming, strategic in future involving consideration of the following:
 1. Whether historical flows of waste indicated by this report are likely to continue including consideration of any barriers to the continuation of waste exports; and
 2. whether new flows of waste beyond the Plan area are likely to occur, taking any predicted changes in capacity that the management of waste arising in Cumbria currently relies on (situated either within or beyond Cumbria) into account.
- 1.4 DtC engagement is conducted against the backdrop of the national policy expectation that authorities should consider planning for the management of waste arising in other areas where appropriate.
- 1.5 Advice is provided to support both Cumberland Council and Westmorland & Furness (W&F) Council in their DtC engagement activities including identification of ‘target’ WPAs.

2. Waste as a Strategic Issue

- 2.1 The management of waste has little regard for administrative boundaries, with waste arising in WPA area often being managed in another. Waste management facilities may have catchments that extend beyond the boundary of the Plan area within which it is situated. Such flows are recognised in relation to the disposal of waste and recovery of mixed municipal waste in particular in the National Planning Policy for Waste that expects WPAs to:

“plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;”¹.

Hence the management of waste can be a cross boundary strategic matter, the proper planning for which may require co-operation between WPAs.

The Duty to Cooperate

- 2.2 Section 33A of the *Planning and Compulsory Purchase Act 2004* (as amended by section 110 of the *Localism Act 2011*) requires Councils in England that produce development plan documents to cooperate with relevant local planning authorities, county councils and bodies or other persons as prescribed. The Duty to Cooperate (aka 'the Duty') imposes, in particular, a duty to: *“engage constructively, actively and on an ongoing basis”*. This is required in relation to *“maximising the effectiveness”* of, and having *“regard to”*, activities concerned with supporting or preparing planning policies *“so far as relating to a strategic matter”*. Hence there is a legal duty on plan making Councils to engage *“constructively, actively and on an on-going basis”* in *“maximising the effectiveness”* of Local Plans.
- 2.3 The Duty applies to the preparation of development plan documents, insofar as they relate to a *“strategic matter”*. A strategic matter is defined as *“sustainable development or use of land that has or would have a significant impact on at least two planning areas including... in connection with infrastructure that is strategic...”* (S33A(4)). Therefore, waste management between Plan areas may qualify as a strategic matter under the Duty.
- 2.4 The updated National Planning Policy Framework (December 2024) expects that Local Plans include ‘non-strategic’ and ‘strategic’ policies, and explains that strategic policies should: *“... set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for ...infrastructure”* and this includes *“for ...waste management”*².

It goes on to specify that:

“In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.”³

¹ Paragraph 4.

² Paragraph 20.

³ Paragraph 28.

- 2.5 The *Levelling up and Regeneration Act 2023* includes provisions for the revocation of the DtC. However, at the time of writing, the regulations and guidance that would enact these provisions have still to be published and until such time, the Duty remains a requirement in Plan making that is intended to seek alignment between Plan making bodies and other relevant Plan making and statutory bodies. It is anticipated that whatever replacement mechanism is put in place, an assessment of strategic flows of waste will need to be undertaken for plan making purposes.

Net Self Sufficiency

- 2.6 Self-sufficiency in terms of waste, as outlined in Article 16 of the EU Waste Framework Directive⁴, refers to the principle that each Member State of the European Union should aim to manage and dispose of its own waste within its borders, to the extent possible. This encourages Member States to take responsibility for their own waste and is designed to reduce the need for cross boundary waste movements, which can create inequalities between countries and waste tourism. Even though the UK has now exited the EU, the principle still applies at national level to the UK as a whole⁵.
- 2.7 The principle of self-sufficiency has been adapted for local waste planning purposes to establish how much management capacity should be provided in each waste Plan area. The addition of the term 'net' recognises that movements of waste occur between waste Plan area, as the management of waste arising within a specific Plan area is not generally restricted to administrative boundaries. Movements can be beneficial for optimising the waste management system where economies of scale apply. This means there is no expectation that each tonne of waste produced in a particular Plan area is to be managed within that Plan area. Rather that, overall, there should be a balance of provision. The objective of net self-sufficiency ensures that there is sufficient capacity to manage the tonnage of waste equivalent to that predicted to arise within a particular Plan area. The degree to which a Plan area is net self-sufficient can be established by comparing the available capacity within the Plan area against the projected capacity requirements.
- 2.8 In addition to the above, the management of any waste by disposal, or the recovery of mixed municipal waste is also subject to the proximity principle⁶ which seeks to ensure waste is managed at one of the nearest appropriate facilities. National guidance acknowledges that such a facility may be located outside a Plan area.

⁴ <https://eur-lex.europa.eu/eli/dir/2008/98/oj>

⁵ As transposed in English law through *The Waste (England and Wales) Regulations 2011* as amended.

⁶ See Paragraph 4 of National Planning Policy for Waste.

Identifying Waste Flows that might be Strategic

- 2.9 A key matter is to establish whether key historical patterns of waste management outside a Plan area can be relied upon for the duration of the Plan period. To ensure compliance with the DtC, the focus for engagement in this case is therefore to address outgoing waste flows, that may be regarded as ‘strategic’ in nature.
- 2.10 The previous Cumbria WNA 2022 applied the following thresholds:
- Inert waste: 10,000 tonnes per annum
 - Non-hazardous waste: 5,000 tonnes per annum
 - Hazardous waste: 100 tonnes per annum

The above thresholds are intended to be used as an initial screening tool only, and movements exceeding these, may be further screened out following more detailed consideration of the significance of individual waste flows to the source WPA. This second stage is important given the expectation that flows of significance are to be subject to Statements of Common Ground between source and receiving WPAs.

3. Waste Flows from Cumberland & Westmorland & Furness

Exports & Imports of Waste Cumberland & Westmorland & Furness (aka Cumbria)

3.1 The principal data source used, the Environment Agency (EA) Waste Data Interrogator (WDI), reports inputs to sites located in England subject to environmental permits it has issued by origin. Table 1 below shows the tonnages of waste attributed to Cumbria as a whole in the WDI 2023 managed at permitted facilities both within Cumbria and beyond, as well as the tonnage of waste from outside of Cumbria managed at permitted waste management facilities located within Cumbria in 2023. It should be noted that some sites do not report inputs down to WPA level and therefore some waste that arose from Cumbria managed at permitted facilities may not be captured in the data below. This shortcoming has been addressed in a subsequent section of this report.

Table 1: Tonnages of 'Cumbria' waste managed in permitted facilities within 'Cumbria', and tonnage of waste imported to former Cumbria facilities 2020 & 2023

Source: WDI 2020 & 2023

Year	Cumbria Arisings		Managed in Cumbria		
	Total Cumbria waste	of which managed outside Cumbria	Cumbria waste managed in Cumbria	Waste imported to Cumbria	Total Managed in Cumbria
2020	2,318,528	552,111	1,766,417	238,693	2,005,110
2023	2,408,685	556,457	1,852,228	290,834	2,143,062

3.2 Table 1 shows that c1.9M tonnes of waste arising in Cumbria as a whole was managed at facilities located in former Cumbria ie Cumberland and Westmorland & Furness in 2023. This compares with c1.8M tonnes in 2020. Table 1 also shows just over half a million tonnes (c556,500) of waste was managed outside 'Cumbria as a whole' in 2023 as compared with c552,000 tonnes in 2020. In both cases the export was partially offset by the import of waste for management from outside Cumbria of c291,000 tonnes in 2023 and c240,000 tonnes in 2020. Taking this snapshot as a simple balance, net-self-sufficiency in waste management capacity was not achieved in either year - 2023 c2.1Mt managed vs c2.4Mt produced c89% net self-sufficiency and 2020 c2Mt managed vs c2.3Mt produced = c86% net ss.

3.3 Figure 1⁷ displays visually the balance between imports and exports by waste management method and waste type in Cumbria.

⁷ Note that Figure 1 only includes waste managed at permitted sites in England and does not include waste exported to Wales, Scotland or further afield as this is not reported reliably in the WDI.

Cumberland and Westmorland & Furness Joint WNA 2025/26

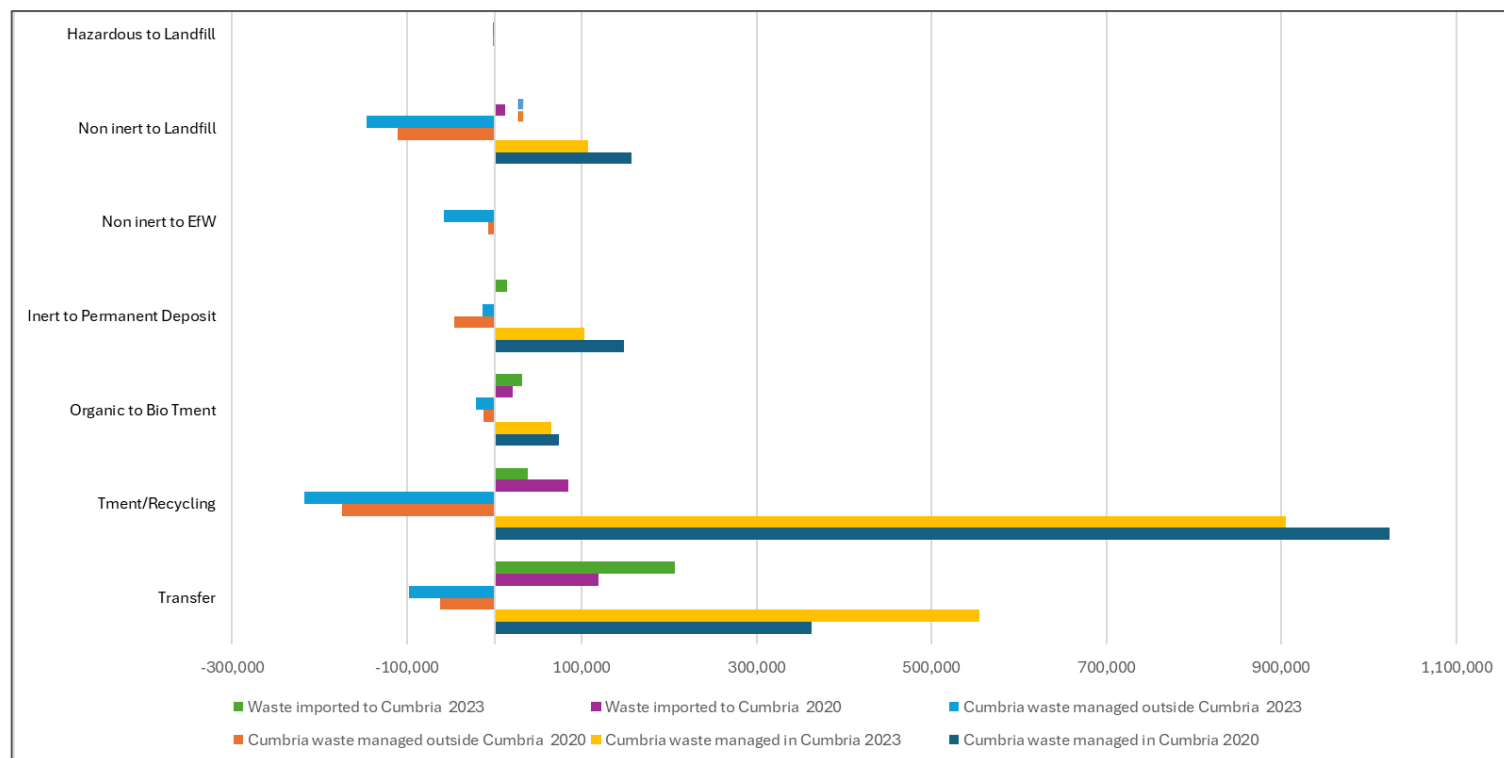


Figure 1: Waste import and export balance in Cumbria 2023 compared to 2020 by management method and waste type where known (tonnes)

3.4 Figure 1 shows that the flow of waste into and out of Cumbria as a whole in 2023 has remained consistent with the flows in 2020 for most management methods. The largest change in 2023 is the increase in Cumbria waste managed by transfer within former Cumbria i.e. Cumberland and Westmorland & Furness, with a slight decrease in management outside Cumbria as a whole.

3.5 Each dataset represents a snapshot for a year and is not necessarily a true representation of net - self-sufficiency as actual inputs in either year may not reflect total available management capacity (and can be expected to be an underestimate of capacity in most cases given most facility types don't necessarily operate to their theoretical maxima capacity every year).

3.6 A key matter to address when assessing the robustness of the proposed planning strategy for waste in both Cumberland and Westmorland & Furness is to establish whether flows of waste to waste management facilities beyond each Plan area that are relied upon by either Cumberland or Westmorland & Furness will be available for the duration of its respective Plan period. The focus for DtC engagement in this case is therefore to address outgoing waste flows and these are considered in the following section.

Applying DtC thresholds

3.7 The 'thresholds' for Duty to Cooperate used in the Cumbria WNA 2022 have been applied.

3.8 Table 2 shows movements of waste from Cumbria as a whole in 2023 (latest data available at the time of commission) to other WPAs (in rank order) where one or more of the thresholds have been met or exceeded.

Table 2: Destination WPAs of Inert, Non-inert and Hazardous Waste exports from Cumbria applying DtC thresholds

Source: WDI 2020 + 2023

N.B. Entries highlighted are those where thresholds have been met or exceeded. Blue highlighted cells show WPA entries that exceeded the thresholds in 2020 but not in 2023. Green highlighted cells show WPA entries that exceed the thresholds in 2023 but not in 2020.

Receiving WPA	Non-inert		Inert		Hazardous	
	2020	2023	2020	2023	2020	2023
Lancashire	125,246	127,957	<10,000	<10,000	853	3,621
Gateshead	101,120	<5,000	<10,000	0	402	1,165
Rotherham	38,169	11,601	<10,000	<10,000	<100	<100
Cheshire West & Chester	<5,000	<5,000	11,277	20,556	1,072	973
Hartlepool	12,328	20,912	<10,000	0	<100	<100
Liverpool	8,648	11,017	<10,000	<10,000	654	1,838
Staffordshire	6,506	115,539	<10,000	0	<100	<100
Redcar and Cleveland	5,300	53,124	<10,000	0	858	1,511
Stoke-on-Trent City	<5,000	<5,000	<10,000	<10,000	190	19,202
County Durham	<5,000	16,427	<10,000	<10,000	103	144
Middlesbrough	<5,000	16,534	<10,000	0	0	0
Warwickshire	0	12,681	0	<10,000	<100	<100
Bury	0	10,353	0	0	<100	<100
North Yorkshire	<5,000	9,281	<10,000	<10,000	<100	<100
East Riding of Yorkshire	<5,000	5,443	<10,000	0	0	0
Sheffield	<5,000	5,095	<10,000	<10,000	<100	<100
Stockton-on-Tees	<5,000	<5,000	<10,000	<10,000	4,710	4,797
Trafford	<5,000	<5,000	<10,000	0	463	869
Knowsley	<5,000	<5,000	<10,000	0	462	239
Salford	<5,000	<5,000	<10,000	<10,000	359	810
St Helens	<5,000	<5,000	<10,000	0	335	771
Nottinghamshire	<5,000	<5,000	<10,000	<10,000	237	187
Sandwell	<5,000	<5,000	0	0	<100	183
Doncaster	<5,000	<5,000	0	0	<100	178
Tameside	<5,000	0	0	0	<100	288
Blackburn with Darwen	<5,000	<5,000	<10,000	0	161	178
Wiltshire	<5,000	0	0	0	0	114
Wigan	7,035	<5,000	<10,000	<10,000	<100	<100
North Tyneside	<5,000	<5,000	<10,000	0	2,077	0
Derbyshire	<5,000	<5,000	<10,000	<10,000	394	<100
Cheshire East	<5,000	<5,000	<10,000	<10,000	293	<100
Kirklees	<5,000	<5,000	<10,000	0	183	<100
Barnsley	<5,000	<5,000	<10,000	0	125	0
Plymouth	<5,000	0	<10,000	0	117	<100

Cumberland and Westmorland & Furness Joint WNA 2025/26

Darlington	6,976	0	<10,000	0	103	0
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3.9 Table 2 shows that:

- in 2023 a total of 27 WPA areas accepted quantities of waste from 'Cumbria as whole' in excess of the initial screening DtC thresholds with 5 WPAs accepting waste in quantities that met or exceeded at least two of the screening thresholds in 2023. This compares with 25 WPAs in total.
- in 2023 of the 27 WPA areas, 10 received significant flows of waste that didn't appear in the 2020 analysis while 8 WPAs appeared in 2020 and not 2023. This suggests quite a high level of churn in flows between the two data years.

3.10 Detailed examination of the totals indicates that movements of waste from 'Cumbria as a whole' that might be classed as strategically significant i.e. met or exceeded the proxy DtC thresholds went to the sites shown in the following tables. It is considered that where strategic flows went to a small number of sites the strategic reliance is greater than if it was distributed across a large number of sites. This suggests that flows to such sites are of greater strategic importance to a planning strategy underpinning waste policies to be included in the respective local plans. Conversely where inputs to individual sites fell below the threshold they have been excluded from further analysis.

Cumbria Non-inert Waste Destinations

Table 3: Destination sites for Non-inert Waste 5,000t or more from Cumbria as a whole in rank order 2023

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type 5,000t or more	Total
Lancashire	Treatment	Hapton Valley Transfer Station	Envirofuel (SRF) Ltd	Waste processing residues	47,763
	Transfer	Lancaster WWTW Sludge Treatment Facility	United Utilities Water Ltd	Sludges from wastewater	37,372
	Treatment	Lancashire Waste Recycling Limited	Lancashire Waste Recycling Ltd	Waste processing residues	12,519
	MRS	Morecambe Metals	James Varley	Ferrous metal	6,706
	Treatment	Recycling Lives Recycling Park	Global Ardour Recycling Ltd	Ferrous metal	6,660
Staffordshire	Landfill	Walleys Quarry Landfill Site ⁸	Walleys Quarry Ltd	Waste processing residues	115,500
Redcar and Cleveland	Incineration	Wilton 10 Power Station	SembCorp Utilities (UK) Ltd	Wood	34,367
	Treatment	Imperial Park Anaerobic Digestion Plant	D&F Management Solutions Ltd	Sludges from washing and cleaning	16,636
Hartlepool	Treatment	Hartlepool BioPower Anaerobic Digestion Plant	D&F Management Solutions Ltd	Animal-tissue waste	19,368
Middlesbrough	Treatment	Waste Knot Energy	WKE (Middlesbrough) Ltd	RDF	15,255
Warwickshire	Landfill	Ling Hall Landfill	Veolia ES Landfill Ltd	Waste processing residues	12,550
Bury	Landfill	Pilsworth South Landfill	Viridor Waste Management Ltd	Waste processing residues	10,353
Rotherham	On/In Land	Maltby Colliery	Maltby Restoration Ltd	Wastes from aerobic treatment of solid wastes	10,294
County Durham	Incineration	Chilton Biomass Plant	Veolia Biopower One UK Ltd	Wood	8,656
Liverpool	MRS	S Norton & Co Ltd	S. Norton & Co Ltd	Ferrous metal	7,441
North Yorkshire	Transfer	Tancred Waste Management Facility	Yorwaste Ltd	Multiple wastes sub 5,000 tonnes	5,978

3.11 Table 3 shows the following in 2023:

- significant flows of non-inert waste from 'Cumbria as a whole' were managed at 16 facilities located in 11 WPA areas.

⁸ From Sinkfall Compost/ WTS.

- flows of waste processing residues (c197,500t) was the largest flow of waste sent for both treatment and landfill out of the respective Plan areas ie Cumbria as a whole. This principally took place at 5 sites located within 4 WPAs and accounted for over half (54%) of the strategically significant tonnage of non-inert waste outward flows. Cross check of the WDI 2023 Waste Removed datasets for permitted sites located in Cumbria as a whole found that c.221,000 tonnes of this waste was reported as having been exported in 2023 by sites located in the respective Plan areas , with the top three exporters being:
 - Rockcliffe Estate operated by North West Recycling Ltd (105,702t),
 - Hespin Wood Resource Park operated at that time by Renewi UK Services Ltd (33,113t); and
 - Unit 25 The Hanger operated by Millers Contracting Limited (29,100t).
 These three sites accounted for over 75% of the total tonnage of waste processing residues exported for management in 2023, and hence their continued operation would appear to be most dependant on such outlets remaining available throughout each Plan period.
- One site, Maltby Colliery classed as Recovery to Land operation located in Rotherham received c10,500t of wastes from the aerobic treatment of solid wastes (EWC 19 05 99) but its precise origin is unknown.
- as shown in Figure 1 no organic waste in excess of the 5,000t threshold was exported outside Cumbria as a whole in 2023, highlighting a previous reliance on exports now being met by AD capacity available within Cumbria as a whole.

Inert Waste Destinations

- 3.12 Table 4 shows a single flow of waste classed in the WDI2023 as inert/C+D occurred in 2023 exceeded the 10,000t threshold. This was glass packaging i.e. bottles/jars, which while classed as inert, would not be classed as construction or demolition waste the type of waste that might normally be regarded as being counted under the heading 'inert'. Rather it would be classed as municipal waste, coming from business premises such as pubs and clubs or households and might either fall under EWC Chapter 15 or EWC Chapter 20. In this case it is classed under EWC 15 01 07.

Table 4: Destination sites for Inert Waste exports c10,000t or more in 2023 from Cumbria as a whole

Facility WPA	Site Name	Operator	Principal Waste Type	Total
Cheshire West & Chester	Manisty Wharf	Recresco Ltd	Glass packaging	20,544

- 3.13 The flow shown in Table 4 went to a facility located in Cheshire West & Chester operated by Recresco Ltd, where it is colour sorted and then goes for reprocessing. Cross check of the WDI 2023 Waste Removed datasets for permitted sites located in Cumbria as a whole found that this came principally from three sites, North West Recycling (2,353t) and Kendal Fell Waste Management Centre operated by SUEZ Recycling & Recovery Ltd (1,971t).

Cumbria Hazardous Waste Destinations

3.14 Table 5 shows multiple flows of hazardous wastes of different types from former Cumbria in 2023.

Table 5: Destination sites for former Cumbria Hazardous Waste Exports 100t⁹ or more in WPA rank order 2023

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type	Total
Stoke-on-Trent City	Transfer	Land Recovery Limited Hazardous Waste Facility	Land Recovery Ltd	Track ballast ¹⁰ , soils and stones + glass	19,159
Stockton-on-Tees	Treatment	Port Clarence Landfill Site	Augean Treatment Ltd	Soils and stones + bituminous waste	2,919
		Billingham Treatment Plant	Rapier Energy Ltd	mineral-based non-chlorinated engine, gear and lubricating oils	1,441
	Landfill	Port Clarence Non-Hazardous Landfill Site	Augean North Ltd	Asbestos waste	315
	Landfill	Port Clarence landfill Site (Haz)	Augean North Ltd	Multiple wastes sub 100 tonnes	115
Lancashire	MRS	Morecambe Metals	James Varley	WEEE	1,805
	Landfill	Whitemoss Landfill	Whitemoss Landfill Holdings Ltd	Asbestos waste	789
	Transfer	Kierby Perry Yard	W Lee Waste Oils Ltd	Oily waste	374
	Treatment	Recycling Lives Recycling Park	Global Ardour Recycling Ltd	WEEE	291
		GED Environmental Services	GED Environmental Services Ltd	Oily waste	170
		Garston Distillation Services	Veolia ES (UK) Ltd	Other organic solvents, washing liquids and mother liquors	1,342
Liverpool	Treatment	Lower Bank View Waste Management Facility	Wastecare Ltd	Liquid waste + premixed wastes	495
		Industrial Effluent Treatment Works	Northumbrian Water Ltd	wastes containing other dangerous substances + liquid waste	718
Redcar and Cleveland	Landfill	ICI No 3 Teesport	Highfield Environmental Ltd	Asbestos waste	503
	Treatment	Holden Close Waste Management Facility	Cleansing Service Group Ltd	mixtures of wastes from grit chambers and oil/water separators	291
		Gap Waste Management	P A Moody Recycling Ltd	Waste containing CFCs	948
Gateshead	Treatment	Nest Road Waste Treatment, Recovery and Transfer Facility	William Tracey Ltd	Oily waste	213
		Cheshire West and Chester	Incineration	Ellesmere Port Incinerator	Veolia ES (UK) Ltd

⁹ WPAs hosting sites receiving quantities hazardous waste in less than 100t in total have not been included

¹⁰ Likely from Kingmore Railway Sidings (Cumbria Local Aggregates Assessment 2021-2022).

Cumberland and Westmorland & Furness Joint WNA 2025/26

Trafford	MRS	Tenax Road, Trafford Park	S. Norton & Co Ltd	WEEE	637
	Transfer	Trafford Park Waste Oil Facility	Slicker Recycling Ltd	Oily waste	176
Salford	Treatment	CSG Lanstar (Cadishead)	Cleansing Service Group Ltd	Liquid +organic waste	632
		Worsley Waste Transfer Facility	Adler & Allan Ltd	Multiple wastes sub 100 tonnes	178
St Helens	Transfer	Unit 20, Haydock Lane	Lis (North Western) Ltd	Oily waste	519
		Morecambe Site	Rentokil Initial UK Ltd	Infectious clinical waste	252
Tameside	Treatment	Manchester Fuel Services Site	City Fuel Services (Manchester) Ltd	other fuels (including mixtures)	288
Nottinghamshire		Bilthorpe Oil Treatment Plant	Enva England Specialist Waste Ltd	Oily waste	187
Blackburn with Darwen		Central Oil Recovery Depot, Blackburn	Electricity North West Ltd	Oily waste	158
Knowsley		Acornfield Road Waste Management Centre	Future Industrial Services Ltd	Multiple wastes sub 100 tonnes	151
Doncaster	Incineration	Kirk Sandall Thermal Treatment Plant	Trackwork Ltd	Glass	155
Wiltshire	Treatment	Westbury Solvent Recovery Plant	Absolute Solvents Ltd	Liquid waste + premixed wastes	114

3.15 Table 5 shows the following:

- significant flows of hazardous waste from former Cumbria as a whole in 2023 were managed at 30 facilities located in 16 English WPA areas.
- a flow of c18,000t track ballast was the largest single flow to a single site located in Stoke-on-Trent City. This accounted for nearly half of the tonnage of hazardous waste exported in significant quantities in 2023. The previous WNA 2022 did not identify any flows of track ballast as hazardous waste in 2020.

4. Summary

- 4.1 45 sites have been identified as receiving what may be regarded as strategically significant quantities of waste from Cumbria as a whole in 2023. These were spread across 24 WPA areas.
- 4.2 In addition, analysis of data for 2021 and 2022 indicates a further 7 WPAs received waste in excess of the thresholds in at least one of those years. These are shown in Appendix 1.
- 4.3 Table 2 sets out the target WPAs in 2023 as compared with the target WPAs identified in 2020. Host WPAs ought to be contacted to confirm the following:
1. Whether the facilities identified as receiving waste are still operational. It should be noted that facilities identified as Recovery to Land and Landfill will have a finite life. Recovery to Land facilities are likely to be operational for a few years only.
 2. Any planning reasons that might mean the acceptance of wastes cannot continue, such as consent conditions and end dates; or if the site has been earmarked in Plans for redevelopment.
 3. Whether the host WPA has any specific policies about providing for the management of waste that arises outside their Plan area.
 4. Whether any Statements of Common Ground have been entered into with other WPAs concerning continued availability of capacity at the facility in question that might compromise continued access for former Cumbria's waste.
- 4.4 The outcomes of the above engagement should be documented, and Statements of Common Ground sought with WPAs hosting facilities taking strategically significant quantities of waste for which ongoing access is to be relied upon during the Plan period as appropriate.

Cumberland and Westmorland & Furness Joint WNA 2025/26

Appendix 1: Historical Cross Check: Destination WPAs of Hazardous, Non-inert and Inert Waste exports from Cumbria 2021-2023 applying thresholds

Source: WDI 2021, 2022 & 2023

Highlighted cells: Blue – additional WPAs that received strategically significant amounts of waste from Cumbria in 2021 and/or 2022
Orange – WPAs receiving strategically significant amounts of waste from Cumbria in at least one of the past 3 data years

Facility WPA	Non-inert			Inert			Hazardous ¹¹		
	2021	2022	2023	2021	2022	2023	2021	2022	2023
Blackburn with Darwen	<5,000	<5,000	<5,000	0	0	0	126	266	178
Bury	<5,000	7,446	10,353	0	<10,000	0	<100	-	<100
Cheshire East	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	373	260	<100
Cheshire West and Chester	<5,000	<5,000	<5,000	14,773	19,194	20,556	712	639	973
County Durham	10,265	15,567	16,427	39,900	21,231	<10,000	160	146	144
Derbyshire	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	130	<100	<100
Doncaster	9,229	19,121	<5,000	0	<10,000	0	<100	<100	178
East Riding of Yorkshire	<5,000	<5,000	5,443	<10,000	0	0	0	0	0
Gateshead	52,202	<5,000	<5,000	0	<10,000	0	796	950	1,165
Hartlepool	24,399	13,631	20,912	0	<10,000	0	<100	<100	<100
Kirklees	<5,000	<5,000	<5,000	<10,000	<10,000	0	1,336	199	<100
Knowsley	<5,000	<5,000	<5,000	<10,000	<10,000	0	163	154	239
Lancashire	122,904	112,810	127,957	<10,000	<10,000	<10,000	1,402	3,506	3,621
Leeds	<5,000	<5,000	<5,000	0	0	0	166	167	<100
Liverpool	8,133	10,374	11,017	0	<10,000	<10,000	1,123	1,523	1,838
Middlesbrough	<5,000	27,226	16,534	0	0	0	0	0	0

¹¹ WPAs with sites receiving various quantities of sub 100t of hazardous waste from Cumbria have not been included.

Cumberland and Westmorland & Furness Joint WNA 2025/26

Facility WPA	Non-inert			Inert			Hazardous ¹¹		
	2021	2022	2023	2021	2022	2023	2021	2022	2023
North Yorkshire	<5,000	<5,000	9,281	<10,000	<10,000	<10,000	<100	<100	<100
Nottinghamshire	<5,000	<5,000	<5,000	0	0	<10,000	141	103	187
Oxfordshire	0	8,466	<5,000	0	0	0	<100	<100	<100
Redcar and Cleveland	19,554	39,049	53,124	<10,000	0	0	721	1,393	1,511
Rotherham	19,070	<5,000	11,601	<10,000	<10,000	<10,000	<100	<100	<100
Salford	<5,000	<5,000	<5,000	0	<10,000	<10,000	811	618	810
Sandwell	<5,000	<5,000	<5,000	<10,000	0	0	126	134	183
Sheffield	<5,000	<5,000	5,095	<10,000	<10,000	<10,000	<100	<100	<100
St Helens	<5,000	<5,000	<5,000	0	0	0	<100	1,630	771
Staffordshire	47,790	103,210	115,539	0	0	0	<100	<100	<100
Stockton-on-Tees	<5,000	6,003	<5,000	<10,000	<10,000	<10,000	4,519	5,941	4,797
Stoke-on-Trent City	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	3,011	5,687	19,202
Tameside	<5,000	<5,000	0	0	0	0	<100	<100	288
Trafford	<5,000	<5,000	<5,000	<10,000	0	0	354	442	869
Walsall	<5,000	<5,000	<5,000	0	<10,000	<10,000	103	<100	<100
Warwickshire	<5,000	<5,000	12,681	0	<10,000	<10,000	<100	<100	<100
Wiltshire	0	0	0	0	0	0	0	<100	114
Wirral	<5,000	<5,000	<5,000	0	0	0	0	447	0

Appendix 2: Facilities that received tonnages of waste from Cumbria above initial screening thresholds pre-2023

	Year	Facility WPA	Site Category	Site Name	Operator	Principal Waste Type	2021 Total	2022 Total
Non-inert	2022	Oxfordshire	Treatment	Finmere Quarry	OPES MRF 2013 Ltd	Waste processing residues	-	7,921
Hazardous	2021 + 2022	Cheshire East	Treatment	Brooks Lane Organics	BIP Organics Ltd	Liquid waste	373	257
	2021	Derbyshire	Treatment	Norwood Recycling Centre	Veolia ES (UK) Ltd	Liquid waste	119	<100 tonnes
	2021 + 2022	Kirklees	Landfill	Bradley Park Landfill	Bradley Park Waste Management Ltd	Soils and stones + asbestos waste	1,149	<100 tonnes
	2021	Leeds	Treatment	Carr Crofts Waste Treatment Facility	Oates Environmental Ltd	Inorganic wastes	123	<100 tonnes
	2022	Leeds	Treatment	Knostrop Waste Treatment Facility	FCC Recycling (UK) Ltd	Nitric acid and nitrous acid	<100 tonnes	160
	2022	Wirral	Transfer	Eastham Site	Exolum Eastham Ltd	Oily waste	-	447