



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

Capacity Requirement for the Management of Waste in former Cumbria

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Executive Summary

This report presents the outcomes arising from the Joint Waste Needs Assessment (JWNA) exercise undertaken by BPP Consulting. The JWNA was completed to update the evidence base supporting the preparation of the Waste Chapter of both the emerging Cumberland and Westmorland & Furness Local Plans. The JWNA assessed the need for additional waste management capacity by quantifying and characterising the principal waste streams arising in Cumbria as a whole and producing forecasts/estimates of the amount of waste that needs to be managed over the respective plan periods, whilst taking into account the potential contribution of the existing available waste management capacity within Cumbria as a whole.

This JWNA found that a total of c1.9M tonnes of wastes arose within Cumbria as a whole in 2023. This exercise has confirmed that figure as a robust value to plan for. The quantities of principal categories of waste arising in Cumbria as a whole are shown in Figure 1 below:

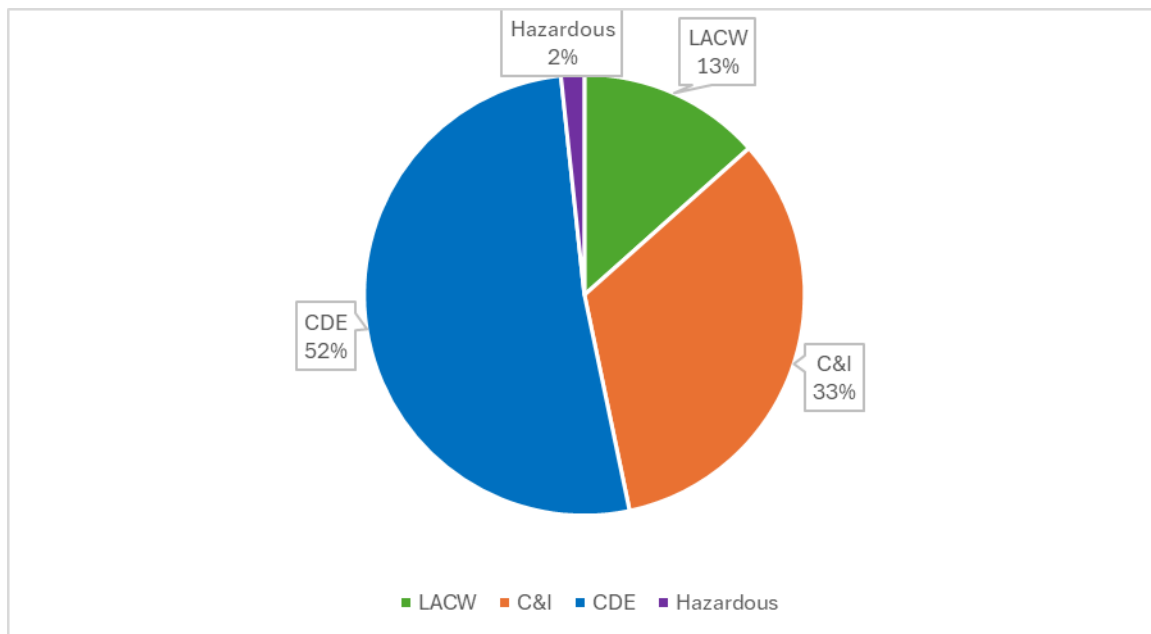


Figure 1: Quantities of Principal Waste Types Arising in Cumbria as a whole 2023 (tonnes)

The JWNA found that while there appears to be sufficient existing consented capacity to meet inert waste management requirement, and while a predicted shortfall in recycling/composting emerges in 2040 the principal predicted shortfall in capacity for the forecast period is that to manage non-inert residual waste through:

1. 'Other' Recovery; and
2. Non-inert Landfill.

The report goes on to present options available to address these shortfalls. Principally they rely on utilisation of capacity in adjacent or nearby Plan areas available over the forecast period. This approach is consistent with initial findings on the availability of capacity in the wider catchment confirmed through DtC engagement.

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).

(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 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 (re)processing 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 Waste Local Plan to which this study relates. In this case the former county of Cumbria including the Lake District National Park now administered by Cumberland Council and Westmorland & Furness Council.
Waste Collection Authority (WCA)	A local authority that has a duty to collect household waste. They also have a duty to collect commercial waste if requested to do so and may also collect industrial waste. In this case Cumberland Council and Westmorland & Furness Council.
Waste Disposal Authority (WDA)	A local authority responsible for managing the waste collected from households and the provision of household waste recycling centres. In this case Cumberland Council and Westmorland & Furness Council.
Waste Planning Authority	The authority responsible for planning for waste within a specific administrative area. In this case Cumberland Council, Westmorland & Furness Council and the Lake District National Park Authority.
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. Purpose

- 1.1 In 2022 BPP Consulting produced a Waste Needs Assessment (WNA) for Cumbria as a whole for Cumbria County Council, using data for 2020. In 2023, two unitary authorities, Cumberland Council and Westmorland & Furness Council (W&F), were created to administer Cumbria, as a result the waste planning functions of Cumbria County Council are now performed by each of the above. This report presents the outcome of the first Cumberland and Westmorland & Furness Joint Waste Needs Assessment (JWNA) BPP Consulting was instructed to produce on behalf of both Councils acting as waste planning authority for their respective areas using data for 2023.
- 1.2 This involves quantifying and characterising the principal waste streams arising in former Cumbria and producing forecasts/estimates of the amount of waste that needs to be managed to 2045 (with separate forecasts for each authority area where data allows), whilst taking into account the contribution of currently consented and permitted waste management capacity. This work is undertaken in the context of the National Planning Policy for Waste (NPPW) and the national Planning Practice Guidance (nPPG), which expects that:
- "Planned provision of new capacity and its spatial distribution should be based on robust analysis of best available data."* (nPPG Para 035).
- 1.3 To achieve this the following steps have been followed:
1. Scope target waste streams;
 2. Generate robust baseline waste arisings values;
 3. Generate realistic and meaningful forecasts of future waste arisings;
 4. Identify appropriate relevant targets for the management of each waste stream (to ensure that waste is managed in accordance with the waste hierarchy);
 5. Assess current management capacity;
 6. Quantify future capacity needs accounting for cross boundary movements of waste; and
 7. Establish any associated future gaps in waste management capacity.
- 1.4 Steps 1-4 have been accounted for in the following documents:
1. Local Authority Collected Waste Assessment of Management Requirements to 2045;
 2. Commercial & Industrial Waste Assessment of Management Requirements to 2045;
 3. Construction, Demolition & Excavation Waste Assessment of Management Requirements to 2045;
 4. Hazardous Waste Assessment of Management Requirements to 2045; and
 5. Scoping Review of Other Waste which concluded there was no requirement for the capacity needs of the other streams assessed, to be considered further in this JWNA.
 6. Assessment of Strategic Flows of Waste in 2023.

This report is principally concerned with steps 5-7.

Principal Data Sources

- 1.5 The principal data sources used to generate this JWNA are as follows:

Waste Data Interrogator

- 1.6 Operators of all sites permitted to manage waste, submit returns reporting the quantities, types and origin of waste received and, where applicable, destination of waste removed at their sites. These returns are collated by the Environment Agency and are included in a national dataset known as the Waste Data Interrogator (WDI) - Waste Received & Waste Removed. The WDI is released approximately nine months after the end of the calendar year to which the data relates. The 2023 WDI (composed of data for the calendar year 2023) was the current version available at the time this JWNA was commissioned.

Hazardous Waste Interrogator

- 1.7 Producers and managers of hazardous waste must notify the environment agencies (which, depends on the part of the UK) of movements of waste classed as hazardous. This data is collated and reported in the Hazardous Waste Interrogator (HWI). Data is currently reported down to receiving local area rather than by receiving site. The HWI 2023 was released in September 2024 and was the current version available at the time this JWNA was commissioned.

Wastedataflow

- 1.8 Wastedataflow (WDF) is a web-based data entry portal for local authorities to report on local authority waste management arrangements to central Government on a quarterly basis. The data input is used to report on national recycling and landfill diversion performance as well as local authority league tables on recycling rates etc following independent quality checking. While Councils normally report in financial years, as the EA WDI reports for calendar year the data for Cumberland and Westmorland & Furness covering the four quarters of 2023 has been accessed to ensure comparability between datasets.

Permit Exemption Register

- 1.9 The permit exemption register lists businesses and individuals undertaking low-risk waste related activities that do not require a full environmental permit but must still be registered to be authorised. Registration generally lasts 3 years and may be renewed on application, with some attracting a fee. To register and remain registered the low risk operation must comply with the specific conditions that apply. If the operation breaches these conditions the Environment Agency may deregister it and remove it from the register.

Scrap Metal Dealers Register

- 1.10 The Scrap Metal Dealers Register is a central online database of all scrap metal dealers and motor salvage operators in England and Wales that have been granted licenses by their local authority. The register is hosted by the Environment Agency on its public register website and includes both site based and itinerant scrap metal dealers. .

Quantities of Waste Produced in Cumbria as a Whole

- 1.11 The JWNA found that c1.9 million tonnes of wastes arose within Cumbria as a whole in 2023. This compares with c1.6 million tonnes in 2020. In 2023 this was assessed as comprising c908,500 tonnes of waste arising in Cumberland and c999,000 tonnes of waste arising in from Westmorland & Furness respectively. The principal components are shown in Table 1:

Table 1: Waste Produced in Cumbria Compared with WNA 2022 values

Waste Stream	Cumberland 2023	Westmorland & Furness 2023	Total Cumbria as a whole 2023 (rounded)	Cumbria as a whole 2020
Local Authority Collected Waste	140,298	110,860	251,000	262,000
Commercial & Industrial Waste	324,500	298,500	623,000	596,000
Construction, Demolition & Excavation	424,000	577,000	1,001,000	781,000
Hazardous Waste	32,500	12,500	45,000	26,500
Total	921,298	998,860	1,920,000	1,665,500

Output Baseline Profile

- 1.12 To 'sense check' the waste stream baseline profile generated in this JWNA, it has been compared with the national waste stream profile for England as shown in Table 2 below. This was on the basis that the national pattern is normally reflected at a local level too, and in the absence of a reason why the situation should be substantially different in Cumbria, a similar profile would be expected to emerge.

Table 2: Contribution Principal Waste Streams Produced in Cumbria as a Whole vs England (2023)

Waste Stream	Total Cumbria as a whole 2023 (tonnes)	%	England totals (Mt) ¹	%
Local Authority Collected Waste	251,000	13%	21.7	18%
Commercial & Industrial Waste	623,000	33%	32.6	28%
Construction, Demolition & Excavation	1,001,000	52%	63.0	54%
Hazardous Waste	45,000	2%	n/a	-
Total	1,920,000		117.3	

- 1.13 Table 2 shows in 2023:

- C, D & E waste is the largest single principal waste stream produced in England and Cumbria as a whole at c54% and 52% respectively;
- C&I waste stood at 28% and 33% respectively; and
- LACW stood at 18% and 13% respectively.

Table 2 shows a reasonably close correlation between the national profile and the local profile obtained from the combined values generated in the JWNA for 2023.

¹ Values taken from *UK statistics on waste* Updated 23 July 2025 <https://www.gov.uk/government/statistics/uk-waste-data/uk-statistics-on-waste#data-revisions-in-this-update>

2. Capacity Assessment Overview

- 2.1 The capacity of waste management facilities has been assessed using data obtained from planning consents (and associated documentation), data for inputs reported through the Environment Agency WDI and consideration of capacity limits set in environmental permits. Data is presented for Cumbria as a whole.
- 2.2 Examination of these datasets indicate the following capacity types exist within the Plan area:
- Landfill;
 - Organic waste treatment (e.g. composting and anaerobic digestion);
 - Waste Recycling, including Materials Recycling Facilities (MRF);
 - Mechanical Biological Treatment (MBT); and
 - Waste Transfer.
- 2.3 Review of the data sources found that there are no consented thermal treatment i.e. Energy from Waste facilities (EfW) in either Plan area, however, there are two sites with related permissions that are still to be built out. Facilities where waste recyclate is reprocessed into product, such as glass-furnaces and paper mills, were not included in this assessment exercise as they are not considered to be waste development and therefore are not provided for through a waste local plan.

Sources of Facility Capacity Data

- 2.4 The WNA 2022 used facility capacity data collated from review of Cumbria County Council's planning register plus a review of input data presented in the WDI compiled by the EA over a 5-year period 2016-2020 (See Appendix 1). Where appropriate, reference was also made to the input limits specified in environmental permits in force for the site. A freeboard of +15% was added to the actual peak input values shown in the WDI to allow for the possibility that the peak operating value is not an absolute limit except where facilities are of a type considered to have a fixed input, such as AD plants. These additions are intended to reflect the maximum realistic throughput of the facility, as opposed to theoretical capacity. For sites other than landfills, a site by site assessment of data sources arrived at a peak capacity value on the following basis.
- Where the planning permission or bespoke permit limit gave an express limit that is reasonably close to the peak value +15%, the prescribed planning limit or bespoke permit limit was taken to apply as that represents the sanctioned capacity. Where both planning consent and bespoke permit limit were identified, the greater of the two was taken. Where the bespoke permit limit exceeds the planning consent limit there is no implied approval to the exceedance, just an acknowledgement that the Environment Agency has assessed the site as being capable of managing a greater tonnage than was assessed through the planning process.

- Where the peak input value (+15%) was significantly larger than that consented or permitted, the peak input value was taken on the basis that the site has the operational capacity to manage this amount of waste. There is no implied approval to the exceedance, just an acknowledgement of what actually occurred.
Where the peak input value (+15%) was significantly less (deviated by more than 50%) than that consented, the peak input value was taken on the basis that the site could only manage that quantity of waste on an ongoing basis i.e. on a precautionary basis.
 - Where no limit was specified under planning but was specified under a bespoke permit, the permit limit was taken on the basis that the Environment Agency will have properly assessed the site's capability to manage the tonnage specified, except where the actual peak input value exceeded the permit limit.
 - Where no limit was specified under either planning or permit, the peak input value recorded over 5 years (+15%) was taken on the basis that the site could manage that quantity of waste on an ongoing basis.
- 2.5 This JWNA includes a review of the latest 3 years of WDI input data (2021-2023) available at the time the JWNA was commissioned. For sites where reported inputs had increased in the more recent 3-year dataset (2021 – 2023) from the peak reported input in 2016-2020 (+15% as appropriate), the capacity value has been updated to reflect this.
- 2.6 As per the WNA 2022, it should be noted that any capacity assessment only presents a snapshot at a particular point in time as the permitted estate is in a state of flux with sites closing and new sites coming on stream over time.

Assumed void space to tonne conversion factors

- 2.7 Where waste is managed at landfill, it is necessary to account for the fact that mass does not necessarily directly correspond to volume. That is to say 1 tonne of waste may not occupy 1m³ of void. Hence any identified void requirement needs to account for the density of material under consideration.
- 2.8 For the purposes of this exercise, it has been assumed that 1.5 tonnes of inert waste can be accommodated within one cubic metre of void, while a single tonne of non-inert residual waste may be accommodated within one cubic metre of void. This latter value is greater than that of 0.85t/m³ applied historically, as very little raw 'black bag' waste is now sent direct to landfill, most, if not all, will have undergone some pre-treatment (as required by the retained EU Landfill Directive), making it significantly denser than mixed municipal or black bag waste (and similar wastes). It is also assumed that 15% of input to non-inert landfill will be inert waste used for operational and restoration purposes as all such sites will have such a need.

3. Capacity in Cumbria by Management Method

Types of Waste Management Capacity

- 3.1 The waste hierarchy is set out at Article 4 of the retained revised Waste Framework (Directive 2008/98/EC) and compliance with it is obligatory under *The Waste (England and Wales) (Amendment) Regulations 2012*. The hierarchy sets an order of preference by which waste is to be managed, starting with the preferred option of prevention (Tier 1), followed by preparing waste for re-use (Tier 2), recycling/composting (Tier 3) and ‘other recovery’ (Tier 4), with disposal (Tier 5) (such as landfill or incineration without energy recovery) as the least favoured as shown in Figure 2.

2

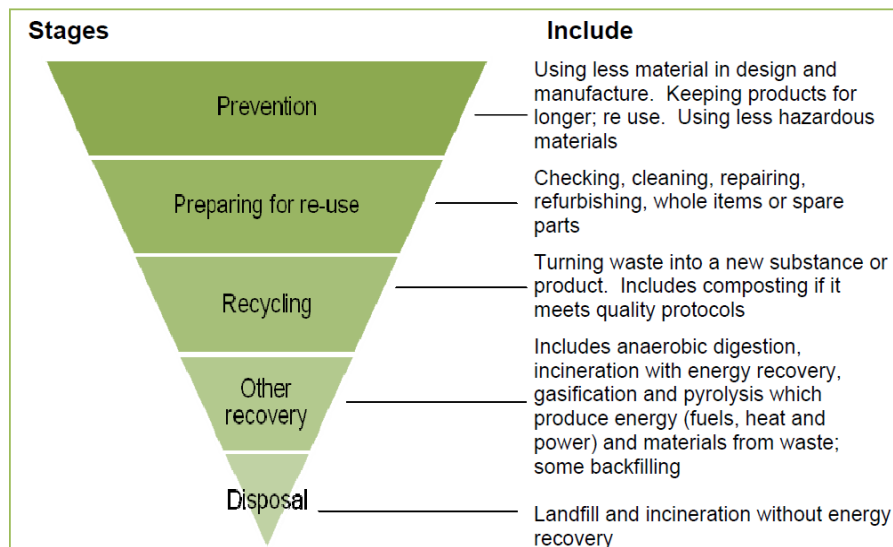


Figure 2: Diagrammatic representation of the Waste Hierarchy

- 3.2 It should be noted that under the Waste Framework Directive, recycling, composting and the recovery of the energy value from waste are all classed as ‘recovery’ operations. However, given recycling and composting is positioned further up the waste hierarchy than energy recovery operations that involve something other than recycling and/or composting and fall below them in the hierarchy are often termed ‘other recovery’. Such operations include Energy from Waste (EfW) plants, where waste is burnt to produce power and/or heat, providing they meet a minimum energy efficiency standard set out in the R1 formula, and anaerobic digestion plants.

² Guidance on applying the Waste Hierarchy DEFRA June 2011
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

- 3.3 Following the waste hierarchy should generally lead to the most resource efficient and environmentally sound approach to managing waste. However, because the “best” choice can be influenced by the fact that different waste streams have different characteristics (such as calorific value), in some cases departing from the waste hierarchy can lead to better environmental outcomes. When considering whether a departure from the waste hierarchy would be justified, decision-makers are to base their choices on the findings of Life Cycle Assessments (LCAs)³
- 3.4 **Recycling** is taken to include any activity that either results in the separation of materials suitable for reuse as a raw material and/or its actual conversion to a product (reprocessing). For the purposes of this capacity assessment exercise, recycling capacity does not include reprocessing capacity where a material such as waste paper is converted into a product such as newsprint as that is a manufacturing process. Plants or facilities where such processes take place are generally not considered to be waste development. Recycling capacity can take various forms from depots where source separated recyclable materials are bulked up for onward recycling, to facilities where materials may be separated out on delivery e.g. Household Waste Recycling Centres (HWRCs), through to fully fledged Material Recycling Facilities where complete loads of waste are passed through a processing line to extract and separate materials for recycling.
- 3.5 **Composting**, involves the decomposition of biodegradable and putrescible matter by aerobic processes. Composting facilities come in two principal forms, open-air (windrow), or enclosed (In Vessel Composting (IVC)). Open-air composting is only suitable for treating vegetable based waste such as green waste and some cardboard, while IVC can also process putrescible wastes such as kitchen wastes due to the requirements of the Animal By-Products Regulations.
- 3.6 **Anaerobic Digestion (AD)** involves the decomposition of biodegradable and putrescible matter within a vessel to produce biogas. While it is normally classified in the waste hierarchy as a form of 'other recovery' (Tier 4), life cycle assessment has demonstrated that it is better than composting and other recovery options when it comes to the management of food wastes, and garden waste in some cases. Given that deviation from compliance with the waste hierarchy may be justified by life cycle thinking, it is therefore considered appropriate for AD to be considered alongside composting as an organic waste treatment method that can contribute to meeting recycling/composting targets. Therefore, the term 'composting' is used as a shorthand term for organic waste treatment including AD.
- 3.7 Kitchen and commercial food waste can only be processed in enclosed systems such as in-vessel composting plant (IVC) and AD facilities due to the requirements of the Animal By-Products Regulations.

³ The way in which the findings of LCAs are relevant to decision making on the application of the hierarchy to waste management has been set out by Government in *Applying the Waste Hierarchy: evidence summary* DEFRA June 2011 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

Recycling Capacity

Material Recycling Facilities (MRF) Capacity

- 3.8 When recyclates such as plastics, metals, paper, cardboard, glass are collected together i.e. 'comingled', the collected material needs to pass through a materials recycling facility (MRF) that separates the individual material streams for onward reprocessing. The WNA 2022 reported 5 such facilities operating in Cumbria as a whole. However, since the WNA 2022 it has been discovered that the site at Unit 25 – The Hangar only holds lawful waste use for composting so has been removed. No additional sites have been identified in this update. The sites are listed in Table 3 below.

Table 3: Material Recycling Facility Capacity in Cumbria as a whole (by waste type managed)
Italicised values relate to WDF inputs

Facility WPA	Site Name & Operator	Principal Waste Type Managed	Planning Consent (tonnes p.a.)	Peak Input +15% WNA 2022	Peak input 2021 – 2023 +15%	Preferred Value	Notes
Cumberland	Hespin Wood (Cumbria Waste Management Ltd)	C&I, CDE and LACW	20,000	52,796	65,291	55,291	HWRC wood bulking of c10,000 tonnes deducted from preferred value based on peak input. PP expires 2039.
Westmorland & Furness	Flusco Pike Landfill (Lakeland Waste Management Ltd)		49,000	17,233 ⁴	15,892	49,000	PP expires 2031.
Cumberland	Kingmoor Recycling Centre (Cumbria Waste Management)	LACW	52,000	7,659	3,309	7,659⁵	Dormant site
	Distington MRF (Cumbria Waste Management)	CDE & C&I	120,000	108,204	97,280	120,000	PP expires 2039.
Total capacity						231,950	

- 3.9 Table 3 shows total MRF capacity in Cumbria as a whole stands at **c232,000 tpa**.

Other Recycling Capacity

- 3.10 Whilst the WDI 2020 used as the primary data source for the WNA 2022 included 16 sites under the transfer site category, closer examination of the inputs and fates of the outputs of each of these sites revealed some separation and processing for recycling took place at all but 1 of the sites. Therefore, those were included as recycling sites in Cumbria as a whole (including those classed as treatment sites in the WDI). One additional operational site has been identified since the WNA 2022, the site is included in Table 4. It should be noted that where capacity is used to produce recycled aggregate, that capacity has been deducted and counted in Table 7.

⁴ It was discovered that the WNA 2022 had used inputs to the landfill rather than the co-located treatment site, so this value has been corrected.

⁵ Actual inputs are significantly less than the planning consent so peak inputs +15% has been taken.

Table 4: Recycling Capacity in Cumbria as a whole

Facility WPA	Site Name & Operator	Principal Waste Type Managed	Facility Type as per EA WDI	Planning Consent	Peak Input +15% WNA 2022	Peak input 2021 – 2023 +15%	Preferred Value	Notes
Westmorland & Furness	Ecclerigg Depot (South Lakeland District Council)	LACW	LACW Transfer	?	836	1,164	1,164	Bulking of LACW DMR
Cumberland	J. M. Skips Brownriggs Yard (Jacksons Marine Ltd)	C&I	C&I Skip Hire and Treatment	-	489	488	489	
	Dundee Tyres (Dundee Tyres Ltd)		ELV tyre treatment	?	9,048	9,113	9,113	
	Hespin Wood Landfill (Cumbria Waste Management Ltd)		Non Haz Waste Transfer / Treatment	?	No entry	15,211	15,211	New Site
Westmorland & Furness	Sowerby Lodge (Eden Valley Oils Ltd)	CDE	Edible Oil Treatment Facility	?	1,587	1,142	1,587	PP expires 2042.
	Sandscale Park (J J C Hire Ltd)		CDE Transfer ⁶	156,000	28,114	326,661	95,650⁷	Capacity may be as great as 326,661tpa. Recycling of skip waste principally. Recycled aggregate mass balance value of 60,350 deducted from consented value, RA inc Table 10.
	Coopers Yard (JJC Hire Ltd)		CDE Transfer/ Treatment		30,657	24,755	10,730	c65% inputs for transfer through the WTS deducted from total (inc Table 12)
Cumberland	Esk Quarry (Eddie Wannop Ltd)		CDE Treatment	?	1,887	25,417	25,417	PP expires 2032
Westmorland & Furness	12 Shap Road Ind Estate (H Wicks Ltd)	CDE and C&I	CDE and C&I Transfer	?	11,756	No entry	11,756	Dormant site. CDE and C&I waste recycling. c60% CDE waste inputs

⁶ Although classed as a transfer site in the WDI, closer examination shows this is a recycling site.

⁷ Max capacity taken to be consented capacity minus recycled aggregate. This site is understood to be subject to a live planning application seeking retrospective approval to increase the capacity.

Cumberland and Westmorland & Furness Joint WNA 2025/26

Cumberland	Unit N, Risehow Ind Est (Thompsons Plant Hire Ltd)		C&I Transfer inc Recycled Aggregate Processing	22,700	3,034	3,275	8,300	14,400 tonnes of inert waste (inc Table 10) leaving 8,300 tonnes of planning max
	Hangar 20 Silloth Airfield (D Alan Harrison)		CDE and C&I Transfer	8,000	13,234	12,338	13,234	Scarth Rd site dormant. Provision of CDE and C&I recycling
Westmorland & Furness	Scarth Road (H Wicks Ltd)			?	27,291	No entry	27,291	
	Station Yard (Adam Hoyle)			?	1,060	683	1,060	50% inert and 50% C&I (application form)
Cumberland	7 Pittwood Road, Lillyhall Industrial Estate (Derwent Recycling Services Ltd)		CDE and C&I Treatment	20,000	15,753	14,353	20,000	
	Unit A, Site 6, Rockcliffe Estate (North West Recycling Ltd)		CDE and C&I Transfer inc Recycled Aggregate Processing	100,000	219,312	221,875	155,312	c30% input materials suitable for conversion to recycled aggregate deducted from peak total (inc Table 10)
Westmorland & Furness	Ormsgill Yard Materials Recycling Facility (W&F Council)	LACW and C&I	LACW and C&I Transfer	?	35,319	19,759	35,319	
	Kendal Fell Waste Management Centre (Suez Recycling & Recovery Lancashire Ltd)			?	50,961	47,941	50,961	c31,500 tonnes LACW
Cumberland	Unit 2, Lillyhall Ind Estate (Cumbria Recycling Ltd)		WEEE Treatment	?	2,211	2,182	2,211	
Westmorland & Furness	Sinkfall Recycling (Brian Armistead Ltd)	CDE, C&I and LACW	CDE, C&I and LACW Transfer	?	38,071	51,609	45,409	6,200 tonnes for composting deducted from peak preferred value (inc Table 6)
Total capacity							530,214	

3.11 Table 4 shows a total operational recycling capacity in Cumbria as a whole of up to **c530,000 tpa** which is a significant increase from the WNA 2022 of **c408,000 tpa**.

3.12 When combined with the MRF capacity of c232,000 tpa (Table 3) this gives a **total recycling capacity of c762,000 tpa**.

Metal Recycling Capacity

- 3.13 Scrap metal principally comes from industrial sources along with demolition and construction. The WNA 2022 reported 6 sites that primarily manage scrap metals and 9 sites that primarily/exclusively managed End of Life vehicles (ELVs). As ELVs are classed as hazardous waste until they have been depolluted the capacities of sites managing these exclusively has been counted in the hazardous waste capacity assessment. One additional operational MRS site has been identified since the WNA 2022, this has been included in Table 5. The metal recycling sites and their capacities are shown in Table 5 below.
- 3.14 Furthermore, the exemption registers for exemption T9 (recovering scrap metal) listed 4 sites in Cumberland and Westmorland and Furness. As exempt facilities do not report waste tonnage received, reference has been made to the estimates included in the original national Reconcile method⁸. These estimated sites operating under a T9 exemption may handle up to 2,500 tpa, so this value has been taken.

Table 5: Metal Recycling Capacity in Cumbria as a whole

Facility WPA	Site Name & Operator	Peak Input +15% WNA 2022	Peak input 2021 – 2023 +15%	Preferred Value
Cumberland	Branthwaite Vehicle Dismantlers (Trevor Brough)	8,068	2,667	8,068
	Junction Street (Mountelm Ltd)	2,619	1,180	2,619
	Sandysike Brickworks (Mountelm Ltd)	2,524	12,075	12,075
	Waller Street Works (Mr W & R Allan)	No entry	17,845	17,845
	Parkgate Garage (Kenmare Tyre Service Ltd)	-	-	2,500
Westmorland & Furness	Canal Head Yard (John Miller & Sons Ltd)	8,440	3,343	8,440
	Morecambe Road (John Morgan & Co Ltd)	1,981	2,650	2,650
	Mintsfeet Road (Lakeland Gold Ltd)	1,603	3,877	3,877
	Schneider Road (Barrow Scrap Metal Ltd)	-	-	2,500
	Old chapel Works (Chris Hindel)	-	-	2,500
	Warcop (Landmarc Support Services Ltd)	-	-	2,500
Total capacity				65,574

- 3.15 Table 5 shows a total operational metal recycling capacity in Cumbria as a whole of **c65,500 tpa**. Combined with the recycling capacity of c762,000tpa above, gives a **total recycling capacity in Cumbria as a whole of c827,500 tpa**.

Organic Waste Treatment Capacity

- 3.16 Various types of organic waste treatment facilities from anaerobic digestion to open windrow composting operate in Cumbria. Windrow composting is used primarily for the processing of green waste and other vegetable-based materials. Due to the requirements of the Animal By-Products Regulations, kitchen and commercial food waste can only be processed in enclosed systems such as in-vessel composting plant (IVC) and AD facilities.
- 3.17 The operational organic waste treatment facilities are listed in Table 6, together with an assessment of operational capacity.

⁸ DEFRA, Commercial and Industrial Waste Survey 2009 Final Report (December 2010).

Table 6: Organic Waste Treatment Capacity in Cumbria as a whole
Italicised values relate to WDF inputs

Facility Type	Facility WPA	Site Name & Operator	Principal Waste Type Managed	Planning Consent (tonnes pa)	Peak Input +15% WNA 2022	Peak input 2021 – 2023 +15%	Preferred Value	Notes
Open Windrow Composting	Westmorland & Furness	Eden Organics Composting Site (H & E Trotter Ltd)	Farm Waste & C&I	-	22,987	24,490	24,490	
	Cumberland	Hespin Wood (AW Jenkinson (Woodwaste) Ltd)	LACW & C&I	-	114,090	96,847	114,090	PP expires in 2039
		Wilson Pit Yard (West Coast Composting Ltd)		25,000	8,979	8,531	25,000	Conditions limiting 25k compost, 2kt plasterboard
AD	Cumberland	Kirkbride House (Solway Heat & Power Ltd)	Farm Waste	16,000	13,310	12,582	16,000	
		Possonby Old Hall Farm (Stanley Renewable Energy Ltd)		-	11,468	6,558	11,468	
IVC		Unit 25, The Hangar (Millers Contracting Ltd)	LACW	26,000 ⁹	12,940	12,525	26,000	Site currently accepts rejects from LACW MBT process
Open Windrow	Westmorland & Furness	Sinkfall Recycling (Brian Armistead Ltd)		2,200	6,200	6,221	6,221	

3.18 Table 6 shows in Cumbria as a whole an **operational organic waste treatment capacity** offering the following management capacity:

LACW and C&I Waste:

- up to c170,000 tpa** open windrow capacity which can only be used to process green and vegetable-based wastes; plus
- c26,000 tpa** in-vessel capacity (currently receiving rejects from the MBT processing of LACW);

Farm Waste Only (covered in the Other Waste Scoping report):

- At least c27,500 tpa dedicated to agricultural waste.

Recycled Aggregate Production sites

3.19 There are a number of sites where incoming inert C, D & E waste is recycled into aggregate. The WNA 2022 made reference to the 2020 Cumbria Local Aggregate Assessment (LAA) where the main recycled aggregate processing facilities were listed (Appendix 6). Table 7 of this report lists these sites along with the annual throughput from the planning register or calculated from input and output data in the WDI (mass balance). Two additional operational recycled aggregate processing sites have come on stream since the WNA 2022, these sites have been added to Table 7 below. Sandscale Park was identified as producing c60,500 tonnes of recycled aggregate through the mass balance method so has also been included in Table 7.

⁹ Planning consent allows max of 500 tonnes per day.

Table 7: Recycled Aggregate Production Sites in Cumbria as a whole
Dash entry indicates 'no entry' in the WDI

Facility WPA	Site Name & Operator	Consented throughput per annum (tonnes)	Throughput entry from CDE baseline WNA 2022 (mass balance)	Updated throughput entry from CDE baseline (mass balance)	Preferred value	Notes
Cumberland	Silvertop Quarry (Thompsons of Prudhoe)	100,000	-	0	100,000	Classed as a recovery to land operation in the WDI 2023 so mass balance method was not applied and no entry in the WDI 2020.
Westmorland & Furness	Diamond Yard (Tony Brown Aggregates Ltd)	7,500	60,619	37,683	60,619	Initial planning application (5/04/9007 in 2004) consented throughput of 7,500 tonnes, capacity is much greater given mass balance amounted to c61,000 tonnes and permitted limit is 75,000tpa – WNA 2022 mass balance value taken to represent the operational capacity as higher than that computed for 2023.
Cumberland	Unit N, Risehow Ind Est (Thompsons Plant Hire Ltd)	14,400	-	-	14,400	No entry in the WDI 2023.
Westmorland & Furness	Flusco Quarry (Lakeland Waste Management Ltd)	60,000	6,395	13,819	60,000	Permission to 31 Dec 2031. 75,000 tonnes permit to treat waste to produce soil.
	Goldmire Quarry (Burlington Aggregates)	30,000	48,349	0	48,349	No shortfall between inputs and outputs of materials suitable for conversion to recycled aggregate in the WDI 2023 mass balance method.
	Plots 1 & 2, Penrith Ind Est (Metcalf Plant Hire Ltd)	25,000	0	0	25,000	
	Bonnie Mount Quarry (JEA and SM Burne)	5,000m ³ (7,500 tonnes)	-	-	7,500	Permission to 7 Oct 2035. No mass balance entry as no entry in the WDI
	Roan Edge Quarry (L & W Wilson Ltd)	6,000m ³ (9,000 tonnes)	-0	54,465	54,465	Permission to 1 Nov 2031. No shortfall between inputs and outputs of materials suitable for conversion to recycled aggregate in the WDI 2020 mass balance method.
Cumberland	Hespin Wood Landfill (Cumbria Waste Management Ltd)	60,000	8,391	4,010	60,000	Permission until landfilling activity ceases in Oct 2039
	McKay Skip & Plant Hire/ KarenHouse (W G Mackay Ltd)	50,000	3,932	0	50,000	The WDI 2020 included 2 entries for Karen House but now the sites are combined so it is not possible to separate the two operations and determine a mass balance value.
	5 Pittwood Road (Phillip Carruthers Ltd)	75,000	35,920	33,204	75,000	
	Fairview House (Ashcroft Demolition (Cumbria))	75,000	14,667	-	75,000	No entry in the WDI 2023.
	Risehow Industrial Estate (Thompson's Plant Hire)	14,400	-	-	14,400	No entry in the WDI 2020 or 2023.
	Units H & L, Knights Drive (Cubby Construction Ltd)	20,000	0	2,393	20,000	No shortfall between inputs and outputs of materials suitable for conversion to recycled aggregate in the WDI 2020 mass balance method.
	Lawson's Recycling Centre (G & A M Lawson Ltd)	60,000	21,580	37,920	60,000	
	Silloth Recycling Centre (D A Harrison)	5,000	0	0	5,000	5,000 tonnes of inert waste to be processed – Committee Report. No shortfall between inputs and outputs of materials suitable for conversion to recycled aggregate in the WDI 2020 and 2023 mass balance method.
	Rockcliffe Estate (North West Recycling Ltd)	?	65,794	26,353	66,563	Value taken is 30% of WNA 2022 peak input

Westmorland & Furness	Unit 6 Clawthorpe Hall (Penningtons Quarry Ltd)	25,000	21,232	21,002	25,000	
	Greenscoe Quarry (Harry Barker Properties Ltd)	?	46,084	63,616	63,616	Latest LAA survey in 2018 reported sales of 41,448 tonnes of recycled aggregate. Permission expired in Nov 2024. Awaiting outcome of live application for time extension (6/24/9006).
Cumberland	Land At Kingmoor Sidings (Network Rail Infrastructure Ltd)	95,000	117,505	76,750	117,505	Specialist facility for track ballast and concrete sleepers for recycled aggregate processing thus not 'normal' CDEW
	Overby Quarry (Thomas Armstrong (Aggregates) Ltd)	75,000	9,274	6,928	75,000	Permission to 31 Dec 2026
Westmorland & Furness	Shap Pink Quarry (Armstrongs Aggregates Ltd)	?	0	0	4,755	WNA 2022 used WDI peak inputs plus 15% freeboard at 4,755 tonnes. WDI 23 shows peak input +15% of 1,296 tonnes. PP expires 2042.
Additional sites						
Cumberland	Tarnside Farm Aggregate Recycling Site (Stuart Barnes)	7,500	0	923	7,500	Planning permission ends in June 2024
Westmorland & Furness	Edenhall Inert Recycling (John Edward Alan Burne)	?	0	9,072	9,072	Planning permission ends in 2035
	Sandscale Park (J J C Hire Ltd)	156,000	0	60,350	60,350	
Total capacity					1,159,094	

3.20 Table 7 shows a total operational recycled aggregate capacity in Cumbria as whole of just under 1.16 million tpa (**c1,159,000**).

'Other Recovery' Capacity

- 3.21 The term Recovery captures recycling, composting plus the management of waste through other methods including thermal treatment. Given recycling/composting are positioned nearer the top of the Waste Hierarchy than thermal treatment, waste requiring management after recycling/composting has been maximised is considered to go to 'other recovery' i.e. to extract the energy value from it, in preference to disposal to landfill.
- 3.22 While some facilities such as MBT plants do not actually undertake 'other recovery', they do facilitate the management of residual waste to maximise the energy value extracted i.e. through 'other recovery' processes. As such, their capacity is counted as contributing towards 'other recovery'. Within Cumbria there are 2 MBT facilities contracted to manage LACW until June 2034. On expiry of the contract term, the capacity would theoretically be available for C&I waste processing until 2039 when each of the respective host sites are due to be restored.
- 3.23 There is also permission at Thackwood landfill to develop a facility for processing up to 150,000 tpa of residual waste into RDF that would subsequently be burnt. In addition, an EfW facility to be built at Kingmoor Park is consented to receive up to 250,000 tpa sourced from the MBT plants in Cumbria and beyond plus C&I waste generated within Cumbria and the surrounding area. At the time of writing, neither of these two facilities has been built out, so capacity of neither has been counted.

3.24 Table 8 assesses the combined capacity of these sites.

Table 8: 'Other' Recovery Capacity in Cumbria as a whole

Facility WPA	Site Name & Operator	Planning Consent	Peak Input +15% WNA 2022	Peak input 2021 – 2023 +15%	Preferred Value	Notes
Cumberland	Hespin Wood Resource Park MBT (Biffa Treatment Services Limited)	75,000	79,330	75,751	75,000	Design capacity taken but actual throughput is constrained by availability of residual black bag waste
Westmorland & Furness	Sowerby Woods Resource Park MBT (Biffa Treatment Services Limited)	75,000	65,694	67,058	75,000	
Cumberland	<i>Thackwood</i>	<i>150,000</i>	-	-	<i>150,000</i>	Facility still to be built out thus no reported inputs in WDI
	<i>Kingmoor Park</i>	<i>250,000</i>	-	-	<i>250,000</i>	Facility still to be built out thus no reported inputs in WDI
Total capacity					550,000	

3.25 Given the two MBT plants do not provide final management capacity it might be argued whether their total capacity ought to be counted towards Cumbria's management capacity or just the process loss shown by the mass balance of inputs and outputs taken¹⁰. However, it is considered justified to do so given they produce fuel that would go for 'other recovery'. Policy can be designed to account for the complementary nature of fuel preparation capacity to provision of EfW capacity (to avoid double counting, and hence over-provision of capacity for residual waste management).

Transfer Capacity

3.26 Waste transfer capacity refers to the reception and bulking of collected wastes, both residual and separated/co-mingled recyclates, for subsequent management at other facilities (waste management or reprocessing). Transfer capacity can be accommodated at dedicated sites or at sites where other waste management activities take place. For example, sites accepting skip waste for recycling may also accept source separated Local Authority Collected Waste (LACW) for onwards transfer. Given the current reliance on out-of-Cumbria thermal treatment capacity, provision of accessible/ proximate transfer capacity to receive loads of residual waste that don't move directly to their end destination as a minimum is important.

3.27 Transfer stations that facilitate recycling by providing bulking capacity as discussed previously, were counted as providing recycling capacity as they facilitate recycling. In addition, many sites classed as transfer stations in the WDI actually undertake sorting of waste to some degree and hence were also counted towards recycling capacity (to some degree). One remaining site was determined to be operating as the only true transfer site as the outputs were predominantly either going to landfill or transfer. This site is shown in Table 9 along with another transfer site where it was possible to apportion the capacity for recycling and transfer due to the ratio of inputs destined for recycling and that for transfer mentioned in planning documents.

¹⁰ These plants also make a contribution towards meeting LACW recycling targets but that is not their primary purpose.

Table 9: Transfer Capacity in Cumbria as a whole

Facility WPA	Site Name & Operator	Principal Waste Type Managed	Planning Consent (tonnes p.a.)	Peak Input +15% WNA 2022	Peak input 2021 – 2023 +15%	Preferred Value	Notes
Cumberland	Unit C, Kingmoor Park, Rockcliffe Estate (Cubby Construction Ltd)	CDE	20,000	8,399	5,994	20,000	
Westmorland & Furness	Coopers Yard (JJC Hire Ltd)	CDE		30,657	24,755	19,927	c65% inputs through the WTS with the remainder of WNA 2022 peak counted as recycling in Table 8
	Ulverston WTS (Westmorland & Furness Council)	HIC	?	-	468	468	
Total Capacity						40,395	

3.28 In addition to the facilities listed in Table 9, there are 14 household waste recycling sites provided and operated under contract. Their assessed capacities are shown in Table 10.

Table 10: HWRC Capacity in Cumbria as a whole

(all operated by Cumbria Waste Management Limited unless otherwise stated)

Facility WPA	Site Name & Operator	Permitted capacity	Peak Input +15% WNA 2022	Peak input 2021 – 2023 +15%	Preferred Value	Notes
Cumberland	Bousteads Grassing Carlisle	24,999	10,552	11,386	11,386	
	Brampton Household Amenity Site	25,000	2,310	3,106	3,106	
	Clay Flats Workington	24,999	6,572	6,155	6,572	PP expires 2039
	Frizington	24,999	6,135	6,201	6,201	PP expires 2029
	Maryport	4,999	4,354	5,767	4,999	
	Millom	2,499	1,525	1,703	1,703	PP expires 2029
	Wigton	4,999	2,078	2,261	2,261	
Westmorland & Furness	Grange	4,999	1,330	1,152	1,330	
	Kendal	10,400	5,418	5,052	5,418	PP expires 2030.
	Kirkby Stephen	2,499	1,417	1,623	1,623	
	Ambleside	10,400	1,480	1,860	1,860	
	Project Furness Household Waste Recycling Centre	10,400	8,215	7,464	10,400	
	Ulverston Civic Amenity Site	4,160	3,552	3,663	4,160	
	Flusco (Lakeland Waste Management Ltd)	25,000	6,906	7,677	7,677	
Total Capacity					68,696	

3.29 HWRCs may be regarded as providing transfer capacity since waste delivered by the public to these sites is bulked and then transported on for onward management. However, as the majority of the inputs (c70%) are segregated on the site to go on for recycling 70% of the capacity of these sites have been counted as contributing towards recycling capacity, with the remaining 30% toward transfer (for LACW). Applying this to the total capacity in Table 10 gives **48,087 tpa recycling** and **20,609 tpa transfer** capacity.

Permanent Deposit Capacity

Non-Inert Landfill Capacity

3.30 To update the available void in Cumbria, information sourced from the EA remaining landfill void dataset at the end of 2023 was used, with supporting information supplied by Cumberland and Westmorland & Furness Councils. One non-inert landfill has been completed since the WNA 2022, the remaining operational non-inert landfills and their remaining void space are listed in Table 11.

Table 11: Capacity offered by Non-inert Landfills in Cumbria as a whole (end 2023)

Source: EA Remaining Void (2023)

Facility WPA	Site Name	End Date	Facility Type Description	Type of waste (WDI 2023)	Remaining void space (m ³)	Total capacity (tonnes) rounded		Notes
						Inert	Non-inert	
Cumberland	Hespin Wood	October 2039	Non-Haz	LACW, C&I, CDE	1,125,832	253,500	872,500	15% of total void (1,125,832) = 168,874m ³ *1.5 = 253,312t inert waste input for restoration.
	Lillyhall	June 2029	Non-Haz (SNRHW)	CDE & LACW	791,528	602,500	390,000 inc up to 156,000 for VLLW	The annual amount of inputs is set at 65,000m ³ pa inc. 26,000m ³ of VLLW. 6 years remain at 2023 thus 6*39Kte = 234,000t for non-inert. 6*26Kte = 156,000t for VLLW. Based on the above calculations <u>the site will not be full with non-inert/ VLLW by the time the permission expires</u> , thus the capacity for inert waste is c401,500m ³ which equates to 602,500t (an additional 424,500 tonnes above the 15% requirement for inert)
Westmorland & Furness	Flusco	2032	Non-Haz (SNRHW)	LACW, C&I, CDE	756,357	170,000	<586,000	15% of total void (756,357) =113,454m ³ *1.5 = 170,180t of inert waste for restoration. Less than (<) as the site has permission for a SNRHW cell but the WDI reports the site is not receiving any hazardous waste at present.
Total						1,026,000	1,848,500	

Table 11 shows there was non-inert landfill capacity to accommodate a total of 2,874,500 tonnes of waste. The three landfills together offer the following 'disposal/final fate' capacity:

- Inert waste: **c1,026,000 tonnes** for operational and restoration purposes; and
- Non-inert waste: **c1,848,500 tonnes** inc up to c156,000 tonnes VLLW.

Inert Waste Permanent Deposit to Land Capacity

Inert Landfill

- 3.31 Since the WNA 2022 one additional inert landfill has commenced operation. The assessed capacity of this site is displayed in Table 12 along with the previous site, Roan Edge Landfill, both of which are located in Westmorland & Furness.

Table 12: Consented/ Operational Inert Landfills in Cumbria as a whole (end 2023)

Source: EA Remaining Void (2023)

Site Name	End Date	Remaining void (m ³)	Capacity (tonnes) m ³ x1.5	Notes
Goldmire Landfill	2042	316,686	475,029	
Roan Edge Landfill	2031	214,092	321,138	Prior extraction of the mineral reserve is required, nonetheless filling of the voidspace is granted until 2031.
Total		530,778	796,167	

- 3.32 Table 12 shows that there is **c796,000 tonnes** of consented inert landfill capacity.

Recovery to Land Capacity

- 3.33 There are several permitted recovery to land operations (see Appendix 2 for full listing). One additional recovery to land site has been permitted by the Environment Agency since the WNA 2022 (capacity is unknown so is shown in Appendix 2) and one that has since been completed. Those assessed to have capacity to receive inert waste from the end of 2023 onwards are listed in Table 13. They are all located within Cumberland.

Table 13: Permitted Recovery to Land Sites in Cumbria as a whole

Site Name & Operator	Issue Date	Permitted Capacity from Waste Recovery Plan	Planning Consent (tonnes)	Cumulative inputs to 2023 inc (tonnes)	Calculated remaining capacity (tonnes) b minus d	Notes
<i>Column</i>	<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e</i>	
Silvertop Quarry (Thompsons of Prudhoe Ltd)	2011	1.5Mm ³ (2.25M tonnes)	-	243,008	2,006,992	
Field 3771 Eel Skye (Ashcroft Demolition (Cumbria) Ltd)	2021	?	200,000	104,706	95,294	No reported inputs in 2023
Cargo Hill Farm (Allan Richard)	2018	19,376m ³ (28,892 tonnes)	-	19,974	8,918	
Total					2,111,204	

3.34 Table 13 shows that there is at least **c2.1M tonnes** of capacity for management of inert waste by recovery to land in Cumbria as a whole, all of which is located in Cumberland. The actual capacity may be greater but it has not been possible to quantify the total capacity for all 13 sites listed in Appendix 2, given a lack of available data.

Conclusion

3.35 The updated assessment of capacity for the permanent deposit of inert waste to land has found the following in Cumbria as a whole:

- up to c1,026,000 tonnes at non-inert landfills,
- c796,000 tonnes of consented inert landfill capacity; and.
- at least c2.1M tonnes of recovery to land capacity.

This gives a total capacity for the deposit of inert waste in Cumbria as a whole of **at least c3.9M tonnes**. However, it should be noted that a number of the sites are subject to end dates, which may constrain the availability of capacity towards the end of the forecast period of 2045.

Capacity Summary

3.36 Table 14 shows a summary of operating capacity of the different type of facilities investigated in this section. The WNA 2022 found at the end of 2020 there was intermediate capacity for managing waste of c1.925M tonnes per annum operating in Cumbria as a whole. This update has found an increase of total capacity to c2.26M tonnes per annum as shown in Table 14.

Table 14: Intermediate Waste Management Capacity in Cumbria as a whole¹¹

Capacity Type	Assessed capacity			
	Non-inert waste			Inert
	Recycling	Other Recovery	Transfer	Recycling
MRF	231,950	-	-	-
Other Recycling	542,310	-	-	-
Metal Recycling	65,574	-	-	-
HWRC Recycling	48,087	-	-	-
Recycled Aggregate	-	-	-	1,159,094
'Other' Recovery	-	150,000	-	-
CDE Waste Transfer	-	-	39,927	-
HIC Transfer	-	-	468	-
HWRC Transfer	-	-	20,609	-
Total	887,922	150,000	61,004	1,159,094

3.37 It should be noted that if the permissions for an EfW facility at Kingmoor and RDF production facility at Thackwood are implemented a further c400,000 tonnes of 'other' recovery capacity would be available. However, the current capacity in Cumbria as a whole is taken to be that shown in Table 14.

¹¹ Note that the capacity for organic waste treatment summarised in Table 3 has not been included because it manages a distinct element of the waste streams and is considered to represent a final fate, like landfill.

4. Assessing the Capacity Gap in Cumbria as a Whole

- 4.1 The following findings should be read in the context of application of the principles set out below.

Net Self Sufficiency

- 4.2 Having established available management capacity within Cumbria as a whole, this is then compared with the projected capacity requirements determined in the waste stream specific reports to ascertain if there is any gap, bearing in mind the strategic objective of net self-sufficiency. That is to say, overall, the aim is to provide sufficient capacity to manage the tonnage of waste equivalent to that predicted to arise within Cumbria as a whole over the forecast period. This does not necessarily mean that every tonne of waste produced in Cumbria ought to be managed within Cumbria, rather that overall, there should be a balance of provision.
- 4.3 The Assessment of Strategic Flows of waste from Cumbria as a whole¹² found in 2023 that:
- c1.9M tonnes of waste arising in Cumbria as a whole was managed in Cumbria; and
 - c556,500 of waste from Cumbria as a whole was managed outside Cumbria; with
 - c291,000 tonnes waste from outside Cumbria being imported for management.
- Taking this snapshot as a simple balance, net-self-sufficiency in waste management capacity may have been achieved in 2023 with c2.1Mt of waste managed within (1.9Mt plus 0.29Mt) vs c1.9Mt produced after adjustments (as per Table 1), equating to c110% net self-sufficiency.
- 4.4 The data above represents a snapshot in time (in this case for 2023) and is not necessarily a true representation of net-self-sufficiency as actual inputs to specific facilities in a particular year may not reflect total available management capacity. It should also be noted that the overall objective of net self sufficiency relates to total arisings from each of the Plan areas.

The Waste Hierarchy

- 4.5 As set out in Section 3 the application of the waste hierarchy in priority order i.e. from the top down is a legal requirement when it comes to considering how waste ought to be managed. Therefore, there should be a presumption to support the development of capacity that will enable waste to be managed as far up the hierarchy as possible regardless of local need, in effect moving its management up from landfill and energy recovery, to reuse and recycling/composting. This shift is reflected in the adoption of the national residual waste reduction target of halving per head by 2042, which targets residual waste managed through landfill, energy from waste or converted to RDF for reduction.

¹² Review of Strategic Waste Flows for Cumbria as a whole BPP Consulting February 2026

Capacity Assessment Approach

- 4.6 While the assessment of need has been conducted on a waste stream-specific basis within each report, the assessment of capacity cannot be conducted in such a precise way since the same facility may manage waste from a number of different waste streams. For example, sites receiving CDEW may also receive C&I waste and LACW for transfer. This means it is necessary to interpret between the identified needs and the existing available capacity to identify any projected capacity shortfall.

Combined Waste Management Requirements at Forecast Milestone Years

- 4.7 To arrive at management requirements for waste produced, proposed targets were applied to the forecasts as presented in the waste stream specific reports. While these are set out for each authority in the waste stream specific reports, they have been combined for the purposes of this capacity assessment to gain a view of any capacity gaps across Cumbria as a whole. Given that waste will move freely from area to area it is considered that assigning capacity to each unitary authority area would give a false degree of granularity to the assessment, plus certain facilities such as EfW plants and landfills would require a critical mass of waste that would need combined arisings for Cumbria as a whole, to justify development. The combined composite management requirement values arrived at are presented in Table 15 below.

Table 15: Cumbria as a Whole Non-inert Waste Management Requirements at Milestone years (arrows indicate demand trajectory)

		Non-Inert Waste Management Requirements (Tonnes at Plan Milestone)						Peak or Cumulative Capacity Requirement (tonnes) rounded
		2023	2025	2030	2035	2040	2045	
Recycling/Organic Waste Treatment	LACW	127,795	133,550	147,938	158,132	167,999	165,701	167,999
	C&I	352,644	370,825	396,747	417,110	454,839	493,450	493,450
	CDEW	117,390	108,421	86,000	114,500	143,500	186,500	186,500
	Total	597,829	612,796	630,685	689,742	766,338	845,651	845,651
Residual waste Other Recovery	LACW ¹³	45,733	44,245	40,527	32,182	62,399	61,546	62,399
	C&I	19,837	47,071	73,275	112,962	129,954	98,690	129,954
	Total	65,570	91,316	113,802	145,144	192,353	160,236	192,353
Residual waste Non-Inert Landfill	LACW	38,951	33,458	19,725	14,597	9,600	9,469	<u>425,264</u>
	C&I	250,286	207,989	163,726	111,635	64,977	65,793	<u>3,056,489</u>
	CDEW	146,203	138,057	117,693	89,183	60,673	17,249	<u>2,091,994</u>
	Total	435,440	379,504	301,144	215,415	135,250	92,511	<u>5,573,748</u>
Aggregate recycling/ Recovery to Land and Inert Landfill	Inert CDE ¹⁴	598,841	658,500					658,500

¹³ These values do not include moisture losses that occur at the MBT plants.

¹⁴ Given that the type of C, D & E waste management facility required depends on the nature of the C, D & E waste produced, it is proposed that rather than make provision for streams by management type, a target combining inert recycling i.e. conversion of hard materials to aggregate and recovery to land i.e. the beneficial use of soft materials, be adopted.

- 4.8 How the waste management capacity requirements identified in Table 15 above might be met is discussed below.

Recycling & Composting Waste Management

- 4.9 As per explanation in Section 3 recycling and organic waste treatment (aka composting) are taken to sit at the same tier of the waste hierarchy and therefore a single combined set of targets are proposed. This approach is reflected in the capacity requirements presented in Table 15 above. It should however be noted that more waste specific needs such as additional organic waste treatment capacity may emerge as separate food waste collections are rolled out in response to the Government's Simpler Recycling initiative.
- 4.10 The waste management capacity requirements to support the achievement of recycling targets for LACW and C&I waste streams varies depending on the collection method used. In particular whether materials are separated at the point of collection and so are collected using segregated collection vehicles or whether recyclate is co-mingled at the point of collection. Where materials are source-separated, it is possible for them to be delivered to and bulked up in separate storage areas within a depot/waste transfer station, from where the bulked recyclates may then be transported directly to reprocessors. In contrast to this, where materials are collected 'co-mingled' they will need to be processed through a MRF for separation and it would be from there that the recyclates would be sent on to reprocessors. Even for co-mingled materials they may be bulked at intermediate sites (transfer stations) before being transported on to a MRF for processing.
- 4.11 Therefore, it should not be assumed that a tonne of waste to be recycled will necessarily require an equivalent tonne of MRF capacity to be provided within a Plan area. Provision of bulking capacity might suffice for source separated recyclate from the LACW and C&I waste streams in particular.
- 4.12 When the total assessed management capacity for recycling and composting of c884,000 tonnes shown in Table 14 is compared with the estimated peak combined recycling/composting requirement of c845,500 tpa shown in Table 15, a surplus of capacity is predicted through most of the forecast period, as shown in Table 16, with a predicted shortfall arising in the final two milestone years. The gap emerges around 2040 as a number of permissions are due to expire between 2025 and 2042 and predicted demand continues to rise. In particular the loss of Hespian Wood c114,000 tpa of organic waste treatment capacity and Distington MRF c120,000 tpa capacity in 2039 when both permissions are due to expire contributes significantly to the shortfall shown in 2040.

Table 16: Cumbria as a Whole Waste Recycling/Composting Capacity Requirement at Plan Milestone years

Source: Table 14 & 15

	Tonnes at Plan Milestone					Peak Requirement (tonnes)
	2025	2030	2035	2040	2045	
Recycling /Composting Need	612,796	630,685	689,742	766,338	845,651	845,651
Cumbria Capacity¹⁵	884,129	878,596	804,179	510,198	508,611	
Shortfall	+271,333	+247,911	+114,437	-256,140	-337,040	

Recycling & Composting Waste Management Sensitivity

4.13 There was one instance where for the Kingmoor Recycling Centre MRF, the more conservative value for capacity was taken due to the peak inputs +15% deviating more than 50% as compared with the planning consent. However, as a sensitivity it has been explored how taking the planning consent limit value would affect the shortfall. This is shown in Table 17 below.

Table 17: Sensitivity Cumbria as a Whole Waste Recycling/Composting Capacity Requirement at Plan Milestone years

	Tonnes at Plan Milestone					Peak Requirement (tonnes)
	2025	2030	2035	2040	2045	
Recycling /Composting Need	612,796	630,685	689,742	766,338	845,651	845,651
Cumbria Capacity	928,470	922,937	848,520	554,539	552,952	
Shortfall	+315,674	+292,252	+158,778	-211,799	-292,699	

Table 17 shows that by taking the planning consent limit at Kingmoor Recycling Centre, the shortfall predicted to emerge in 2040 is reduced by c44,500 tonnes.

¹⁵ Starting capacity in 2025 does not align with the value shown in Table 14 due to the closure of Kendal HWRC in 2025.

Residual Non-inert Waste Management

- 4.14 Predicted management capacity requirements for residual waste at the milestone years are shown in Table 18. This shows a peak 'other recovery' capacity requirement of c471,000 tpa in 2025 falling to c252,500 tpa in 2045 plus a cumulative landfill requirement of c5.57 million tonnes.

Table 18: Cumbria as a Whole Residual Non-Inert Management Capacity Requirement at Plan Milestone years
Source: Table 15

	Tonnes at Plan Milestone					Peak or Cumulative Capacity Requirement (tonnes)
	2025	2030	2035	2040	2045	
Other Recovery	91,316	113,802	145,144	192,353	160,236	192,353
Non-inert Landfill	379,504	301,144	215,415	135,250	92,511	<u>5,573,748</u>
Total Capacity Requirement at Milestone Years	470,820	414,946	360,559	327,603	252,747	

Implications for Cumbria as a Whole Net-Self Sufficiency for Residual Waste

- 4.15 While there is no obligation for Cumbria as a whole to achieve net self-sufficiency for non-inert waste management, given the focus of national policy on residual waste management, consideration has been given to the remaining consented non-inert landfill capacity.
- 4.16 Table 19 below displays the predicted depletion of non-inert landfill void in Cumbria as a whole with deduction of the projected combined tonnages of residual non-inert waste requiring landfill as shown in the individual baseline reports and summarised in Table 18. The depletion profile takes into account the average non-inert inputs received at the landfills over 5-years and deducts this from the remaining capacity annually.

Table 19: Predicted Depletion of Non-inert Landfill void in Cumbria as a Whole (tonnes)
NB: cells in amber mark the expiry year of the extant planning permission

Year	Annual Landfill Requirement	Lillyhall	Flusco	Hespin Wood	Remaining Capacity for Non-inert (tonnes)	Annual Landfill Requirement Shortfall	Cumulative shortfall
					1,848,500		
2023/24	435,440	380,754	541,788	821,105	1,743,648	-330,588	-330,588
2024/25	461,502	371,508	497,577	769,710	1,638,795	-356,650	-687,237
2025/26	379,504	362,262	453,365	718,315	1,533,943	-274,652	-961,889
2026/27	363,831	353,017	409,154	666,920	1,429,091	-258,979	-1,220,868
2027/28	348,159	343,771	364,942	615,525	1,324,238	-243,307	-1,464,175
2028/29	332,488	334,525	320,730	564,131	1,219,386	-227,635	-1,691,810
2029/30	318,538	-	276,519	512,736	1,123,779	-222,931	-1,914,741
2030/31	301,144		232,307	461,341	1,028,173	-205,537	-2,120,279
2031/32	283,997		188,096	409,946	932,566	-188,390	-2,308,670
2032/33	266,852		-	358,551	881,172	-215,457	-2,524,127
2033/34	249,707			307,156	829,777	-198,312	-2,722,439
2034/35	232,560			255,761	778,382	-181,165	-2,903,604
2035/36	215,415			204,366	726,987	-164,020	-3,067,624
2036/37	199,382			152,971	675,592	-147,987	-3,215,611
2037/38	183,349			101,576	624,197	-131,954	-3,347,564
2038/39	167,316			50,181	572,802	-115,921	-3,463,486
2039/40	151,283			0	522,621	-101,102	-3,564,588
2040/41	135,250				0	-135,250	-3,699,838
2041/42	126,702				0	-126,702	-3,826,540
2042/43	118,153				0	-118,153	-3,944,694
2043/44	109,605				0	-109,605	-4,054,299
2044/45	101,059				0	-101,059	-4,155,358
2045/46	92,511				0	-92,511	-4,247,869

4.17 Table 19 shows if inputs to the operational non-inert landfills continue at the rate they have been historically Lillyhall and Flusco landfills would not be filled in advance of their consent expiry dates of 2029 and 2032 respectively while Hespin Wood would be full by 2039. Given historic fill rates a shortfall in non-inert waste landfill capacity is predicted to persist for the whole Plan period. This results in a cumulative deficit of c4,248,000 tonnes of non-inert waste landfill capacity at the end of the forecast period. However, it should be noted that the Environment Agency Remaining Landfill void dataset for end of 2024 which became available during the course of production of this JWNA shows both sites as having remaining void available at the end of 2024: 722,386 m³ for Flusco and 1,084,924 m³ for Hespin Wood¹⁶ respectively (equating to 1,536,000 tonnes of non-inert residual waste).

¹⁶ The value in the EA remaining void dataset for 2024 was identical to that reported in the 2023 dataset – amended value provided by Mike Anderson of the Environment Agency by email dated 02.03.2026.

- 4.18 Given Lillyhall is predicted to close before the capacity has been fully utilised, it has been assumed that the remaining void at this site would be filled with inert waste to achieve the final approved restoration profile.

Cumbria Non-inert Waste Other Recovery Capacity

- 4.19 Cumbria as a whole has 'other' recovery capacity of 550,000tpa in the form of two operational MBT plants plus a consented RDF production facility and EfW facility still to be built out. The MBT facilities are only expected to receive LACW until 2034, after which date the future contribution the two facilities might make is unclear. Therefore, the expectation is that waste destined for management through that route will need to be managed through other facilities (until/unless the two consented developments are 'built out') located out of the Plan areas, providing availability of capacity in proximity is confirmed (See Section 5 for further detail).

Inert Waste Management

- 4.20 Inert waste can be managed through two principal routes - recycled to aggregate or soil or deposited for beneficial purposes on land (recovery to land). Inert waste can also be used for the restoration of non-inert landfills which is considered to be a 'recovery' operation rather than disposal to landfill. The peak quantity of waste requiring management through a combination of conversion to aggregate, use in recovery to land projects and inert waste to landfill is assessed to be c658,500t as shown in Table 15. It should be noted that the production of recycled aggregate also contributes towards each Plan area meeting its aggregate supply obligations under the NPPF¹⁷, so ought to be supported in principle given an available supply of suitable feedstock. The value of the use of inert waste in certain applications which involve its deposit on land is recognised in national policy (see the National Resource & Waste Strategy 2018) which classifies the backfilling of mineral workings with inert waste for restoration and its use in construction as a 'recovery' rather than a disposal activity, meaning that such development is preferred to disposal to landfill.
- 4.21 Table 7 identifies 25 sites within Cumbria as a whole that were assessed to be producing recycled aggregate. These sites have combined capacity of c1,159,000tpa, reducing to c1,019,500 tonnes by 2042 due to the expiry of various time limited permissions. In either case the assessed capacity is in excess of the identified combined management requirement of c658,500tpa. Hence the capacity requirement for inert waste can be said to be met with retention of the recycled aggregate capacity alone, providing sites are safeguarded for the purpose. However, the capacity to convert inert waste into aggregate can be limited by the characteristics of the waste material actually available in any particular year. Therefore, some provision should be made for the deposit of inert waste to land as well.
- 4.22 There are two consented inert landfills identified in Table 12. The assessed remaining void at the end of 2023 was c531,000m³ equating to c796,000 tonnes of inert waste. Further to this, a total of c1,026,000 tonnes of capacity for inert waste to complete the restoration of Hespin Wood, Lillyhall and Flusco landfills was identified in Table 11. Therefore, total management capacity for inert waste is estimated to be c1,822,000 tonnes, subject to the expiry of the respective planning consents.
- 4.23 In addition, 3 inert waste recovery to land sites have been identified as operating (all located in Cumberland) in 2023 (see Table 13). The activity at each site is permitted as Recovery to Land operations by the Environment Agency. The total assessed remaining capacity is c2,111,000 tonnes, with the bulk of this capacity provided at a single site.
- 4.24 Given the forecast adequacy of provision for inert waste arisings solely from the capacity offered by recycled aggregate facilities plus that at inert and non-inert waste landfill plus Recovery to Land facilities, net self-sufficiency for management of inert waste arising is predicted to the end of the forecast period.

¹⁷ Chapter 17 Facilitating the sustainable supply of minerals (Paragraph 203 to 208) NPPF 2019

Hazardous Waste Management

- 4.25 The background evidence reports found that combined capacity offered by facilities within Cumbria as a whole managing hazardous waste equates to at least c47,500 tonnes per annum (c35,500 tonnes in Cumberland and c12,500 in Westmorland & Furness), and this substantially exceeds the peak projected overall annual arising of hazardous waste over the forecast period of c32,000 tonnes (c19,500 tonnes in Cumberland and c12,500 tonnes in Westmorland & Furness).

Capacity Gap Summary

- 4.26 The findings from the preceding discussion on waste management capacity gaps in Cumbria as a whole are summarised in Table 20 below along with the peak or cumulative capacity requirement.

Table 20: Cumbria combined Capacity Assessment & Annual Capacity Gap Analysis
Italicised values are uncertain due to contribution MBT might make beyond 2034 and possible implementation of dormant EfW/RDF consents
Underlined values relate to cumulative totals

Capacity Type	Waste Management Capacity Gap (Tonnes at Plan Milestones)					Peak/ Cumulative Requirement (tonnes) rounded
	2025	2030	2035	2040	2045	
Recycling & Composting (Table 17)	0	0	0	-211,799	-292,699	292,699
Other Recovery (Table 18)	0	0	-145,144	-192,353	-160,236	192,353
Non-inert Landfill (Table 19)	-274,652	-205,537	-164,020	-135,250	-92,511	<u>4,247,869</u>
Aggregate Recycling/ Deposit to Land	0	0	0	0	0	0
Hazardous Waste	0	0	0	0	0	0

- 4.27 Table 20 shows that at historic inputs there is a predicted shortfall in non-inert landfill capacity of c274,500 tonnes at the first milestone year 2025, but this annual deficit reduces to c92,500 tonnes in 2045. In addition, an 'other recovery' capacity shortfall emerges post 2034 following the forecast closure of the two MBT plants but reduces post 2040 in response to the national 2042 halving residual waste target which includes waste managed by 'other recovery' such as incineration. This need could be met through the permissions for RDF processing at Thackwood and/or EfW at Kingmoor Park, which are still to be built out, but may otherwise be met through use of out of Plan area management capacity set out in the following section. A capacity shortfall for recycling/composting emerges in 2040 when the recycling targets reach 70%+ as diversion from both landfill and EfW to meet the national 2042 halving residual waste target ramps up.
- 4.28 The projected early closure of the Lillyhall and Flusco landfills contributes towards the early shortfall in non-inert landfill capacity. Whilst the remaining void has been assumed to accommodate inert waste, given the surplus of capacity in managing inert waste, the use of this remaining void for non-inert waste would be preferable.

5. Sub-Regional Capacities

5.1 Given a projected shortfall in 'other' recovery and landfill disposal capacity for non-inert waste in the latter part of the forecast period, consideration has been given to the national policy expectation of waste planning authorities through National Planning Policy for Waste. In relation to identifying the need for waste management facilities this states that:

3. In preparing Local Plans, waste planning authorities should: ...

- consider the need for additional waste management capacity of more than local significance and reflect any requirement for waste management facilities identified nationally;*
- take into account any need for waste management, including for disposal of the residues from treated wastes, arising in more than one waste planning authority area but where only a limited number of facilities would be required;*
- work collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management;*
- consider the extent to which the capacity of existing operational facilities would satisfy any identified need.*

5.2 This is intended to ensure that over-provision of capacity does not occur, rather an optimal distribution of capacity is established "to provide a suitable network of facilities to deliver sustainable waste management" that may extend beyond a specific Plan area. This is particularly the case when a facility has substantially greater capacity than required to meet the needs of the Plan area in which it is located due to such things as economies of scale.

Defining the Sub-Region to Cumbria

5.3 While waste produced in Cumbria as a whole may travel considerable distances, for the purposes of this assessment the plan areas that are contiguous to Cumbria have been considered as forming a sub-region to which Cumbria waste might be expected to travel in the first instance. These areas are listed below:

- Cheshire West & Chester
- Cheshire East
- Warrington
- Greater Manchester
- Lancashire
- Merseyside

Non-inert Landfill Capacity

The capacity analysis presented in Table 19 identifies an emerging predicted shortfall in non-inert landfill capacity in 2023 of c330,500 tonnes, falling to c92,500 tonnes in 2045 with a projected cumulative requirement of over 4 million tonnes over the Plan period. Therefore, consideration has also been given to the availability of non-inert landfill capacity in the WPAs contiguous to Cumbria. Environment Agency landfill capacity data, downloaded from the .gov datastore website, shows the remaining permitted landfill capacity at the end of 2024 for non-inert landfills in the Cumbria sub-region excluding Cumbria itself totalled c.11.9Mm³. Specific sites listed in Appendix 3 with end dates.

- 5.4 The remaining void at the end of 2024 may be converted into capacity to accommodate the tonnage of non-inert waste shown in Table 21 below (see Appendix 3 for site by site breakdown).

Table 21: Remaining Capacity at Permitted non-hazardous Landfill in Cumbria sub-region 2024

Source: .gov datastore website¹⁸

WPA	Remaining Void m ³ (end 2024 data)	Capacity (Tonnes)	
		Inert deduction ¹⁹	Non-Inert ²⁰
Lancashire	5,403,791	932,154	4,471,637
Warrington	319,486	55,111	264,375
Greater Manchester	6,267,296	1,081,109	≤5,186,187
		Total	≤9,922,199

- 5.5 Given the expectation that non-inert waste will continue to be diverted from landfill due to various pressures including the landfill tax, it may be assumed that the rate of depletion of void in consented landfill will reduce dramatically. This could serve to conserve remaining void capacity so that the combined predicted cumulative non-inert landfill capacity requirement (4,247,869t), may be accommodated within landfills outside Cumbria as a whole. That is predicated on other authorities planning to divert their waste from landfills which remains a national policy priority driven by the landfill tax escalator.
- 5.6 The long-term availability of such capacity ought to be confirmed with the host WPAs before reliance might be placed on it. Particularly at Pilsworth South Landfill located in Bury (Greater Manchester), given it is the landfill with the largest remaining void (Appendix 3). In particular, contact should seek to determine whether there is an intention to extend the current permission end date from the end of 2028 currently. **If such capacity cannot be confirmed this is the most immediate need to meet.** However, it should be noted that the introduction and increase in

¹⁸ After deduction of void shown for the Brinefields in CWaC and CE and Fiddlers Ferry Ash Lagoon in Warrington which don't operate as merchant non-inert landfill sites.

¹⁹ Total exceeds void due to density factor of 1.5 applied.

²⁰ Note non-inert capacity in Greater Manchester includes landfill with SNRHW cell thus capacity for non-inert waste may be less than the remaining capacity shown.

landfill tax for non-inert waste has driven a move away from landfilling in recent years, and few operators are seeking to develop new non-inert landfill capacity.

Energy Recovery Capacity

- 5.7 Industry has invested in energy from waste capacity, as well as processing technology such as MBT to produce RDF which may be suitable for use in industrial plant such as cement kilns if of a sufficient calorific value (SRF) or exported to other plants in England or even mainland Europe for (heat and) power production.

In Plan Area Consented Capacity

- 5.8 Whilst there are currently no operational EfW sites located in the combined Plan areas, permission has been granted for an EfW facility, which would manage up to 250,000 tpa, primarily RDF sourced from MBT plants and C&I waste generated within the combined Plan areas and the surrounding area to be built at Kingmoor Park. However, given the facility is still to be built out, the potential capacity has not been relied upon.

Capacity in vicinity of combined Plan area.

- 5.9 A review of the destination EfW sites for waste arising within the combined plan areas shows that waste travelled to the following EfW plants in 2023:
- Ferrybridge Multifuel (Wakefield)
 - Hooton Sustainable Energy Facility (Wirral); and
 - Allerton Waste Recovery Park (N Yorkshire).

- 5.10 Analysis of the sources of inputs to these sites shows the following

Table 22: Permitted EfW Capacity utilised by combined Plan areas

Site Name	Host WPA	Host WDA	Cumbria	Other WDA	Remainder	Notes
Ferrybridge Multifuel	Wakefield MDC	245,901	3,761	102,815	946,092	Rail link
Hooton	Wirral MBC	37,351	3,585	0	53,440	c.2.5 hrs via M6
Allerton	N Yorkshire	238,905	2,758	0	62,422	c. 2 hours via the A66/A1
Total					1,061,954	

The above table indicates that excluding tonnages arising from Waste Disposal Authority arrangements, there is up to a million tonnes of merchant EfW capacity already within reach of the combined Plan area. Given the peak quantity of residual waste for which 'other' recovery management capacity is predicted to be c192,500 tonnes in 2040, this would fall well within the indicated available merchant capacity at the above facilities.

- 5.11 In addition a review of the permitted site listing reveals a number of other EfW plants in operation that are within a similar drive time to Allerton and Hooton that may also offer merchant capacity. These include the following:
- Runcorn EfW facility (Halton BC)
 - Teeside EfW/NEERC (Stockton on Tees BC)
 - Parc Adfer (Flintshire)
 - Wilton Plant (Redcar & Cleveland BC)
- 5.12 The long-term availability of such capacity for the combined Plan areas waste ought to be confirmed with host WPAs before reliance might be placed on it for the Plan period. If the capacity is not available, given the emerging need later in the forecast period, and noting the existence of an extant permission for an EfW plant to be built within the combined Plan area, should market conditions be sufficiently attractive, the need to consider identifying suitable sites might be deferred to a five-year annual review. This is particularly relevant given the intended Government national target of 50% reduction in residual waste by 2042, includes waste managed through EfW, is less than five years after the milestone year in which the deficit is forecast to arise.
- 5.13 In addition to the above, an EfW plant under construction in Cheshire West & Chester (Lostock) within a similar drivetime as Allerton and Hooton is due to commence commissioning trials later in 2026. FCC Waste Management Ltd, the operator of the Lillyhall Landfill site is expected to source waste for the plant, and this may mean capacity will be made available to manage residual LACW at least from the combined Plan areas by arrangement.

6. Recommendations

- 6.1 In light of the above findings, the following recommendations are made for next steps in the development of the Waste Chapters forming part of the respective emerging Cumberland and Westmorland & Furness Local Plans.
- 6.2 Follow up the initial Duty to Cooperate enquiries with WPAs whose areas fall within the Cumbria sub-region, in particular those sent to Bury Borough Council, Lancashire County Council and Warrington Borough Council hosting the landfill capacity identified in Table 21. The only response received at the time of writing was from Bury Borough Council in relation to Pilsworth South Landfill, for which follow up contact to determine the likelihood of this capacity remaining available post 2028 when the current permission expires is advised is recommended.
- 6.3 Dialogue with WPAs hosting EfW plants identified in Table 22 (and the paragraphs that follow), would establish the availability of other recovery capacity for residual waste throughout the forecast period and whether there is any planning impediment, such as a planning condition restricting the waste supply catchment, that would prevent waste from the combined Plan areas being managed there.
- 6.4 The above engagement should be documented by way of Statements of Common Ground as part of the evidence base supporting production of sound Waste Chapters for inclusion in the respective Local Plans.
- 6.5 Establishing the intentions of the operator of Lillyhall landfill and the consent holders for Thackwood RDF and Kingsmoor EfW is also advised.

Subject to the outcome of the above:

- 6.6 Consider initiating a call for sites to identify land that might be suitable to accommodate additional capacity that may receive the equivalent tonnage of non-inert residual waste identified as needing management. This equates to a maximum of c471,000 tpa in 2025, split between c91,500 tpa of 'other' recovery and c379,500 tonnes of non-inert landfill capacity, with a cumulative need for non-inert landfill to accommodate c4,248,000 tonnes of waste over the forecast period. Providing non-inert landfill capacity is available out of Cumbria then capacity would not necessarily have to be provided. In addition, capacity might become available on existing sites due to end date extensions so the allocation of additional land might not actually be necessary.

Appendix 1: Intermediate Site Throughput over 5 years reported through WDI tonnes (peak year identified by green cell)

Site Name + Operator	Site Category	Inputs 2016	Inputs 2017	Inputs 2018	Inputs 2019	Inputs 2020	Peak Input	Plus 15% freeboard	Peak Input 2021 – 2023 +15%
Eden Organics Composting Site (H & E Trotter Ltd)	Organic waste Treatment	18,965	19,413	18,797	19,989	16,732	19,989	22,987	24,490
Hespin Wood (Cumbria Waste Management Ltd)		92,179	99,209	84,308	89,458	56,640	99,209	114,090	96,847
Wilson Pit Yard (West Coast Composting Ltd)		6,802	6,056	6,136	7,808	6,483	7,808	8,979	8,531
Kirkbride House (Solway Heat & Power Ltd)		11,574	11,101	10,865	10,620	11,356	11,574	13,310	12,582
Possonby Old Hall Farm (Stanley Renewable Energy Ltd)		0	0	6,280	7,699	9,972	9,972	11,468	6,558
The Hangar (Agriorganics Ltd)		4,178	7,360	8,717	10,373	11,252	11,252	12,940	12,525
Sinkfall Recycling (Brian Armistead Ltd)		1,122	2,330	2,417	5,391	5,249	5,391	6,200	51,609
Hespin Woods (Cumbria Waste Management Ltd)	MRF	44,081	37,459	46,396	49,593	52,796	52,796	60,715	65,291
Flusco Pike Landfill (Lakeland Waste Management Ltd)		75,413	74,883	83,199	86,219	131,289	131,289	150,982	15,892
Unit 25 - The Hangar (Millers Contracting Ltd)		28,707	69,261	35,964	32,322	53,767	69,261	79,650	93,578
Kingmoor Recycling Centre (Cumbria Waste Management)		6,868	5,327	5,090	2,451	2,739	6,868	7,899	3,309
Distington Materials Recycling Facility (Cumbria Waste Management)		87,886	94,090	93,425	86,533	82,060	94,090	108,204	6,563
Ecclerigg Depot (South Lakeland District Council)	LACW Recycling	692	727	632	727	671	727	836	1,164
J. M. Skips Brownriggs Yard (Jacksons Marine Ltd)	C&I Recycling	82	412	425	260	250	425	489	488
Dundee Tyres (Dundee Tyres Ltd)		7,336	6,610	8,518	7,868	6,703	7,868	9,048	9,113
Hespin Wood landfill (Cumbria Waste Management)		-	-	-	-	-	-	-	15,211
Sowerby Lodge (Eden Valley Oils Ltd)		681	1,378	1,380	1,323	743	1,380	1,587	1,142
Sandscale Park (JJC Hire Ltd)	CDE Recycling	-	-	-	24,447	11,469	24,447	28,114	326,661
Coopers Yard (JJC Hire Ltd)		26,041	25,524	26,658	4,200	25,967	26,658	30,657	24,755
Esk Quarry (Eddie Wannop Ltd)		-	-	-	-	1,641	1,641	1,887	25,417
12 Shap Road Ind Estate (H Wicks Ltd)	CDE and C&I Recycling	10,223	9,144	6,915	6,568	1,617	10,223	11,756	
Unit N, Risehow Ind Est (Thompsons Plant Hire Ltd)		-	-	2,388	3,034	2,705	3,034	3,489	3,275
Hangar 20 Silloth Airfield (D Alan Harrison)		10,840	11,508	10,546	11,089	10,525	11,508	13,234	12,338
Scarth Road (H Wicks Ltd)		22,645	18,583	16,095	23,731	12,363	23,731	27,291	
Station Yard (Adam Hoyle)		922	883	766	609	612	922	1,060	683
Pittwood Road, Lillyhall Industrial Estate (Derwent Recycling Services Ltd)		13,698	13,315	13,300	10,807	9,847	13,698	15,753	14,353
Unit A, Site 6, Rockcliffe Estate (North-West Recycling Ltd)		75,042	116,783	152,315	158,756	190,706	190,706	219,312	221,875
Ormsgill Yard Materials Recycling Facility (FCC Recycling Ltd)	LACW & C&I	30,712	28,148	28,626	24,222	16,609	30,712	35,319	19,759

Site Name + Operator	Site Category	Inputs 2016	Inputs 2017	Inputs 2018	Inputs 2019	Inputs 2020	Peak Input	Plus 15% freeboard	Peak Input 2021 – 2023 +15%
Kendal Fell Waste Management Centre (Suez Recycling & Recovery Lancashire Ltd)	Recycling	42,986	44,314	43,042	42,785	42,357	44,314	50,961	47,941
Unit 2, Lillyhall Ind Estate (Cumbria Recycling Ltd)		1,923	1,224	1,117	1,364	1,450	1,923	2,211	2,182
Sinkfall Recycling (Brian Armistead Ltd)	CDE, C&I & LACW Recycling	16,533	19,689	18,993	19,642	33,105	33,105	38,071	51,609
Branthwaite Vehicle Dismantlers (Trevor Brough)	MRS	5,064	7,339	5,186	3,681	608	7,339	8,440	2,667
Canal Head Yard (John Miller & Sons Ltd)		346	315	25	1,408	1,723	1,723	1,981	3,343
Morecambe Road (John Morgan & Co Ltd)		1,778	2,277	1,830	2,097	2,056	2,277	2,619	2,650
Junction Street (Mountelm Ltd)		1,394	1,237	1,233	-	797	1,394	1,603	1,180
Mintsfeet Road (Lakeland Gold Ltd)		-	1,713	1,593	1,762	2,580	2,580	2,967	3,877
Sandysike Brickworks (Mountelm Ltd)		8,832	7,796	7,700	9,410	7,930	9,410	10,822	12,075
Waller Street Works (Mr W & R Allan)		-	-	-	-	-	-	-	17,845
Northern Resource Park (Renewi Ltd)		65,845	65,179	64,190	64,360	68,983	68,983	79,330	75,751
Sowerby Woods Resource Park (Renewi Ltd)	MBT	50,100	53,960	53,200	51,842	57,125	57,125	65,694	67,058
Unit C, Kingmoor Park, Rockcliffe Estate (Cubby Construction Ltd)	Transfer	-	-	8,399	2,118	899	8,399	9,659	5,994
Ulverston WTS (Westmorland & Furness Council)									468
Ambleside (Cumbria Waste Management Ltd)	HWRC	1,417	1,314	1,369	1,480	1,420	1,480	1,702	1,860
Bousteads Grassing Carlisle (Cumbria Waste Management Ltd)		10,492	10,552	10,134	9,527	6,492	10,552	12,135	11,386
Brampton Household Amenity Site (Cumbria Waste Management Ltd)		1,934	2,092	2,308	2,310	2,137	2,310	2,657	3,106
Clay Flats Workington (Cumbria Waste Management Ltd)		6,539	6,572	6,224	6,278	4,334	6,572	7,558	6,155
Frizington (Cumbria Waste Management Ltd)		6,135	5,924	5,845	5,729	4,224	6,135	7,055	6,201
Grange (Cumbria Waste Management Ltd)		1,330	1,287	1,193	1,145	764	1,330	1,530	1,152
Kendal (Cumbria Waste Management Ltd)		5,418	5,387	5,066	4,913	3,597	5,418	6,231	5,052
Kirkby Stephen (Cumbria Waste Management Ltd)		1,285	1,249	1,365	1,417	1,228	1,417	1,630	1,623
Maryport (Cumbria Waste Management Ltd)		4,031	3,855	4,010	4,354	3,759	4,354	5,007	5,767
Millom (Cumbria Waste Management Ltd)		1,384	1,521	1,525	1,412	1,314	1,525	1,754	1,703
Project Furness Household Waste Recycling Centre (Cumbria WMT Ltd)		7,564	7,881	8,215	7,747	4,791	8,215	9,447	7,464
Ulverston Civic Amenity Site (Cumbria Waste Management Ltd)		3,552	3,319	3,290	3,229	2,641	3,552	4,085	3,663
Wigton (Cumbria Waste Management Ltd)		1,923	1,882	1,851	2,078	1,577	2,078	2,390	2,261
Flusco (Lakeland Waste Management Ltd)		6,352	6,423	6,459	6,906	4,888	6,906	7,942	7,677

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Appendix 2: Permitted Recovery to Land Operations in Cumbria

Site Name & Operator	Issue Date	Permitted Capacity from Waste Recovery Plan (m ³)	Planning Consent (tonnes)	Cumulative inputs to 2023 inc (tonnes)	Remaining capacity (tonnes) b minus d	Notes
Column	a	b	c	d	e	
Distington Golf Club (Robert Dickinson)	2012	137,544 (275,088 tonnes)	-	329,181	0	Assumed complete. No inputs in the last 3 years. Still holds permit.
Silvertop Quarry (Thompsons Of Prudhoe Ltd)	2011	1.5Mm ³ (2,250,000 tonnes)	-	243,008	2,006,992	
Whitehaven Golf Course (Western Lakes Ltd)	2012	30,552 (45,828 tonnes)	-	81,123	0	
Faugh Sandpit No2 (Eddie Wannop Ltd)	2012	?	-	72,678	-	Assumed complete. No inputs in the last 3 years. Still holds permit.
Overby Quarry (Thomas Armstrong Aggregates Ltd)	2013	?	-	310,970	-	
Rose Garth (Mr & Mrs Bellas)	-	?	-	34,556	-	Assumed complete. No inputs in the last 3 years does not hold permit.
Field 3771 Eel Skye (Ashcroft Demolition (Cumbria) Ltd)	2021	?	200,000	104,706	95,294	
Moss Band Farm (AD Waste Transfer)	2016	?	-	83,366	-	
Kendal Auction Mart (L& W Wilson)	2015	?	-	101,116	-	Assumed complete. No inputs in the last 2 years. Still holds permit.
Thackwood Landfill Site (Waste Transfer Services)	2018	?	-	92,839	-	
Cargo Hill Farm (Allan Richard)	2018	19,376 (28,892 tonnes)	-	19,974	8,918	
Land South of Fisher Farm (Andrew Ladds)	2019	10,500 (21,000 tonnes)	-	39,914	0	Assumed complete. No entry in the last 3 years. Still holds permit.
Total capacity					2,11,204	

Method of calculating remaining capacity

Where no waste recovery plans were provided for permitted recovery to land sites, no estimation of remaining capacity could be undertaken. For those which were provided, the cumulative inputs reported in the WDI from the issue date were deducted from the permitted capacity to calculate any remaining capacity. This revealed 3 out of the 12 sites still had capacity remaining as shown in the table above. Where the cumulative inputs exceeded the permitted capacity, it was assumed that there is no more capacity remaining. It was noted that some sites reported inputs in 2020, despite their consented capacities being exceeded, however, on closer inspection, the reported inputs were significantly less than previous years, indicating the near cessation of the recovery operation, thus no capacity was taken in this instance.

Appendix 3: Assessment of Non-Inert Landfill Capacity in Cumbria Subregion

WPA	Operator Name	Facility Name	Remaining Capacity end 2024 (m ³)	End Date
Greater Manchester	Valencia Waste Management Ltd	Pilsworth South Landfill	5,618,259	31/12/2028 ²¹
	Booth Ventures Ltd	Harwood Quarry Landfill Site	649,037	31/12/2026 ²²
Lancashire	SITA (Lancashire) Ltd	Clifton Marsh Landfill Site	1,564,803	2035 ²³
	SITA (Lancashire) Ltd	Whinney Hill (Phase 2) Landfill Site	1,175,376	21/02/2045 ²⁴
	Transwaste Recycling & Aggregates Ltd	Jameson Road (Phase 2) Landfill Site	887,199	31/12/2033 ²⁵
	Quercia Ltd	Clayton Hall Landfill Site	219,868	06/04/2029 ²⁶
	Churchill Enviro Ltd	Fletcher Bank Landfill Site	670,099	31/12/2036 ²⁷
	Woods Waste Limited	Westby Landfill Site	224,364	1/06/2028 ²⁸
	WRG Waste Services Ltd	Deerplay Landfill	662,082	31/12/2029 ²⁹
Warrington	Collier Industrial Waste Ltd	Rixton Landfill	319,486	Permission may have expired in 2024 ³⁰

²¹ Obtained from https://www.greatermanchester-ca.gov.uk/media/xdqniu5y/waste-amr-2020-25_final_aug_2025.pdf?utm

²² Obtained from <https://eas.merseysidebiobank.org.uk/wp-content/uploads/2023/05/Joint-Annual-Local-Aggregate-Assessment-Report-2019.pdf?utm>

²³ Granted by Lancashire County Council (LCC) in 2014 - SCP/2014/0001

²⁴ Granted by LCC in 2011 - 11/11/0082

²⁵ Granted by LCC in 2018 - LCC/2018/0059

²⁶ Granted by LCC in 2017 - 09/08/0478NM1

²⁷ Granted by LCC in 2006 - 14/04/0610

²⁸ Granted by LCC in 2018 - LCC/2018/0019

²⁹ Granted by LCC in 2022 - LCC/2022/0025

³⁰ Granted by Warrington BC 2015/25816